

London Borough of Hammersmith and Fulham  
Draft Local Plan

**Draft Local Plan Environmental Report  
(Sustainability Appraisal)**

**January 2015**

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# **1 NON – TECHNICAL SUMMARY**

- 1.1 This summary is an overview of the assessment work carried out and explains how the Sustainability Appraisal (SA) ties in with the Draft Local Plan as a whole. The purpose of the SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of planning policy documents. It is a legal requirement for local authorities to carry out a SA. Under European Directive, local authorities are required to undertake a Strategic Environmental Assessment (SEA) and an 'Environmental Report' must be prepared. Both of these requirements are covered in this report by incorporating both the SA and SEA.

## **The Draft Local Plan**

- 1.2 The London Borough of Hammersmith & Fulham (H&F) has revised its principal planning policy documents which will guide development across the borough over the long term.
- 1.3 This revision has resulted in the production of a key strategic planning policy document termed as the Draft Local Plan, which amalgamates the adopted Core Strategy (adopted in October 2011) and the Development Management Local Plan (adopted in July 2013) into one document.

## **Summary of the Sustainability Appraisal of the Local Plan**

- 1.4 The preparation of the SA of the Draft Local Plan has involved two key stages so far:
- the production of a Scoping Report (January 2014) setting out the scope of the SA work to be carried out in relation to the Draft Local Plan
  - the production and consequent consultation of this Report.
- 1.5 The Scoping Report identified some key issues in this borough which have been explored within the Draft Local Plan with appropriate options identified and it is these options that have been assessed in this report.
- 1.6 This report firstly tests the strategic objectives of the Draft Local Plan which set out the many and varied aims of the council in relation to land use and future development. It is the Local Plan objective to regenerate the most deprived parts of the borough and increase housing where there is most tension with the SA objectives. Overall, the SA revealed that they exhibit a broad commitment to the principles of sustainable development and are largely compatible with the assessment objectives of the SA process.

- 1.7 The next stage of this report involved the testing of the Draft Local Plan options against the nineteen SA objectives in order to identify likely positive impacts and also determine whether any negative impacts could arise. The Draft Local Plan includes preferred policies for the broad spatial approach to planning and regeneration across the borough over the next 20 years. It is the Draft Local Plan's preferred approach to focus major growth in five key regeneration areas; to promote new housing and employment activities throughout these areas; and to deliver supporting infrastructure. For each of the five regeneration areas identified, the Draft Local Plan sets out policies for the overall strategy and vision for the area and the proposals for sites of strategic importance.
- 1.8 In relation to the policies for the key regeneration areas and strategic sites, the SA found that no wholly unsustainable policies have been put forward. In general, the policies meet social and economic sustainability criteria, but there is less certainty as to whether they will meet the environmental objectives as this will depend on implementation through the development management policies. Throughout the SA process, recommendations were made in order to ensure a high level of sustainability in those development management policies concerned with environmental criteria. The SA also recommended that more in-depth sustainability appraisals should be carried out for the key regeneration areas, for example as individual area planning frameworks are prepared or updated, and that appropriate appraisals accompany major planning applications.
- 1.9 In addition to the overarching spatial strategy and regeneration area policies, the Draft Local Plan includes a number of borough-wide development management policies to help deliver the spatial strategy and to ensure that development both inside and outside the proposed regeneration areas contributes to meeting the council's objectives. The preferred borough-wide development management policies are generally sustainable.
- 1.10 Overall, the preferred strategic objectives, spatial policies, regeneration area and strategic site policies and borough-wide development management policies are generally sustainable. This is only to be expected given the iterative nature of the Local Plan process and the fact that sustainability appraisal has run side by side with the development of policy options.
- 1.11 In addition, this SA Report is the latest in a series of SAs to be published on council planning documents, with previous reports being made available for planning documents in June 2007 (Core Strategy Preferred Options), June 2009 (Core Strategy Options), October 2011 (Core Strategy) and July 2013 (Development Management Local Plan).

- 1.12 In general, growth in London is supported by national and London wide policy and can be more sustainable in a highly accessible area like Hammersmith and Fulham than in many other areas of the country. Achieving the council's vision, including regenerating deprived areas of the borough and delivering affordable homes for local people and improving local health and social care provision will, however, have an impact on the environment and will need to be managed carefully (for example, to minimise carbon emissions and resource use) through development management and environmental standards.

### **Next Steps**

- 1.13 The next stage of this process is to consult on the assessment work along with the Draft Local Plan, after which comments will be collated and analysed. If the consultation process results in significant changes, then the Sustainability Appraisals may need to be reviewed to account for significant changes in the wording of the preferred options. The SA Report, along with any revisions to this, will be submitted as part of the evidence base for the Local Plan.

## **2 INTRODUCTION**

### **Legal Requirements**

- 2.1 The council is legally required under both European and UK law to prepare a 'Sustainability Appraisal' ('SA') of the Draft Local Plan in order to help ensure that social, environmental and economic considerations are taken into account during all the stages of the Draft Local Plan's preparation. European law is contained in European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment', better known as the Strategic Environmental Assessment (SEA) or SEA Directive. The UK Government has introduced regulations, termed the SEA regulations, that transpose the SEA Directive into UK law.
- 2.2 Both EU and national legislative provisions require local authorities to prepare sustainability appraisals of proposed land use or planning policies. The policies in the National Planning Policy Framework are also underpinned by a presumption in favour of the 'golden thread' of sustainable development.

### **EU Statutory framework**

- 2.3 The (SEA) Directive 2001/42/EC (the 'SEA Directive')<sup>2</sup> states that a Strategic Environmental Assessment is mandatory for plans or programmes which are prepared for purposes including town or country planning or land use and which set the framework for future development consent of certain listed projects.

### **National statutory planning framework**

- 2.4 a) Planning and Compulsory Purchase Act 2004 - S19(5) of the Planning and Compulsory Purchase Act 2004 requires local authorities to carry out an appraisal of the sustainability of the proposals within each proposed local development document and prepare a report of the findings of the appraisal.
- b) Environmental Assessment of Plans and Programmes Regulations 2004 – The requirements of the Sustainability Appraisal process are detailed in the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'). The SEA Regulations transpose the provisions of the EU Strategic Environmental Assessment (SEA) Directive 2001/42/EC or 'SEA Directive' into English law. However, the SEA Regulations go beyond the environmentally focussed considerations of the EU SEA Directive by also requiring an assessment of the wider social and economic effects of plans.
- c) Town and Country Planning (Local Planning) (England) Regulations 2012 ('the 2012 Planning Regulations')- Regulation 17 of the 2012 Planning Regulations states that sustainability appraisal reports are a 'proposed submission document' and must be submitted to the Secretary of State with the Local Plan.

d) National Planning Policy Framework (NPPF) - Paragraph 14 states that a presumption in favour of sustainable development lies at the heart of the NPPF.

2.5 Paragraph 165 of the NPPF states:

*'A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process and should consider all the likely significant effects on the environment, economic and social factors.'*

## **Purpose of the Sustainability Appraisal**

2.6 The overall purpose of the SA (incorporating SEA) is to:

- systematically assess the Draft Local Plan to determine whether it takes account of environmental, social and economic considerations, collectively referred to as 'Sustainable Development' and by suggesting ways that can help to improve its sustainability;
- identify and mitigate any potential adverse effects that the plan might otherwise have; and
- ensure that the policies in the plan are the most appropriate given other reasonable policy alternatives.

2.7 In order to achieve its overall purpose, the development of the SA follows a prescribed staged approach, the compliance with which requires:

- ensuring compliance with the European SEA Directive and UK regulations transposing the European Directive into UK law;
- ensuring that the Draft Local Plan takes account of relevant international and national legislation and policies;
- establishing the baseline environmental, social and economic characteristics of the area by identifying any current environmental constraints, issues and problems;
- establishing sustainability objectives based on local sustainability issues and appraising and monitoring the Draft Local Plan policies against these objectives;
- assessing viable policy options and alternatives; and
- reviewing the sustainability impacts of the options, and of the preferred policy option.

## **The Draft Local Plan**

2.8 The London Borough of Hammersmith & Fulham (H&F) has revised its principal planning policy documents which will guide development across the borough over the long term.

2.9 This revision has resulted in the production of a key strategic planning policy document termed as the Draft Local Plan, which amalgamates the adopted Core Strategy (adopted in October 2011) and the Development Management Local Plan (adopted in July 2013) into one document.

2.10 The policies in the Draft Local Plan document consist of:

- existing policies contained in the Core Strategy and the Development Management Local Plan;
- policies contained in the Core Strategy and Development Management Local Plan which have been amended to reflect changes in the wider planning context; and
- new regeneration and strategic site policies which will focus on guiding development in specific parts of the borough; and
- new borough-wide development management policies TLC7 Addressing the concentration and clustering of betting shops and payday loan shops, TLC8 Public houses, CF4 Professional football grounds and DC10 Telecommunications.
- new section on planning contributions and infrastructure planning.

2.11 The council wishes to transform the borough in the next 20 years. This transformation will involve the increased provision of housing, particularly affordable housing to meet the needs of local residents and the development of sustainable communities; physical, social and economic regeneration; improved quality of life for all residents; and mitigation of and adaptation to the impacts of climate change.

2.12 Major regeneration and growth in the borough's five regeneration areas will deliver 25,800 new homes in the period 2015-2035 to meet local housing needs and it will also deliver 49,500 new jobs in the period 2015-2035. Regeneration will provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion.

2.13 After an examination in public and upon formal adoption, the Local Plan will form the borough's principal planning policy document and will comprise a key part of the suite of statutory planning policies that will guide development across the borough over the long term.



## **The development of the Draft Local Plan and its relationship to this Sustainability Appraisal**

- 2.14 The council originally commenced preparation of Development Plan Documents (DPDs) for the Core Strategy, Development Management policies and Site Specific Allocations in 2005.
- 2.15 Preferred options for the Local Development Framework Core Strategy and Site Specific Allocations were subsequently developed, taking into account the responses to an 'Issues and Options' consultation report in October 2005 and the results of the sustainability appraisal (SA) of the options identified.
- 2.16 The Core Strategy and Site Specific Allocations preferred options documents were made available for public consultation in June/August 2007.
- 2.17 The council subsequently took the decision to re-consult on Core Strategy Options (including strategic site specific allocations) in June 2009 and this document was accompanied by a revised SA report.
- 2.18 The Development Management Options document was subjected to public consultation in November 2009. A SA report was also prepared for this document.
- 2.19 The Core Strategy and accompanying SA reports were subject to consultation in October 2010. Following an Examination in early 2011, the Core Strategy was adopted in October 2011. The Development Management DPD and accompanying SA reports were subject to consultation in 2012. Following an Examination in 2012, the Development Management Local Plan was adopted in July 2013.
- 2.20 The Draft Local Plan consists in large part of an amalgamation of the following planning policies:
- Core Strategy, adopted in October 2011; and
  - Development Management Local Plan, adopted in July 2013.
- 2.21 The majority of policies from these adopted policy documents have been included in the Draft Local Plan and remain unchanged. However, some policies have been amended to ensure their continued relevance in the face of a changed policy context, principally the changes made to the London Plan. Additionally, the Draft Local Plan also contains some new policies, notably those relating to the Old Oak Regeneration Area and Hammersmith Regeneration Area. There are also new borough-wide development management policies to reflect changes to the planning context.
- 2.22 The reasons for the council's decision to merge the Core Strategy and Development Management Local Plan and produce one comprehensive strategic planning policy document include:

- the creation of a new Old Oak Regeneration Area, encompassing the development of the Old Oak Station in the north of the borough, which would form a strategic rail node for the proposed HS2 line and connections to Heathrow Airport and the Eurostar rail line;
- the need to revise some of the policies in the Core Strategy and the Development Management Local Plan in accordance with changes to the broader policy context and/or local conditions in the borough; and
- the practical advantages of producing one comprehensive policy document, including avoiding having to duplicate the lengthy process associated with adopting Local Plans.

## **Consultation**

2.23 This report will accompany the Draft Local Plan (2014) which will be consulted on from 9<sup>th</sup> January to 20<sup>th</sup> February 2015.

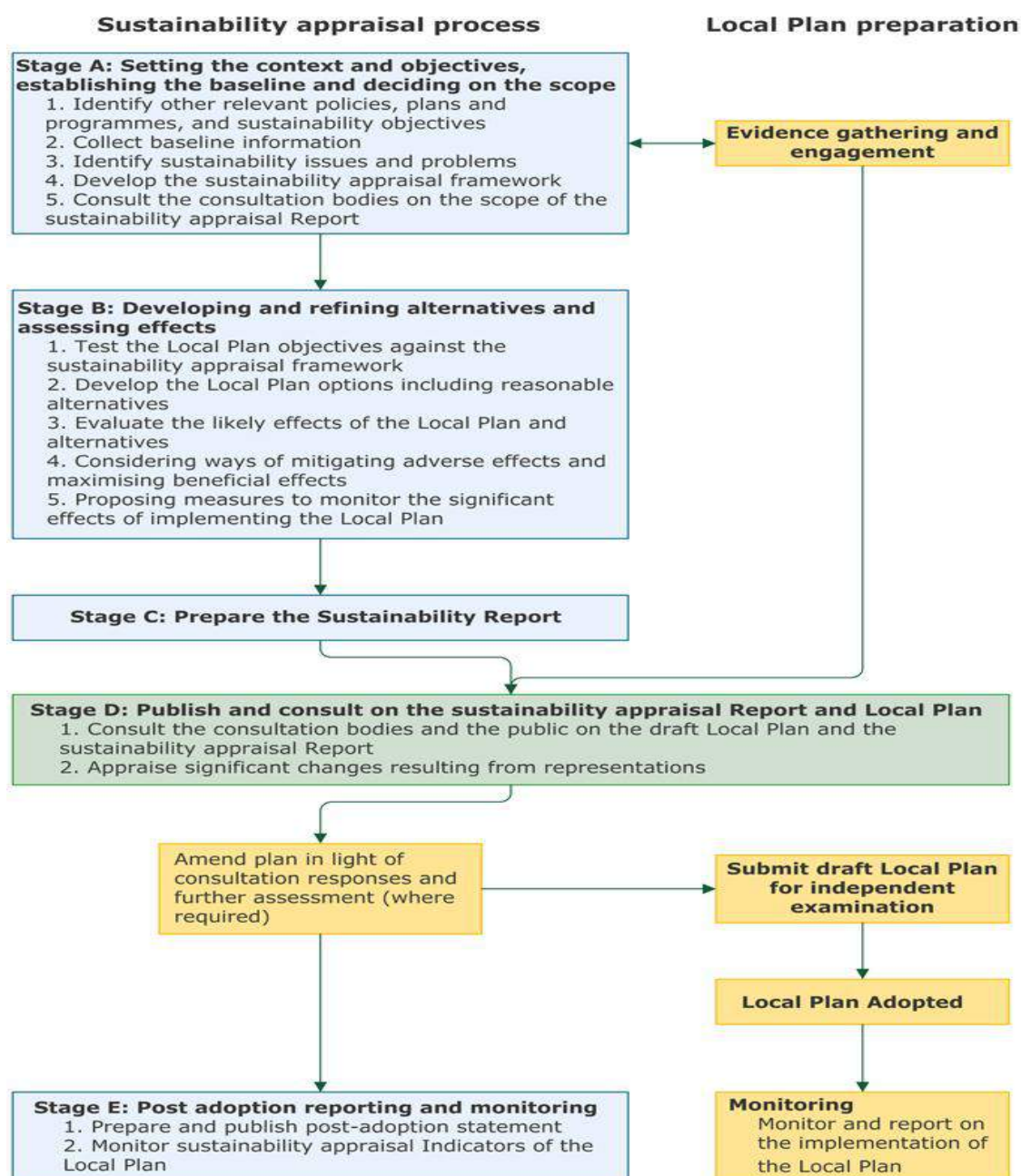
2.24 The environmental bodies as listed in the guidance will be consulted along with any other stakeholders who may be interested in the methodology and outcome of the assessments.

### 3 APPRAISAL METHODOLOGY

#### The stages of Sustainability Appraisal

3.1 There are five key stages in preparing a SA. These stages are undertaken in parallel with the development of the Local Plan. The table below illustrates the key stages of the SA development process and their relationship with the development of the Local Plan.<sup>1</sup>

**Diagram 1: The Five Stages of Sustainability Appraisal**



<sup>1</sup> National Planning Policy Guidance: Strategic environmental assessment and sustainability appraisal (2014), <<http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>>, accessed 13 April 2014.

## Completed Stages of the SA

- 3.2 The first stage of the SA process (Stage A) was the development of an initial SA report termed the 'SA Scoping Report'. The SA Scoping Report was completed in February 2014 and sent out to prescribed agencies and other relevant stakeholders for consultation.
- 3.3 The Scoping Report along with the responses received during the consultation process (please refer to Appendix 1 for the Council's response to consultee's). This established the overall framework of this sustainability appraisal. The development of the SA framework in the Scoping Report included the following:
- setting out the 'baseline' of the existing social, environmental and economic conditions in the borough;
  - identifying sustainability issues facing the borough from the baseline conditions in the borough; and
  - identifying a number of sustainability objectives that were derived from an analysis of the specific sustainability issues facing the borough. These sustainability objectives form the basis for the SA and are used to test the sustainability of the Local Plan policies.

## The SA stages addressed in this report

- 3.4 This SA report addresses the second and third stages (Stage B and C) in the SA process as detailed in the boxes below:

### Stage B: Developing and refining alternatives and assessing effects

- |   |
|---|
| <p><b>B1.</b> Test the Local Plan objectives against the sustainability appraisal objectives</p> <p><b>B2.</b> Develop the Local Plan options including reasonable alternatives</p> <p><b>B3.</b> Evaluate the likely effects of the Local Plan and alternatives</p> <p><b>B4.</b> Consider ways of mitigating adverse effects and maximising beneficial effects</p> <p><b>B5.</b> Propose measures to monitor the significant effects of implementing the Local Plan</p> |
|---|

### Stage C: Developing and refining alternatives and assessing effects

- |  |
|--|
| <p><b>C.</b> Prepare the Sustainability Report</p> |
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## **Step B1. Test the Local Plan objectives against the sustainability appraisal objectives**

- 3.5 The first step in the SA process was to test the compatibility of the Draft Local Plan's strategic objectives against each other in order to identify any inconsistencies between these objectives that could give rise to adverse environmental effects and if so to allow mitigation measures or alternatives to be considered. The strategic objectives of the Draft Local Plan are similar to those of the adopted Core Strategy document and were developed following public consultation.
- 3.6 Generally, the Draft Local Plan objectives are compatible with each other, subject to the actual implementation of the Draft Local Plan policies. While no obvious incompatibilities were identified between the Draft Local Plan objectives, there are some inevitable tensions between the objectives promoting housing, businesses and local employment, open and green spaces and biodiversity, climate change mitigation and preservation of the character of the borough's natural and built environment. When implementing the policies of the Draft Local Plan, it will be important for the council to recognise any potential conflicts between the Draft Local Plan objectives at an early stage so that any likely adverse or undesired effects can be identified and mitigated as far as possible.
- 3.7 The next step in the process involved testing the compatibility of the objectives of the Draft Local Plan with the sustainability objectives in order to identify any potential synergies and inconsistencies between these objectives.
- 3.8 The SA that was prepared for the Core Strategy included a detailed assessment of the compatibility between both the Core Strategy objectives and the sustainability objectives, and concluded that these objectives were broadly compatible with each other. Some tensions were identified, particularly between the objectives of increasing housing and economic development and those concerned with protecting and enhancing environmental quality. Measures to mitigate against and reduce the impact of any negative environmental effects included a recommendation that sustainability considerations be taken into account when implementing the Core Strategy policies, for example by incorporating energy and resource efficiency measures, encouraging biodiversity, ensuring public transport accessibility and avoiding inappropriate developments in areas prone to flooding.
- 3.9 As part of the SA preparation of this Draft Local Plan, the Draft Local Plan objectives were tested against the sustainability framework to ascertain their compatibility with the borough's sustainable development objectives. Overall, the analysis shows that the Draft Local Plan's strategic objectives are broadly compatible with the Sustainability Objectives. However, in many instances this compatibility will depend upon how the Local Plan policies are implemented.

## **Steps B2 and B3 - Develop the Draft Local Plan options including reasonable alternatives and evaluate the likely effects of the Local Plan**

3.10 These steps involved appraising the Draft Local Plan options including the reasonable alternatives and providing a commentary on their effect on the sustainability objectives. Following each policy theme a commentary has been provided assessing the secondary, cumulative and synergistic effects of the policy options.

3.11 The Draft Local Plan (2014) consists of policy options arising from:

- an amalgamation of unchanged and amended planning policies which have already been adopted as part of either the Core Strategy or the Development Management Local Plan;
- new strategic area and site policies that relate to the borough's regeneration areas;
- new borough-wide development management policies; and
- a new section on planning contributions and infrastructure planning.

3.12 As a consequence of the background of the Draft Local Plan policies, some of these policies have already been subjected to a number of separate sustainability appraisal reports. The development of the preferred Local Plan options has drawn upon the previous sustainability appraisals where appropriate and refreshed these appraisals if needed. New reasonable alternatives have been identified and appraised for policies in the Draft Local Plan which have been materially amended or in some cases are entirely new.

3.13 The assessment of the preferred Local Plan options was carried out using the framework in the table below.

**Table 1: Sustainability Appraisal matrix**

<b>Symbol</b>	<b>Definition of Impact</b>
✓	Positive effect
✗	Negative effect
0	No significant effect
?	Uncertain effect

## **Step B4- consider ways of mitigating adverse effects and maximising beneficial effects**

3.14 A number of recommendations were made as part of the appraisal process to improve the overall sustainability of the Draft Local Plan in accordance with the iterative nature of the SA, and as part of the need to mitigate negative effects arising from its implementation. In most instances, the recommended changes have been incorporated into the current version of the Draft Local Plan.

## **Step B5. Propose measures to monitor the significant effects of implementing the Local Plan**

3.15 The Council is legally required to monitor the significant environmental effects of the implementation of the Draft Local Plan with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

3.16 The results of this monitoring will be included in the Council's Monitoring Report. Among other things, the Monitoring Report will identify and assess indicators linked to the Sustainability Objectives. This methodology will enable any significant sustainability effects to be monitored, demonstrating progress made towards the achievement of the objectives or alerting the council on remedial action that may need to be taken if negative effects have arisen.

## 4 BASELINE INFORMATION

### Baseline information and sustainability issues

- 4.1 Baseline information on the borough has been set out in the Scoping Report and is not replicated in its entirety in this document. A summary profile is set out below in the context and baseline data section and data has been updated wherever appropriate. For reference the Scoping Report can be viewed on the council's website [www.lbhf.gov.uk/localplan](http://www.lbhf.gov.uk/localplan)

### Context and baseline data

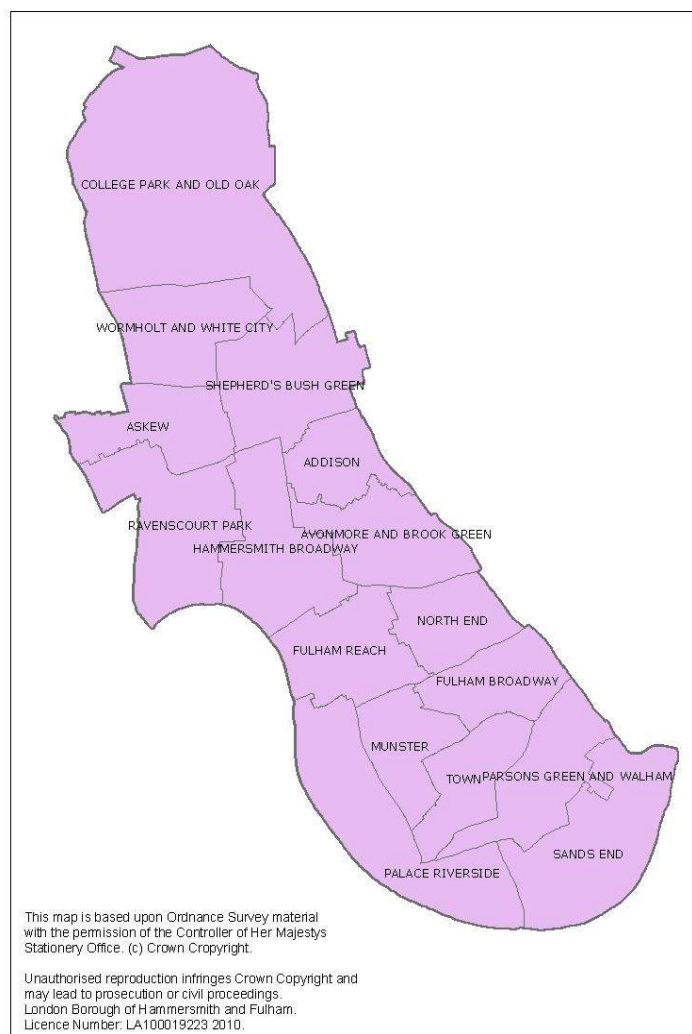
- 4.2 H&F is one of 13 inner London boroughs and is situated in the centre-west of London on the transport routes between the City and Heathrow airport. It is a long narrow borough running north to south with a river border at its south and south-west side. It is bordered by six London boroughs: Brent to the north; Kensington and Chelsea to the east; Wandsworth and Richmond-Upon-Thames to the south; and Ealing and Hounslow to the west. Excluding the City of London, it is the third smallest of the London boroughs in terms of area, covering 1,640 hectares.<sup>2</sup>

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<sup>2</sup> Borough profile, 2014.



## Map 1: Wards in H&F



## Population

- 4.3 H&F is a small and densely populated west London borough. The population of Hammersmith and Fulham has risen by over 10% from 165,242 in 2001 to 182,500 in 2011. The population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about half of all households having moved in the previous five years. Nearly half of the population (45%) is between the ages of 20 and 40 years old which is significantly higher than in London (32%) and the rest of the country (27%). The borough has a high proportion of single people, the fourth highest proportion (55.9%) in London. Three in ten (29%) of all households consist of one person (Source: 2011 Census).

- 4.4 The main growth will occur for people aged 85 and over and is expected to increase by 1,840 by 2031, equivalent to 91%. The population aged 50 to 64 is expected to grow by 27% between 2021 and 2031 and the population aged 65 to 84 to grow by 31% by 2031. The main growth in number of households will be in 'one person' households (32% up to 2026), while the number of 'couple' households will decrease by nearly 8%. The growth in population and the changing age distribution will place new demands on local public services such as education, health and housing.
- 4.5 The borough has a relatively young and ethnically diverse population with a higher proportion of young adults aged 20-40 (45%) than London and the rest of the country. According to the 2011 Census, 55.1% of the total population are from other ethnic group other than White British compared to 42% in 2001. Just over one in five residents are from non-white ethnic backgrounds, 3.5% were born in Ireland and there is a well established Polish community. Some ninety different languages are spoken in local schools. London's place as a world city means that the borough will continue to be home for many diverse groups of people, of different nationality, ethnic origin, religion and culture. A significant section of the population is highly mobile.

## Housing

- 4.6 In 2010, there were 81,620<sup>3</sup> dwellings in the borough. In 2011, only 34% of households in H&F were owner occupiers compared to an average of 56.5% across London. About a third of households rent from a social landlord compared to 26% for London. In 2001, more than 23% of all households in the borough were living in the private rented sector (Census 2001), rising to 33.3% in 2011. The constantly changing private tenant population also provides its own challenges for the borough's neighbourhoods and communities and for local public services.
- 4.7 Houses prices and private sector rents are well above the London and the West London average. The very high cost of market housing both for owner and occupation and for rent impacts on who can afford to live in the borough. As a simple measure of affordability, the ratio between lower quartile income and lower quartile house prices is calculated. H&F has a significantly higher ratio than Inner London, London and England as a whole. Using the 3.5x earnings as a measure of affordability and the current lower quartile income house price for the borough (at £360k), a household would need an income of £103k per annum to purchase an "entry level" property in the borough.
- 4.8 The need for more affordable housing is demonstrated by the number of households on the Housing Register – 850 applicants. Also 17% of households in social rented housing in the borough are overcrowded. H&F is ranked 12<sup>th</sup> in terms of boroughs with the most overcrowded properties. All four wards in the northern sub area of the Borough rank within the top 5 for overcrowding.<sup>4</sup>

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<sup>3</sup> Source: HSSA, Regulatory Statistical Return and Joint Regional returns.

<sup>4</sup> Borough profile, 2014.

## Deprivation

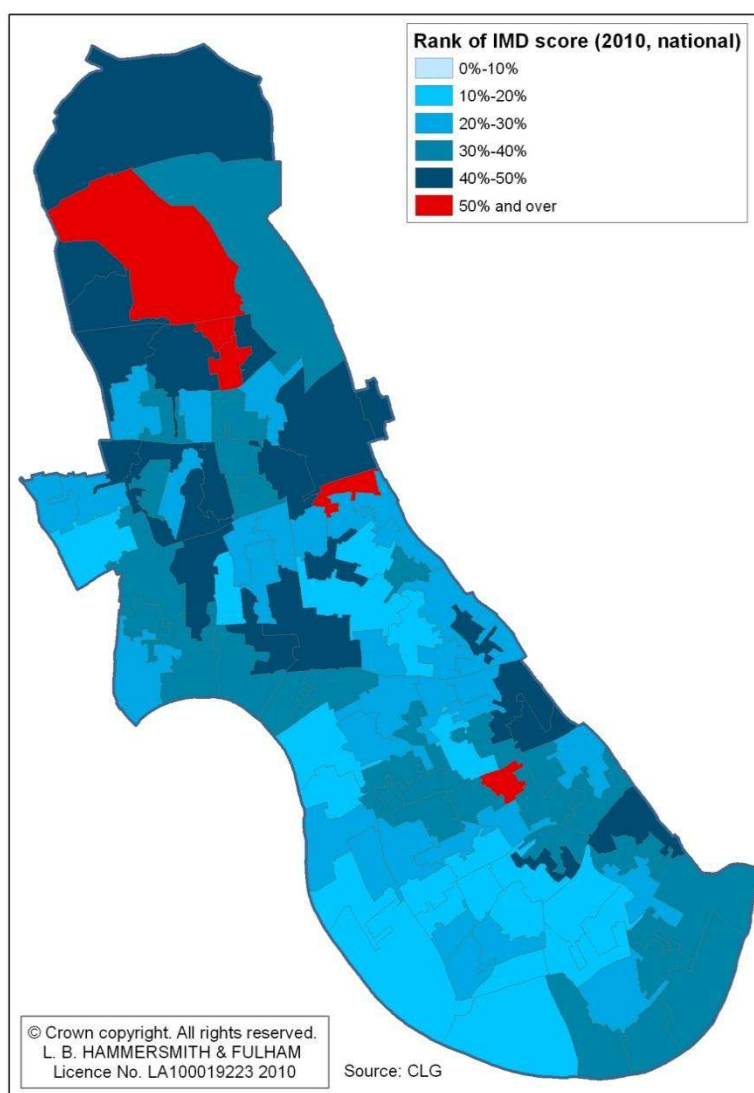
- 4.9 There is also a strong correlation between high concentrations of social rented housing in the borough and deprivation. Social rented housing has increased from 24,630 (31.7%) in 2001 Census to 25,133 (31.1%) in 2011 Census. In some parts of the borough, in particular the north of the borough the proportion is significantly higher. It is ranked 31<sup>st</sup> most deprived local authority area in the country (38th in 2007 and 42nd in 2004) and there are significant pockets of deprivation, particularly in the north of the borough. There are significant pockets of deprivation, particularly in the north of the borough. Four of the borough's Lower Super Output Areas (LSOAs) are within the top 10% most deprived nationally. These areas comprise major public sector housing estates: White City, Clem Atlee, Wormholt and Charecroft. A further 23% of the borough's LSOAs are in the 10-20% worst nationally.
- 4.10 Deprivation and low household incomes result in high levels of child poverty. About 20% of people are in poverty in H&F compared to 32% of children in poverty.<sup>5</sup> Childhood poverty in H&F does not follow the general north-south divide, but is much more scattered geographically across the borough. In 2013, over 30% of nursery and primary school children and 23.8% of stated-funded secondary school children were entitled to free school meals in H&F compared to national figures of 11.1% and 15% respectively. Further details of the health, wellbeing and social care needs of the borough can be found in the Joint Strategic Needs Assessment 2010/11<sup>6</sup> carried out by the council and NHS Hammersmith and Fulham (now NHS Hammersmith & Fulham Clinical Commissioning Group).

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<sup>5</sup> Children and Young People's Plan 2008-11

<sup>6</sup> Joint Strategic Needs Assessment 2009/10

**Map 2: Index of Multiple Deprivation (IMD), 2010**



## Education

4.11 H&F's overall GCSE results for 2013 were above the national average. However, there is a significant difference in attainment between schools. In 2012/13, approximately 66% of pupils achieved 5 GCSE A\*-C grades including English and Maths.<sup>7</sup> In some schools, the percentage of passes was much higher than the average, while in others it was much lower.

## Crime

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<sup>7</sup> Borough profile, 2014.

4.12 The Annual Residents' Survey Results 2013, revealed that residents felt that motor vehicle crime, violence or assault, noisy neighbours and abandoned or burnt out cars were a worsening problem whilst robbery and burglary were felt to be less of a problem than in previous years. Overall residents said they felt safer in the borough. Total crime has reduced by 14% between 2013/14 and 2012/13, an actual reduction of 2,625 crimes. The official statistics show residential burglary down by 10% between 2013/14 and 2012/13. All wards saw a decrease in violent crimes between 2013/14 and 2012/13. Between 2012-13 and 2013-14 most anti-social behaviour incidents decreased.<sup>8</sup>

## **Health**

4.13 In 2013, the standard mortality ratio (SMR) for H&F was 96 compared to 91 in London (England SMR=100). For deaths from all causes in H&F has decreased significantly since 2011. The average life expectancy for men in the borough was 79.1 years in 2010-12 which is at the same level as in England and Wales but slightly lower than in London (79.7 years). For women, the average life expectancy was 83.3 years in 2010-12, compared to 83.8 years in London and 82.9 years in England and Wales. Life expectancy in the north of the borough is on average 6 years less than in the south.<sup>9</sup>

## **Employment and the economy**

4.14 Hammersmith and Fulham's economy is part of the wider London and West London economic area. It has seen significant growth in employment and economic activity, with the central Hammersmith area becoming an important sub-regional location for offices.

4.15 In 2012, 127,173<sup>10</sup> people worked in the borough which is an increase from the 103,200<sup>11</sup> people employed in the borough in 2002 and 113,600<sup>12</sup> in 2007. Over the last ten years, there has been a 23% increase in the numbers of people working in the borough, and a 12% increase over the last five years.

4.16 However local employment opportunities are not shared by all residents. In order to ensure that all sections of the community benefit from projected economic growth, it is necessary to provide the opportunities to access necessary education, training and development that will fill emerging skills gaps.

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<sup>8</sup> Borough profile, 2014.

<sup>9</sup> Borough profile, 2014.

<sup>10</sup> 2012 BRES

<sup>11</sup> 2002 Annual Business Inquiry

<sup>12</sup> 2007 Annual Business Inquiry

## Transport

4.17 The strategic location of the Borough and its position in relation to London's transport network means that it suffers from the worst congestion in London. Nearly one sixth of carbon emissions in H&F in 2012 was from road transport<sup>13</sup> and pollution levels exceed air quality targets. The continuing population growth could increase congestion on the roads and transport systems and impact on the environment of the borough including air quality. Public transport provision in the borough has improved, with a major transport interchange at Shepherd's Bush and new railway stations at Imperial Wharf on the West London line and at Wood Lane on the Hammersmith and City Line. The proposed HS2/Crossrail/Great Western Main Line interchange at Old Oak Common will significantly increase public transport capacity. The Council supports more environmentally friendly means of transport, such as cycling and walking, and is investigating options for replacing the Hammersmith flyover and other sections of the A4 with a tunnel.

## Heritage assets

4.18 The borough has a rich and varied townscape character that is largely a result of its historical development. Archaeological remains from Roman, Saxon and Medieval periods have been discovered in the borough in areas which today form the focus for development. The current townscape and landscape structure of the borough can be clearly traced through the successive layers of development over the past two hundred years. Most of the borough's earliest buildings are now statutorily listed and most of the early patterns of development are recognised in conservation area designation.

## Open Space and Green infrastructure

4.19 There are three nature conservation areas of metropolitan importance in the borough, namely the River Thames and its inlets, the Grand Union Canal and the Kensal Green Cemetery. The river Thames is important site of archaeological value. These waterways enhance the environment and character of the borough and provide the potential for further benefit to the borough.

4.20 Many borough parks and open spaces are subject to nature conservation area designations. The borough also contains Registered Parks and Gardens of Historic Interest, Fulham Palace's gardens and Bishops Park. However H&F has relatively little open space per person, just 231 hectares of public open space or 1.3 hectares of open space per 1,000 residents<sup>14</sup>. In some parts of the borough, particularly to the east, many residents do not have convenient access to local parks. Additional development in the borough will put further pressure on the open space that is available to local residents and visitors, unless additional open space can be created as part of new developments.

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<sup>13</sup> DECC

<sup>14</sup> Open Spaces and Outdoor Recreation Facilities in H&F 2006

## **Efficient resource management**

- 4.21 In order to accommodate the extra residential and commercial properties required to provide for the expected growth over the next ten years, there will need to be better strategic and local management of resources.
- 4.22 The cleanliness of local streets and open spaces is one of the most importance issues for residents, with 40% of local people ranking cleanliness as the most importance area for improvement in the borough, with 16% stating that parks are the most important area for improvement.
- 4.23 Although the total amount of local authority collected waste has fallen from 79,407 tonnes in in 2009-10 to 73,158 in 2013-14 the council's percentage of household waste sent for reuse, recycling or composting has also fallen. In 2013/14, 20.53% was sent for re-use, recycling or composting compared to 30.1% in 2011-12 and 23% in 2012-13.

## **Climate change**

- 4.24 Climate change is, perhaps, the most significant issue for the 21<sup>st</sup> century affecting all our futures. Rising temperatures, building subsidence, flooding and increased precipitation will affect buildings, people, biodiversity and the overall environment of the borough. Climate change needs to be addressed in the Local Plan.
- 4.25 The borough can reduce its impact on climate change by using adaptation and mitigation measures. By reducing carbon emissions as a result of fewer vehicle movements, reducing energy use, increasing energy efficiency in buildings and the management of waste and flood risk.
- 4.26 Significant areas of this borough are subject to some risk of flooding. Climate change, will lead to more frequent extreme weather events, increasing the risk of flooding in H&F, particularly from surface water and sewer flooding. This will be an important consideration in planning for future development in the borough. New development will need to be flood proof and incorporate sustainable drainage systems where appropriate.

## 5 KEY SUSTAINABILITY ISSUES

- 5.1 The Scoping Report (2014) identified the key sustainability issues and problems for which the Draft Local Plan needs to address.
- 5.2 The key sustainability issues identified have been categorised under the sub-elements of sustainability, namely environmental, social and economic issues and are set out in the table below.

**Table 2: Sustainability Issues in the London Borough of Hammersmith & Fulham**

Sub-Element	Sustainability issue
<b>Social</b>	<ul style="list-style-type: none"> <li>• Reduce deprivation and polarisation</li> <li>• Improve provision of essential social infrastructure to cater to projected changes in the population(Health, education and sports and leisure facilities)</li> <li>• Reduce crime and anti-social behaviour</li> <li>• Promoting housing opportunities for all by increasing housing supply, home ownership rates and diversifying tenure</li> <li>• Improving housing quality</li> <li>• Reduce the relatively high mortality(early deaths) ratio by improving health outcomes for residents and reducing health inequalities</li> <li>• Reduce the polarisation of employment opportunities and reduce dependency on benefits</li> <li>• Improve the quality of education in state schools</li> <li>• Increase council support for the third sector and volunteering</li> <li>• Improve amenity and quality of life for residents by creating safe and pleasant environments with a strong sense of place</li> </ul>
<b>Economic</b>	<ul style="list-style-type: none"> <li>• Reduce unemployment and increase investment in the borough;</li> <li>• Improve the level of education, training and local employment opportunities;</li> <li>• Prevent the loss of viable employment land</li> <li>• Enhance the vitality and viability of town and local centres</li> <li>• Identify and regenerate suitable areas to boost economic investment and employment</li> </ul>
<b>Environmental</b>	<ul style="list-style-type: none"> <li>• Improve the quality of the borough's public realm and green spaces and expand the borough's green infrastructure;</li> <li>• Conserve and enhance the borough's natural and built environment</li> <li>• Increase biodiversity across the borough</li> <li>• Reduce congestion and improve transport accessibility</li> </ul>



	<ul style="list-style-type: none"> <li>• Ensure a high quality public realm and design</li> <li>• Reduce and mitigate the local causes of climate change</li> <li>• Reduce flood risk</li> <li>• Improve efficiency in resource(water, materials and energy)</li> <li>• consumption;</li> <li>• Reduction of waste generated and an increase in waste treatment and recycling;</li> <li>• Improving street cleanliness and environmentally responsible behaviour with regard to fly tipping and waste disposal.</li> </ul>
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## **6 TASK B1 – TESTING THE DRAFT LOCAL PLAN OBJECTIVES AGAINST THE SUSTAINABILITY OBJECTIVES**

- 6.1 The strategic objectives of the Draft Local Plan set out what the Plan is aiming to achieve in spatial planning terms. Testing the compatibility of the Draft Local Plan's strategic objectives with the SA objectives is a formal stage in the SA Scoping process to establish the degree to which the Local Plan's objectives reflect the principles of sustainable development. This compatibility testing may also help in further refining the Draft Local Plan's strategic objectives if needed. In order to ensure a more rigorous assessment and to help identify any internal inconsistencies and tensions, the Draft Local Plan's strategic objectives have first been tested for compatibility with one another.
- 6.2 It must be noted that whilst the aim should be to achieve consistency between plan's strategic objectives, in practice there may be tensions between objectives. Where win-win outcomes cannot be achieved, decision makers will need to determine where the priorities should lie and this should be recorded explicitly as part of the SA process.

### **The objectives of the Draft Local Plan**

- 6.3 The Draft Local Plan sets out a number of objectives which outline the measures the council will encourage to help achieve the strategic vision for the borough. The objectives are listed below:
1. In particular, encourage regeneration of the most deprived parts of the borough, especially in the Old Oak, White City, North Fulham and Hammersmith town centre areas.
  2. Increase the supply and choice of high quality housing and ensure that the new housing meets local needs and aspirations, particularly the need for affordable housing local residents to rent or buy and for homes for families.
  3. Protect social housing, improve services for council residents and provide more new affordable homes for local residents to buy or rent.
  4. Create opportunities for education, training and employment in order to reduce polarisation and worklessness and create more stable, mixed and balanced communities.
  5. Encourage inward investment, facilitate job growth and support the borough's many smaller and younger firms enabling a highly entrepreneurial economy to develop and remain in the borough.
  6. Support businesses particularly local firms and the third sector so that they maximise job opportunities, develop apprenticeships and recruit and maintain local people in employment and enhance the vitality and vibrancy of high streets.
  7. Protect and enhance the borough's attractions for arts and creative industries.
  8. Regenerate Hammersmith & Fulham's town centres to improve their viability and vitality and sustain a network of supporting key local centres providing local services.
  9. Ensure that both existing and future residents and visitors have access to a range of high quality facilities and services, including, health, education and

training, retail, leisure, recreation, sporting activities, arts, entertainment and other community infrastructure, such as policing facilities and places of worship.

10. Ensure that the child care facilities and schools in the borough meet the needs and aspirations of local parents and their children.

11. Maintain and improve health care provision in the borough and encourage and promote healthier lifestyles, for example through better sports facilities, to reduce health inequalities.

12. Promote the safety and security of those who live, work and visit Hammersmith & Fulham.

13. Protect and enhance the amenity and quality of life of residents and visitors by providing a safe, accessible and pleasant local environment, characterised by a strong sense of place.

14. Preserve and enhance the quality, character and identity of the borough's natural and built environment (including its heritage assets) by respecting the local context, seeking good quality developments and ensuring compliance with the principles of inclusive and sustainable design.

15. Protect and enhance the borough's open green spaces and create new parks and open spaces where there is major regeneration, promote biodiversity and protect private gardens.

16. Increase public access and use of Hammersmith & Fulham's waterways as well as enhance their environment, quality and character.

17. Reduce and mitigate the local causes of climate change, mitigate flood risk and other impacts and support the move to a low-carbon future.

18. Ensure the development of a safe, sustainable transport network that includes improvements to public transport, cycling and walking infrastructure which will improve transport accessibility and local air quality and reduce traffic congestion and the need to travel.

19. Ensure that regeneration in the borough benefits and involves all sections of the community and meets the diverse needs of residents and visitors now and in the future.

## **Testing the compatibility of the Local Plan objectives**

- 6.4 The internal compatibility of the Local Plan objectives has been tested in the table below to identify any inconsistencies between these objectives that could give rise to adverse environmental effects and if so to allow mitigation measures or alternatives to be considered.

**Table 3: Testing the compatibility of Local Plan strategic objectives**

Objective 1																			
Objective 2	++																		
Objective 3	++	+/?																	
Objective 4	++	+/?	++																
Objective 5	++	+/?																	
Objective 6	++	?/+			++														
Objective 7	+/?	?			+/?	++													
Objective 8	++	+/?	+	?	+/?	+/?	+/?												
Objective 9	+	+/?			++	+	+	+/?											
Objective 10									++										
Objective 11	?	?						+/?	+										
Objective 12	+/?		+/?	+/?				+/?	+		+								
Objective 13	+/?	+/?	+/?	+/?	+/?	+	+	+/?	+	+	+	+							
Objective 14	+/?	+/?	+/?	?	?			?/+	+/?		+/?	+	++						
Objective 15	+/?	?	?	?	?			+/?	+		++	+/?	++	++					
Objective 16	+/?	+/?	?	+/?				+/?	+		++	++	++	++	++				
Objective 17	?	+/?	?	?				?/+	?/+	?	?/+	+/?	?	?	+				
Objective 18	++	++			++	++	+	++	++		+/?	+	+	++	+/?	?/+	+/?		
Objective 19	++	++	++	+	+	+	+/?	++	+	+/?	+/?	+/?	+	+/?	+/?	+/?	+/?	++	
	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9	Objective 10	Objective 11	Objective 12	Objective 13	Objective 14	Objective 15	Objective 16	Objective 17	Objective 18	Objective 19

**Table 4: Methodology**

Key	Definition of Impact
+/++	Compatible/ Strong compatibility
-	Incompatible/Tensions
?	Dependent on implementation
Blank	No Links

6.5 Generally, the Draft Local Plan strategic objectives show a general internal compatibility subject to the actual implementation of the Draft Local Plan policies. While no obvious incompatibilities were identified between the Draft Local Plan strategic objectives there are some inevitable tensions between the objectives promoting housing, businesses and local employment, open and green spaces and biodiversity, climate change mitigation and preservation of the character of the borough's natural and built environment. When implementing the policies of the Local Plan, it will be important for the council to recognise any potential conflicts between the Local Plan strategic objectives at an early stage so that any likely adverse or undesired effects can also be recognised and mitigated as far as possible.

### The Sustainability objectives

6.6 The sustainability objectives developed during the Scoping Report stage are listed below:

**Table 5: Sustainability Objectives**

Topic	Sustainability Objective	Sustainability sub-objective
<b>Social justice</b>	1. Increase equity and social justice	<ul style="list-style-type: none"> <li>• Make essential services affordable to all</li> <li>• Reduce differences in standards between different communities</li> <li>• Improve support to groups that are vulnerable and have special needs including those with disabilities</li> </ul>
<b>Health</b>	2. Improve health of population overall	<ul style="list-style-type: none"> <li>• Increase expected years of health life</li> <li>• Enable healthy lifestyles including mode of travel</li> </ul>
<b>Education and skills</b>	3. Improve the education and skills of young people and adults	<ul style="list-style-type: none"> <li>• Raise the standard of achievement at all ages</li> </ul>
<b>Affordable homes</b>	4. Provide decent and affordable homes	<ul style="list-style-type: none"> <li>• Reduce homelessness</li> <li>• Increase the range and affordability of housing</li> <li>• Reduce the number of unfit homes</li> </ul>
<b>Social cohesion</b>	5. Increase local residents' sense of community and social cohesion	<ul style="list-style-type: none"> <li>• Increase participation and voluntary activity</li> <li>• Reduce levels of crime and non-criminal anti-social disturbances</li> <li>• Increase sense of security and safety at home and in the street</li> </ul>
<b>Satisfying work</b>	6. Increase the opportunities for satisfying and well paid work	<ul style="list-style-type: none"> <li>• Reduce unemployment, especially long term unemployment</li> <li>• Improve earnings and reduce work related stress to improve health</li> </ul>

<b>Heritage</b>	7. Improve the local environment and heritage	<ul style="list-style-type: none"> <li>• Conserve and enhance sites, features and areas of cultural, historical and archaeological value</li> <li>• Maintain and enhance sites and species of nature conservation interest</li> <li>• Retain and enhance the character and use of the river</li> </ul>
<b>Reduce pollution</b>	8. Reduce the level of pollution	<ul style="list-style-type: none"> <li>• Improve local air and water quality and reduce noise levels</li> <li>• Reduce the amount of litter, derelict, degraded and underused land</li> </ul>
<b>Reduce transport impacts</b>	9. Reduce the effect of transport on the environment	<ul style="list-style-type: none"> <li>• Reduce the need for travel and therefore reduce traffic volume</li> <li>• Encourage use of more sustainable modes of transport</li> </ul>
<b>Careful consumption</b>	10. Responsible consumption of resources in the borough	<ul style="list-style-type: none"> <li>• Increase efficiency in use of resources in future plans</li> <li>• Reuse, recover and/or recycle waste</li> </ul>
<b>Climate change</b>	11. Reduce climate change and its impact on the borough	<ul style="list-style-type: none"> <li>• Reduce emissions of greenhouse gases and ozone depleting substances</li> <li>• Reduce energy and water use and increase use of renewable sources</li> <li>• Minimise the risk of flooding from storm events and overflow of watercourses</li> </ul>
<b>Sustainable economy</b>	12. Improve the sustainability of the local economy	<ul style="list-style-type: none"> <li>• Improve the level of investment in community services and shopping facilities</li> <li>• Improve access to key local services, shopping and other local facilities</li> <li>• Encourage indigenous investment and training of local workers</li> </ul>

### Testing the Draft Local Plan strategic objectives against the sustainability appraisal objectives

6.7 The starting point of the Sustainability Appraisal is to test the compatibility of the objectives of the Draft Local Plan with the Sustainability objectives in order to identify any potential synergies and inconsistencies between these objectives. The objectives of the Draft Local Plan and the sustainability objectives remain substantially unchanged since the adoption of the Core Strategy in 2011.

- 6.8 The SA prepared for the Core Strategy included a detailed assessment of the compatibility between both the Local Plan objectives and the sustainability objectives, concluding that these objectives were broadly compatible with each other. Some tensions were identified, particularly between the objectives of increasing housing and economic development and those concerned with protecting and enhancing environmental quality. Measures to mitigate against and reduce the impact of any negative environmental effects included a recommendation that sustainability considerations be taken into account when implementing the Core Strategy policies, for example by incorporating energy and resource efficiency measures, encouraging biodiversity, ensuring public transport accessibility and avoiding inappropriate developments in areas prone to flooding.
- 6.9 As part of the preparation of the SA preparation of this Draft Local Plan, the Draft Local Plan objectives were tested against the sustainability framework to ascertain their compatibility with the borough's sustainable development objectives. The results of the appraisal are shown in Table 5 below.

**Table 5: Compatibility of the Draft Local Plan objectives against the Sustainability Appraisal Objectives**

Draft Local Plan Strategic objectives												
1	+/?	+/?	?/+	++	+	+/?	+/?	?	?/+	+/?	+/?	+
2	+	+/?	?/+	++	+	?/+	+/?	?	?/+	+/?	+/?	+
3	++	+/?		++	+		+		?	+/?	+/?	+
4	+	+	+	+	+	+	?/+					+
5	+/?	+/?	+	?/+	+	+/?	?/+	?	?	+/?		++
6	+	+/?	+		+	+/?	?	?	?			++
7	+	+	+		+	+	?	?				+
8	+	+	?/+	+	+/?	+	+/?	?	?/+	+/?	+/?	++
9	+	+	+	+	+	+	+/?	?	?/+		?	++
10	++	+	++	+	+	+			?/+		?/+	++
11	++	++	+	+	+/?	?/+	?/+	++	++		+	+
12	++	++	+	?/+	++	?		+	+			+
13	+	+		?/+	++	?/+	?/+	++	+	+	?	?/+
14	+	+		?	++	+	++	+			+	?/+
15	+	++		?	++		++	+			+	?
16	+	++		+	+		+	?/+		?/+	?/+	?/+
17	+			+/?			?	++	++	+	++	?
18	+	+	+	+/?	+/?	+/?	?	++	+	+/?	+	+
19	+	+	+/?	+	+/?	?/+	?/+	?/+	+	?	?/+	+
SA Objectives	1	2	3	4	5	6	7	8	9	10	11	12

**Table 6: Methodology**

Key	Definition of Compatibility
+/++	Compatible/ Strong compatibility
-/--	Incompatible/Strong incompatibility
?	Dependent on implementation
Blank	No Links

6.10 Overall, an analysis of Table 5 shows that the Draft Local Plan's strategic objectives are compatible with the sustainability objectives. However, in many instances this compatibility will depend upon how the Local Plan policies are implemented.

**Table 7: Explanation of compatibility test between the Sustainability Appraisal Objectives and Draft Local Plan Strategic Objectives**

<b>Sustainability appraisal objective</b>	<b>Effect on compatibility with Draft Local Plan strategic objectives</b>
<b>1. Increase equity and social justice</b>	Overall positive and very positive compatibility, particularly for Draft Local Plan (DLP) objectives 10,11 & 12 . However, care should be taken when implementing regeneration (1) and economic development (5) objectives to ensure that vulnerable groups of people living and working within these areas are not placed at particular disadvantage or treated inequitably.
<b>2. Improve health of population overall</b>	Overall positive and very positive compatibility, particularly for DLP objectives 11,12 15 & 16. Care should be taken when implementing DLP objectives 1,2,3,5 & 6. In particular, if regeneration of identified areas includes estate renewal and rebuilding of new housing, care should be taken that these areas are equally or better provided with affordable housing, sustainable transport modes, access to open spaces and community and leisure centres and are not located in areas of relatively poor air quality, noise or other pollution sources which could adversely impact on health.
<b>3. Improve the education and skills of young people and adults</b>	Broadly positive compatibility. Care should be taken when implementing policies supporting DLP objectives 1,2,8 & 19 as there is the potential for some tensions to arise between these objectives and those promoting education, notably in terms of any competition for space between education uses(developing new schools, colleges, etc) and other key priorities such as housing and commercial uses.
<b>4. Provide decent and affordable homes</b>	Very strong positive compatibility with DLP objectives 1,2 & 3, with positive compatibility with other objectives. However, care should be taken when implementing policies furthering DLP objectives 5,12,13 & 18 to ensure that these are balanced against the objective to provide an increased range of better and more affordable housing. For instance, care should be taken to balance housing need with the need to attract economic investment to support business growth. Similarly, the need for additional new housing should not come at the expense of the amenity and quality of life of existing residents. This may be mitigated by ensuring new housing development is well designed and located, complements the scale and character of the area and preserves local amenity and the quality of life of local residents by not encroaching upon open and green spaces.



<b>Sustainability appraisal objective</b>	<b>Effect on compatibility with Draft Local Plan strategic objectives</b>
<b>5. Increase local residents' sense of community and social cohesion</b>	Generally, there is a positive compatibility between objectives, with a very strong positive compatibility with DLP objectives 12,13,14 & 15. DLP objectives 8,11,18 & 19 pose some uncertainty and care should be taken when implementing policies supporting these objectives to ensure the preservation and enhancement of any existing sense of community and social cohesion. This may be achieved through sensitive and careful planning based on best practice, sustainable urban design principles and early consultation with local residents on major planning proposals. Other measures to mitigate or reduce any negative impacts may include seeking 106 developer contributions or allocating Community Infrastructure Levy funds towards suitable infrastructure projects in the areas concerned.
<b>6. Increase the opportunities for satisfying and well paid work</b>	While there is general compatibility with the DLP objectives, a strong compatibility between the objectives will be dependent on the implementation of relevant policies. Policies supporting DLP objectives 1,2,5,6,18 & 19 all offer varying potential to help achieve Sustainability objective 6. However, care should be taken that regeneration and economic development policies do not adversely affect existing viable businesses and niche employment sectors that may be located in these areas of change. Where such impact is unavoidable, the impacts should be mitigated or reduced as far as possible. This may include modifying planning applications if appropriate, seeking developer contributions and/or Community Infrastructure Levy funds to mitigate impacts by supporting these employment sectors or assisting affected businesses to relocate in other suitable locations in the borough. Additionally, there may be potential conflict with policies supporting DLP objectives 11,12 & 13 if these are not implemented in a sustainable manner. For instance, permitting and locating employment generating industries that cause pollution in close proximity to residential areas can result in reduced health outcomes and amenity for affected communities and can increase health inequalities in the borough.
<b>7. Improve the local environment and heritage</b>	While there is a strong positive compatibility with DLP objectives 14 and 15, overall, the compatibility of this SA objective with other DLP objectives will be dependent upon the implementation of relevant DLP policies, notably those concerning regeneration, housing, employment and economic development, which may conflict with this sustainability objective. The fact that any loss of these heritage features will be permanent emphasises the need for sensitive and innovative planning and urban design measures that can achieve positive sustainability outcomes. Nonetheless, tensions for space for different land uses, including pressures to develop on the borough's open and natural spaces are likely to remain.

<b>Sustainability appraisal objective</b>	<b>Effect on compatibility with Draft Local Plan strategic objectives</b>
<b>8. Reduce the level of pollution</b>	<p>There is general compatibility between the objectives with strong compatibility with DLP objectives 11,13,17 &amp; 18. The main tensions however concern the objectives to intensify land use through regeneration and additional housing and economic development and the likely increase in pollution that this intensification is likely to result in. Air pollution resulting from the increase in motorised transport is likely to be the greatest source of additional pollution associated with increased development in the borough. New buildings will also consume energy and water and contribute to carbon emissions. A range of mitigation measures may be applied to reduce the negative effects of this pollution. These could include, reducing the need to travel using private motorised transport and encouraging sustainable transport modes; ensuring new buildings are resource efficient; locating developments that are substantial transport generators close to public transport and incorporating Sustainable Urban Drainage systems in new developments to divert polluted runoff away from waterways</p>
<b>9. Reduce the effect of transport on the environment</b>	<p>This SA objective is very similar to the previous one, but is broader in scope as it encompasses the wider effects of transport on the environment, which would include pollution but also other issues such as the severance effect of communities by roads in particular, road safety issues, amenity and associated planning issues caused by increased private vehicle ownership such as parking stress on local streets, the pressure to provide parking in new developments, increased pressure on the existing road infrastructure to accommodate more vehicles, the loss of front gardens for parking purposes and the paving over of land for parking which contributes to runoff and flooding. There is very strong compatibility with DLP objectives 11 &amp; 17 and positive compatibility generally with objectives aimed at improving amenity and quality of life for people within the borough. The compatibility of DLP objectives 1,2,3,5,6,8,9 &amp; 10 with this SA objective will depend largely on the implementation of the policies related to these objectives. Regeneration and housing schemes of all scales should consider the effects, including cumulative and synergistic effects of any additional transport needs generated as a result of these developments and its effects on the environment. Mitigation measures should be implemented to reduce the negative transport effects on the environment and could include ensuring the provision of adequate public transport in close proximity to the proposed developments, seeking developer contributions and/or using CIL funds to fund sustainable transport infrastructure, promotion of sustainable transport use and preventing wherever possible, the paving over of gardens and other permeable spaces for parking purposes.</p>

<b>Sustainability appraisal objective</b>	<b>Effect on compatibility with Draft Local Plan strategic objectives</b>
<b>10. Responsible consumption of resources in the borough</b>	The compatibility of this SA objective with those of the DLP objectives will be dependent on the implementation of relevant DLP policies. Increased development in the borough will inevitably lead to an increased consumption of resources. Policies should include measures that aim to maximise efficiency in the development process by placing an emphasis on reducing resource consumption and increasing recycling from the earliest stages of any proposed development.
<b>11. Reduce climate change and its impact on the borough</b>	The compatibility of this SA objective with those of the DLP objectives will be dependent on the implementation of the relevant DLP policies. Local authorities have a statutory duty to address climate change; the London Plan also contains a number of policies aimed at addressing this issue. As such, it is reasonable to surmise that DLP policy implementation will contribute towards ensuring compatibility between the DLP objectives and the SA.
<b>12. Improve the sustainability of the local economy</b>	There is very strong compatibility with DLP objectives 5,6,8,9 & 10. The compatibility with DLP objectives 13-17 relating to the preservation of amenity, the natural and built environment (including the borough's waterways) and addressing climate change will depend on how policies aimed at achieving SA objective 12 are implemented. It is likely that tensions will arise between the pursuit of economic development objectives and those related to the above mentioned objectives.

## **7 TASKS B2 & B3 - DEVELOPING THE DRAFT LOCAL PLAN OPTIONS AND EVALUATING THE LIKELY EFFECTS OF THE DRAFT LOCAL PLAN**

- 7.1 This section of the SA Report covers tasks B2: Developing the Draft Local Plan options and task B3: Evaluate the likely effects of the Draft Local Plan. The Local Plan options have been appraised and include an accompanying commentary containing any issues that arose through the assessment process. Where a preferred option is found to generally be the most sustainable but could be improved, recommendations are put forward.
- 7.2 Throughout the sustainability appraisal process, many detailed discussions took place during the development of the Local Plan options between the planning officers and the officer who undertook the appraisal process. During these meetings feedback was provided by the officer appraising the policies on how the wording of the specific policies could be improved so that these would have a better impact in terms of social, environmental and economic sustainability.
- 7.3 As previously mentioned the Draft Local Plan (2014) consists of policy options arising from:
- an amalgamation of unchanged and amended planning policies which have already been adopted as part of either the Core Strategy or the Development Management Local Plan;
  - new strategic area and site policies that relate to the borough's regeneration areas; a
  - new borough-wide development management policies, TLC7 Addressing the concentration and clustering of betting shops and payday loan shops, TLC8 Public houses, CF4 Professional football grounds and DC10 Telecommunications; and
  - a new section on planning contributions and infrastructure planning.
- 7.4 Appendix 2 sets out the changes that have been made to policy titles and numbering since the publication and adoption of the Core Strategy (October 2011) and the Development Management Local Plan (July 2013).
- 7.5 As a consequence of the background of the draft Local Plan policies some of these policies and their reasonable alternatives have already been subject to a number of separate SA reports. The development of the preferred local plan options has drawn upon the previous sustainability appraisals where appropriate and refreshed these appraisals if needed. New reasonable alternatives have been identified and appraised for policies in the Draft Local Plan which have been materially amended or are entirely new.
- 7.6 The following sustainability appraisal reports for the Core Strategy and Development Management Local Plan are available to view and download from Hammersmith and Fulham's website:

- *Sustainability Appraisal Core Strategy and Site Allocations Preferred Options* (June 2007) [http://www.lbhf.gov.uk/Images/SAR-%20Printing%20version%20110607\\_tcm21-81782.pdf](http://www.lbhf.gov.uk/Images/SAR-%20Printing%20version%20110607_tcm21-81782.pdf)
- *Sustainability Appraisal of Core Strategy Options* (May 2009) [http://www.lbhf.gov.uk/Images/SA%20REPORT%20June%202009\\_tcm21-123060.pdf](http://www.lbhf.gov.uk/Images/SA%20REPORT%20June%202009_tcm21-123060.pdf)
- *Sustainability Appraisal Core Strategy* (October 2011) [http://www.lbhf.gov.uk/Images/Core%20Strategy%20SA\\_tcm21-165539.pdf](http://www.lbhf.gov.uk/Images/Core%20Strategy%20SA_tcm21-165539.pdf)
- *Sustainability Appraisal of Possible Options for Generic Development Management Policies* (November 2009) [http://www.lbhf.gov.uk/Images/SA%20of%20GDM%20options%20-%20Nov%202009\\_tcm21-134582.pdf](http://www.lbhf.gov.uk/Images/SA%20of%20GDM%20options%20-%20Nov%202009_tcm21-134582.pdf)
- *Sustainability Appraisal for the Submission Development Management DPD* (June 2012) [http://www.lbhf.gov.uk/Images/DM%204%20Sustainability%20Appraisal%20for%20Submission%20DM%20DPD\\_tcm21-173805.pdf](http://www.lbhf.gov.uk/Images/DM%204%20Sustainability%20Appraisal%20for%20Submission%20DM%20DPD_tcm21-173805.pdf)

7.7 With the exception of policy HO10 Gypsies and Travellers, which is an interim policy position awaiting the completion of the Gypsy and Traveller Needs Assessment. The SA of the appraised preferred policies are broadly in accordance with the identified sustainability objectives. However, in practice, the sustainability of the strategic regeneration promoted by the Local Plan as well as more minor development will largely depend on the degree to which the numerous measures promoting sustainability within the policy document are implemented when planning applications are determined.

7.8 All the policies have been appraised using the appraisal methodology displayed in the table below. Following each policy theme, a commentary assessing secondary, cumulative and synergistic effects is provided.

**Table 8: Local Plan sustainability matrix**

Symbol	Definition of Impact
✓	Positive effect
✗	Negative effect
0	No significant effect
?	Uncertain effect

## APPRAISAL OF DRAFT LOCAL PLAN POLICY OPTIONS (JANUARY 2014)

### Strategic Regeneration Area Policy

#### Strategic Policy Strategic Regeneration Area Policy

The Council will focus and encourage major regeneration and growth in the borough's five regeneration areas and will work with key stakeholders to ensure that within these areas, proposals will:

- Provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion;
- Deliver 25,800 new homes in the period 2015-2035 to meet local housing needs and enable local residents to access affordable homes to buy or rent;
- Deliver 49,500 new jobs in the period 2015-2035, providing a range of skills and competencies and supported by initiatives to enable local residents to access employment and training; and
- Deliver new physical, social and environmental infrastructure that meets the needs of new residents as well delivering tangible benefits for surrounding communities.

7.9 The preferred policy will have numerous positive effects for the majority of the sustainability appraisal objectives. The overriding objective of the preferred policy is to achieve new mixed, balanced communities and provide new homes to meet local housing needs. The mix of housing in the regeneration areas will be determined by the Borough-wide policies on housing.

7.10 Around 25,800 new homes are proposed to be delivered in the regeneration areas across the borough. The preferred policy option refers to providing the appropriate social, physical, environmental and transport infrastructure to support these new communities. This will have a positive impact on the social justice, health and education sustainability objectives. The provision of new infrastructure will also benefit nearby existing communities.

7.11 New development in each of the regeneration areas will need to respect and enhance the existing townscape context and heritage assets both within and around the area. This will have a positive impact on the heritage sustainability objective.

7.12 New development will increase local employment opportunities and provide training programmes for local people to access new jobs. This will have a positive effect on the satisfying work sustainability objective.

7.13 The preferred policy seeks to deliver 49,500 new jobs across the five regeneration areas in the borough as well as employment and training initiatives. This will help support economic growth in the borough by creating a skilled local work force. The preferred policy will positively contribute to the economic, social and education sustainability objectives. It may also contribute to health objectives by providing people with the skills and knowledge to earn more money and sustain healthier lifestyles. Encouraging businesses to adopt the Living Wage will have benefits for those workers who are in low paid jobs and contribute to the social justice objective.

7.14 The policy encourages major regeneration and this will have a positive effect on the careful consumption sustainability objective by making efficient use of the land as well as the reducing pollution levels by reusing land. Combined with other borough wide policies aimed at increasing resource efficiency, the implementation of this preferred policy will help in having a positive effect on the reducing climate change and its impact on the borough.

#### Alternative Options - Regeneration Areas

- Not to actively promote the regeneration areas and strategic sites within the borough.

7.15 The alternative option proposes to not actively promote the regeneration areas and strategic sites in the borough. This option would fail to capitalise on the opportunity to focus on these areas in need of regeneration and would not maximise the opportunity for significant new sustainable place-making. This option also doesn't comply with the London Plan which has identified 3 out of the 5 identified regeneration areas as opportunity areas to deliver a significant amount of new homes and jobs.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Policy Strategic Regeneration Area Policy	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> The Council will focus and encourage major regeneration and growth in the borough's five regeneration areas and will work with key stakeholders to ensure that within these areas, proposals will:	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Preferred Option:</b> Provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion;	✓	✓	0	0	✓	0	✓	✓	✓	✓	✓	✓

<b>Preferred Option:</b> Deliver 25,800 new homes in the period 2015-2035 to meet local housing needs and enable local residents to access affordable homes to buy or rent;	✓	✓	0	✓	✓	0	0	✓	✓	✓	✓	✓
<b>Preferred Option:</b> Deliver 20,000 new jobs in the period 2015-2035, providing a range of skills and competencies and supported by initiatives to enable local residents to access employment and training; and	0	0	✓	0	0	✓	0	0	✓	0	0	✓
<b>Preferred Option:</b> Deliver new physical, social and environmental infrastructure that meets the needs of new residents as well delivering tangible benefits for surrounding communities.	✓	✓	✓	0	✓	0	✓	✓	✓	✓	✓	✓
<b>Alternative Option (1):</b>  <i>Not to actively promote the regeneration areas and strategic sites within the borough.</i>	x	x	x	x	x	x	x	x	x	x	x	x

## Assessing secondary, cumulative and synergistic effects

7.16 The Strategic Regeneration Area Policy is anticipated to contribute towards a number of the Draft Local Plan's strategic objectives including: 1 - which seeks to encourage regeneration in the most deprived areas of the borough, 2 - which seeks to increase supply and choice of housing to meet local needs, 4 - which seeks to create employment and training opportunities, 5 - which seeks to encourage investment and job growth, 6 - which seeks to support maintain local people in employment, 9 - which seeks to provide residents with social and physical infrastructure and 19 - which seeks to ensure that regeneration benefits the whole community.

7.17 It is predicted that the effects of this strategic policy will have a significant, positive, medium to long term effect. The effects of this strategic policy will be permanent in implementation and have a direct impact on the Borough's residents and visitors. It is expected that it will also lead to secondary impacts on a number of the SA objectives. The delivery of this strategic policy in conjunction with the other regeneration and strategic site allocation policies in the Draft Local Plan will have a significant, positive, cumulative effect in regenerating the borough's most deprived areas and maximising the opportunities to improve existing infrastructure and provide new social, physical and environmental infrastructure. It will also contribute substantially in the delivery and provision of new homes and jobs in the borough.



## Strategic Policy OORA – Old Oak Regeneration Area

### Strategic Policy OORA – Old Oak Regeneration Area

Indicative homes	Indicative jobs
6,000	20,000

The council will support the principle of the sustainable, phased, comprehensive mixed use redevelopment of the OORA. Based around the planned major transport improvements at Old Oak Common, the council will encourage development of a new urban quarter which could deliver up to 6,000 homes across a range of tenures and affordabilities and 20,000 jobs, with supporting retail, community facilities and public open space, to create a new mixed, balanced and sustainable community in the period 2015-2035. Proposals for major sports, arts, leisure, education or health providers that act as the catalyst for mixed use regeneration will also be supported. In order to achieve this growth and to reach the full potential of up to 18,000 homes and 50,000 jobs the Council will:

- Work with the GLA, neighbouring boroughs, other strategic partners and landowners to secure the comprehensive regeneration of the area.
- Actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area;
- Continue to support the Government's proposals for a HS2, Crossrail and Great Western Main Line station at Old Oak Common.
- Support the provision of further rail connectivity at the proposed Old Oak Common station, including connections into the London Overground Network and a Crossrail spur to the West Coast Main Line.
- Support the early regeneration of the OORA in advance of the proposed Old Oak Common station.

Proposals for development in the OORA should:

- Optimise development potential. Development around the edges of the OORA should in terms of scale and form be sensitively integrated into the surrounding context. Tall buildings of exceptionally good design may be acceptable, as part of increased massing nearer to areas of high public transport accessibility and subject to detailed analysis of their impact on nearby heritage assets.
- Demonstrate a high quality of urban design and public realm.
- Improve connections to existing communities, including North Acton, East Acton, White City, North Kensington, Kensal Green and Harlesden and improve both north-south and east-west connectivity within the OORA, providing safe and convenient connections for pedestrians and cyclists in accordance with recognised best practice.
- Secure economic benefits for the wider community around the Old Oak Regeneration Area by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or

**targeted recruitment;**

- **Provide appropriate social, physical, environmental and transport infrastructure to support the needs of the OORA as a whole and create viable new sustainable communities.**
- **Create a network of new public green open spaces.**
- **Ensure that Wormwood Scrubs is protected and its existing character and biodiversity value is safeguarded.**
- **Ensure that retail provision within the OORA caters for the day to day needs of development and does not have a detrimental impact on neighbouring retail centres such as Shepherd's Bush and Harlesden.**

7.18 The preferred policy aims to achieve a new mixed, balanced and communities and reduce social and economic polarisation by providing homes across a range of tenures and affordabilities. The mix of housing in the regeneration areas will be determined by the Borough-wide policies on housing and in particular housing policy Borough-wide HO3 Affordable Housing. This policy sets a 40% affordable housing target for all major residential development and 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing available to households who cannot afford to buy and/or rent market accommodation in the borough. Therefore this policy will have a positive effect on increasing equity and social justice for the local community.

7.19 Development will take place in a carefully planned manner, with a focus on sustainable urban design, including sustainable travel modes. Appropriate social infrastructure including affordable leisure and new open spaces will also be provided as part of development. However it is important that any early development that occurs, particularly before the station is developed has access to essential infrastructure. Connections to adjoining established neighbourhoods will also encourage physical activity and promote both physical and mental health in the population.

7.20 The policy aims to provide new homes across a range of tenures and affordabilities. It is therefore likely to have a positive effect on the provision of affordable housing in the borough. The amount and mix of affordable housing is determined by Borough-wide policy HO3 Affordable Housing therefore it's difficult to be fully certain about the effect until this policy is implemented.

7.21 The emphasis on high quality sustainable design, provision of appropriate infrastructure and the intensity of planned development is likely to create a strong local community with a distinctive character.

7.22 The development is likely to result in the creation of around 50,000 jobs, which will significantly contribute towards the satisfying work sustainability objective and increasing the opportunities for well-paid work.

7.23 The policy aims to protect existing heritage features. However, there is some uncertainty about how development, notably tall buildings could impact upon the heritage setting of the Grand Union Canal.

- 7.24 The focus on public transport oriented development will help to reduce greenhouse gas emissions compared to a scenario where the planned development did not include, or was not based around a major railway station. This will have a positive impact on reducing the levels of pollution.
- 7.25 The focus on public transport oriented development will result in lower levels of air, water and noise pollution compared to a scenario where this policy was not being implemented. It will have positive effect on reducing transport impacts on the environment and contribute towards careful consumption. The council could consider actively encouraging the development of a strategic network of segregated cycleways in the OORA, connecting this area to adjoining areas and beyond.
- 7.26 The policy encourages efficient and intensive land use. Combined with other borough wide policies aimed at increasing resource efficiency, implementation of this policy will help in having a positive effect on the reducing climate change and its impact on the borough.
- 7.27 The proposed mixed use development will significantly boost the local economy. The scale of the development, the opportunity to provide a significant amount of new jobs and its transport network will attract visitors from the UK and overseas.

**Alternative Options – Policy OORA (Strategic Policy – Old Oak Regeneration Area)**

- Maintain the current policy where existing strategic industrial land and waste uses are safeguarded.
- Defer the regeneration of parts of the site until suitable transport nodes are operational.
- Optimise the quantum of development as far as possible but prohibit tall buildings in the regeneration area.
- Rather than a mix of employment and residential, land use could be weighted towards the provision of employment.
- Rather than a mix of employment and residential, land use could be weighted towards the provision of more residential use.

- 7.28 Alternative option (1) will maintain the status quo, apart from the development of the planned HS2 station development. The advantages of doing so include the preservation of existing industrial and commercial land uses and associated employment and minimal disruption to the setting of existing heritage areas such as the Grand Union Canal and the Kensal Green Cemetery. The lack of new development will mean that greenhouse gas emissions, noise and construction waste associated with development will also not be generated. However, despite this the sustainability costs of this option are considerably greater than the benefits. Firstly, the proposed regeneration is likely to create substantially more employment in the area (50,000 jobs). Existing employment uses will not be lost but will be shifted to other suitable locations. The maintenance of the status quo, whereby the waste treatment sites are retained, may also lead to possible conflict with the proposed station development in terms of a loss of amenity or environmental nuisance. The form and intensity of the proposed land use generates efficient economies of scale, in terms of urban design, resource consumption, public transport effectiveness and community building. The result, if properly implemented, is likely to produce a high quality sustainable community, which will help address London's need for housing and employment.
- 7.29 Alternative option (2) considers whether housing led development at Old Oak North should be deferred until accessible public transport and other essential social infrastructure (education, healthcare and leisure services) are provided to service this area. While Acton North appears to have good public transport access, Old Oak North is relatively poorly serviced by accessible public transport. This may lead to increased car dependence among residents and may particularly affect people who are less mobile such as the very young, elderly and disabled. Similarly, a focus on prioritising housing should not come at the cost of necessary social infrastructure such as schools, medical and leisure facilities.
- 7.30 Alternative option (3) is likely to result in a reduction in the quantum of development, reducing the economic viability of development and associated economic benefits. Height restrictions also has a negative impact on economies of scale in terms of the efficiency of public transport provision and resource consumption notably land use, building materials and infrastructure. The council's evidence base indicates that tall buildings would be broadly acceptable. Notwithstanding this, prohibiting tall buildings may positively impact on the skyline and minimise any adverse effects on nearby conservation areas and heritage assets.
- 7.31 Alternative option (4) focuses on employment generation at the expense of more housing so is likely to lead to greater economic benefits, but less housing including affordable housing. An imbalanced approach may in turn impact on the character of the area, leaving large areas inactive outside of working hours and potentially impacting on perceptions of community safety. Weighting towards employment may also have a negative impact on the transport network with higher flows in the AM and PM peaks. Finally, this option is unlikely to conform with Further Alterations to the London Plan figures.

7.32 Alternative option (5) focuses on residential led development which may lead to an increased provision of affordable housing, increasing social justice and equity. Negative transport and traffic impacts may also be reduced. However, a focus on residential development may adversely impact on 'place making', by rendering the area comparatively sterile and lacking in vibrancy and activity. Negative impacts on the local economy stemming from the reduction in employment are also likely. This in turn may contribute to a reduction in social justice and equity. Finally, this option is unlikely to conform with Mayor of London's Draft Revised London Plan 2014 figures which identifies the potential up to deliver 55,000 new jobs in this area.

POLICY OPTIONS		SA OBJECTIVES											
Strategic Policy OORA – Old Oak Regeneration Area		Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option</b> <i>See policy wording above.</i>		✓	✓	0	✓	✓	✓	✓/?	✓	✓	✓	✓	✓
<b>Alternative Option (1):</b> <i>Maintain the current policy where existing strategic industrial land and waste uses are safeguarded.</i>		X	0	?	X	X	X	✓	X	X	X	X	X
<b>Alternative Option (2):</b> <i>Defer the regeneration of parts of the site until suitable transport nodes are operational.</i>		?	?	?	?/✓	?	0	0	?/✓	?	✓	0	?
<b>Alternative Option (3):</b> <i>Optimise the quantum of development as far as possible but prohibit tall buildings in the regeneration area.</i>		?	0	0	?	0	0	✓/0	0	?	?/X	0/X	X
<b>Alternative Option (4):</b> <i>Rather than a mix of employment and residential, land use would be weighted towards the provision of employment.</i>		?	0	0	X	?/X	✓	0	?/0	?/X	0	0/✓	✓
<b>Alternative Option (5):</b> <i>Rather than a mix of employment and residential, land use would be weighted towards the provision of more residential use.</i>		?	0	0	✓/?	?	X	0	?/0	?/✓	0	0/✓	✓

## Strategic Site Policy OORA1 – Old Oak Common Station

### Strategic Site Policy OORA1 – Old Oak Common Station

**The council will work with partners to secure a new Old Oak Common station that is of the highest design quality and is the focal point for the new community. It will therefore be expected that:**

- **The station and its immediate surroundings become the focal point for regeneration within the OORA and deliver uses such as retail, civic space, open space, offices and leisure.**

**The development should:**

- **Provide legible connections into and through the station, including free public access from the north, east and west and with access to the south to be opened once regeneration proposals are brought forward for the North Pole Depot.**
- **Be of exceptional architectural quality and to act as an exemplary marker of London's role as a world city.**
- **Be accompanied by a state of the art intermodal interchange that facilitates the safe and efficient movement of passengers from buses, taxis and private vehicles, including cycles, into and out of the station. Most access will be by buses, taxis, walking and cycling but provision will need to be made for a small proportion of journeys to be made by private car. The intermodal interchange should be designed to be attractive to pedestrians, allowing safe and efficient movement into and through the station and should be well integrated into the surrounding public realm.**
- **Be supported by adequate connections into the strategic road network. Improvements will be expected to road connections to the south and west to connect to the A40. New bridge connections over the Grand Union Canal must be provided to connect to Hythe Road and provide road connections to the north and east.**

7.33 The emphasis on public transport will enable travel by people of varying means. The location of the station and the surrounding layout will encourage people to use sustainable modes of travel such as walking and cycling to access the station. The health benefits of this policy can be enhanced if care is taken to focus on this objective such as by ensuring adequate cycle parking and attractive and safe pedestrian environments leading into the station precinct.

7.34 The emphasis on exceptional design in making the station and the surrounding area the focal point for regeneration in the OORA should result in the creation of a high quality public realm of a distinctive character, which will both encourage engagement in the local community and foster a sense of community spirit and social cohesion.

- 7.35 The station will deliver employment generating mixed uses such as offices, retail and leisure uses and will have a positive effect on the providing satisfying work sustainability objective.
- 7.36 The existing land use on the Old Oak Common site is predominantly industrial. The site has no significant built heritage value. However, the Grand Union Canal is a conservation area of heritage value. Additionally, tall buildings are planned as part of the development and may impact on strategic views. New developments should therefore be carefully designed to preserve (and enhance wherever possible) existing heritage features and views.
- 7.37 The development of what is essentially a 'blank canvas' is a unique rarity in London and offers an opportunity for exemplary sustainable transport design, offering locals and overseas visitors a safe, ideal platform from which to access the OORA, adjoining neighbourhoods and wider London. The focus on public transport oriented development will result in lower levels of air, water and noise pollution compared to a scenario where this policy was not being implemented.
- 7.38 The preferred policy encourages efficient and intensive land use. The focus on public transport oriented development will help to reduce greenhouse gas emissions compared to a scenario where the planned development did not include, or was not based around a major railway station. The proposed mixed use development will significantly boost the local economy. The scale of the development and its transport network will attract visitors from the UK and overseas.

**Alternative Options – Policy OORA1 (Strategic Site Policy – Old Oak Common Station)**

- The station should be designed purely as an interchange station with a limited number of entrances and exits to be used primarily for emergency egress.

Implementation of this alternative option would result in a number of unsustainable outcomes. A sub-optimal design outcome providing no accompanying retail, office or leisure uses would result in a relatively impoverished public realm, contributing to a lack of social cohesion and sense of community. This option would also create significantly fewer employment opportunities and would impinge on the ability of the station to act as a catalyst for the regeneration of the surrounding area, which would adversely impact upon the local economy. This design option is also likely to result in people having to travel further to access work, leisure and shopping. This may increase car dependence and other pressures on transport and increasing greenhouse gas emissions. In terms of urban design, opportunities to provide access through the station to Wormwood Scrubs would be limited, meaning that more open space would need to be provided to the north, reducing the development quantum and viability.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Site Policy OORA1 – Old Oak Common Station	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	✓/ ?	0	0	✓	✓	?	✓	✓	✓	✓	✓
<b>Alternative Option:</b> <i>The station should be designed purely as an interchange station with a limited number of entrances and exits to be used primarily for emergency egress</i>	0	0	0	0	X	X	0	?	X	X	X	X

### Strategic Site Policy OORA2 – Old Oak South

#### Strategic Site Policy OORA2 – Old Oak South

The council will encourage the early relocation of the Crossrail depots and Intercity Express Programme (IEP) depot to enable regeneration around the new Old Oak Common station (see Strategic Site policy OORA1). Development proposals for this strategic site should:

- Be employment led immediately around the Old Oak Common station, with opportunities for the creation of a substantial employment centre. Any tall buildings should be perceived as separate elements within a coherent group rather than a single mass.
- Be predominantly residential around the edges of the site, especially on the boundaries with Wormwood Scrubs, Little Wormwood Scrubs and the Grand Union Canal.
- Create new connections through the site including a new public east-west road connection on the IEP depot that will link, linking Old Oak Common Lane to Scrubs Lane and new road and pedestrian connections over the Grand Union Canal.
- Provide a network of public green open spaces, connecting the Grand Union Canal and Old Oak Common station to Wormwood Scrubs and connecting Old Oak Common Lane, through the planned Old Oak Common HS2 station to the Grand Union Canal.
- Contribute to upgrading Wormwood Scrubs and sports facilities such as the Linford Christie Stadium.



- 7.39 The policy is likely to encourage healthy lifestyles as it aims to develop connections to open spaces, creates new open spaces and encourages sustainable modes of travel which are conducive to promoting physical activity. In order to encourage walking and cycling, careful attention should be placed on street design to ensure permeability and direct routes to attractors such as the station (streets should follow a grid pattern, the canal and open spaces; curvilinear streets and cul de sacs should be avoided).
- 7.40 In conjunction with the other policies in the Draft Local Plan, it is likely that there will be a positive effect on the sustainability objective increasing the local residents' sense of community and social cohesion. However it is difficult to ascertain the precise effects of this policy as it provides a steer on residential and employment development. A key aspect of sustainable development is the provision of mixed uses and this will enable the station area to remain vibrant and lively well after office hours and this will significantly contribute towards passive surveillance of streets and improvements in personal safety. There are benefits in adopting a finer grained approach to land use around the station, which can nonetheless be predominantly 'employment led'.
- 7.41 The preferred policy option aims to create a substantial new employment centre. This is likely to contribute towards improving local unemployment levels and have a positive effect on satisfying work sustainability objective.
- 7.42 The policy proposes development in close proximity to heritage assets, including the Grand Union Canal. Care should be taken that new development respects these heritage assets and their setting.
- 7.43 In line with the Draft Local Plan's objectives to have a safe and sustainable transport network and provide improvements cycling and walking infrastructure, the OORA presents a unique opportunity to develop walk and cycling infrastructure to be incorporated into the urban fabric relatively easily. This will improve transport accessibility and local air quality and reduce traffic congestion and the need to travel.
- 7.44 The planned intensity of development will maximise efficiencies in resource consumption in terms of land use, infrastructure provision and public transport effectiveness.
- 7.45 The creation of new jobs will significantly contribute towards improving the local economy by attracting investment, lowering unemployment and positively impacting on land values in the area.

#### **Alternative Options – Strategic Site Policy OORA2 (Old Oak South)**

- Land use should be weighted towards the provision of residential uses throughout the area.
- Rather than actively pursuing the relocation of the Crossrail and Intercity Express Programme depots we could assume that these remain within the strategic site.

7.46 Alternative option (1) may result in greater amounts of affordable housing being provided. An emphasis on residential development may also reduce pressures on the transport network and avoid morning and evening peaks in transport usage. However, a reduction in economic benefits is likely, along with a reduction in social cohesion and sense of community, associated with a lack of vibrancy. The latter may have a compound effect, by contributing to preventing the area from becoming a destination in its own right. There may also be a risk that Old Oak would be less vibrant, detracting from its placemaking. The reduction in employment capacity would mean that this policy would not be in conformity with the Mayor of London's Draft Revised London Plan 2014 figures.

7.47 Alternative option (2) would substantially reduce the development capacity of the strategic site. This is likely to adversely impact on the level of housing, including affordable housing, and employment and leisure opportunities. The reduced quantum in development is likely to impact upon the amount and quality of infrastructure required to permit effective place-making. This option would also have a significant severance effect, reducing the connectivity across the site and severing Old Oak South from Old Oak North and Wormwood Scrubs. The reduction in employment and homes capacity would mean that this policy would not be in conformity with the Mayor of London's Draft Revised London Plan 2014 figures.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Site Policy OORA2 – Old Oak South	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	0	✓	0	✓/?	✓	✓	✓/?	0	✓/?	✓	0	✓
<b>Alternative Option (1):</b> Land use should be weighted towards the provision of residential uses throughout the area.	?	0	0	✓/?	?/X	X	?	0	✓	0	0	X
<b>Alternative Option (2):</b> Rather than actively pursuing the relocation of the Crossrail and Intercity Express Programme depots, the policy would assume that these remain within the strategic site.	X/?	X	0	X	X	X	0	0	X	X	X	X

### Recommendation

Overall this policy is found to be generally sustainable however it is difficult to clarify the effect of this strategic site policy on the some of the sustainability objectives therefore it is recommended that more detailed sustainability appraisals are carried out for the key regeneration areas, for example as individual area planning frameworks are prepared or updated, and that appropriate appraisals accompany major planning applications.

### Strategic Site Policy OORA3 - Old Oak North

### **Strategic Site Policy OORA3 - Old Oak North**

**The Council will support the early development of the Old Oak North site. Proposals for the site should:**

- **Lead to the substantial provision of new housing, including affordable homes with supporting social and physical infrastructure. In addition, a major educational, health, arts, leisure or sports complex such as a football stadium would be supported if it helped to act as a catalyst for the regeneration of the area.**
- **Create new connections into the site, including over the Grand Union Canal into the Old Oak South site and new road connections off Scrubs Lane. Existing connections should be enhanced and the existing pedestrian bridge from Willesden Junction should be replaced by a new high quality pedestrian walkway and cycle route. Improvements should be secured to Willesden Junction station, including the creation of a new station entrance to the east.**
- **Provide a network of open spaces connecting the Grand Union Canal to Willesden Junction station.**
- **Ensure that taller buildings are located at points of townscape significance within the wider plan and respect the amenity of residential properties in the vicinity and the amenity and settings of the Grand Union Canal, St. Mary's and Kensal Cemeteries and Wormwood Scrubs.**

7.48 The provision of a substantial new housing, including affordable housing will contribute towards the achievement of the social justice objective.

7.49 The regeneration of this area is contingent on new connections being provided to enable access. As part of this, new connections are proposed which will increase access to the open space of the Grand Union Canal. New open spaces will also be provided in the area. New infrastructure for pedestrians will also be provided which will encourage physical activity.

7.50 The council would encourage a new educational institution if this would catalyse the regeneration of the area, this would have a positive effect on the education and skills sustainability objective.

7.51 The preferred policy states that proposals for new development should lead to the provision of substantial amounts of new housing including affordable housing. The provision of social and physical infrastructure to support new residential development in this strategic site area will contribute towards increasing local residents sense of community and social cohesion. The policy itself does not promote substantial new employment in this area. However the justification for this preferred option states that the north of the site may be suitable for mixed use development, which would include employment uses. There are likely to be some gains to employment in this part of the borough.

- 7.52 The preferred policy seeks to ensure that new development respects the amenity of nearby heritage assets and therefore has positive effect on heritage sustainability objective. Heritage values are proposed to be further protected by locating tall buildings towards the centre of the site further away from these assets.
- 7.53 The site is in relatively close proximity to Willesden Green Train station, encouraging people to travel using public transport. The development of mixed use developments to the north of the site will also further reduce people's need to travel further afield to access goods and services.
- 7.54 The planned intensity of development will maximise efficiencies in resource consumption in terms of land use, infrastructure provision and public transport effectiveness. Development in this area will bring both direct and indirect benefits to the local economy stemming from the new proposed mixed uses in the north of the site and the increase in the number of new residents.

#### **Alternative Options – Strategic Site Policy OORA3 (Old Oak North)**

- Retain both the European Metal Recycling (EMR) and Powerday waste recycling sites in the longer term.
- Not to encourage the development of a major educational, health, leisure or sports complex to act as a catalyst for regeneration.
- Rather than development in Old Oak North being residential led, the land use could be weighted towards the provision of employment.

- 7.55 For alternative option (1) development could still occur around the waste sites but the development capacity would be substantially reduced. This would be likely to adversely impact on development viability. The nature of the uses to be retained may also serve to preclude the development of the local economy, notwithstanding that these retained uses will continue to provide employment. The negative environmental impacts resulting from the waste sites would also remain. On the other hand retaining these sites in the longer term means that waste recycling will continue to be processed within the borough.
- 7.56 Alternative option (2) suggests not providing a major educational, health, leisure or sports complex in this strategic site area and this could have a negative impact on health, education and social cohesion sustainability objectives. Not providing this facility may delay regeneration as developers would instead have to rely on residential and commercial sales values, which would not be optimal until after the HS2 station opens.
- 7.57 Alternative option (3) is likely to lead to greater economic benefits but less housing including affordable housing. Focusing on employment may have a negative impact on the transport network with higher flows in the AM and PM peaks. Additionally, this option would not be in conformity with the Mayor of London's Draft Revised London Plan 2014 figures.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Site Policy OORA3 - Old Oak North	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	✓	✓/ ?	✓	✓/ ?	✓	✓	0	✓	✓	0	✓
<b>Alternative Option (1)</b> <i>Retain both the European Metal Recycling (EMR) and Powerday waste recycling sites in the longer term.</i>	X	X	0	X	X	?	0	X	?	0	0	?
<b>Alternative Option (2)</b> <i>The policy would not actively encourage the development of a major educational, health, leisure or sports complex to act as a catalyst for regeneration.</i>	?	X	X	?	X	X/?	0	0	?	0	0	X
<b>Alternative Option (3)</b> <i>Rather than development in Old Oak North being residential led, the land use would be weighted towards the provision of employment.</i>	?/X	?	?/ ✓	X	X	✓	0	?	?/X	0	0	✓

### Recommendation

Overall this policy is found to be generally sustainable however it is difficult to clarify the effect of this strategic site policy on the some of the sustainability objectives therefore it is recommended that more detailed sustainability appraisals are carried out for the key regeneration areas, for example as individual area planning frameworks are prepared or updated, and that appropriate appraisals accompany major planning applications.

### Assessing secondary, cumulative and synergistic effects

7.58 Strategic Policy OORA – Old Oak Regeneration Area is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 4, 5, 9, 14, 15, 18 and 19. It is predicted that the effects of the strategic policy OORA in terms of time frame is medium to long term. Effects of this policy will be permanent in implementation and have a direct impact on the Borough and secondary impacts on the surrounding area. This policy in conjunction with the implementation of other policies in the Draft Local Plan will have a significant positive cumulative effect in regenerating this area and maximising the opportunities to improve and provide new social, physical and environmental infrastructure and contribute substantially in the provision of new homes and jobs in the Borough.

- 7.59 Strategic Site Policy OORA1 – Old Oak Common Station is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 4, 5, 14, and 18. It is predicted that the effects of Strategic Site Policy OORA1 in terms of time frame is medium to long term. Effects of this policy will have a permanent effect which will be felt by the local community and by those using the station. It will have a direct impact by providing people with different modes of transport and encouraging the use of sustainable modes of transport will have a direct impact on health. Combined with other borough wide policies in the Draft Local Plan, aimed at increasing resource efficiency, there will be a synergistic effect as the implementation of this policy will help contribute towards reducing the impact climate change has on the borough.
- 7.60 Strategic Site Policy OORA2 – Old Oak South is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 4, 5, 14, and 18. The establishment of a new urban quarter around the planned Old Oak Common station is largely dependent on the relocation of the Crossrail depots and Intercity Express Programme depot. It is predicted that the effects of Strategic Site Policy OORA2 in terms of time frame is medium to long term. This policy in conjunction with other policies in the Draft Local Plan will have a cumulative impact on many of the sustainability objectives as it will deliver a significant amount of new housing and job opportunities in this deprived area. It will have a direct effect on sustainability objectives such as health as the policy promotes connectivity to open spaces and encourages sustainable modes of transport.
- 7.61 Strategic Site Policy OORA3 – Old Oak North is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 13, 14, 15, 16 and 18. It is predicted that the effects of this policy in terms of time frame is medium to long term. The preferred option will have a permanent and direct effect on the majority of the sustainability objectives. Old Oak North has the potential to contribute to a new open space network and this will have synergistic effect in relation to health, the environment, transport and pollution.

### **Strategic Policy- White City Regeneration Area**

#### **Strategic Policy WCRA - White City Regeneration Area**

<b>Indicative additional homes</b>	<b>Indicative new jobs</b>
<b>6,000</b>	<b>10,000</b>

**The Council will work to secure the comprehensive regeneration of WCRA, in particular the creation of a new high quality mixed-use development in White City East, along with the creation of a major educational facility with supporting retail, community facilities and open space; the regeneration of the historic Shepherd's Bush Town Centre; and the phased renewal of the estates. In order to achieve this, the Council will:**

- Work with the GLA, TfL, other strategic partners, and landowners to secure the comprehensive regeneration of the area;
- Actively engage with local residents and community groups to ensure that the regeneration delivers benefits for the surrounding area; and
- Work with the community and local enterprises, to establish ongoing partnerships and initiatives to provide sustainable public sector service delivery in the area.

**Proposals for development in WCRA should:**

- Contribute to the provision of 6,000 new homes across a variety of tenures and 10,000 jobs, mainly within White City East, but also in smaller scale developments elsewhere in White City West and in the town centre;
- Provide commercial uses within a new mixed-use area in White City East, capitalising on existing activities in the area including creative, media and bio-technology sectors;
- Include educational use, together with a limited amount of student accommodation;
- Sustain regeneration of the historic town centre, by locating retail activities within the town centre. Major leisure and retail that cannot be located within the town centre may be appropriate north of Westfield on the edge of the existing town centre boundary;
- Improve the vitality of the important Shepherd's Bush Market;
- Provide appropriate social, physical, environmental and transport infrastructure to support the needs arising from the development of WCRA as a whole and create new sustainable communities;
- Support the maintenance of existing green space and encourage the creation of new green space;
- Secure economic benefits for the wider community by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;
- Improve connections to existing communities, including between White City West, the town centre and east to RBKC to improve both north-south and east-west connectivity within the WCRA and connections to the wider area;
- Ensure that development extends and integrates with the urban grain and pattern of development in the WCRA and its surrounding area; and
- Ensure that new development respects the scale of adjoining development along its edges, but with increased massing towards the centre of the site.

The scale should be generally medium rise and aim to meet the regeneration objectives of the area. A limited number of tall buildings of exceptionally good design may be acceptable especially in locations close to the A40 and A3220 where they are not considered to have a detrimental impact on the

**setting of listed buildings, the character and appearance of the Wood Lane conservation area, or the setting of other neighbouring conservation areas and the local area in general.**

- 7.62 The preferred policy will make a positive contribution towards achieving the social justice objective by pursuing the phased renewal of housing estates in the White City Regeneration Area (WCRA) and providing new housing across a variety of tenures to provide alternative accommodation choice. The mix of housing in the regeneration areas will be determined by the Local Plan's housing policies, in particular Borough-wide policy HO3 Affordable Housing which seek to provide new affordable homes for local residents to buy or rent.
- 7.63 The preferred policy promotes the development of educational institutions and associated student housing. Additionally, it states that new developments should provide programmes to enable local people to access new job and business enterprise opportunities through training, local apprenticeships and targeted recruitment. These initiatives are likely to have a positive impact upon education and skills sustainability objective and raise the standard of achievement at all ages.
- 7.64 The preferred policy states that new development should provide new homes across a variety of tenures. The quantum of the affordable housing will be determined by Borough-wide Policy HO3 Affordable housing which requires 40% of new homes to be affordable and therefore estimates on the likely amount of new social housing are not able to be determined at this point. The draft Local Plan's objective is to protect social housing and provide new affordable homes for local residents to buy or rent.
- 7.65 The preferred policy aims to attract significant investment in mixed use developments, commercial, retail and leisure uses and also seeks to sustain the vitality of both the Shepherd's Bush historic town centre and the Shepherd's Bush market. Ensuring the viability of these important social and cultural centres will contribute to the sense of community and social cohesion among locals and assist in helping to achieve this objective.
- 7.66 The preferred policy aims to provide 10,000 jobs in the WCRA created through the creation of a wide range of different roles including in retail, office, creative industries and education. It also seeks to further capitalise on the area's existing strengths in the creative, media and bio-technology sectors.
- 7.67 The preferred policy seeks to ensure the sustained vitality and vibrancy of the Shepherd's Bush historic town centre by actively prioritising retail activities within the town centre. Those retail activities that cannot be located within the town centre may be appropriate for location on the edge of the existing town centre.



- 7.68 The preferred policy requires development proposals to provide appropriate transport infrastructure to support the needs arising from the development as a whole. The justification for this preferred policy supports improved connectivity for cycling and walking and increasing the capacity of public transport modes rather than measures aimed at furthering car dependency. This is likely to reduce greenhouse gas emissions and therefore contribute towards reducing the impacts of climate change.
- 7.69 The policy aims to create 6000 new homes and 10,000 new jobs in the WCRA by adopting a range of measures including promoting a diverse range of commercial uses, capitalising on the area's unique employment sectors, and seeking training and apprenticeships for local people as part of the development approval process. These measures are likely to have a significant positive impact on the local economy.

<p><b>Alternative Options – Strategic Policy WCRA (White City Regeneration Area)</b></p> <ul style="list-style-type: none"> <li>• Develop an updated SPD for the area.</li> <li>• Extend the regeneration area boundary and exclude the area of land to the west and/or the town centre from the regeneration area boundary.</li> </ul>
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7.70 Alternative option (1) suggests an update of the White City Opportunity Area Planning Framework SPD. This will be needed to reflect the revised policy position set out in the adopted Local Plan and ensure the SPD is in conformity with its policies. Thus at this stage, it is difficult to appraise this alternative option and be certain of its effects until the SPD is revised and is subjected to a further SA. The current SA of the White city Opportunity Area Planning Framework SPD is available to view on the Council's website, *White City Opportunity Area Planning Framework, Integrated Impact Assessment, October 2013 (Greater London Authority and London Borough of Hammersmith & Fulham)*  
[http://www.lbhf.gov.uk/Directory/Environment\\_and\\_Planning/Regeneration/Regeneration\\_projects/122809\\_White\\_City\\_Opportunity\\_Area\\_planning\\_framework.asp](http://www.lbhf.gov.uk/Directory/Environment_and_Planning/Regeneration/Regeneration_projects/122809_White_City_Opportunity_Area_planning_framework.asp)

7.71 Alternative option (2) proposes to extend the regeneration area boundary and exclude the area of land to the west and/or the town centre from the boundary. It is difficult to assess this option because it does not provide information on what exactly would be provided in the existing WCRA. There is no evidence that the existing regeneration boundary is unsatisfactory. To exclude the town centre would divorce it from the rest of the regeneration area and would detract from the possibility of achieving a comprehensive approach to regeneration of this area. Excluding land in the west would similarly reduce the opportunities to bring multiple benefits to this regeneration area.

POLICY OPTIONS	SA OBJECTIVES
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<b>Strategic Policy WCRA - White City Regeneration Area</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	0	✓/?	✓/?	✓	✓	✓	0	✓	0	✓	✓
<b>Alternative Option (1)</b> <i>Develop an updated SPD for the area.</i>	?	?	?	?	?	?	?	?	?	?	?	?
<b>Alternative Option (2)</b> <i>Extend the regeneration area boundary and exclude the area of land to the west and/or the town centre from the regeneration area boundary.</i>	?	?	?	?	?	?	?	?	?	?	?	?

### **Recommendation**

When the White City Opportunity Area Planning Framework SPD is updated to reflect the revised adopted policies in the Local Plan then its sustainability appraisal will need to be updated accordingly.

## **Strategic Site Policy WCRA1 - White City East**

### **Strategic Site Policy WCRA1 – White City East**

**The council will seek regeneration in White City East for a mixed-use urban quarter within a high quality environment.**

**Proposals for development in White City East should:**

- be mixed use providing housing, employment and community uses, creative industries and a major educational hub, leisure facilities as well as small-scale retail;
- provide large amounts of housing for residents across all tenures, house sizes and affordability;
- ensure that on sites primarily developed for higher educational purposes, that a mix of uses is provided, including non-student accommodation and other non-educational uses;
- provide retail to meet the day to day needs of development. Any retail provision exceeding day to day needs should be provided adjacent to Shepherd's Bush Town Centre;
- demonstrate how the proposal fits within the context of a detailed masterplan, and how it integrates and connects with the surrounding context. There should be improved permeability and access between Westfield and areas north in the WCRA, particularly through areas of public open space;

- **provide a network of green corridors and public open spaces including a local park located centrally of approximately 2ha in size;**
- **ensure that development provides high quality places for living and working that are well integrated with, and respect the setting of, the surrounding area;**
- **retain those parts of the BBC TV Centre which have historic and/or architectural interest. The Centre's setting should be integrated with the surrounding public realm, providing connectivity to the east, west and south of the site; and**
- **contribute proportionally to the achievement of the objectives and policies for the area; to the overall provision of social and physical infrastructure such as: a health centre, educational facilities, public open space, employment training and recruitment programmes, community facilities, a decentralised energy network and other necessary improvements to the transport infrastructure to enable the White City Regeneration Area to be developed to its potential.**

7.72 The preferred policy option will assist in contributing towards the social justice objective by pursuing the phased renewal of housing estates in the White City Regeneration Area (WCRA) and providing new housing across all tenures, house sizes and affordability.

7.73 The creation of new open space, including a centrally located park and the development of a network of green corridors is likely to encourage physical activity, and positively impact on physical and mental health of the community and contribute towards achieving the health objective.

7.74 The policy aims for the provision of the development of a major higher educational hub in the area and this will have a positive impact on the education and skills sustainability objective.

7.75 It is predicted that there will be a positive effect on the affordable housing as this policy seeks proposals to provide large amounts of new residential development across all tenures, house sizes and affordability. However it is difficult to ascertain the full effect as proposals will need to adhere to the requirements of the Borough-wide HO3 Affordable Housing policy which requires 40% affordable housing for new developments with 60% of additional affordable housing for social or affordable renting.

- 7.76 The policy contains a number of provisions which collectively will increase local residents' sense of community and social cohesion. These provisions include the emphasis on creating mixed use communities and providing a range of services to meet the everyday needs of the community, the provision of a range of different housing types, tenures and sizes and the creation of a new open space and network of green corridors. A commitment to a high quality urban design, protection of heritage assets and careful location of tall buildings to create a distinct character.
- 7.77 The preferred policy option will have a positive impact on the heritage sustainability objective by preserving heritage assets by retaining those parts of the BBC TV Centre which have historic and/or architectural interest. Tall buildings will also be located in areas to minimise adverse effects on conservation areas and important views.
- 7.78 The mixed use regeneration of the area providing housing, employment and community uses, creative industries, educational and leisure facilities is likely to boost the local economy.
- 7.79 The effect of the preferred policy on the pollution, transport, resources and climate change sustainability objectives are dependent on implementation of the policy.

<p><b>Alternative Options – Strategic Site Policy WCRA1 (White City East)</b></p> <ul style="list-style-type: none"> <li>• Separate planning development of individual sites east of Wood Lane.</li> <li>• Encourage predominantly employment or housing with little mix.</li> </ul>
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- Separate planning development of individual sites east of Wood Lane.
- Encourage predominantly employment or housing with little mix.

Alternative option (1) proposes separate planning development of individual sites east of Wood Lane. Therefore it is difficult to appraise this option at this stage. However it can be assumed that this option would result in a piecemeal approach to development of this regeneration site and reduces the advantages that a masterplanning approach would provide.

- 7.80 The provision of additional employment will have a positive impact on the local economy and provide an opportunity for local employment for existing residents. It may encourage investment and improve the prospects for regeneration of the surrounding area. Similarly a housing led development would have benefits in terms of providing decent and affordable homes. Alternative option (2) however, would not have the same level of benefits as the preferred option as it is not providing a mixed use development and the overall impact on housing and the economy would be dependent on which sector has the predominant land use therefore many of the effects of this policy on the sustainability objectives are uncertain. Impacts will arise from increased traffic movements and resource use from both additional employment and/or housing and are likely to be detrimental unless carefully managed.

POLICY OPTIONS	SA OBJECTIVES
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<b>Strategic Site Policy WCRA1 - White City East</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	✓
<b>Alternative Option (1):</b> <i>Separate planning development of individual sites east of Wood Lane.</i>	?	?	?	?	?	?	?	?	?	?	?	?
<b>Alternative Option (2):</b> <i>Encourage predominantly employment or housing with little mix.</i>	?	0	0	?	?	?	?	?	?	?	?	?

### Strategic Site Policy WCRA2 - White City West

#### Strategic Site Policy WCRA2 - White City West

The council will work with estate residents and other stakeholders to secure the renewal of the estates and the creation of a sustainable community. Development proposals within this strategic site should:

- Support employment and skills training opportunities to assist residents in obtaining local jobs
- Enable existing residents to remain in the area, providing a more sustainable community through provision of new housing with a mix of tenures and sizes of units that enable greater housing choice;
- Provide an appropriate level of social, environmental, transport and physical infrastructure and co-locate facilities where this will make the most efficient use of infrastructure;
- Assist in providing a permeable street pattern that is well integrated with the surrounding area; and
- Enable the continuation of some commercial uses in areas less suitable for residential purposes.

If either the Loftus Road Stadium or Territorial Army (TA) Centre come forward for redevelopment, the council will seek residential led development. On the Loftus Road site, in particular, there should be provision of community facilities and open space.

- 7.81 The preferred policy seeks to regenerate the White City Estate by promoting refurbishment and/or redevelopment. The policy aims to ensure that existing residents of the estate remain in the area and are provided with the option of moving into better quality new accommodation as part of any estate redevelopment scheme. Prima facie this policy approach has the potential to increase equity and social justice for deprived communities in the area. However, the actual benefits are dependent on implementation of the policy.
- 7.82 The preferred policy aims to secure the renewal of the estates by providing a greater choice of housing through a mix of tenures and sizes. As such, implementation of the policy will assist in meeting the affordable homes sustainability objective.
- 7.83 The preferred policy's purpose is to regenerate the White City Estate in order to create a mixed and balanced community. In doing so, the policy seeks to provide new housing with a mix of tenures and sizes. This is likely to act as a catalyst in altering the social composition of the estate community in terms of demographics and socio-economic background. The impacts of this change on social cohesion are difficult to predict. However, it is reasonable to surmise that the change is likely to have a beneficial impact on the key indicators of deprivation.
- 7.84 The preferred policy states that development proposals for this site should support employment and skills training opportunities. This will have a positive effect on the education and skills and satisfying work sustainability objectives.

#### **Alternative Options – Strategic Policy Site WCRA2 (White City West)**

- Not to seek a comprehensive approach to planning this area and allow piecemeal development and improvements on the estates as opportunities arise.
- Consider any proposals for either the QPR ground or TA Centre separately that might be put forward.

- 7.85 It is difficult to appraise alternative option (1) at this stage hence the effects of this option is uncertain. However it could be predicted that this approach would only provide limited opportunities for providing the appropriate infrastructure needed. In terms of impacts on the environment, it may be a less resource intensive option, however there will be limited opportunity with a piecemeal approach.
- 7.86 Alternative option (2) will improve living conditions for some householders over time by reducing the number of unfit homes but would not contribute to any of the economic sustainability objectives. The overall social benefits will be fewer than with the preferred option as there will no large increase in housing, (unless the QPR and/or TA Centre land becomes available) and less opportunity for providing local services and facilities.

POLICY OPTIONS	SA OBJECTIVES
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<b>Strategic Site Policy WCRA2 - White City West</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓/?	0	✓/?	✓	✓/?	✓	0	0	0	0	0	0
<b>Alternative Option (1):</b> <i>Not to seek a comprehensive approach to planning this area and allow piecemeal development and improvements on the estates as opportunities arise.</i>	?	?	?	?	?	?	?	?	?	?	?	?
<b>Alternative Option (2):</b> <i>Consider any proposals for either the QPR ground or TA Centre separately that might be put forward.</i>	?	?	?	✓	?	0	0	?	0	?	?	0

### **Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land**

#### **Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land**

The Council will continue to support and work with existing traders for the retention and improvement of Shepherd's Bush Market to provide a more vibrant mix of town centre uses, retaining accommodation for existing market traders and traders along Goldhawk Road.

Development proposals for this strategic site should:

- Retain and improve the market, including its layout, to create a vibrant, mixed use area; include additional leisure uses, offices and residential development to ensure a more vibrant mix; and
- Consider including adjacent Pennard Road Laundry site in any development scheme and land to the west of the market off Lime Grove.

7.87 The preferred policy aims to regenerate the Shepherd's Bush Market by providing a mix of town centre uses. This will increase employment opportunities and should also contribute to reducing unemployment in the borough.

7.88 The proposed regeneration may result in a material change to the existing appearance, layout and character of the Shepherd's Bush Market. If so, this would represent the loss of an area of cultural value.

7.89 The proposed regeneration of the market and surrounding areas will increase the efficiency and intensity of land use, creating more employment and enabling an increase in the number of people living in the area, which would improve the local economy.

**Alternative Options – Strategic Site Policy WCRA3 (Shepherds Bush Market and adjacent land)**

- Allow the market to continue in its existing form and encourage refurbishment by Transport for London. No other change to adjacent properties, but develop the Pennard Road site for housing.

7.90 The alternative option retains the historic use of the market, however it does not invest in the market and is therefore less likely to improve the sustainability of the local economy and contribute towards its long term viability. Keeping the market in its current form is limiting, the site is cramped and therefore opportunities to maximise space and improve the public realm would not be utilised. Allowing the Pennard Road site to be developed for housing will provide additional homes which are in close proximity to local services but it will not increase opportunities for long term employment.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	0	0	0	0	0	✓	x/ ?	0	0	0	0	✓
<b>Alternative Option (1):</b> <i>Allow the market to continue in its existing form and encourage refurbishment by Transport for London. No other change to adjacent properties, but develop the Pennard Road site for housing.</i>	0	0	0	✓	0	0	?	✓	0	0	0	?



## Assessing secondary, cumulative and synergistic effects

- 7.91 Strategic Policy WCRA – White City Regeneration Area is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 3, 4, 7, 8, 9, 14, 18 and 19. It is predicted that the effects of Strategic Policy WCRA in terms of time frame is medium to long term. The policy is likely to have a permanent and direct effect on a number of the sustainability objectives. The provision of 10,000 new jobs in this regeneration area will have both a cumulative and synergistic effect for the satisfying work and sustainable economy sustainability objectives.
- 7.92 Strategic Site Policy WCRA1 – White City East is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 4, 7, 9, 14, 15, 18 and 19. It is predicted that the timeframe of the effect of Strategic Site Policy WCRA1 will be medium to long term. It's also predicted that the effects of this proposed policy will be both permanent and direct in its impact. The provision of a new mixed use development along with new public open space is likely to have a cumulative effect on this regeneration area.
- 7.93 Strategic Site Policy WCRA2 – White City West is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 3, 9, and 19. It is predicted that the timeframe of the effect of Strategic Site Policy WCRA2 will be medium to long term. It's also predicted that the effects of this proposed policy will be both permanent and direct in its impact on the existing residents living at White City Estate.
- 7.94 Strategic Site Policy WCRA3 – Shepherd's Bush Market and adjacent land is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 5, 6 and 8. It is predicted that the timeframe of the effect of Strategic Site Policy WCRA3 will be medium to long term. It is expected that the effects of this preferred options policy will have both a permanent and direct effect on the satisfying work, heritage and sustainable economy sustainable objectives.

### Hammersmith Regeneration Area

#### Strategic Policy HRA – Hammersmith Regeneration Area

Indicative additional homes	Indicative new jobs
2,800	10,000

The Council will encourage the regeneration of Hammersmith town centre and seek development that builds upon the centre's major locational advantages for office and retail development. Opportunities will be taken to secure more modern accommodation, to continually improve the environment and public realm, and to improve access between the town centre and the Thames. In order to achieve this, the Council will:

- Work with the GLA, TfL, other strategic partners, including the Hammersmith BID and landowners to secure the regeneration of the area;

- **Actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area;**
- **Support the continuation of Hammersmith as a major town centre with a wide range of major retail, office, local government services, leisure, arts, entertainment, community facilities and housing;**
- **Promote the continued regeneration of Hammersmith Town Centre by actively encouraging the improvement of the Kings Mall and other retail in this part of the town centre, and the range and quality of independent and specialist shops;**
- **Promote the continuation of the town centre as a key strategic office location, through provision of modernised office blocks;**
- **Support proposals for the regeneration of the western part of the town centre around the Town Hall;**
- **Support proposals that expand Hammersmith's arts and leisure offer, capitalising on the existing facilities such as Hammersmith Apollo, Lyric Theatre, St Pauls Green, Lyric Square, Riverside Studios and the river front;**
- **Promote and support the replacement of the flyover and section of the A4 with a tunnel; and**
- **Return the Hammersmith Gyratory to two way working provided that this can be done without unacceptable traffic and environmental costs in the neighbouring areas.**

**Proposals for development in the HRA should:**

- **Improve pedestrian and cycle connectivity with the River;**
- **Improve the range and quality of independent and specialist shops and services, as well as leisure services;**
- **Provide appropriate social, physical, environmental and transport infrastructure to support the needs arising from the development of HRA;**
- **Secure economic benefits for the wider community around the Hammersmith Regeneration Area by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;**
- **Seek the creation of a high quality urban environment, with public spaces, architecture and public realm of the highest quality, that is sensitively integrated into the existing context;**
- **Improve and enhance St Pauls Green and Furnivall gardens and their connections to the rest of the regeneration area; and**
- **Ensure that feeder roads to the gyratory are not widened or properties demolished as part of these plans.**

- 7.95 The preferred policy option promotes the tunnelling of the Hammersmith Flyover and parts of the A4. If the 'flyunder' is implemented and additional connections to the river are also developed, connectivity to the River will improve, encouraging people to increase passive and active use of the riverside walk. This may contribute to improved quality of life and associated health outcomes.
- 7.96 The policy refers to the provision of a wide range of new housing development in the regeneration area. The regeneration area has the potential to provide affordable housing. The amount of affordable housing will be determined by the Borough-wide policy HO3 Affordable housing which requires 40% affordable housing for major housing developments. However, the justification does refer to all new housing developments will be expected to contribute to creating a more sustainable community and provide housing for people on low to middle incomes.
- 7.97 Around 2,800 new homes are proposed in this regeneration area. It is important that necessary social infrastructure including but not limited to community and health facilities are also provided to meet the needs of the local community. The preferred policy option refers to supporting a wide range of facilities including community facilities and for development proposals to provide appropriate social, physical, environmental and transport infrastructure. The justification text refers to likely need for new schools to be provided.
- 7.98 The policy aims to create 10,000 new jobs in the regeneration area, covering a wide range of sectors but principally focusing on office development. This is likely to increase the opportunities for relatively well paid service sector work. New development will increase local employment opportunities and provide training programmes for local people to access new jobs. This will have a positive effect on the satisfying work sustainability objective.
- 7.99 The policy seeks to further capitalise on the strong tradition of arts, culture and entertainment in the regeneration area by supporting proposals that seek to expand these sectors. New development will have to be of a high quality design and sensitively integrated into the existing context. Proposals for tall buildings will need to have regards to the Borough-wide Policy DC3 Tall Buildings.
- 7.100 The policy also expressly protects nearby heritage assets by limiting the areas within the regeneration area where tall buildings may be situated. However, details of the precise locations of tall buildings are yet to be identified. As such, it is difficult to accurately assess the sustainability impacts of this particular initiative.
- 7.101 The policy aims to create 10,000 new jobs in the regeneration area, in a number of different sectors, but principally in the service sector. Retail sector development will also be encouraged in order to maintain the town centre's status and to enable it to better compete in the London wide retail market. The policy also aims to create around 3000 new homes in the regeneration area. The influx in the local population will help to sustain the local economy further and contribute to its long term sustainability.

### Alternative Options – Strategic Policy HRA (Hammersmith Regeneration Area)

- Not to pro-actively promote development and, in particular, not to promote the strategic development sites. Sites would be dealt with as they come forward.

7.102 The alternative option would not actively promote development could fail to maximise the opportunity for public realm improvements particularly around the Hammersmith Town Hall and the riverside sites. It could lead to a piecemeal approach to redevelopment and not provide the same overall benefits in terms of additional housing, improved shopping facilities and office accommodation. It is difficult to appraise this option in the matrix as it is uncertain which sites will come forward for redevelopment.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Policy HRA – Hammersmith Regeneration Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b>  <i>See policy wording above.</i>	0	✓/ ?	0	✓	✓	✓	?	0	0	0	0	✓
<b>Alternative Option (1):</b> Not to pro-actively promote development and, in particular, not to promote the strategic development sites set out below. Sites would be dealt with as they come forward.	?	?	?	?	?	?	?	?	?	?	?	?

### Recommendation

Most of this area is at risk from tidal flooding and is in Flood Zone 3a. As such specific Flood Risk Assessments will be required for any planning application and more vulnerable uses will need to pass the Exception Test in accordance with National Planning Policy Framework and national Planning Practice Guidance.

### Strategic Site Policy HRA1: Town Hall Extension and adjacent land, Nigel Playfair Avenue

#### Strategic Site Policy HRA1 - Town Hall Extension and adjacent land, Nigel Playfair Avenue

The council will work with partners to upgrade the Town Hall Extension and neighbouring land to provide refurbished or replacement council offices of high quality design along with a mix of other uses to contribute to the improvement of the area at street level. Proposals will be expected to:

- Include replacement council offices and a mix of town centre uses, including retail, employment and housing;
- Provide an active frontage along King Street, complementing the core

**shopping area and helping to improve the economic health of the western part of the town centre;**

- **Improve the area at street level by either opening up the Grade II listed Town Hall frontage and creating a new public space or refurbishing the Extension building and including an area of civic space;**
- **Provide space for a cinema;**
- **Improve links with Furnivall Gardens and the river; and**
- **Ensure building height is generally consistent with the existing height in the townscape, having particular regard to the civic significance of the site and the importance of enhancing the contribution and setting of the Grade II listed Town Hall building and respecting views along the river.**

7.103 The preferred option will lead to improved connectivity between Hammersmith town centre and the river Thames, this will encourage people to increase passive and active use of the riverside walk. This may contribute to improved quality of life and associated health outcomes.

7.104 This site has the potential to deliver affordable housing. The amount of affordable housing will be determined by the Borough-wide policy HO3 Affordable Housing.

7.105 The preferred option aims to either replace or refurbish the existing Town Hall extension building in order to highlight the Grade II Town Hall building. The heritage aspects of the area will also be protected by the imposition of height restrictions on any new building replacing the existing town hall extension.

7.106 The preferred policy option aims to improve the economic health of this part of the Town Centre by supporting the provision of an active frontage, which would include a mix of retail units along King Street. The council has also indicated its support for an anchor retail store in the area which could act as the catalyst for further development. These initiatives are likely to improve the sustainability of the local economy.

#### **Alternative Options – Strategic Site Policy HRA1 (Town Hall Extension and adjacent land, Nigel Playfair Avenue)**

- Demolish the Town Hall Extension and provide alternative offices on Nigel Playfair Avenue car park, but not include the cinema site and the Pocklington Estate on Cromwell Avenue in the development.
- Restrict the development site to the car park but replace the Town Hall Extension with additional offices and/or housing.

7.107 Alternative option (1) would have the benefit of improving the appearance of the area and potentially greater community services, but none of the additional benefits from retail, housing and increased accessibility to the river would accrue. This alternative option would also be unlikely to complement the core shopping areas or sufficiently attract people to the west end of King Street, assisting in its economic viability.

7.108 The lack of a comprehensive approach in alternative option (2) may lead to a less well integrated development and miss opportunities for a zero carbon development and linkages with the Thames. It would provide housing in the town centre but it would not enhance the local heritage by improving the setting of the Town hall listed building.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Site Policy HRA1 - Town Hall Extension and adjacent land, Nigel Playfair Avenue	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Preferred Option:  <i>See policy wording above.</i>	0	✓/ ?	0	✓	?/ ✓	✓	?	0	0	0	0	✓
<b>Alternative Option (1):</b> <i>Demolish the Town Hall Extension and provide alternative offices on Nigel Playfair Avenue car park, but not include the cinema site and the Pocklington Estate on Cromwell Avenue in the development.</i>	?/ ✓	0	0	x	x	x	?/ ✓	0	0	0	0	?
<b>Alternative Option (2):</b> <i>Restrict the development site to the car park but replace the Town Hall Extension with additional offices and/or housing.</i>	0	0	0	✓	0	✓	0	0	0	0	0	✓

## Strategic Site Policy HRA2– King Street East

### Strategic Site Policy HRA2– King Street East

The Council will encourage proposals for this strategic site that improve the quality of the town centre. Proposals should:

- Increase the vitality and viability of the centre through increasing the range of retail unit sizes and town centre uses;
- Provide further office uses to retain a strong commercial role for Hammersmith Town Centre;
- Include additional housing;
- Enhance the attractiveness of, and access to retail at the King's Mall and its appearance on King Street;
- Improve the southern side of King Street to enhance the centre's retail offer and provide pedestrian links from King Street toward the River Thames;
- Support and encourage further growth of the area's arts, culture and leisure offer;
- Improve the town centre environment, through public realm, pedestrian

**linkages and shopfront improvement;**

- **Provide adequate social, physical, environmental and transport infrastructure to support the needs of development; and**
- **Respond to the prevailing height in the town centre and respect the existing townscape and historic context and make a positive contribution to the skyline.**
- **Retain within the site the social rented accommodation in the Ashcroft Square Estate.**

7.109 The preferred option will provide better connectivity to the river Thames will encourage people to increase passive and active use of the riverside walk. This may contribute to improved health outcomes.

7.110 The preferred policy option encourages housing and has the potential to provide new affordable housing in this area. The amount of affordable housing will be determined by the Borough-wide policy HO3 Affordable Housing which requires 40% affordable housing provision for major housing developments. The policy supports the retention social rented accommodation at Ashcroft Square council housing estate.

7.111 The preferred policy's overarching objective is to improve the quality of the town centre. A number of initiatives are proposed to help achieve this objective, which would also increase local residents' sense of community and 'sense of place.' These initiatives include increasing active street frontages by encouraging more retail activity and greatly improving the town centre environment, public realm and pedestrian linkages.

7.112 The preferred policy proposes to increase large scale office development within the site. This will increase the opportunities for relatively well paid service sector employment.

7.113 New development in this regeneration area will improve the townscape and contribute towards improving the local environment. The policy proposes that new developments should respond to the prevailing height of buildings in the town centre and make a positive contribution to the skyline. Careful consideration will need to be given to minimise any adverse impacts on nearby heritage assets arising from any tall building construction.

7.114 The preferred policy aims to regenerate and revitalise the economy of the immediate area by encouraging new retail and office development along with some increases in residential development. These initiatives are likely to stimulate and sustain the economic development of the area.

#### **Alternative Options – Strategic Site Policy HRA2 (King Street East)**

- Focus on only upgrading the retail element in this area.
- Comprehensive redevelopment of the shopping centre site.
- Encourage development to be residential rather than office led.
- Prohibit tall buildings that exceed the height of existing buildings.



7.115 Alternative option (1) would have a beneficial impact on local employment and the local economy. The vitality and vibrancy of the area is also likely to be improved. However, this option fails to consider opportunities to improve the mix and type of housing in this area and does not seek to protect social rented housing.

7.116 Alternative option (2) is likely to exacerbate the decline in retail provision along King Street, the impacts of which will result in less active frontages on this street and could contribute to further negative impacts on footfall and perceptions of increased risks to public safety. It also misses out on the opportunity to encourage further growth of the area's arts, culture and leisure offer in Hammersmith town centre.

7.117 Alternative option (3) proposes to encourage new residential development in this area. However, a number of adverse implications are likely from implementing this particular policy approach. Firstly this will result in an undermining of the investment that has already taken place to improve the attractiveness of the retail offer on the site. Secondly the shopping centre provides a range of everyday items for local people and plays an important role in creating a 'critical retail mass' in making the town centre a sustainable, attractive shopping destination. This could disproportionately disadvantage people who are less mobile and may also contribute to increased private car use on local roads, with associated air quality and traffic impacts. It would also mean that benefits of supporting office development would not be realised and opportunities for providing relatively well paid service sector employment would be missed.

7.118 Alternative option (4) proposes prohibiting tall buildings in the town centre that exceed the prevailing height of existing buildings. This option would help ensure that adverse amenity impacts on neighbouring heritage areas are minimised. However, this policy may serve to be overly restrictive and stifle creative design and/or the sustainability of the local economy. A more sustainable outcome would suggest a more flexible and fine grained approach to the identification of sites that may be suitable for tall buildings.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Site Policy HRA2– King Street East	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	0	✓	0	✓	✓	✓	✓	0	0	0	0	✓
<b>Alternative option (1):</b> <i>Focus on only upgrading the retail element in this area.</i>	x	0	0	?/x	?	✓	0	0	0	0	0	✓
<b>Alternative option (2):</b> <i>Comprehensive redevelopment of the shopping centre site.</i>	0	0	0	0	?/x	x	?/x	0	0	0	0	x



<b>Alternative option (3):</b> <i>Encourage development to be residential rather than office led.</i>	x	x	0	0/?	x	?	0	0	0	0	0	x
<b>Alternative option (4):</b> <i>Prohibit tall buildings that exceed the height of existing buildings.</i>	0	0	0	?	0	?	?/ ✓	0	0	0	0	?

### **Strategic Site Policy HRA3: A4, Hammersmith Flyover and adjoining land**

#### **Strategic Site Policy HRA3: A4, Hammersmith Flyover and adjoining land**

The Council will work with Transport for London and other stakeholders to replace the Hammersmith Flyover (A4) with a tunnel, thereby releasing land for development that will contribute to the social, environmental and economic regeneration of Hammersmith town centre.

The council will expect any proposal to remove the Hammersmith Flyover and a section of the A4 and replace it with a tunnel to:

- result in the release of land formerly occupied by the Flyover and its approaches for redevelopment;
- ensure that there will be no detrimental impact on the flow of traffic on this strategic route and no increase in levels of traffic congestion in Hammersmith Regeneration Area and the surrounding road network, minimising the displacement impact;
- develop and improve the quality and safety of pedestrian and cycle routes, particularly those connecting Hammersmith Town Centre to the riverside;
- improve the quality of the environment of Hammersmith town centre and its environs by removing high levels of noise, vibration and air pollution;
- ensure that the tunnel entrances and exits have a minimal impact on the amenity of nearby residents;
- minimise disruption during construction; and
- reconfigure the Hammersmith Gyratory to provide an improved traffic solution for road users.

Development proposals for the strategic site released by the tunnel should:

- provide for mixed-use redevelopment, including housing for local people across a range of tenures and affordabilities, employment, hotels, retail and arts, cultural and leisure facilities and supporting infrastructure;
- improve and enhance St Paul's Green and Furnivall Gardens and their connections with the rest of the regeneration area;
- provide new areas for public open space and improve physical connections between the town centre and the riverside; and
- be of a coherent urban design that has regard to the setting and context of the regeneration area.

- 7.119 The preferred option will result in more housing, employment, culture and retail facilities and supporting infrastructure. New public open spaces will also be created. Environmental quality will also be improved. These developments will all increase equity and social justice by helping to improve the quality of life of all people in the area impacted by the policy.
- 7.120 The preferred option seeks to ensure that noise, vibration and air pollution are minimised as far as possible within the Hammersmith Town Centre. This is likely to have a positive benefit on the health of people living and working within this town centre.
- 7.121 Subject to the quantum of housing, there may be a need for new educational facilities to be built therefore there could potentially be a positive impact on the education and skills sustainability objective.
- 7.122 This option seeks to develop additional housing across a range of affordabilities and tenures for local people on the flyover site. This could potentially entail the provision of an increased number of affordable homes in accordance with the council's housing policies.
- 7.123 The preferred policy aims to replace the flyover with new development that includes essential social infrastructure and improved access to the river and town centre. Removing the flyover and replacing it with a tunnel is also likely to help resolve the current severance and pollution issues facing the town centre. The provision of cycle and pedestrian routes into the town centre and to the riverside will also enable better access into the public realm for people of all ages and abilities. These improvements are likely to increase local residents' sense of community and pride in the town centre and surrounding area.
- 7.124 The policy proposes to provide employment on the flyover site. This will increase the opportunities for relatively well paid service sector employment.
- 7.125 Although the preferred option does not specifically refer to the protection for heritage and conservation areas which may be impacted upon by the tunnel and associated infrastructure, new development will need to have regard to the setting and context of the regeneration area. Careful consideration will need to be given to minimise any adverse impacts on nearby heritage assets arising from the removal and replacement of the flyover.
- 7.126 It is uncertain at present whether the removal and replacement of the flyover with a tunnel will reduce the level of traffic related pollution (air, noise, vibration). Similarly, the policy does not offer robust protection of the amenity of people who are likely to be affected by the tunnel development both during and after construction.

7.127 It is likely that the tunnel will reduce the current severance effect in the town centre associated with large numbers of vehicles using the flyover. The tunnel option will remove the barrier the A4 creates in terms of access to the riverside along the east end of the town centre. It is likely to have a positive effect on reducing the impacts of transport on the environment as the policy encourages improving the quality and safety of pedestrian and cycle routes connecting Hammersmith town centre to the riverside.

7.128 It is likely that the tunnel option will contribute to the local economy by encouraging new employment development in the form of retail, leisure and other employment opportunities along with increases in residential development. These initiatives are likely to stimulate and sustain the economic development of the area. However it is important to highlight that the construction of a new tunnel will be a costly piece of transport infrastructure and this will have an impact on the viability and deliverability of any development proposals.

**Alternative Options – Strategic Site Policy HRA3 (A4, Hammersmith Flyover and adjacent land)**

- Retain the flyover and continue to support the town centre in its current function
- Retain the flyover and unravel the one-way system to create a civic space that could encourage a mixed use town centre, encouraging a mix of uses along the prime retail frontage in town centre.
- Protect offices in the town centre and increase density of employment uses with the inclusion of a flyunder, but retain the current one-way system

7.129 Alternative option (1) proposes to retain the flyover, this option is likely to present less overall financial risk for the public sector in terms of cost overruns and other unanticipated expenses. The risk of potential transport disruptions will also be negated if the status quo is maintained. However, there might be some degree of long term safety risk and associated remediation cost implications with retaining the flyover. The benefits of the tunnel in terms of the economic opportunities provided by the release of new land and regeneration that would follow would also not be realised. Additionally, existing traffic and amenity issues associated with the flyover would also not be realised.

7.130 Alternative option (2) would offer some benefits such as deferring the financial risk involved in investing in a major piece of infrastructure and the potential for disruptions to traffic during construction. However there would be less traffic passing directly through Hammersmith and this may impact on visitor numbers. Crucially retaining the flyover will prevent realising the numerous benefits associated with the preferred option. These benefits include the release of the land underneath the flyover for public realm and residential, commercial and retail development could generate significant increases in rates and rents from increased land and property values, thus helping to fund future development. This option will also mean that the environmental benefits from reduced noise, emissions, dust will not be realised if the flyover is retained.

7.131 Alternative option (3) would help ensure that Hammersmith will remain as the key commercial centre for the Borough, encouraging large businesses to locate here. The release of the land under the flyover for the public realm and residential, commercial and retail development will generate significant increases in rates and rents from increased land and property values, thus helping to fund the development. It will contribute towards enhancing the area, by improving the civic space and further increase numbers of visitors to the area. It will also improve legibility and permeability throughout the area and improve the visual appearance of the area and setting of listed buildings. It will also improve environmental quality by reducing air, noise pollution, the severance effect of traffic and vibration. However this alternative option may not contribute to the vibrancy in the town centre at ground floor level if offices are to be protected, which may discourage further business to locate in Hammersmith; and is unlikely to optimise the benefits associated with the removal of the one-way system.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Site Policy HRA3: A4, Hammersmith Flyover and adjoining land	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	✓	?/ ✓	✓	✓	✓	?	?	✓	0	0	✓
<b>Alternative option (1):</b> <i>Retain the flyover and continue to support the town centre in its current function.</i>	x	x	x	x	x	x	0	0	0/?	0	0	x
<b>Alternative option (2):</b> <i>Retain the flyover and unravel the one-way system to create a civic space that could encourage a mixed use town centre, encouraging a mix of uses along the prime retail frontage in town centre.</i>	?/x	x	x	x	?/x	x	0	?/x	0/?	0	0	x
<b>Alternative option (3):</b> <i>protect offices in the town centre and increase density of employment uses with the inclusion of a flyunder but retain the current one- way system.</i>	?	0	0	0	x/?	0	0	0	0	0	0	0

## **Assessing secondary, cumulative and synergistic effects**

- 7.132 Strategic Policy HRA – Hammersmith Regeneration Area is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 4, 6, 7, 8, 16, 18 and 19. It is predicted that the timeframe of the effect of Strategic Policy HRA policy will be medium to long term. It is expected that the effects of this preferred options policy will have both a permanent and direct effect on a number of the sustainability objectives; health, affordable homes, social cohesion, satisfying work, heritage and sustainable economy. There is likely to be a cumulative impact on the sustainable economy.
- 7.133 Strategic Site Policy HRA1 – Town Hall Extension and adjacent land, Nigel Playfair Avenue is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 48, 14, 15, and 16. It is predicted that the timeframe of the effect of Strategic Site Policy HRA1 will be medium to long term. It is expected that the effects of this preferred options policy will have both a permanent and direct effect on the heritage and sustainable economy sustainability objectives. It is likely that the provision of mixed town centre uses along with better links to the river will have a cumulative impact on the local community and economy.
- 7.134 Strategic Site Policy HRA2 – King Street East is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 3, 8, and 14. It is predicted that the timeframe of the effect of Strategic Site Policy HRA2 will be medium to long term. It is likely that the effect of the policy will have both permanent and direct effects on affordable homes, social cohesion and heritage and sustainable economy. In particular increasing social cohesion, improving the townscape and promoting the strong commercial role of the town centre is likely to have cumulative impacts.
- 7.135 Strategic Site Policy HRA3 – A4, Hammersmith Flyover and adjoining land is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 4, 8, 14, 15, 16 and 18. It is predicted that the timeframe of the effect of Strategic Site Policy HRA3 will be long term. It is expected that the effects of this option will have direct, permanent, cumulative and synergistic effects on many of the sustainability objectives socially, environmentally and economically. The replacement of Hammersmith flyover with a tunnel provides a significant opportunity to release the land for redevelopment and provide mixed use development and improve access to the riverside from the town centre and quality of life for existing and new residents.

## Strategic Policy FRA – Fulham Regeneration Area

### Strategic Policy FRA – Fulham Regeneration Area

Indicative additional homes	Indicative new jobs
7,000	10,000

Regeneration Area (FRA) and for the development of strategic sites to benefit the wider community. In order to achieve this, the Council will:

- Work with the GLA, Royal Borough of Kensington and Chelsea, other strategic partners and landowners to secure the regeneration and renewal of the area.
- Actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area;

Development proposals should:

- Contribute to the provision of 7,000 homes and 10,000 jobs;
- Enhance the vitality and viability of Fulham Town Centre, particularly on North End Road and explore opportunities to secure the long term future of and enhance the North End Road street market;
- Provide for the improvement of the West Kensington, Gibbs Green and Registered Provider estates;
- Secure economic benefits for the wider community around the Fulham Regeneration Area by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;
- Provide appropriate social, physical, environmental and transport infrastructure to support the needs arising from the area as a whole; and
- Demonstrate a high quality of urban design and public realm; and preserve or enhance the character, appearance and setting of heritage assets including the Grade II\* listed Fulham Town Hall.

- 7.136 The preferred policy option has the potential to increase equity and social justice for the deprived communities living in the area. The policy promotes active engagement with local communities to ensure that regeneration delivers benefits to the area, it also promotes improvements of the West Kensington, Gibbs Green and Registered Provider estates and for development proposals to provide the relevant infrastructure to support local needs.
- 7.137 There is likely to be a positive effect on the affordable homes sustainability objective as the preferred option seeks the renewal of and additions to all or part of the estates in order to provide improved housing opportunities for local residents.
- 7.138 The policy aims to develop 7,000 new homes and 9,000 new jobs in the area. This in itself may contribute towards increased public participation in community life. The policy also seeks to regenerate the large council estates in the area and signals the council's intention to explore opportunities to secure the long term future of and enhance the North End Road Street market. If these initiatives are implemented, care should be taken to ensure that any existing positive elements of community life associated with the estates and the street market are preserved and enhanced.
- 7.139 The policy aims to create 9,000 new jobs in the Earl's Court and West Kensington Opportunity Area and for development proposals to provide local people access to new job opportunities through training and local apprenticeship schemes. This will play a significant role in reducing local unemployment and improving earnings of local people.
- 7.140 The proposed development of new homes and jobs will predominantly take place in an area of high public transport accessibility. This will encourage people to use sustainable transport modes and reduce the private car usage.
- 7.141 The location of the proposed development in an area of high public transport accessibility is likely to contribute to a reduction in the amount of greenhouse gas emissions that would result if the development was taking place in a location poorly provided with public transport.
- 7.142 The creation of 9,000 new jobs in this regeneration area is likely to significantly improve the sustainability of the local economy by increasing levels of investment in businesses. The policy also supports proposals that will provide employment training opportunities for local people. These initiatives will contribute towards improving the sustainability of the local economy.

#### **Alternative Options –Strategic Policy FRA – (Fulham Regeneration Area)**

- Not to pro-actively promote development and, in particular, not to promote the strategic development sites. Sites would be dealt with as they come forward.

7.143 The alternative option proposes not to proactively promote development and deal with sites as they come forward. It is therefore difficult to ascertain the effects of this approach on the sustainability objectives. However it can be assumed that this approach is likely to result in a piecemeal development and would not maximise the opportunities new development could bring to the Fulham Regeneration Area in terms of housing, jobs and infrastructure.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Policy FRA – Fulham Regeneration Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	0	0	✓/ ?	?	✓	0	0	✓	0	✓	✓
<b>Alternative option (1):</b> <i>Not to pro-actively promote development and, in particular, not to promote the strategic development sites. Sites would be dealt with as they come forward.</i>	?	?	?	?	?	?	?	?	?	?	?	?

### Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area

#### Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area

The Council will support the phased mixed use residential led redevelopment of the Earl's Court and West Kensington Opportunity Area. Development proposals should:

- Provide a mix of land uses, including housing, employment, hotels, leisure and associated facilities, retail to cater for day to day needs and cultural facilities. Cultural facilities should include a major arts, leisure or entertainment activity that will be a major visitor attractor;
- Provide adequate social, physical, environmental and transport infrastructure to support the needs of the area as a whole;
- Provide for improvement to the West Kensington, Gibbs Green and Registered Provider estates, as part of the comprehensive approach to the regeneration of the Opportunity Area;
- Provide green corridors and public open spaces including the provision of a centrally located local park of at least 2 hectares;
- Ensure that the design, layout, massing and density of development takes account of and respects the local context and setting, local conservation areas and local views. In addition, development should also recognise the substantial scope offered by the scale and location of the Opportunity Area to create a new sense of place and range of densities. There may be scope for tall buildings in close proximity to the existing Empress State building, however any tall buildings would need to be justified by a full urban design analysis.



- 7.144 The preferred option includes initiatives that are likely to increase levels of equity and social justice in the regeneration area. The preferred option also has the potential for the creation of 7,500 new homes and 8,500 new jobs and the provision of accessible new social, physical and green infrastructure for use by all local people.
- 7.145 The provision of new public open space and local park has the potential to positively contribute towards health outcomes.
- 7.146 The quantum of new housing development proposed for this regeneration area will mean that new educational facilities will need to be provided. This will have a positive effect on the education and skills sustainability objective.
- 7.147 The preferred policy aims to improve the estates via renewal and additions. It is intended that the new homes will be better suited to the needs of estate residents and as such, will contribute towards achieving the affordable homes objective. The justification for the preferred option refers to no net reduction in the amount of social rented housing in this regeneration area. The types and mix of housing will be determined by the local plan's housing policies. The preferred policy promotes a mixture of land uses including supporting the development of a major visitor attractor in this regeneration area. Development along these lines is likely to help create a place of distinctive character and encourage a sense of community and social cohesion among local residents.
- 7.148 The policy aims to create around 8,500 new jobs within the Earl's Court and West Kensington Opportunity Area. A diverse range of new employment opportunities will be created in the retail, leisure and culture sectors.
- 7.149 The preferred policy is likely to have a positive effect on heritage sustainability objective. The preferred policy aims to ensure that new development will take account of, and respect the local context and setting, including local conservation areas and local views. The policy also places restrictions on the height and location of tall buildings in order to minimise adverse impacts on surrounding areas.
- 7.150 This option also aims to provide a network of green corridors and public open spaces. The justification also states the need to protect the West London Line railway corridor which is designated partly as a green corridor and partly as a nature conservation area of borough wide importance.
- 7.151 The good transport accessibility of the area should ensure that the need for private car use is minimised, however any new development would need to take care not to overload the system and the option recognises that additional infrastructure may be required. It also seeks to improve pedestrian connections.

7.152 The policy aims to create around 8,500 new jobs within the regeneration area. A diverse range of new employment opportunities will be created including in the retail, leisure and culture sectors. The policy also aims to create around 7,500 new homes in the regeneration area. The associated increase in population will further contribute to demand for local services and the sustainability of the local economy.

7.153 The preferred option could potentially be very resource intensive in both the construction and operational phases. The redevelopment of this area will need to incorporate sustainable design and construction techniques and will need to implement the policies in the Local Plan's environmental issues chapter.

**Alternative Options – Strategic Site Policy FRA1 (Earls Court and West Kensington Opportunity Area)**

- Deal with the future of the sites separately without trying to combine the land in one overall scheme.

7.154 Alternative option (1) proposes to deal with the future of the sites separately without trying to combine the land in one overall scheme. The future of the housing estates would be considered as a separate development scheme. This option is less likely to attract development finance and enable estate renewal and so the future redevelopment of the housing estates is less certain. There may also be negative impacts on the existing estates if development is uncoordinated and there will be less opportunity for linkages and improved pedestrian access. There will be positive impacts on job creation and improving the sustainability of the local economy but this is likely to be to a lesser extent than if the site was developed comprehensively as a whole.

POLICY OPTIONS	SA OBJECTIVES											
Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	✓/?	✓/?	✓/?	✓/?	✓	✓	0	?	0	0	✓
<b>Alternative option (1):</b> <i>Deal with the future of the sites separately without trying to combine the land in one overall scheme.</i>	✓	?	?	✓	?	✓	?	?	?	?	?	✓

## Assessing secondary, cumulative and synergistic effects

7.155 Strategic Policy FRA - Fulham Regeneration Area is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 3, 4, 8, 9, 14, and 19. It is predicted that the timeframe of the effect of Strategic Policy FRA will be medium to long term. It is expected that the effects of the preferred option will be both direct and permanent on the socio-economic objectives. The creation of 9,000 new jobs in the Fulham Regeneration Area will have a cumulative and synergistic impact as well as having a significant positive impact on local economy. Whilst the potential for renewal of the housing estates will have a significant positive effect of tackling the high levels of social, economic and physical deprivation.

7.156 Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 3, 7, 9, 14, and 15. It is predicted that the timeframe of the effect of Strategic Site Policy FRA1 will be medium to long term. This option will have a positive, direct and permanent impact on the socio-economic sustainability criteria, particularly on job creation, improving the local economy and providing decent and affordable homes. Linking redevelopment to the housing estate sites to the Earls Court site and adjacent land would have further benefits through improved housing and community cohesion.

## Strategic Policy SFRRA - South Fulham Riverside Regeneration Area

### Strategic Policy SFRRA - South Fulham Riverside Regeneration Area

Indicative homes	Indicative jobs
4,000	500

The council will work with landowners and other partners to secure the phased regeneration of the area to become a high quality residential area together with a mix of other uses. In order to achieve this, the Council will work with:

- Neighbouring boroughs, strategic partners, and landowners to secure regeneration of the SFRRA; and
- Actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area;

Proposals for development in SFRRA should:

- Be for predominantly residential purposes to contribute to the South Fulham Riverside target of 4,000 additional dwellings by 2035;
- Include employment based uses that will meet local business needs and are compatible with residential development in the most accessible parts of the area, particularly in the vicinity of Imperial Wharf Station and on sites close to the Wandsworth Bridge Road, Townmead Road and Carnwath Road junction;
- Include appropriate small scale retail, restaurants/ cafes and leisure

uses to support day to day needs. These uses are likely to be appropriate on the Thames frontage to provide activity adjacent to the river.

- Opportunities for river related uses will be encouraged in accordance with the objectives of the Local Plan River Thames policies;
- Create a high quality urban environment. On the riverside, a very high standard of urban design will be necessary. Opportunities will be encouraged that maximise the permeability and connectivity between sites, include the extension of the Thames Path and provision of open spaces that create interest and activity;
- Demonstrate how they integrate and connect with the surrounding context, particularly the river;
- Support the implementation of a pedestrian and cycle bridge that will provide access to the south of the river;
- Provide appropriate social, physical and environmental infrastructure to support the needs arising from development and the area as a whole;
- Secure economic benefits for the wider community around the South Fulham Regeneration Area by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;
- Be acceptable in terms of their transport impact and contribute to necessary public transport accessibility and highway capacity in the SFRRA; and
- Be sensitively integrated with the existing townscape, ensuring the protection of heritage assets, and respect for the scale of the surrounding residential buildings, particularly to the north of the regeneration area. Building height can be gently stepped up toward the riverside, to provide a presence and give definition to the river frontage. There may be an opportunity for taller buildings at two key focal points at Imperial Wharf Station and Fulham Wharf.

- 7.157 The preferred option will contribute towards increasing sport and leisure activities and improvement of the riverside path. This will have a positive impact on health through increased physical activity.
- 7.158 The quantum of new housing development proposed for the South Fulham Regeneration Area means new educational facilities will need to be provided to support the community.
- 7.159 The preferred option which seeks residential uses will increase the range and affordability of housing.
- 7.160 The preferred policy's emphasis on a very high standard of urban design, especially along the riverside will help to increase perceptions of personal safety in the public realm and will also contribute towards increasing local residents' sense of community.
- 7.161 Although largely residential development led, the preferred option also promotes employment in selected areas along with small scale retail and related uses in suitable areas to cater to the daily needs of residents. These initiatives are likely to increase employment opportunities for local people.
- 7.162 The policy places significant emphasis on protecting and improving the local environment and heritage. It requires a very high standard of urban design for riverside developments. Tall buildings will also be permitted only in those locations that minimise any adverse impacts on local heritage values. Retaining and enhancing the character and use of the river will improve the local environmental heritage, particularly if development is of a suitable design and a scale/height appropriate to the riverside location.
- 7.163 Redeveloping riverside vacant and underused sites will reduce derelict, degraded land, bring it back into public use and improve access to the river. The river Thames is a nature conservation area of metropolitan importance, therefore any development proposals will need to take into consideration this sensitive location and protect the river's ecological value and related biodiversity.
- 7.164 The preferred option proposes a number of measures to encourage the development of better transport connections, sustainable transport measures and enhanced public transport infrastructure and services. The policy also aims to reduce the need for travel, particularly for some employment purposes and for meeting daily needs by encouraging suitable employment and small scale retail in appropriate areas. Improvements to the road network are also proposed. These initiatives are likely to reduce the negative impacts of transport on the local community.

7.165 Although development in this regeneration area will principally be residential in nature, the preferred option seeks the development of compatible employment uses along with suitable small scale retail and leisure uses in suitable locations. This is likely to improve the sustainability of the local economy and improve local residents' access to key local services.

**Alternative Options – Strategic Policy SFRRA (South Fulham Riverside Regeneration Area)**

- Prioritise the safeguarding of wharves over other land uses.
- Promote employment led development across the site.
- Tall buildings will be acceptable in principle in all areas of the SFRRA, subject to compliance with other Local Plan policies.

7.166 There are currently three protect wharves in the Borough and these are protected by The London Plan. Alternative option (1) would provide more employment than the preferred option and would retain the historical use of the wharves but it would result in increased traffic movements and air pollution generated by heavy goods vehicles in particular. It would not improve access to the riverside or provide much if any housing as this is unlikely to be compatible with the adjoining wharf uses. There are three safeguarded wharves in the area, of which only one is in current use. The functioning wharf provides some employment and safeguarding wharves may also result in some benefits to local biodiversity by preserving more open land along the riverside. Given the changing nature of land uses along the riverside and the significant demand for housing in this area, it would be appropriate to consider consolidating wharf use wherever possible in order to permit development on sites adjacent to these wharves. Enabling suitable development will allow the entire area to be regenerated in a coherent manner and may also allow planning contributions to be collected, which can then be used to provide necessary infrastructure in the area, including improving levels of access to the area.

7.167 Alternative option (2) seeks employment development as a priority in this regeneration area. Although the area was formerly designated as an employment zone, this is no longer appropriate given the greater need for new housing and the low level of accessibility in much of the area. Adverse impacts on local transport networks may also arise if large scale employment is encouraged across the area. Employment uses may be more appropriate in limited areas with a higher level of public transport access out in appropriate parts of the area.

7.168 Alternative option (3) is likely to provide greater numbers of dwellings, including affordable housing. Increasing the intensity of development is also likely to result in more developer contributions being levied, which could fund the provision of necessary infrastructure in the area. However uncontrolled development of tall buildings could seriously impact on local amenity, exerting an overbearing influence particularly on older buildings in the surrounding area. The council has also prepared a tall buildings background paper which analyses the existing building heights and massing to justify permitting tall buildings only in limited areas.

POLICY OPTIONS	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Strategic Policy SFRRA - South Fulham Riverside Regeneration Area</b>												
<b>Preferred Option:</b> <i>See policy wording above.</i>	0	✓/?	✓/?	✓/?	✓	✓	✓/?	?	✓/?	0	0	✓
<b>Alternative option (1):</b> <i>Prioritise the safeguarding of wharves over other land uses.</i>	X	?/X	0	0	?	0	0	0	0	0	?	?
<b>Alternative option (2):</b> <i>Promote employment led development across the site.</i>	?	0	✓	✓	?	✓	0	0	?/X	0	0	X
<b>Alternative option (3):</b> <i>Tall buildings will be acceptable in principle in all areas of the SFRRA, subject to compliance with other Local Plan policies.</i>	?	0	0	0	X/?	0	0	0	0	0	0	0

## Recommendations

Public transport and accessibility improvements should be sought for the area given the relatively poor accessibility at present.

## Strategic Site SFRRA1 - Imperial Gasworks National Grid

### Strategic Site SFRRA1 - Imperial Gasworks National Grid

The council supports comprehensive residential-led development of the site with supporting community facilities and open space. Development proposals for this site should:

- Be predominantly residential with supporting social, physical, environmental and transport infrastructure;
- Provide for a link road through the site connecting Imperial Road through to the New Kings Road together with a network of pedestrian and cycle connections.

- **Aim to provide a pedestrian access under the West London Line at the southern end of the site connecting to Lots Road;**
- **Provide an area of public open space of at least 1 hectare;**
- **Be of high quality design which respects the character and appearance of the Imperial Square and Gasworks Conservation Area and protects the Grade II Listed Gasholder and other associated structures and its setting;**
- **Ensure that the building heights are predominantly low to medium rise, and represent a general reduction in scale of redevelopment from neighbouring sites located towards the riverside. There may be some scope for increased massing at a limited location towards the south-east corner of the site; and**
- **Ensure any remaining gas operations that may be required are designed in such a way to ensure that that may be required health and safety requirements are met and integrated into the high quality design for the area with minimal impact.**

7.169 The preferred option has the potential to have a positive impact on the affordable housing sustainability objective. The amount of affordable housing will be determined by policy HO3 Affordable Housing which requires 40% affordable housing for major housing developments.

7.170 The preferred option aims to ensure that new development will protect existing heritage values by ensuring that building heights are predominantly low to medium rise with tall buildings permitted in a limited location. Additionally, the policy requires new development to be of a high quality design which respects the character and appearance of the Imperial Square and Gasworks Conservation Area and the setting of the Grade II listed Gasholder and other associated structures. These policy initiatives will help to ensure the protection and enhancement of local heritage values.

#### **Alternative Options – Strategic Site SFRA1– (Imperial Gasworks National Grid)**

- Maintain the site for employment purposes.
- Promote employment-led mixed use development.



7.171 Alternative option (1) prioritises employment to minimise the reduction of business and industrial activities. It maximises scope for a wide range of employment activities in the area. However, the pace of regeneration may be slowed if this option was implemented due to the low demand for further employment uses in the area. Present day values also provide for less land value and therefore less viability of development and less section 106 agreement money. Conversely there is increased pressure on increasing housing supply in the Borough. The area has poor transport connections. Employment led regeneration is likely to exacerbate traffic congestion and local air pollution. Continued employment use may also conflict with neighbouring residential sites and existing residential area by causing noise and disturbance if industrial activities were to be carried out. Finally, implementing this alternative option may encourage commercial development outside the town centre. This may have an adverse impact on the functioning of the town centre.

7.172 Alternative option (2) proposes a mix of uses which is likely to encourage a more vibrant and sustainable community. Whilst the prioritisation of employment would minimise the reduction of business and industrial activities, these uses may be incompatible with other uses stymying further development. The pace of regeneration may be slowed as there is currently little demand for further employment uses and land could remain unused. Also this alternative option fails to recognise the great demand for new housing in the borough. The area has poor transport connections. Employment led regeneration is likely to exacerbate traffic congestion and local air pollution. Continued employment use may also conflict with neighbouring residential sites and existing residential area by causing noise and disturbance if industrial activities were to be carried out. Finally, implementing this option may encourage commercial development outside the town centre. This may have an adverse impact on the functioning of the town centre.

POLICY OPTIONS	SA OBJECTIVES											
<b>Strategic Site SFRRRA1 - Imperial Gasworks National Grid</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	0	0	0	✓/?	0	0	✓	0	0	0	0	0
<b>Alternative option (1):</b> <i>Maintain the site for employment purposes.</i>	?/X	?	✓	X	?	✓	0	X	X	0	?	✓
<b>Alternative option (2):</b> <i>Create an employment-led mixed use development.</i>	?	0	0	0	X/?	0	0	0	0	0	0	0

## **Assessing secondary, cumulative and synergistic effects**

7.173 Strategic Policy SFFRA – South Fulham Riverside Regeneration Area is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 4, 14, 15, 16, 18, and 19. It is predicted that the timeframe of the effect of Strategic Policy SFFRA will be medium to long term. This option will have a positive, direct and permanent impact on the number of the sustainability objectives. In particular the preferred option is likely to have indirect effect increasing of local residents' sense of community and social cohesion due to the policy's emphasis on high quality urban design and supporting active river frontage uses.

7.174 Strategic Site Policy SFRRA1 – Imperial Gasworks National Grid is anticipated to positively contribute towards the Draft Local Plan strategic objectives 1, 2, 14, 15 and 18. It is predicted that the effects of Strategic Site Policy SFRRA1 will be medium to long term and will have permanent and direct impact on affordable housing and heritage sustainability objectives as development proposals will be predominantly residential and be of high quality design that respects the character and appearance of the conservation area.

## **MEETING HOUSING NEEDS AND ASPIRATIONS**

### **Borough-wide Policy HO1 Housing supply**

#### **Borough-wide Policy HO1**

##### **Housing supply**

**The council will work with partner organisations and landowners to exceed the proposed London Plan target of 1,031 additional dwellings a year up to 2025 and to continue to seek at least 1,031 additional dwellings a year in the period up to 2035. The New homes to meet London's housing need will be achieved by:**

- 1. The development of strategic sites identified within the Local Plan;**
- 2. The development of sites identified in the council's Strategic Housing Land Availability Assessment;**
- 3. The development of windfall sites and the change of use of buildings where land and premises are shown to be surplus to the requirements of other land uses;**
- 4. The provision of new homes through conversions;**
- 5. Ensuring that new dwellings meet local needs and are available for occupation by people living in London; and**
- 6. The retention of existing residential accommodation and improvement in the quality of private rented housing.**

**The following are estimates of the likely increases in new housing in different parts of the borough.**

- 7.175 Overall, increasing home ownership will positively influence social equity and justice. However it is important that pursuing the objective of creating mixed and balanced communities does not prejudice already deprived sections of the community.
- 7.176 The majority of new homes in the borough will be built in areas with good access to public transport. The proposed density of development will also help to ensure the borough's town centre continue to remain viable and attractive destinations serving a number of different functions including employment, leisure, recreation, health and shopping functions. Having easy access to a wide range of services and amenities is likely to improve the quality of life of local people and therefore exert a positive impact on people's physical and mental health.
- 7.177 Increasing the number of homes in the borough will place greater demand on the borough's educational institutions. It is likely that these institutions will require and will receive increased investment in order to cater to this increased demand. This in turn should positively impact on the quality of education and the standard of achievement of students of all ages.
- 7.178 The preferred option does not address affordability or housing quality because it focuses on the numbers of homes to be provided over the life of the Local Plan. Affordability and housing quality are addressed in other Local Plan policies.
- 7.179 Increasing the number of homes in the three town centre areas and the Old Oak area is likely to foster an increased sense of community and social cohesion, simply by the fact that there will be a greater amount of 'human capital' in these areas than currently exists. Notwithstanding this, the degree to which this will be achieved will be heavily dependent upon urban design policies and policies aimed at reducing economic polarisation within these communities. In particular, care should be taken to avoid as far as possible, the negative effects gentrification can exert on community polarisation.
- 7.180 The implementation of the preferred option will inevitably have some impact on heritage and conservation. The sustainability issues concerning these issues are addressed in other policies in the Local Plan.
- 7.181 Increasing the intensity of development in the borough will almost inevitably add to pollution levels in terms of air and water quality and waste. However, development will also reduce the amount of derelict and degraded land and can also result in the remediation of previously contaminated land.
- 7.182 Increasing residential density in areas that have good access to public transport and local amenities will both reduce the need to travel and will encourage use of sustainable transport modes, including walking and cycling.

7.183 Although not directly relevant to the preferred option, increasing residential density will result in greater efficiencies in terms of land and resource use.

7.184 No significant effect. Although not directly relevant to this policy, increasing residential density will result in greater efficiencies in terms of resource use, including water and energy by incorporating sustainable urban design principles and higher building design standards.

7.185 Implementing this policy will improve the viability and vitality of the local town centres and is likely to catalyse employment and economic development in the borough.

#### Alternative Options – Policy HO1 (Strategic housing supply)

- Allow more employment land to be redeveloped for housing.
- Introduce a time limit for the protection of vacant sites.

7.186 Alternative option (1) proposes to allow more employment land in the borough to be redeveloped for housing, it could have a negative impact on the local economy. Reducing employment floorspace which would be available locally may also mean increasing travel distance to employment for residents (which would disproportionately affect the disabled, long-term ill, single parents, and low income households), and may also restrict the types and locations of services that can be provided. The Draft Further Alterations to the London Plan (2014) supports only limited release of employment land for residential development if it meets Local Plan objectives and is located in areas of high transport accessibility which will facilitate high density housing.

7.187 Alternative option (2) proposes to introduce a time limit for the protection of vacant sites. By imposing a time limit on vacant land without the use of any other policy criteria, developers may try to take advantage of a time limit when a change-of-use application would be possible. This alternative option may not effectively address the employment needs of the community and could have a negative impact. Policy E2 Land and premises for employment uses requires supporting evidence of at least 12 months of marketing for application of change of use out of employment.

POLICY OPTIONS	SA OBJECTIVES											
Borough-wide Policy HO1 Housing supply	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	✓	0	0	✓	0	0	?	✓	✓	✓	✓
<b>Alternative option (1)</b> Allow more employment land to be redeveloped for housing.	?	0	0	✓	0	X	0	?	?	?	?	X
<b>Option 2.1.5</b> Introduce a time limit for the protection of vacant sites.	?	0	0	?	?	X	0	?	?	?	?	X

## Borough-wide Policy HO2 Housing conversion and retention

### Borough-wide Policy HO2

#### Housing conversion and retention

##### The council will:

##### 1. Permit conversions of existing dwellings into two or more dwellings where:

- a. The net floor area of the original dwelling is more than 120sqm;
- b. At least 50% of the proposed units consist of two or more bedrooms;
- c. Housing appropriate for families has access to any garden or amenity space; and
- d. Where there is no adverse impact on on-street parking stress.

##### 2. Resist proposals which would result in a net loss of permanent residential accommodation as a result of redevelopment or change of use without replacement (measured by floorspace), including to short stay accommodation.

7.188 The preferred option will address the under-provision of family homes in the borough. It will have a positive impact on the social and affordable homes objectives by increasing the range of homes available and improving social justice and cohesion. Effects on pollution and climate change are uncertain and will depend on mitigation measures.

7.189 The preferred option has positive effects on maintaining housing accommodation, on social cohesion and justice. No negative impacts have been identified although as old housing was not built to sustainable codes it may not be so beneficial to climate change.

#### Alternative Options – Policy HO2 (Housing conversion and retention)

- Allow the loss of existing housing.
- Greater restrictions on conversions.

7.190 Alternative option (1) proposes to allow the loss of existing housing however this option will have numerous negative impacts on many of the sustainability objectives.

7.191 Alternative option (2) proposes greater restrictions on conversions. Greater restrictions on housing conversions means the opportunity to meet the housing needs of community and address the under provision of homes in the borough will be missed.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO2 Housing conversion and retention	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> Permit conversions of existing dwellings into two or more dwellings where: a) the net floor area of the original dwelling is more than 120sqm; b) at least 50% of the proposed units consist of two or more bedrooms; c) housing appropriate for families has access to any garden or amenity. d) where there is no adverse impact on on-street parking stress.	✓	0	0	✓	✓	0	0	?	✓	0	?	0
Resist proposals which would result in a net loss of permanent residential accommodation as a result of redevelopment or change of use without replacement (measured by floorspace), including to short stay accommodation.	✓	0	0	✓	✓	0	?	0	0	0	?	0
<b>Alternative option (1):</b> <i>Allow the loss of existing housing.</i>	X	X	0	X	X	0	X	0	0	X	0	0
<b>Alternative option (2):</b> <i>Greater restrictions on conversions.</i>	x	x	0	x	x	0	0	0	0	0	0	0

### Borough-wide Policy HO3 Affordable Housing

#### Borough-wide Policy HO3

#### Affordable Housing

Housing development should increase the supply and improve the mix of affordable housing to help achieve more sustainable communities in the borough.

On sites with the capacity for 10 or more self-contained dwellings affordable housing should be provided having regard to the following:

a. A borough wide target that at least 40% of all additional dwellings built between 2015-25 should be affordable.

- b. 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing.**
- c. Affordable dwellings should be located throughout a new development and not concentrated on one part of the site.**
- d. The council will encourage the provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership.**
- e. In negotiating for affordable housing and for an appropriate mix of social and affordable rented and intermediate housing in a proposed development, the council will take into account:**
- site size and site constraints; and**
  - financial viability, having regard to the individual circumstances of the site and the availability of public subsidy.**
- f. In exceptional circumstances, a financial contribution may be required to provide affordable housing off-site where other sites may be more appropriate or beneficial in meeting the borough's identified affordable housing needs.**
- In addition, there should be no net loss of social/affordable rented housing on development sites.**

7.192 The preferred option seeks to increase the supply and mix of affordable housing. This approach will have positive impact on the social justice sustainability objective by enabling the creation of mixed and sustainable communities and contribute towards reducing the differences in housing standards between different communities in the borough.

7.193 The provision of affordable housing will have a positive impact on the affordable homes objective by increasing the range and affordability of housing available in the borough and will contribute towards providing decent homes. Providing social or affordable renting, with a focus on family accommodation along with intermediate housing will help meet the borough's housing needs.

7.194 The provision of intermediate housing recognises the particular need in London to cater for people that are above social rent income levels, but are unable to afford private market housing. This forms a relatively broad demographic in London, as a result of high property prices. It offers these people opportunities to get onto the property ladder in the borough and remain living in the borough rather than having to move out of London in order to attain home ownership. This will help to achieve a more sustainable community in the borough.

7.195 The preferred option will ensure that there is no reduction in the social rented stock and this will have a positive impact by continuing this supply of accommodation to meet local need.

### Alternative Options – Policy HO3 (Affordable Housing)

- Set differential affordable housing targets in different parts of the borough.
- Set a lower or higher target for social/affordable rented housing.

7.196 Alternative option (1) proposes to set differential affordable housing targets in different parts of the borough. A differential/and or lower affordable housing target will reduce the volume of affordable housing and lead to disparity across the borough. It may not cause any significant change in environmental impacts. It is possible that this alternative option could help reduce the level of pollution by reducing the amount of derelict, degraded and underused land, although it could also compete for land that has potential for other uses such as employment or open space.

7.197 Alternative option (2) proposes a lower or higher target for social housing. Proposing a higher target for affordable housing will ensure that housing is made available for those people within the borough who cannot afford market housing but this could impact upon development viability. Whilst proposing a lower target for affordable housing means there will be less affordable housing which will lead to disparity across the borough.

7.198 For both alternative options, the main environmental impacts will depend on largely on local characteristics of the surrounding area and the construction methods used, rather than the actual mix of housing provided. Affordable housing located near public transport is likely to be less detrimental in terms of the effect of transport on the environment. Any new development will have some unavoidable environmental footprint which differs by type of housing.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO2 Housing conversion and retention	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> A borough wide target that at least 40% of all additional dwellings built between 2015-25 should be affordable.	✓	0	0	✓	✓	0	0	0	0	0	0	0
<b>Preferred Option:</b> 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing	✓	0	0	✓	✓	0	0	0	0	0	0	0
<b>Preferred option:</b> In addition, there should be no net loss of social/affordable rented housing on development	✓	0	0	✓	✓	0	0	0	0	0	0	0



POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO2 Housing conversion and retention	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
sites.												
<b>Alternative option (1):</b> <i>Set differential affordable housing targets in different parts of the borough.</i>	✓	0	0	✓	✓	0	0	0	0	0	0	0
<b>Alternative option (2):</b> <i>Set a lower or higher target for social/ affordable rented housing, or rely on the current London Plan target of 60%.</i>	?	0	0	?	?	0	0	0	0	0	0	0

## Borough-wide Policy HO4 Housing quality and density

### Borough-wide Policy HO4

#### Housing quality and density

The council will expect all housing development to respect the local setting and context, provide a high quality residential environment, be well designed and energy efficient in line with the requirements of the Code for Sustainable Homes, and (subject to the size of scheme) provide a good range of housing types and sizes.

All new housing must take account of the amenity of neighbours (see also Design and Conservation policies) and must be designed to have adequate internal space in accordance with London Plan Policies unless it can be shown that not building to those standards is justified by the circumstances of a particular site; and

Ground level family housing should have access to private gardens/amenity space and family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity and design considerations, or to shared amenity space/ and to children's playspace.

Acceptable housing density will be dependent primarily on an assessment of these factors, taking account of London Plan policies and subject to public transport and highway impact and capacity.

In existing residential areas, and in substantial parts of regeneration areas, new housing will be expected to be predominantly low to medium rise consisting of small scale developments of houses, maisonettes and flats, and modern forms of the traditional mansion block and other typologies of

**residential development that may be suitable for its context, with gardens and shared amenity space in street based layouts. (See also policy OS1 Improving and Protecting Parks and Open Spaces)**

**Some high density housing with limited car parking may be appropriate in locations with high levels of public transport accessibility (PTAL 4-6) provided it is satisfactory in all other respects.**

7.199 The preferred option seeks to ensure that all housing developments are provided to a satisfactory quality and well related to the surroundings. It has a wide range of positive effects including environmental benefits, (particularly in relation to climate change), careful consumption and pollution. It will lead to sustainable developments and potentially maintain the character/heritage of the borough. It will also improve social justice and cohesion by increasing residents' sense of community. Indirectly, well designed houses could lead to improving the health of the population.

7.200 The provision of ground floor level family housing with access to private gardens or amenity space will have a number of positive effects particularly in relation to health.

7.201 The preferred option scores positively on the social and environmental objectives in terms of providing residential development that responds to its surroundings. The provision of well-designed homes that fit into the surroundings will have a positive impact on the well-being of the community and indirectly on its health. High density housing can impact upon flood risk and consequently it will be important to ensure that sustainable urban drainage systems are incorporated in developments.

7.202 The preferred option supports high density housing in appropriate locations with high levels of public transport accessibility. This is likely to have a positive effect on a number of the sustainability objectives in terms of providing new housing development in areas of good transport accessibility meaning local services can be accessed easily.

#### **Alternative Options – Policy HO4 (Housing Quality)**

- Set a specific mix and density of homes for different areas within the borough.
- Maximise density in all locations.

7.203 Alternative option (1) proposes to set a specific mix and density of homes for different areas within the borough. This approach would need to be based on a strategic analysis of the borough in order to identify suitable densities and housing mix for different parts of the borough. However a prescriptive policy approach may well limit the development of sites.

7.204 Alternative option (2) proposes to permit high density development in all locations, this option would have a detrimental effect on the character and appearance of conservation areas, listed buildings and locally listed buildings and in particular the character of the riverside and existing low rise residential areas.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO4 Housing quality and density	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> The council will expect all housing development to respect the local setting and context, provide a high quality residential environment, be well designed and energy efficient in line with the requirements of the Code for Sustainable Homes, and (subject to the size of scheme) provide a good range of housing types and sizes.	0	✓	0	✓	0	0	✓	✓	0	✓	✓	0
<b>Preferred Option:</b> All new housing must take account of the amenity of neighbours (see also Design and Conservation policies) and must be designed to have adequate internal space in accordance with London Plan Policies unless it can be shown that not building to those standards is justified by the circumstances of a particular site; and	✓	✓	0	✓	✓	0	✓	✓	0	✓	✓	0
<b>Preferred Options:</b> Ground level family housing should have access to private gardens/amenity space and family housing on upper floors should have access to a balcony and/or	✓	✓	0	✓	✓	0	0	0	0	0	0	0

POLICY OPTIONS		SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO4 Housing quality and density	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy	
terrace, subject to acceptable amenity and design considerations, or to shared amenity space/ and to children's playspace.													
<b>Preferred Options:</b> In existing residential areas, and in substantial parts of regeneration areas, new housing will be expected to be predominantly low to medium rise consisting of small scale developments of houses, maisonettes and flats, and modern forms of the traditional mansion block and other typologies of residential development that may be suitable for its context, with gardens and shared amenity space in street based layouts. (See also policy OS1 Improving and Protecting Parks and Open Spaces)	✓	✓	0	✓	✓	0	✓	✓	0	0	0	0	
<b>Preferred Options:</b> Some high density housing with limited car parking may be appropriate in locations with high levels of public transport accessibility (PTAL 4-6) provided it is satisfactory in all other respects.	0	0	0	0	0	0	0	?	?	0	?	0	
<b>Alternative option (1):</b> <i>Set a specific mix and density of homes for different areas within the borough.</i>	✓	0	0	✓	✓	0	?	0	0	0	0	0	
<b>Alternative option (2):</b> <i>Maximise density in all locations.</i>	✓	0	0	✓	✓	0	x	?	0	0	0	0	

## **Borough-wide Policy HO5 Housing mix**

### **Borough-wide Policy HO5**

#### **Housing mix**

**The council will work with Registered Providers and other house builders to increase the supply and choice of high quality residential accommodation that meets local residents' needs and aspirations and demand for housing. In order to deliver this accommodation: - there should be a mix of housing types and sizes in development schemes, including family accommodation.**

**Developments should aim to meet the following mix subject to viability, locational characteristics and site constraints being considered on a site by site basis:**

- **For social and affordable rented housing approximately: 1 bedroom: 10% of units; 2 bedrooms: 40% of units; 3 bedrooms: 35% of units; 4+ bedrooms 15% of units;**
- **For intermediate housing approximately: 1 bedroom: 50%; 2 bedroom: 35%; 3 or more bedrooms : 15% of units; and**
- **For market housing, a mix of unit sizes including larger family accommodation.**

**Residential conversions that result in an increase in the number of high quality family size dwellings will be supported, particularly where the reinstatement of a family house can be achieved.**

7.205 The preferred option sets out a defined housing mix which will seek to address the lack of family sized social housing in the borough on a site by site basis, thus allowing viability and other factors to be considered. It therefore scores positively on social justice, social cohesion and affordable homes. It will be important to monitor the mix that is provided so as to ensure housing needs are being met.

7.206 The preferred option seeks to meet local needs and will have a positive impact on the social, health and pollution sustainability objectives.

#### **Alternative Options – Policy HO5 (Housing mix)**

- Apply a mix of housing flexibly on a site-by-site basis.
- Maximise the provision of dwellings and to not require an increase in family accommodation overall or for private market housing.
- Increase the amount of social rented housing with most new build to be for families.

7.207 Alternative option (1) proposes a mix of housing flexibly on a site-by-site basis. This option provides flexibility but the effects are uncertain without detailed policy criteria.

7.208 Alternative option (2) proposes to maximise the provision of dwellings and to not require an increase in family accommodation overall or for private market housing. This option will not meet the borough's housing needs which has identified a particular need for family sized housing, especially affordable family sized accommodation.

7.209 Alternative option (3) proposes to increase the amount of social rented housing with most new build to be for families. Although this option would satisfy the borough's needs for new affordable family accommodation it would not meet the recognised need for intermediate family housing.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO5 Housing mix	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> The council will work with Registered Providers and other house builders to increase the supply and choice of high quality residential accommodation that meets local residents' needs and aspirations and demand for housing. In order to deliver this accommodation: - there should be a mix of housing types and sizes in development schemes, including family accommodation. Developments should aim to meet the following mix subject to viability, locational characteristics and site constraints being considered on a site by site basis: [...] See policy wording above.	✓	0	0	✓	✓	0	0	0	0	0	0	0
<b>Preferred option:</b> Residential conversions that result in an increase in the number of high quality family size dwellings will be supported, particularly where the reinstatement	✓	0	0	✓	✓	0	0	✓	0	0	0	0

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO5 Housing mix	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
of a family house can be achieved.												
<b>Alternative option (1):</b> Apply a mix of housing flexibly on a site-by-site basis.	?	?	0	?	?	0	0	0	0	0	0	0
<b>Alternative option (2):</b> Maximise the provision of dwellings and to not require an increase in family accommodation overall or for private market housing.	0	0	0	✓	0	0	0	0	0	0	0	0
<b>Alternative option (3):</b> Increase the amount of social rented housing with most new build to be for families.	0	0	0	✓	0	0	0	0	0	0	0	0

## Borough-wide Policy HO6 Accessible housing

### Borough-wide Policy HO6

#### Accessible housing

**All new housing should be built to accessible “Lifetime Homes” standards and, where feasible, additional dwellings resulting from conversions, changes of use and dwellings formed in extensions or floors added to existing blocks of flats should also be built to these standards.**

**In developments providing ten or more residential units 10% of all new housing, in proportion to the tenure mix of the development, should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.**

**Car parking spaces should be provided on site to meet the needs of blue badge holders.**

7.210 The preferred option seeks to address the shortage of accessible housing in London. By enhancing choice, enabling independent living and it could help reducing differences between communities. This will have a positive impact on the social, housing and transport objectives.

#### Alternative Options – Policy HO6 (Accessible housing)

- Apply a development size threshold of 20 or more units when seeking wheelchair housing.

- Requiring 10% of all new housing, including conversions, to be wheelchair accessible or easily accessible for wheelchair users.

7.211 Alternative option (1) proposes to apply a development size threshold of 20 or more units when seeking wheelchair housing. This alternative option would not maximise the achievement of social objectives.

7.212 Alternative option (2) proposes requiring 10% of all new housing, including conversions, to be wheelchair accessible or easily accessible for wheelchair users. This alternative option would have positive social benefits, although technically it may be difficult to achieve.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO6 Accessible housing	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	0	0	✓	0	0	0
<b>Alternative option (1):</b> <i>Apply a development size threshold of 20 or more units when seeking wheelchair housing.</i>	x	x	0	x	x	0	?	?	?	?	?	0
<b>Alternative option (2):</b> <i>Requiring 10% of all new housing, including conversions, to be wheelchair accessible or easily accessible for wheelchair users.</i>	✓	✓	0	?	✓	0	x	?	?	?	?	0

## Borough-wide Policy HO7 Meeting needs of people who need care and support

### Borough-wide Policy HO7

#### Meeting needs of people who need care and support

Applications for development that would result in the loss of special needs housing will only be granted permission if it can be demonstrated that there is no longer an established local need for this type of accommodation.

The council will encourage and support applications for new special needs and supported housing, including specialist housing for older people, if it meets the following criteria:

- there is an established local need for the facility;
- the standard of the facilities are satisfactory and suitable for the intended occupants;



- there is a good level of accessibility to public transport and other facilities needed by the residents; and
- the impact of the proposed development will not be detrimental to the amenity of the local area or to local services.

7.213 The preferred policy should allow the retention of a stock of special needs accommodation thereby meeting health and housing needs where they exist. For many of the sustainability objectives, the preferred policy has no obvious significant positive or negative effects.

7.214 The preferred option will require applications for special needs housing to show that they are considering the local area and the development in terms of local needs, suitability, accessibility, environmental impacts on the community and amenity of areas. It will have numerous positive effects related to the above.

#### **Alternative Options – Policy HO7 (Meeting needs of people who need care and support)**

- Only permit the loss of special needs housing if the development would be wholly for affordable housing.
- Resist the loss of special needs accommodation.

7.215 Alternative option (1) proposes to only permit the loss of special needs housing if the development would be wholly for affordable housing. There are positive social effects in terms of health and social justice, but to insist upon affordable housing only could preclude other tenure forms that would benefit the borough.

7.216 Alternative option (2) proposes to resist the loss of special needs accommodation. There are positive social effects in terms of health and social justice, but flexibility is required or else it could lead to underused and vacant buildings, and inefficient use of the building stock.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy HO7 Meeting needs of people who need care and support</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> Applications for development that would result in the loss of special needs housing will only be granted permission if it can be demonstrated that there is no longer an established local need for this type of	✓	✓	0	✓	✓	0	0	0	0	0	0	0

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO7 Meeting needs of people who need care and support	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
accommodation.												
<b>Preferred option:</b> The council will encourage and support applications for new special needs and supported housing, including specialist housing for older people, if it meets the following criteria: [...].  <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	✓	0	✓	0	0	✓
<b>Alternative option (1):</b> <i>Only permit the loss of special needs housing if the development would be wholly for affordable housing.</i>	✓	✓	0	X	?	0	?	0	0	0	0	0
<b>Alternative option (2):</b> <i>Resist the loss of special needs accommodation.</i>	✓	✓	0	?	✓	0	0	0	0	?	0	0

## Borough-wide Policy HO8 Hostels and houses in multiple occupation

### Borough-wide Policy HO8

#### Hostels and houses in multiple occupation

The acceptability of planning applications for new houses in multiple occupation (HMOs) or hostels or for the loss of existing HMOs or hostels will be considered in relation to the following criteria:

- the quality of the accommodation that is proposed or might be lost;
- the impact of the accommodation on the locality; and
- the local need for the proposed or existing HMO or hostel accommodation.

7.217 The preferred option assesses the need or loss of houses in multiple occupation (HMOs)/hostels considering the impact on the local area, the quality of the development and local needs for this type of accommodation. The provision of other types of housing such as hostels is generally sustainable given that it will help to support vulnerable groups and those in education. It will have significant positive effects on the social and housing objectives. It will have uncertain effects on the health objectives because HMOs accommodation can sometimes be of low standard.

**Alternative Options – Policy HO8 (Hostels and houses in multiple occupation)**

- Encourage the conversion of hostels and HMOs to self-contained accommodation and not permit further HMOs.
- Permit loss of hostels and HMOs only if the accommodation is replaced by permanently available affordable housing.
- Resist the loss of hostels and HMOs.

7.218 Alternative option (1) proposes to encourage the conversion of hostels and HMOs to self-contained accommodation and not permit further HMOs. Encouraging conversion of HMOs to self-contained accommodation could reduce the amount of cheaper accommodation for those on low incomes but it could potentially improve the quality of the accommodation and reduce the number of unfit homes.

7.219 Alternative option (2) proposes to permit the loss of hostels and HMOs only if the accommodation is replaced by permanently available affordable housing. There are uncertain social effects, because insisting upon affordable housing only, could preclude other tenure forms that would benefit the borough.

7.220 Alternative option (3) proposes to resist the loss of hostels and HMOs. This approach would be too restrictive and would mean that opportunities to replace accommodation which is in a poor state of repair and is inadequate in terms of size and condition, would be missed.

POLICY	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<i>See policy wording above.</i>	✓	?	0	✓	✓	0	0	0	0	0	0	0
<b>Alternative option (1):</b> <i>Encourage the conversion of hostels and HMOs to self-contained accommodation and not permit further HMOs .</i>	0	✓	0	✓	✓	0	0	0	0	0	0	0
<b>Alternative option (2):</b> <i>Permit loss of hostels</i>	✓	?	0	?	?	0	0	0	0	0	0	0

POLICY	SUSTAINABILITY OBJECTIVES											
<i>and HMOs only if the accommodation is replaced by permanently available affordable housing.</i>												
<b>Alternative option (3):</b> <i>Resist the loss of hostels and HMOs.</i>	✓	?	0	?	?	0	0	0	0	0	0	0

## Borough-wide Policy HO9 Student accommodation

### Borough-wide Policy HO9

#### Student accommodation

The council recognises the London-wide need for student accommodation, and to assist in meeting this need it will support applications for student accommodation as part of mixed use development schemes within the Old Oak Regeneration Area, White City and Earls Court and West Kensington Opportunity Areas. Applications for student accommodation outside of these areas will be assessed on a site by site basis, but the council will resist proposals which are likely to have adverse local impacts.

An application for student accommodation will need to show that:

- The site is in an area with good public transport accessibility (normally PTAL 4-6) with access to local convenience services and the proposal would not generate additional demands for on-street parking;
- There would be no loss of existing housing;
- The development does not have a detrimental impact on the local area, and where appropriate should include a management and maintenance plan for the accommodation to demonstrate how the amenity of neighbouring properties will be protected and what steps would be taken to minimise the impact of the accommodation on neighbouring uses;
- The accommodation is of high quality, including size of units, daylight and sunlight standards;
- Wheelchair accessible accommodation is provided to meet the needs of disabled students; and
- The student accommodation should be secured for occupation by members of specified London-based educational institutions.

7.221 The preferred option considers that student accommodation will be best delivered in the two main Opportunity Areas where it can be planned and integrated as part of mixed use developments. The effects on a number of sustainability objectives are uncertain and will depend upon the specifics of individual schemes. Those effects will need to be kept under review.

7.222 The preferred option seeks to mitigate the potential negative impacts of student accommodation on neighbouring properties by assessing the overall impact of the proposal on the Opportunity Areas strategies. and applications outside those areas on a site-to-site basis. There are a number of positive effects but some uncertainties as well because much will depend upon specific proposals.

**Alternative Options - Policy HO9 (Student accommodation)**

- Restrict student housing unless it meets the needs of a local college or institutions.
- Not have a transport accessibility level criterion and allow student accommodation across all the regeneration areas subject to other criteria.

7.223 Alternative option (1) proposes to restrict student housing unless it meets the needs of a local college or institutions. Restricting student accommodation to that which meets local need is positive in that it would minimise transport movements across the borough, however there is a London wide need for student accommodation and the council's preferred approach is to support schemes that will not replace existing housing for local residents.

7.224 Alternative option (2) proposes not have a transport accessibility level criterion and allow student accommodation across all the regeneration areas subject to other criteria. This could lead to proposals being promoted in unsuitable areas of the borough, thus undermining sustainability objectives.

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO9 Student accommodation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> The council recognises the London-wide need for student accommodation, and to assist in meeting this need it will support applications for student accommodation as part of mixed use development schemes within the Old Oak Regeneration Area, White City and Earls	✓	0	?	✓	?	0	✓	?	✓	?	?	✓

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO9 Student accommodation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Court and West Kensington Opportunity Areas. Applications for student accommodation outside of these areas will be assessed on a site by site basis, but the council will resist proposals which are likely to have adverse local impacts.												
<b>Preferred Option:</b> An application for student accommodation will need to show that [...]. <i>See policy wording above.</i>	✓	?	?	✓	?	0	✓	?	✓	?	?	✓
<b>Alternative option (1):</b> <i>Restrict student housing unless it meets the needs of a local college or institutions.</i>	0	0	?	✓	0	✓	0	✓	✓	0	0	✓
<b>Alternative option (2):</b> <i>Not have a transport accessibility level criterion and allow student accommodation across all the regeneration areas subject to other criteria.</i>	?	0	0	?	X	0	?	?	X	?	X	?

## Borough-wide Policy HO10 Gypsy and traveller accommodation

### Borough-wide Policy HO10

#### Gypsy and traveller accommodation

The council will work closely with the Royal Borough of Kensington and Chelsea to protect, improve and, if necessary, increase the capacity of the existing gypsy and traveller site at Westway.

7.225 The preferred option is an interim policy awaiting the completion of the Gypsy and Traveller Accommodation Needs Assessment which has been carried out jointly with the Royal Borough of Kensington and Chelsea. The outcome of this assessment will have an impact on the future wording of this policy at the Regulation 19 proposed submission stage.

#### Alternative Options - Policy HO10 (Gypsy and traveller accommodation)

- Identify alternative sites in the borough to meet the need for additional pitches.

7.226 The alternative option would be the ideal way to ensure adequate provision of pitches to meet local need, but would difficult to implement given the built up nature of the borough and the lack of suitable space to accommodate additional pitches.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO10 Gypsy and traveller accommodation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	?	?	0	?	0	0	0	0	0	0	0	0
<b>Alternative option (1):</b> <i>Identify alternative sites in the borough to meet the need for additional pitches.</i>	?	?	0	?	0	0	0	0	0	0	0	0

#### Recommendation

The interim policy option is awaiting the completion of the joint Gypsy and Traveller Accommodation Needs Assessment. Following the completion of this assessment then changes to the wording of this policy will be required.

#### Borough-wide Policy HO11 Basement accommodation and lightwells

##### Borough-wide Policy HO11

##### Basement accommodation and lightwells

New basement accommodation in existing dwellings will only be permitted where:

- it does not extend beyond the footprint of the dwelling and any approved extension (whether built or not);
- it does not comprise more than one storey;
- there is no adverse impact on the amenity of adjoining properties and

- on the local, natural and historic environment; and
- it does not increase flood risk from any source and complies with the requirements of policy CC3 on reducing the risks of flooding.

**All other new or extended accommodation below street level should be designed to minimise the risk of flooding to the property and nearby properties from all sources of flooding.**

**To minimise the risk of sewer flooding, developments will be required to provide active drainage devices.**

**New self-contained basement flats will not be permitted in the Environment Agency's Flood Zone 3 areas where there is a risk of rapid inundation by flood waters in the event of a breach of the river's flood defences, unless a satisfactory means of escape can be provided.**

7.227 The effects of the preferred option are primarily related to environmental objectives.

7.228 The preferred option seeks to ensure that new basement development should not cause harm to the significance of heritage assets. As such the preferred option would have a positive impact on the heritage sustainability objective as its very purpose is to protect the Borough's heritage assets.

7.229 The policy does not allow basements deeper than a single storey given the likely impact of the construction phase on the amenity and living conditions of those who live in the vicinity, the higher carbon embodiment of basements and the greater risk of harm to structural stability associated with deeper basement digs. The approach is likely to have a positive relationship with the climate change sustainability objective as smaller basements will use less steel and concrete. It will also be compatible with reducing the transport impacts sustainability objective as a reduction in the amount of excavation is likely to reduce the number of vehicle movements required. A reduction in traffic and the construction process will have a corresponding positive impact on air quality and pollution, and upon the creation of construction waste and reduction in traffic. Where structural stability is maintained, this will have a positive impact on the heritage sustainability appraisal.

7.230 The preferred option also makes a specific reference to the need to minimise the risk of sewer flooding in order to protect the newly created basement from sewer flooding. This requirement is considered to be compatible with the reduction of pollution and reduce the impact of climate change sustainability objectives as its purpose is to mitigate both flooding and pollution events.

7.231 There are no significant effects on other objectives, although allowing basements could potentially contribute towards increasing the range of housing available.



### Alternative Options - Policy HO11 (Basement accommodation and lightwells)

- Permit all basement residential accommodation where criteria including room sizes, car parking, daylight and sunlight is met.

7.232 The alternative option has some negative effects, in particular on the climate change sustainability objective because it does not consider the issue of flooding or sewer flooding. The impact of flooding could be significant and the alternative policy does not allow for the effective drainage of the remaining soil having a beneficial impact on surface water flows and flooding. It also doesn't not consider the impact of basement accommodation on the historic environment such as listed buildings and archaeological remains and this could lead to a negative impact on the heritage sustainability objective by causing harm.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO11 Basement accommodation and lightwells	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	0	0	✓	0	0	✓	0	0	✓	✓	0
<b>Alternative option (1):</b> <i>Permit all basement residential accommodation where criteria including room sizes, car parking, daylight and sunlight is met.</i>	0	?	0	✓	0	0	x	0	0	✓	x	0

### Borough-wide Policy HO12 Detailed residential standards

#### Borough-wide Policy HO12

#### Detailed residential standards

The council will ensure that the design and quality of all new housing, including new build, conversions and change of use, is of a high standard and that developments provide housing that will meet the needs of future occupants and respect the principles of good neighbourliness.

To achieve a high standard of design, the following considerations will be taken into account:

- Floor areas and room sizes in new build dwellings, conversions and changes of use, including meeting 'Nationally Described Space Standard';
- Accessibility for disabled people;
- Amenity and garden space provision;
- A safe and secure environment;
- Car parking and cycle parking;

- Flood protection measures and attenuation of surface water run off;
- Sustainable energy measures;
- Provision of waste and recycling storage facilities;
- Noise insulation and layout to minimise noise nuisance between dwellings; and
- Protection of existing residential amenities, including issues such as loss of daylight, sunlight, privacy and outlook.

**Proposals for extensions will be considered acceptable where it can be demonstrated that there is no detrimental impact on:**

- Privacy enjoyed by neighbours in adjoining properties;
- Daylight and sunlight to rooms in adjoining properties;
- Outlook from windows in adjoining properties; and
- Openness between properties.

**The council has prepared an SPD that provides further guidance on these and other residential amenity issues referred to in Local Plan.**

7.233 The policy has a wide range of positive effects including environmental (particularly in relation to climate change, careful consumption and pollution) social, transport and heritage benefits. It will lead to high standard of design and sustainable developments in the borough.

7.234 There is a strong correlation between this housing policy and design/heritage policies. The provision of supporting SPDs should flesh out some of the details of these standards.

#### **Alternative Options - Policy HO12 (Detailed residential standards)**

- Not to have any standards.
- Require market housing to meet the standards of the Mayor's Housing Design Guide only.

7.235 Alternative option (1) proposes not to have any standards but this could lead to unsustainable development, for example low quality housing and neighbourhoods and non-consideration of environmental effects.

7.236 Alternative option (2) proposes to require market housing to meet the standards of the Mayor's Housing Design Guide only. There are a range of positive effects with this alternative option however by only requiring market housing to meet these standards, there is the potential for affordable and intermediate housing to be built to a lower residential standard.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO12 Detailed residential standards	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b>  <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	✓	✓	✓	✓	✓	✓
<b>Alternative option (1):</b> <i>Not to have any standards.</i>	0	X	0	X	?	0	X	X	0	X	X	0
<b>Alternative option (2):</b> <i>Require market housing to meet the standards of the Mayor's Housing Design Guide only.</i>	0	✓	0	✓	?	0	?	✓	0	✓	✓	0

### Assessing secondary, cumulative and synergistic effects

7.237 Policy HO1 Housing Supply is anticipated to positively contribute to the Draft Local Plan strategic objective 2 which seeks to increase the supply and choice of high quality housing. It is predicted that the policy will have a significant positive effect in the medium to long term, especially on the social sustainability objectives because new homes provided will need to meet local needs. New housing will be located in areas of good transport accessibility and the proposed density of new development will help to ensure the borough's town centres remain viable and attractive destinations providing employment, leisure and retail.

7.238 Policy HO2 Housing conversion and retention is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 2 which seeks to increase the supply and choice of high quality housing in the borough. The effect of policy HO2 is medium to long term. Overall, the preferred policy has been found sustainable against the sustainability objectives and will have both a permanent and direct effects on the social justice, affordable homes and social cohesion sustainability objectives. The uncertain effects will need to be monitored.

7.239 Policy HO3 Affordable Housing is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 2 increase the supply and choice of housing, particularly the need for affordable housing and strategic objective 3 protect social housing and provide more new affordable homes for local residents to buy or rent. The policy seeks no net loss of social/affordable rented housing on development therefore the effect of policy HO3 will be short to long term. It will have permanent and direct effects as well as a cumulative effect on the social justice, affordable homes and social cohesion sustainability objectives. The monitoring of this policy will be essential to ensure that appropriate tenure mixes are being secured and that social and economic polarisation in the borough is being reduced.

- 7.240 Policy HO4 Housing quality and density is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 2, 13, 14, and 17. The effect of policy HO4 will be medium to long term. It will have permanent and direct effects as well as a cumulative effect on the social and environmental sustainability objectives as the policy seeks to provide high quality housing developments which are well related to its surroundings. This will help maintain the character of the borough and the protection of residential amenity. Also the building of new homes in line with requirements of the Code for Sustainable Homes will mean housing is built to a higher environmental standard and be more energy efficient.
- 7.241 Policy HO5 Housing mix is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 2 which seeks to provide more housing in the borough and 3 which seeks to provide more affordable homes for local residents to buy or rent. Policy HO5 is likely to have medium to long term sustainability effect. It will have both permanent and direct effect by providing a mix of housing types that meet the borough's identified housing needs and this will have an overall positive effect and will increase the supply and choice of high quality housing.
- 7.242 Policy HO6 Accessible housing is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 2 which seeks to ensure that new housing meets local needs. The effect of this policy is short to long term and is predicted to have a permanent and direct impact on the social sustainability objectives. The building of new homes to "Lifetime Homes" standards will have a positive impact especially on the social justice sustainability objective by meeting the needs of those with disabilities. Overall, the preferred option has been found sustainable and no uncertain or negative effects have been identified.
- 7.243 Policy HO7 Meeting needs of people who need care and support is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 2 which seeks to ensure that new housing meets local needs. It is likely that the effects of this policy will be short to long term and will have a positive effect on the social justice sustainability objective by providing housing for those with special needs. Overall policy HO7 is sustainable and has no uncertain or negative effects.
- 7.244 Policy HO8 Hostels and houses in multiple occupation is anticipated that it will positively contribute towards the Draft Local Plan's strategic objective 2 by seeking to increase the supply and choice of high quality housing. Policy HO8 recognises the role that hostels and HMOs play in providing accommodation for single people who cannot afford self-contained accommodation. Policy HO8 is likely to have a medium to long term effect. Overall, the preferred option has been found sustainable.

- 7.245 Policy HO9 Student accommodation is anticipated to positively contributing towards the Draft Local Plan's strategic objective 2 by increasing the supply and choice of high quality housing. The policy seeks to provide new student accommodation as part of mixed use development schemes within the identified regeneration areas. It is predicted that effects of this policy will be medium to long term in terms of timeframe. The uncertain effects of policy HO9 on some sustainability objectives means that individual schemes will need to be looked at carefully as and when they come forward.
- 7.246 Policy HO10 Gypsy and traveller accommodation may contribute towards the Draft Local Plan's strategic objective 2 to ensure housing meets local needs and aspirations as it focuses on exploring the potential to increase the capacity of the existing site. The uncertain effects of policy HO10 on the social justice, health and affordable homes sustainability objectives will need to be monitored. It is important to note that the council is currently carrying out a Gypsy and Traveller Accommodation Needs Assessment and the outcome of this assessment will have an impact on the future wording of this policy.
- 7.247 Policy HO11 Basement accommodation and lightwells is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 2, 13 and 17. Any environmental impact is likely to be permanent in nature, as once a basement is excavated it is extremely unlikely to be removed at a later date. Any negative impact on the local economy would be short term as it would only relate to the construction phase of the development.
- 7.248 Policy HO12 Detailed residential standards is anticipated to positively contribute towards the Draft Local Plan increasing the supply and choice of high quality housing. Overall, Policy HO12 has been found sustainable, with a wide range of positive effects including environmental particularly in relation to climate change, careful consumption and pollution. It is likely that the effects of this policy will be medium to long term in terms of its timeframe and have both permanent and direct impacts on the sustainability appraisal objectives.

## **Local economy and employment**

### **Borough-wide Policy E1 Providing for a range of employment uses**

#### **Borough-wide Policy E1**

##### **Providing for a range of employment uses**

**The council will support proposals for new employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services and bio-medical research, and the retention and intensification of existing employment uses. It will require flexible and affordable space suitable for small and medium enterprises in large new business developments. When considering new proposals the council will also take into account:**

- whether there will be displacement of other priority uses;
- whether the scale and nature of the development is appropriate, having regard in particular to local impact and public transport accessibility; and
- impact upon small business accommodation.

7.249 By enhancing opportunities for the development of a range of different employment uses the policy will have positive effects on creating a sustainable economy and will also have the potential for providing satisfying work and social justice for borough residents. However, increasing employment could lead to an increase in pollution in the form of waste, emissions and consumption of resources if not carefully managed. These potential consequences may adversely impact upon the council's objectives to minimise the borough's impact on climate change and will need to be carefully considered when making planning decisions.

**Alternative Options - Policy E1 (Providing for a range of employment uses)**

- To seek a fixed proportion of accommodation for small business in larger developments.
- To allow the market to decide on the appropriate size of premises.

7.250 Alternative option (1) proposes to seek a fixed proportion of accommodation for small business in larger developments. This policy objective was included in earlier development plans (for example the UDP) when units of 500sq m or less were required in schemes of 5000 sqm or more. However the policy proved to be unsuccessful, and rather than include this level of detail in the policy it is more appropriate for it to be in the supporting text. It is considered that the best way forward to create a sustainable economy is to seek developments that are designed flexibly to allow for a range of sizes throughout a building's life.

7.251 Alternative option (2) proposes to allow the market to decide on the appropriate size of premises. It is considered that this option runs the risk of not delivering enough small accommodation, for example smaller start-up units for embryonic businesses. Existing accommodation of this type is at threat from change of use through permitted development rights and without re-provision there could be a negative impact upon a sustainable economy and also on satisfying work.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy E1 Providing for a range of employment uses</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy E1 Providing for a range of employment uses</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> The council will support proposals for new employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services and bio-medical research, and the retention and intensification of existing employment uses. It will require flexible and affordable space suitable for small and medium enterprises in large new business developments. When considering new proposals the council will also take into account: [...]. <i>See policy wording above.</i>	✓	0	0	0	0	✓	0	?	0	?	?	✓
<b>Alternative option (1):</b> <i>To seek a fixed proportion of accommodation for small business in larger developments.</i>	0	0	✓	0	0	✓	0	0	0	0	0	X
<b>Alternative option (2):</b> <i>To allow the market to decide on the appropriate size of premises.</i>	0	0	✓	0	0	X	0	0	0	0	0	X

## Borough-wide Policy E2 Land and premises for employment uses

### Borough-wide Policy E2

#### Land and premises for employment uses

The council will seek to retain land and premises capable of providing continued accommodation for employment or local services unless:

1. Continued use would adversely impact on residential areas; or
2. An alternative use would give a demonstrably greater benefit that could not be provided on another site; or

- 3. It can be satisfactorily demonstrated that the property is no longer required for employment purposes; or**
- 4. An alternative use would enable support for essential public services and is otherwise acceptable.**

**Where the loss of employment use is proposed in line with sub para.3 above, the council will have regard to:**

- the suitability of the site or premises for continued employment use with or without adaptation;**
- evidence of unsuccessful marketing;**
- the need to avoid adverse impact on established clusters of employment use; and**
- the need to ensure a sufficient stock of premises and sites to meet local need for a range of types of employment uses, including small and medium sized enterprises, in appropriate locations.**

**The mixed use enhancement of employment sites will be considered acceptable where these are under-utilised, subject to the satisfactory retention or replacement of employment uses in the scheme where this continues to be appropriate.**

7.252 A lack of land and premises for employment activities is likely to reduce the possibility of maintaining a sustainable economy and business diversity in the borough. It is appropriate to protect this local resource, whilst allowing for release of land and premises where this is justified by site circumstances, viability, etc. Loss could also impact upon opportunities for the education, training and employment prospects of local residents. The policy to allow the mixed use enhancement of sites will be sustainable where uses do not impact detrimentally on their neighbours.

#### **Alternative Options - Policy E2 (Land and premises for employment uses)**

- To allow employment land and premises to be lost to other uses without the assessment of appropriate criteria.**

7.253 The alternative option proposes the loss of employment land and accommodation without being subject to assessment of safeguarding criteria. It is considered that this option, which would not allow for the consideration of matters such as viability, vacancy and need, would inevitably lead to a loss of accommodation to more high value uses. It is possible that a shortage of accommodation could arise through such a policy and therefore this would not contribute to the creation of a mixed use sustainable economy. People would also have to travel further to jobs as local employment opportunities declined.



POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy E2 Land and premises for employment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	0	✓	0	0	✓	0	0	0	0	0	✓
<b>Alternative option (1):</b> <i>To allow employment land and premises to be lost to other uses without the assessment of appropriate criteria.</i>	0	0	x	0	0	x	0	0	0	0	0	x

### Borough-wide Policy E3 Provision for visitor accommodation and facilities

#### Borough-wide Policy E3

##### Provision for visitor accommodation and facilities

Permission will be granted for new visitor accommodation and facilities or the extension of existing facilities within the three town centres, the Earl's Court and West Kensington and White City Opportunity Areas and the Old Oak Regeneration Area subject to:

- the development being well located in relation to public transport;
- the development and any associated uses not having a detrimental impact on the local area;
- no loss of priority uses such as permanent housing;
- provision of adequate off street servicing;
- at least 10% of hotel bedrooms designed as wheelchair accessible;
- the facility being of a high standard of design; and
- the scheme adding to the variety and quality of visitor accommodation available locally.

Outside the identified areas, the following will be considered appropriate, subject to meeting the above criteria:

- small scale hotels; and
- visitor accommodation related to major visitor attractions of sub-regional or greater significance in accordance with the provisions of London Plan Policy 4.5A (c).

7.254 The preferred policy seeks to ensure that new visitor accommodation and facilities are located in clearly defined areas with good public transport accessibility and other facilities. The criteria based-approach that will apply to individual proposals will ensure that impacts on the social justice, housing, heritage, transport and economic objectives are positive. The policy will ensure that outside of the defined areas, new developments are of a smaller scale and not detrimental to the local and residential areas.

**Alternative Options - Policy E3 (Provision for Visitor accommodation and facilities)**

- Developing area-specific policies for different types of accommodation, indicating, for instance where larger hotels would generally be acceptable.
- Identifying capacity for new visitor facilities in the town centres and other locations with good public transport access and include a criteria based approach to determining proposals.

7.255 Alternative option (1) would allow for more certainty regarding where certain types of hotel may be appropriate. However, it could also be overly restrictive and may prevent the location of hotel accommodation in other areas that might be considered to be acceptable after applying locational criteria.

7.256 Alternative option (2) would allow for more certainty but identifying capacity for certain areas could be seen as constraining possibilities in other locations. Rather than set capacity figures it is considered more appropriate to consider issues of scale and numbers against physical and environmental criteria as and when proposals come forward.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy E3 Provision for visitor accommodation and facilities	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	0	0	✓	?	✓	✓	✓	✓	0	✓	✓
<b>Alternative option (1):</b> <i>Developing area-specific policies for different types of accommodation, indicating, for instance where larger hotels would generally be acceptable.</i>	0	0	0	0	0	0	0	0	0	0	0	?

<b>Alternative option (2):</b> <i>Identifying capacity for new visitor facilities in the town centres and other locations with good public transport access and include a criteria based approach to determining proposals.</i>	0	0	0	0	0	0	0	0	0	0	0	?
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## **Borough-wide Policy E4 Local employment, training and skills development initiatives**

### **Borough-wide Policy E4**

#### **Local employment, training and skills development initiatives**

**The council will insist on appropriate employment and training initiatives for local people of all abilities in the construction of major developments and in larger employment generating developments, including visitor accommodation and facilities, when these are completed. Local businesses will be encouraged to adopt the London Living Wage.**

7.257 The policy will seek employment and training initiatives as part of major developments and will help support economic growth in the borough by creating a skilled local work force. The policy will positively contribute to the economic, social and education sustainability objectives. It may also contribute to health objectives by providing people with the skills and knowledge to earn more money and sustain healthier lifestyles. Encouraging businesses to adopt the Living Wage will have benefits for those workers who are in low paid jobs and contribute to the social justice objective.

#### **Alternative Options - Policy E4 (Local employment, training and skills development initiatives)**

- To not seek any contributions and for employment training and skills development.

7.258 This alternative option would not seek employment and training initiatives as part of major developments. Pursuing this option is likely to adversely affect the most disadvantaged people in the community who could otherwise benefit from obtaining employment training and skills. There are also likely to be knock on negative impacts in terms of the sustainability of the economy.

POLICY OPTION	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy E4 Local employment, training and skills development initiatives	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	0	✓	0	✓	✓	0	0	✓	0	0	✓
<b>Alternative option (1):</b> <i>To not seek any contributions and for employment training and skills development.</i>	x	0	x	0	0	x	0	0	0	0	0	x

### Assessing secondary, cumulative and synergistic effects

7.259 Policy E1 Providing for a range of employment uses is anticipated to contribute positively towards the Draft Local Plan's strategic objective 4 seeking to reduce polarisation and worklessness, and objective 5 and objective 6 that look to support the local economy, inward investment and businesses. Overall, policy E1 has been found sustainable, but uncertain environmental effects on the SA objectives will have to be monitored.

7.260 Policy E2 Land and premises for employment uses is anticipated to contribute positively towards the Draft Local Plan's strategic objectives 5 and 6 that look to support the local economy, inward investment and businesses. Overall, policy E2 has been found sustainable however the policy will also allow for the provision of alternative uses, such as housing, which will assist in meeting other strategic objectives.

7.261 Policy E3 Provision for visitor accommodation and facilities is anticipated to contribute positively towards the Draft Local Plan's strategic objectives 5 and 6 that look to support the local economy, inward investment and businesses. Overall, policy E3 has been found sustainable however policy E3 will protect other uses, such as housing, thereby contributing to other social appraisal objectives and will include an assessment of transport accessibility and have positive environmental impacts.

7.262 Policy E4 Local employment, training and skills development initiatives is anticipated to contribute positively towards the Draft Local Plan's strategic objectives 4, 5 and 6 that look to create opportunities for training and employment and support the local economy, inward investment and businesses. Overall, policy E4 has been found sustainable and will also contribute to other social appraisal objectives.

## **Town and Local Centres**

### **Borough-wide Policy TLC1 Hierarchy of town and local centres**

#### **Borough-wide Policy TLC1**

##### **Hierarchy of town and local centres**

**The council will work with the Mayor of London and other stakeholders, such as Business Improvement Districts, to sustain the vitality and viability of the borough's hierarchy of three town centres, 4 key local centres, 17 neighbourhood parades and 6 satellite parades (see Appendix 2 and Map 6 for details) and to sustain the vitality and viability of the hierarchy. In particular:**

- Hammersmith town centre is designated as a major centre in the London Plan and will be the borough's primary civic centre, a strategic office centre, and major shopping, arts, cultural and entertainment centre. Sites should be developed within the town centre to strengthen that role and especially to regenerate King Street between the Town Hall and the prime shopping area. (See also policy for Hammersmith Regeneration Area);**
- Shepherds Bush town centre is designated as a metropolitan centre in the London Plan. The priority will be to strengthen the historic town centre by encouraging shopping and leisure based development and uses that will help regenerate town centre functions and link with the White City Opportunity Area. Major leisure, sports and arts activities and major shopping that cannot be located within the town centre may be appropriate north of Westfield on the edge of the existing town centre boundary and there is potential to consider a northwards extension of the town centre. Improving the vitality of Shepherds Bush Market is an important part of the strategy for this centre. (see also policy for the White City Regeneration Area); and**
- Fulham town centre is designated as a major centre in the London Plan. The priority will be to regenerate the northern part of the centre, which is in need of significant new investment, by the provision of more and improved shopping. The focus for Fulham town centre will be shopping and local services and leisure activities. (See also policy for the Fulham Regeneration).**

**The 4 key local centres are East Acton, Askew Road, North End Road (West Kensington) and Fulham Road.**

**The 17 neighbourhood parades and 6 satellite parades are identified in Appendix 2 and Map 6.**

**In all three town centres (but also in other centres in the hierarchy) the council will encourage diversity and distinctiveness in the shopping mix. The council will seek to ensure a good range of shop sizes and types, with independent as well as national traders, that are accessible to local residents, workers and visitors. The council will negotiate planning obligations where appropriate,**

**feasible and viable to mitigate the loss of, and/or secure or support, affordable retail space to encourage small or independent traders. The council will promote the provision of shopmobility schemes.**

**In the major regeneration areas new shopping facilities of an appropriate scale will be required to provide for the day to day needs of people living and working in the area.**

**Applications for all new shopping will be expected to meet the policies set out in the National Planning Policy Framework or successor national planning policy. However, whatever national policy is in place, the council will be concerned that all proposals are of an acceptable scale and appropriate impact for the existing hierarchy.**

7.263 The preferred policy option will seek to locate major shopping developments in the borough's larger shopping centres. This will help to protect smaller centres from over-development and will reduce the need to travel as the borough's larger centres generally have the best public transport accessibility. A hierarchy of town centres, key local centres and smaller neighbourhood parades will make local shops and services more accessible to residents. The preferred option seeks to regenerate run down areas that are in need of investment, (particularly in Fulham centre) and to minimise adverse impacts on surrounding residential properties. The impacts on the environmental objectives from this regeneration will to a large extent depend on implementation. By concentrating economic development in the town centres is likely to exert a positive effect by boosting the local economy. The provision of local convenience stores and other shops for day to day needs as part of major developments, will create employment opportunities for surrounding residents. Overall it is considered that this policy will have no significant effects and there should be an overall improvement on the local economy.

#### **Alternative Options – Policy TLC1 (Hierarchy of Town and Local Centres)**

- Maintain the existing hierarchy of town and local centres and protected parades with protection of corner shops without any updates or boundary changes
- No longer have a designated hierarchy.

7.264 Alternative option (1) proposes to maintain the existing hierarchy of town and local centres and protected parades with the protection of corner shops. However this alternative option lacks any strategic direction to improve and enhance the hierarchy of town centres and make improvements in areas in need of regeneration. Therefore the alternative option scores less favourably in terms of sustainability and has no significant effect on many of the sustainability objectives. It does not maximise the opportunities which can be achieved by the preferred option such as reducing the need to travel and boosting the local economy by providing jobs for local residents. This alternative option lacks detail in identifying the specific priorities for Hammersmith town centre, Shepherds Bush town centre and Fulham town centre.

7.265 Alternative option (2) proposes not to have a designated hierarchy policy approach. This alternative option does not score well in terms of sustainability because without a hierarchy in place there is no identification of the principal shopping functions in the Borough's centres and therefore it would be difficult to encourage appropriate levels of new retail investment. Without a designated hierarchy in place it would also be difficult to strengthen and sustain a spread of centres which serve the Borough's changing shopping need in convenient and accessible locations. This would have a negative impact on pollution especially in terms of transport and air quality as residents would have to travel to other areas in the Borough or further afield to access shops which fulfil their needs as these would not be provided locally, significantly limiting the use of sustainable modes of transport such as walking and cycling.

POLICY OPTIONS	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Policy TLC1: Hierarchy of Town and Local Centres</b>  <b>Preferred Option</b> A hierarchy of centres to consist of three town centres, four key local centres, 16 neighbourhood parades and 6 satellite parades.	✓	0	0	0	✓	✓	0	0	✓	0	0	✓
<b>Preferred Option</b> In the major regeneration areas, new shopping facilities of an appropriate scale will be required to provide for the day to day needs of people living and working in the area.	✓	0	0	0	✓	✓	0	0	✓	0	0	✓
<b>Alternative Option 1:</b> <i>Maintain the existing hierarchy of town and local centres and protected parades with protection of corner shops.</i>	?	0	0	0	?	0	0	0	0	0	0	0
<b>Alternative Option 2:</b> <i>No longer have a designated hierarchy.</i>	0	0	0	0	0	0	?	x	x	0	0	0

## Borough-wide Policy TLC2 Managing uses in the prime retail frontage areas of town centres

### Borough-wide Policy TLC2

### Managing uses in the prime retail frontage areas of town centres

**The council will seek to manage uses within the prime retail frontages as shown on the Proposals Map and defined in Table 9 below with the objective of ensuring that shops (A1 use class) remain the main use in the town centres.**

- 1. In the core areas of the following town centres there should be no loss of class A1 frontage at street level or net loss of class A1 floorspace:**
  - a. In Hammersmith Town Centre, between 1- 93 King Street and on the north side of King Street between Hammersmith Grove and Leamore Street; and**
  - b. In Fulham Town Centre between 312 - 406 and 417- 445 North End Road and 1-19a and 2-24 Jerdan Place.**
- 2. Elsewhere within the prime retail frontages, changes out of A1 floorspace or a reduction in the proportion of the length of frontage in A1 use may be permitted where it does not have an adverse impact on the local area, and if:**
  - a. No more than 33% of the length of the prime retail frontage as whole and no more than 33% of the length of the frontage in an individual street block (including in enclosed purpose built shopping centres and in malls that are not subject to specific site specific planning permissions that control uses) would be occupied by or have permission to be used by uses other than those within class a1;**
  - b. No more than 20% of the length of the frontage of an individual street block in any part of the prime retail frontage would be in class A3-A5 uses (except in shepherd's bush where the maximum percentage will be 33%); and**
  - c. Other than in enclosed purpose-built shopping centres or in malls, no more than two adjoining premises or a frontage in excess of 15 metres, whichever is the lesser width of frontage, would be occupied by or have permission to be used by uses other than those within class A1.**
- 3. Planning conditions will be imposed in any permission for such changes of use to secure provision of a shop style fascia, and window display at street level, and to control the hours of opening of class A3-A5 uses.**
- 4. Additional A4 and A5 uses (pubs, bars and takeaways), betting shops, pay day loan shops, amusement centres, mini cab offices and residential uses will not be permitted on the ground floor of the prime retail frontages.**
- 5. In all calculations of the proportion of the frontage of street blocks in class A1 and non-class A1 uses, the lawful use and unimplemented extant permissions for changes of use will be taken into account.**
- 6. Consent will not be granted for any ground floor residential frontages.**

7.266 The preferred policy has a variety of positive impacts. By seeking to protect the amount of retail frontage and floorspace within town centres it will help in achieving a sustainable economy, however the policy may need to be applied flexibly in times of economic downturn. There will also be positive impacts on transport as vibrant town centres with a good range of uses will reduce the need for residents to travel further to access a wider variety of retail premises. The controls on A3-A5 use class could have a positive effect on health and social behaviour by managing, in particular, the accessibility of takeaways for children and young people.



### Alternative Options – Policy TLC2 (Managing uses in the prime retail frontage areas of town centres)

- Alter the boundaries of the town centres and prime retail frontages.
- Change quotas so that they are either more or less restrictive or remove completely.

7.267 Alternative option (1) proposes to alter the boundaries of the town centres and prime retail frontages. This alternative option would either result in an enlarged or reduced town centre. A larger town centre might impact on viability and the sustainability of the economy. A smaller town centre might impact upon the amount of retail that can feasibly be provided and may lead to residents needing to travel further distances to shop.

7.268 Alternative option (2) proposes to change quotas so that they are either more or less restrictive or remove them completely. If the quotas were made more restrictive, this could result in a lack of flexibility and restrict the retail market which would negatively impact on the sustainability of the economy. If the quotas were removed altogether or made less restrictive this could reduce the number and range of retail premises in the town centres which could negatively impact on the vitality of the centres and the sustainability of the economy.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy TLC2 Managing uses in the prime retail frontage areas of town centres</b>												
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	0	0	✓	0	0	0	✓	0	0	✓
<b>Alternative option (1):</b> <i>Alter the boundaries of the town centres and prime retail frontages.</i>	0	0	0	0	0	0	0	0	X	0	0	X
<b>Alternative option (2):</b> <i>Change quotas so that they are either more or less restrictive or remove completely.</i>	0	0	0	0	0	?	0	0	0	0	0	?

### Borough-wide Policy TLC3 Managing uses in the non-prime frontage areas of town centres

#### Borough-wide Policy TLC3

#### Managing uses in the non-prime frontage areas of town centres

In non-prime retail frontages in town centres, changes from A class use at

street level may be permitted for alternative uses which can be shown to be complementary to the shopping frontage, maintain or increase the vitality and viability of the town centre, do not have an adverse impact on the local area and where:

- more than 50% of the length of frontage of the individual street block would remain in class A1 uses; and
- no more than 33% of the length of frontage of the individual street block would be in class A3, A4, A5 and sui generis uses, such as amusement centres or mini-cab offices.

Where a proposal does not meet the quotas set out above and where the premises have been vacant for at least 1 year with evidence of marketing, the council may consider granting permission taking into account other factors such as:

- the contribution the unit makes to the function of the centre in terms of the size of the unit and the length of its frontage;
- the nature and characteristics of the proposed use and evidence of need;
- the location of the unit within the centre; and
- shop front appearance.

In all calculations of the proportion of the frontage of street blocks in class A1 and non-A1 uses, the lawful use and unimplemented extant permissions for changes of use will be taken into account. Consent will not be granted for any ground floor residential frontages.

7.269 The policy manages the uses in non-prime frontage areas in town centres. It will contribute to achieving a sustainable economy. It will have a positive impact on the social justice (by protecting the range and quality of shops and meeting residents' needs), the health (by minimising the adverse impact of too many bars and hot food takeaways) and transport (by reducing the need to travel) objectives.

#### **Alternative Options – Policy TLC3 (Managing uses in the non-prime retail frontage areas of town centres)**

- Alter the boundaries of the non-prime retail frontages.
- Change quotas so that they are either more or less restrictive or remove completely.

7.270 Alternative option (1) would either result in an enlarged or reduced town centre. A larger town centre might impact on viability and the sustainability of the economy. A smaller town centre might impact upon the amount of retail that can feasibly be provided and may lead to residents needing to travel further distances to shop.

7.271 Alternative option (2) proposes to change quotas so that they are either more or less restrictive or remove them completely. If the quotas were made more restrictive, this could result in a lack of flexibility and restrict the retail market which would negatively impact on the sustainability of the economy. If the quotas were removed altogether or made less restrictive this could reduce the number and range of retail premises which could negatively impact on the vitality of the centre and the sustainability of the economy.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy TLC3 Managing uses in the non-prime retail frontage areas of town centres	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b>  <i>See policy wording above.</i>	✓	✓	0	0	?	0	0	0	✓	0	0	✓
<b>Alternative option (1):</b> <i>Alter the boundaries of the town centres and prime retail frontages.</i>	0	0	?	0	0	0	0	0	X	0	0	X
<b>Alternative option (2):</b> <i>Change quotas so that they are either more or less restrictive or remove completely.</i>	0	0	0	0	0	?	0	0	0	0	0	?

#### **Borough-wide Policy TLC4 Managing uses in key local centres, neighbourhood parades and satellite parades**

##### **Borough-wide Policy TLC4**

##### **Managing uses in key local centres, neighbourhood parades and satellite parades**

The council has designated key local centres, neighbourhood parades and satellite parades to provide accessible shopping and service facilities to meet local needs (see Proposals Map and Appendix 2). In these centres, uses will be permitted on the following basis:

##### **Key Local Centres:**

- a. No more than 50% of the length of the key local centre frontage as a whole will be permitted to change to non-class A1 uses; and
  - b. No more than 20% of the key local centre frontage as a whole will be permitted to change to food and drink uses (class A3, A4 and A5 uses)
- Neighbourhood Parades:**

- a. No more than 35% of the neighbourhood parade frontage as a whole will be permitted to change to non-class A1 uses; and

**b. No more than 20% of the neighbourhood parade frontage as a whole will be permitted to change to food and drink use (class A3, A4 and A5 uses).**

**Satellite Parades:**

**a. No more than 50% of the satellite parade frontage as a whole will be permitted to change to non-class A1 uses; and**

**b. No more than 25% of the satellite parade frontage as a whole will be permitted to change to food and drink use (class A3, A4 and A5 uses).**

**Criteria for all key local centres, neighbourhood and satellite parades**

**Community facilities and other uses will be permitted within key local centres, neighbourhood parades and satellite parades subject to the above quotas, the proposed use being shown to be complementary to the function of the centre, enhancing the centre's viability and vitality and not having an adverse impact on the local area. Consent will not be granted for any ground floor residential frontages.**

**Where a proposal does not meet the quotas set out above and where the premises have been vacant for at least 1 year with evidence of marketing, the council may consider granting permission taking into account other factors such as:**

- the contribution the unit makes to the function of the centre in terms of the size of the unit and the length of its frontage;**
- the nature and characteristics of the proposed use and evidence of need;**
- the location of the unit within the centre; and**
- shop front appearance.**

**In respect of proposals involving the loss of pubs, the council will consider evidence of need, community asset value and viability in pub use.**

**In respect of proposals for additional hot food takeaways (class A5), in addition to the quota policies that will apply, the council when considering proposals will take into account proximity to areas where children and young people are likely to congregate, such as schools, parks and youth facilities.**

**In respect of proposals for additional betting shops, pawnbrokers and pay day loan shops, in addition to the quota policies that apply, the council will take into account the distribution and clustering of such premises in the locality (see policy TLC7).**

**In all calculations of the proportion of the frontage of street blocks in class A1 and non-A1 uses, the lawful use and unimplemented extant permissions for changes of use will be taken into account.**

7.272 The quota policies will contribute to maintaining the viability and vitality of the centres and protect the retail base of those centres. The flexibility that is built in to the policy will allow a considered approach to the issue of vacancy. The policy will have a positive impact on the economy, social justice (by improving the range and quality of shops and meeting residents' needs), health (by minimising the adverse impacts of too many bars and hot food takeaways) and sustainable transport objectives (by reducing the need to travel).

**Alternative Options – Policy TLC4 (Managing uses in key local centres, neighbourhood parades and satellite parades)**

- Change quotas so that they are either more or less restrictive or remove completely.

7.273 Alternative option (1) proposes to change quotas so that they are either more or less restrictive or remove them completely. If the quotas were made more restrictive, this could result in a lack of flexibility and restrict the retail market which would negatively impact on the sustainability of the economy. If the quotas were removed altogether or made less restrictive this could reduce the number and range of retail premises which could negatively impact on the vitality of the centre and the sustainability of the economy.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy TLC4 Managing uses in key local centres, neighbourhood parades and satellite parades	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	0	0	?	0	0	0	✓	0	✓	✓
<b>Alternative option (1):</b> <i>Change quotas so that they are either more or less restrictive or remove completely.</i>	0	0	0	0	0	?	0	0	0	0	0	?

**Borough-wide Policy TLC5 Small non designated parades, clusters and corner shops**

**Borough-wide Policy TLC5**

**Small non designated parades, clusters and corner shops**

**Outside town centres, key local centres, neighbourhood parades and satellite parades, the council will seek to retain shops and other local services to meet local needs. Residential use and changes to other non- class A uses will be permitted except where this will result in a demonstrable shortage of class A1 uses in the locality.**

**In assessing an application in a non-designated parade or cluster for a change of use from a class A1 use to any other use, the council will take into account:**

**the need to retain 50% of the total length of the frontage of the parade or cluster in a class A1 use and less than 33% of the length of frontage in food and drink uses (class A3, A4 and A5 uses);**

- **the range of shops in the locality to meet local needs;**
- **the length of time that the application premises may have been vacant and the marketing of the premises; and**
- **the number of uses that may adversely impact on the quality of the parade or cluster, such as betting shops and amusement centres.**

**Corner shops are important for meeting local needs and will be protected for continued retail use (class A1). Changes of use from retail use will not be permitted where there is a shortage of alternative shopping (where town centres, key local centres, protected parades and satellite parades and non-designated parades and clusters are not within 300 metres).**

**In respect of proposals involving the loss of pubs the council will consider evidence of need, community asset value and viability in pub use. In respect of hot food takeaways (class A5), in addition to the quota policies that will apply, the council will take into account proximity to areas where children and young people are likely to congregate, such as schools, parks and youth facilities.**

**In respect of proposals for additional betting shops, pawnbrokers and pay day loan shops, in addition to the quota policies that apply, the council will take into account the distribution and clustering of such premises in the locality (see policy TLC7). In all calculations of the proportion of the frontage of street blocks in Class A1 and non-A1 uses, the council will take into account the lawful use and unimplemented extant planning permissions for changes of use.**

7.274 The quotas policy is more flexible outside the draft Local Plan retail hierarchy but still seeks to protect retail premises. Shops in these areas can provide important goods and services to local residents and this will contribute positively to social objectives, local employment and the economy, to health (by sustaining local shops that people can get to by walking) and sustainable transport (by reducing the need to travel).

#### **Alternative Options – Policy TLC5 (Small non-designated parades and clusters and corner shops)**

- **Change quotas so that they are either more or less restrictive or remove completely.**
- **Protect all shop parades across the borough as retail locations.**

7.275 Alternative option (1) proposes to change quotas so that they are either more or less restrictive or remove them completely. If the quotas were made more restrictive, this could result in a lack of flexibility and restrict the retail market which would negatively impact on the sustainability of the economy. If the quotas were removed altogether or made less restrictive this could reduce the number and range of retail premises outside of the designated centres which still provide a local service, effecting both social cohesion and the sustainability of the economy.

7.276 Alternative option (2) would help protect local shopping opportunities, whilst allowing a limited amount of other A class uses. However, a blanket approach may not reflect the realities of each cluster, and could result in vacancies where viable A1 uses cannot be found. This could particularly be a problem in clusters located close to larger centres. In these locations, there may be more benefit in allowing more A2 or community service uses for example.

POLICY	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy TLC5 Small non designated parades, clusters and corner shops</b>												
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	0	0	✓	✓	0	0	✓	0	0	✓
<b>Alternative option (1):</b> <i>Change quotas so that they are either more or less restrictive or remove completely.</i>	0	0	0	0	?	0	0	0	0	0	0	?
<b>Alternative option (2):</b> <i>Protect all shop parades across the borough as retail locations.</i>	✓	✓	0	0	?	?	?	?	✓	?	✓	✓

## **Borough-wide Policy TLC6 Managing the impact of food, drink and entertainment uses**

### **Borough-wide Policy TLC6**

#### **Managing the impact of food, drink and entertainment uses**

**Planning permissions for use class A3, A4 and A5 food and drink establishments as well as arts, culture, entertainment and leisure uses will be subject to conditions controlling hours of operation, as follows:**

- a. **Except in predominantly commercial areas, such as parts of town centres – premises shall not be open to customers later than the hour of 23:00; and**
  - b. **Within predominantly commercial areas, such as parts of town centres – premises shall not be open to customers later than the hour of 24:00.**
- Extended opening may be permitted where:**

- i. The activities would not be likely to cause impact especially on local residents, and that, if there is potential to cause adverse impact, appropriate measures will be put in place to prevent it; and**
- ii. There will not be any increase in the cumulative impact from these or similar activities, on an adjacent residential area; and**
- iii. There is a particularly high level of public transport accessibility to and from the premises at appropriate times; and**
- iv. The activity will not be likely to lead to a demonstrable increase in car parking demand in surrounding residential streets and roads forming part of the Strategic London Road Network or the London Bus Priority Network.**

**In addition, subject to the location of the proposals, the council will consider the type of activities appropriate to the class A3, A4 and A5 premises, and apply conditions on uses where these are appropriate.**

**Where a use will impact on local amenity, the council may also set an appropriate start time.**

7.277 Policy C6 seeks to mitigate the impact of A3, A4 and A5 establishments by controlling hours of operation, type and location of activities. This will have positive significant effects on the health, and social objectives for example through safeguarding residential amenity. The locational criteria will also have positive impacts on transport. Permitting later opening hours will assist in achieving a sustainable economy, including a night time economy.

#### **Alternative Options – Policy TLC6 (Managing the impact of food, drink and entertainment uses)**

- Formulate a policy based on regional policies such as night time economy zones and/or other GLA guidance.
- Relax the approach to night-time opening in the area, as long as local residents are not adversely affected.

7.278 Alternative option (1) would require strategies to be developed in partnership with leisure and recreation providers, the council and the community. It could enable a more focussed approach to the issue of the night-time economy with identified clusters or zones, ensuring that people's enjoyment does not impinge upon residential amenity. Notwithstanding the positives of such an approach, night time zones would need to be carefully considered in the borough town centres where there is a inconsistent distribution of night time uses. Identifying specific zones rather than adopting a town centre approach could impact negatively on a sustainable night time economy.

7.279 Alternative option (2) proposes to relax the approach to night-time opening in the area, as long as local residents are not adversely affected. Notwithstanding the desire to protect residential amenity, this option could impact negatively on the amenity of the surrounding areas in terms of noise pollution.



POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy TLC6 Managing the impact of food, drink and entertainment uses</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<p>Planning permissions for use class A3, A4 and A5 food and drink establishments as well as arts, cultural entertainment and leisure uses will be subject to conditions controlling hours of operation, as follows: [...]</p> <p><i>See policy wording above.</i></p>	0	✓	0	0	✓	0	0	✓	✓	0	0	✓
<p><b>Alternative option (1):</b> <i>Formulate a policy based on regional policies such as entertainment management zones and/or other GLA guidance.</i></p>	✓	✓	0	0	✓	0	0	0	?	?	0	?
<p><b>Alternative option (2):</b> <i>Relax the approach to night-time opening in the area, as long as local residents are not adversely affected.</i></p>	X	0	0	0	?	0	0	X	?	0	0	?

### Town and Local Centre policy TLC7 (New Policy)

#### Borough-wide Policy TLC7

#### Addressing the concentration and clustering of betting shops and payday loan shops

Planning permission for new betting shops and payday loan shops will not be permitted in the prime retail frontage of town centres or within 400 metres of the boundary of an existing or permitted betting shop or payday loan shop. Outside of these areas, planning permission will only be granted for a betting shop or payday loan shop where it can be demonstrated that the proposal will not impact on residential amenity and will add to the vitality of the existing shopping parade or cluster.

7.280 This is a new policy option in the draft Local Plan. Local retail health checks have confirmed that the over representation of betting shops is especially high in the most deprived parts of the borough. There are currently 46 licensed premises across the borough and notable concentrations on North End Road and in our designated town and local centres.

7.281 The preferred policy option has scored both positively and uncertain in relation to the health sustainability objective. Evidence indicates that the concentration of betting shops can have an impact on health for the more vulnerable members of the community. Further work will be needed to gather evidence on the impact the presence of betting shops and payday loan shops have on vulnerable members of the local community. This option also scores positively in terms of social sustainability by contributing towards local residents sense of community and social cohesion by helping reduce anti-social behaviour in the community. This option will also have a positive impact on the economy as limiting betting shops in areas of high concentration will mean that retail choice would not be displaced by more betting shops and would therefore contribute towards the vitality of town and local centres.

**Alternative Options – Policy TLC7 (Addressing the concentration and clustering of betting shops and payday loan shops)**

- Permit betting shops subject to existing non-A1 quota policies.
- Only permit new betting shops in designated shopping areas.
- Restrict betting shops in the most deprived parts of the borough.

7.282 Alternative option (1) scores both positively and uncertain in relation to the health sustainability objective. It scores positively in terms of sustainable economy as it will contribute towards reducing the concentration of betting shops and payday loan shops in town centres, key local centres and neighbourhood parades. However this approach provides less flexibility because non-A1 quota policies provide better protection for A1 use classes rather than A2 uses classes. Therefore this policy approach is likely to have no impact on social sustainability and contribute towards reducing anti-social behaviour.

7.283 Alternative option (2) scores negatively against the health, social cohesion and economic sustainability objectives because this alternative option would permit new betting shops in designated shopping areas. This option would lead to an increase in the number and concentration of betting and payday loan shops in designated centres which could impact negatively on the vitality of the centre and the sustainability of the economy. This could lead to an increase in the number of betting shops and consequently this option scores negatively in terms health, social and economic sustainability.

7.284 Although alternative option (3) could be seen to have a positive impact on the deprived areas in the borough by restricting betting shops in these areas. This alternative option would not restrict betting shops and payday loan shops in the designated shopping areas and shopping parades which aren't covered by the hierarchy which fall outside of the deprived area. This could lead to an increase in the number of betting shops and consequently this option scores negatively in terms health, social and economic sustainability.

POLICY OPTIONS	SA OBJECTIVES											
Borough-wide Policy TLC7 Addressing the concentration and clustering of betting shops and payday loan shops.	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	0	✓/!	0	0	✓	0	0	0	0	0	0	✓
<b>Alternative Option (1):</b> Permit betting shops subject to existing non-A1 quota policies.	0	✓/!	0	0	0	0	0	0	0	0	0	✓
<b>Alternative Option (2):</b> Only permit new betting shops in designated shopping areas.	0	×	0	0	×	0	0	0	0	0	0	×
<b>Alternative Option (3):</b> Restrict betting shops in the most deprived parts of the borough.	0	×	0	0	×	0	0	0	0	0	0	×

### Recommendation

The policy approach will need to be supported by robust evidence to justify the Council's approach to restricting betting shops in the borough. Evidence could focus on the potential health impacts of betting shops and payday loan shops on the local community as well their finances.

## Town and Local Centre policy TLC 8 (New Policy) Public houses

### Borough-wide Policy TLC8

#### Public houses

1. The Council will only permit the change of use or redevelopment of a public house (A4) after consideration of relevant town and local centre retail policies and an assessment of the following:

a. a viability report that demonstrates to the Council's satisfaction that the

**public house is no longer economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months;**  
**b. the role the public house plays in the provision of space for community groups and whether the loss of such space would contribute to a shortfall in local provision;**  
**c. the design, character and heritage value of the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance; and**  
**d. the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.**

**2. Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as making a significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic environment, the Council will require the building to be retained.**

**3. The proposed change of use of a ground floor of a public house for residential use will only be acceptable where:**

**a. the premises are not within a town centre, key local centre, satellite parade or neighbourhood parade;**  
**b. the proposal has been assessed against parts 1c and 1d of this policy and the impact of the proposal on these features; and**  
**c. the Council is satisfied that residential use is acceptable, the accommodation to be provided will be of the highest quality and it meets the requirements outlined in DM LP Policy HO1 (Detailed residential standards).**

7.285 The preferred policy option scores positively on a number of sustainability objectives. This policy option will provide the community access to a wide range of services by protecting the provision of community space in public houses and would reduce the need to travel if community space is available locally.

7.286 The National Planning Policy Framework identifies public houses as a community facility that contributes to enhancing the sustainability of communities and residential environments. As such, pubs should be safeguarded and retained for the benefit of the community and planning policies and decisions should guard against the unnecessary loss.

7.287 There would be a positive impact on heritage and this policy seeks to protect public houses which make a positive contribution of the historic environment. Reuse of the building will maximise the use of existing resources and encourage responsible consumption in the borough. It would also contribute towards achieving a sustainable economy. Effects on pollution and climate change are uncertain and dependant on mitigation measures.

### Alternative Options – Policy TLC8 (Public Houses)

- Permit change of use subject to existing non-A1 quotas.
- Allow change if premises fall out of use.

7.288 Alternative option (1) proposes to permit change of use subject to existing non-A1 quotas. The council considers that non-retail uses should not occupy more than about one third of the length of an individual shopping block in town centres, for example. Therefore where non-A1 occupies less than a third of the shopping block then public houses can change use. This alternative option provides reduced protection of public houses and will result in the loss of public houses as a community facility, this could lead to a negative effect on the environment as people will travel to find community facilities elsewhere.

7.289 Alternative option (2) proposes to allow change if premises fall out of use. This alternative option provides less protection of public houses and therefore could result in a loss of local community facilities. There could be a negative impact on the environment as residents might travel elsewhere in the Borough to find community facilities. There could also be a negative impact on the character and appearance of the area if public houses are lost to other uses.

POLICY OPTIONS	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy TLC8 Public houses</b>  <b>Preferred Option:</b> 1. The Council will only permit the change of use or redevelopment of a public house (A4) after consideration of relevant town and local centre retail policies and an assessment of the following: a. a viability report that demonstrates to the Council's satisfaction that the public house is no longer economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months; b. the role the public house plays in the	✓	0	0	0	✓	0	✓	?	✓	✓	?	✓

POLICY OPTIONS	SA OBJECTIVES											
<b>Borough-wide Policy TLC8 Public houses</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<p>provision of space for community groups and whether the loss of such space would contribute to a shortfall in local provision;</p> <p>c. the design, character and heritage value of the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance; and</p> <p>d. the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.</p>												
<p><b>Preferred Option</b></p> <p>2. Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as making a significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic</p>	0	0	0	0	0	0	0	?	0	0	?	0

POLICY OPTIONS	SA OBJECTIVES											
<b>Borough-wide Policy TLC8 Public houses</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
environment, the Council will require the building to be retained.												
<b>Preferred Option</b> 3. The proposed change of use of a ground floor of a public house for residential use will only be acceptable where: a. the premises are not within a town centre, key local centre, satellite parade or neighbourhood parade; b. the proposal has been assessed against parts 1c and 1d of this policy and the impact of the proposal on these features; and c. the Council is satisfied that residential use is acceptable, the accommodation to be provided will be of the highest quality and it meets the requirements outlined in DM LP Policy HO1 (Detailed residential standards).	0	0	0	?	0	0	0	0	0	0	0	0
<b>Alternative Option 1:</b> <i>Permit change of use subject to existing non-A1 quotas.</i>	x	0	0	0	x	0	x/?	x/?	x/?	0	0	0
<b>Alternative Option 2:</b> <i>Allow change if premises fall out of use.</i>	x	0	0	0	x	0	x/?	x/?	x/?	?	?	0

## **Assessing secondary, cumulative and synergistic effects**

- 7.290 Policy TLC1 Hierarchy of town and local centres is anticipated to positively contribute towards the Draft Local Plan strategic objective 8 seeking to regenerate Hammersmith & Fulham's town centres to improve their viability and vitality and sustain a network of supporting Key Local Centres providing local services. It is predicted that the policy will have a positive effect on the objective, especially in the medium to long term. The economies of scale offered by concentrating economic development in the town centres is likely to exert a positive synergy to boost the local economy.
- 7.291 Policy TLC2 Managing uses in the prime retail frontage areas of town centres is anticipated to positively contribute towards the Draft Local Plan strategic objective 8 which seeks to regenerate Hammersmith & Fulham's town centres to improve their viability and vitality. It is predicted that this policy will have a positive secondary impact on the promotion of small businesses and the creation of job opportunities by making the retail mix better and more accessible. It is predicted that the policy will have a positive effect on the sustainability appraisal objectives, especially in the medium to long term. Policy TLC2 could combine cumulatively and synergistically with the other shopping policies to strengthen the local economy and in particular the retail offer in the borough's town centres.
- 7.292 Policy TLC3 Managing uses in the non-prime frontage areas of town centres is anticipated to positively contribute towards the Draft Local Plan strategic objective 8 which seeks to regenerate Hammersmith & Fulham's town centres to improve their viability and vitality. It is predicted that this policy will have a positive secondary impact on the local economy by maintaining a strong retail presence in the town centres. It is predicted that the policy will have a positive effect on the social, reducing the impact of transport on the environment and the sustainable economy SA objectives, especially in the medium to long term. Policy TLC3 could combine cumulatively and synergistically with the other shopping policies, in particular Policy TLC2, to strengthen the local economy and retail offer in the borough's town centres.
- 7.293 Policy TLC4 Managing uses in key local centres, neighbourhood parades and satellite parades is anticipated to positively contribute towards the Draft Local Plan strategic objective 8 which seeks to sustain a network of supporting Key Local Centres providing local services. It also contributes to achieving strategic objective 9 which seeks to ensure that residents have access to a range of facilities and services including retail. It is predicted that this policy will have a positive secondary impact on the local economy by making retail more accessible. It is predicted that the policy will have a positive effect on the SA objectives, especially in the medium to long term. The policy could combine cumulatively and synergistically with the other shopping policies, in particular Policies TLC5-8 to strengthen the local economy across the whole borough and help protect residential amenity and create sustainable communities.



- 7.294 Policy TLC5 Small non designated parades, clusters and corner shops is anticipated to positively contribute towards the Draft Local Plan strategic objective 8 which seeks to sustain a network of supporting Key Local Centres providing local services. It also contributes to achieving strategic objective 9 which seeks to ensure that residents have access to a range of facilities and services including retail, in the case of this policy out of centre retail. It is predicted that this policy will have a positive secondary impact on the local economy by making retail more accessible. It is predicted that the policy will have a positive effect on the objective, especially in the medium to long term. The policy could combine cumulatively and synergistically with the other shopping policies, in particular Policies TLC4, TLC6-8 to strengthen the local economy across the whole borough and help protect residential amenity, contributing towards sustainable communities.
- 7.295 Policy TLC6 Managing the impact of food, drink and entertainment uses is anticipated to positively contribute towards the Draft Local Plan strategic objective 13 which seeks to protect and enhance the amenity and quality of life of residents and visitors. It is predicted that this policy will have a positive secondary impact on the safety and security of those who live, work and visit Hammersmith and Fulham. It is predicted that the policy will have a positive effect on the SA objectives, especially in the medium to long term. Policy TLC6 could combine cumulatively and synergistically with the other shopping policies, in particular Policies TLC7 and TLC8 to contribute towards sustainable communities.
- 7.296 Policy TLC7 Addressing the concentration and clustering of betting shops and payday loan shops is anticipated to positively contribute towards the Draft Local Plan strategic objectives 8, which seeks to improve vitality of town centres and Key Local Centres and strategic objective 13 to protect the amenity of residents. Effects of this policy are likely to be permanent in its implementation and have a direct effect on the community in terms of impact on finances and health. It is predicted that the effects of this policy in terms of time frame is long term. This policy in conjunction with the implementation of the other town centres policies will have a positive cumulative effect on the town centre hierarchy in terms of maintaining and enhancing vitality of town centres. Collating an evidence base for this policy will provide a greater level of certainty over its effect.
- 7.297 Policy TLC8 Public houses is anticipated to positively contribute towards the Draft Local Plan strategic objectives 9 which seeks to ensure that residents have access to a range of community infrastructure. It is predicted that the effects of this policy will be permanent in implementation and will have a medium term to long term effect by ensuring that local and accessible community space is protected. The policy does not have a direct relation with traffic. However, the promotion and protection of local facilities may lead to a reduction in the need to use private transport.

## **COMMUNITY FACILITIES, LEISURE AND RECREATION**

### **Borough-wide Policy CF1 Supporting community facilities and services**

#### **Borough-wide Policy CF1**

##### **Supporting community facilities and services**

**The council will work with its strategic partners to provide borough-wide high quality accessible and inclusive facilities and services for the community by:**

- **Seeking to ensure high quality healthcare and the retention and enhancement of existing healthcare facilities, such as accident and emergency departments, including Charing Cross Hospital and Hammersmith Hospital, unless there is clear evidence that there is no longer an identified need for a particular facility; and;**
  - **assisting in securing sites and buildings for future healthcare provision or reorganisation of provision, including local hubs for a wide range of health services in the north, centre and south of the borough, including new provision in the regeneration areas; and**
  - **supporting renewal of existing GP premises and other healthcare facilities where this is required.**
- **Seeking the improvement of school provision, including:**
  - **Improvement and/or expansion of secondary schools;**
  - **Improvement and/or expansion of primary schools through the primary school capital programme;**
  - **Supporting the creation of new free schools;**
  - **Requiring the building of new primary schools as appropriate and applicable to the need generated by development proposals and available existing capacity in the White City Opportunity Area, the Earls Court and West Kensington Opportunity Area and the Old Oak Regeneration Area;**
  - **Supporting the provision of schools and facilities for those with special needs; and**
  - **Supporting provision of childcare nurseries**
- **Improving the range of leisure, recreation, sports, arts, cultural and entertainment facilities by:**
  - **Protecting existing premises that remain satisfactory for these purposes;**
  - **Supporting reprovision of facilities for existing users in outworn premises where opportunities arise;**

- **Seeking new facilities where appropriate and viable, including as part of major development proposals, in particular:**
  - **Major new leisure, arts, sports and recreation facilities in the White City Opportunity Area, especially east of Wood Lane and in Shepherds Bush town centre, in the Earls Court and West Kensington Opportunity Area and in the Old Oak Regeneration Area; and**
  - **Water related sports and educational facilities in riverside and canalside developments.**
  - **Supporting the continued presence of the major public sports venues for football and tennis, subject to the local impact of the venues being managed without added detriment to local residents;**
  - **Enhancing sport, leisure and cultural provision for schools and public use in suitable local parks.**
- **Protecting all existing community facilities and services throughout the borough where there is an identified need;**
- **Supporting the Metropolitan Police Service, the London Fire and Emergency Planning Authority and Her Majesty's Court Service and action to deal with safety, crime and anti-social behaviour; and**
- **Requiring developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities.**

7.298 By working with strategic partners, the council should ensure that needs and requirements are identified in a holistic and comprehensive manner. The policy is aimed at safeguarding and providing for community facilities to assist in meeting the needs of borough residents and visitors to the borough, this will help meet many of the social objectives of the sustainability appraisal. There will also be economic benefits in maintaining arts, cultural and entertainment facilities, many of which provide local jobs, as well as transport benefits in having local facilities within easy reach of the community. By seeking new facilities in the regeneration areas, where there will be significant population growth, these areas should be well supplied with social infrastructure and should not give rise to unsustainable pressure on existing facilities in the borough.

#### **Alternative Options – Policy CF1 (Supporting Community Facilities and Services)**

- **Maintain a town centre focus, but with a more flexible approach to the use of sites where activities close down elsewhere.**
- **Identify premises needs and safeguard sites, possibly as part of mixed use**

development.

7.299 Alternative option (1) proposes to maintain a town centre focus however the impact of this approach will depend largely on how flexible the council is in the operation of the policy. However, because many facilities, such as schools and health premises, are located outside of town centres, it is questionable how rigorous a town centre policy focus should be. Too much flexibility in allowing loss of premises, for example, could result in existing leisure and recreation uses that are not within town centres being lost, leading to erosion of provision. The negative effects of this approach would be made worse by a growing population if provision of new facilities was not made in the regeneration areas.

7.300 Alternative option (2) should be part and parcel of Local Plan strategy and policy development. In this respect, the option is already incorporated in the development of the Local Plan, for example through the duty to co-operate and by identifying social infrastructure needs in strategic site policies.

POLICY OPTIONS	SA OBJECTIVES											
Borough-wide Policy CF1 Supporting community facilities and services	Social Equity	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful Consumption	Climate Changes	Sustainable Economy
<b>Preferred option:</b> Seeking to ensure high quality healthcare and the retention and enhancement of existing healthcare facilities, such as accident and emergency departments, including Charing Cross Hospital and Hammersmith Hospital, unless there is clear evidence that there is no longer an identified need for a particular facility and assisting in securing sites and buildings for future healthcare provision or reorganisation of provision, including local hubs for a wide range of health services in the north, centre and south of the borough, including new provision in the regeneration areas; and supporting renewal of existing GP premises and other healthcare facilities where this is required.	✓	✓	✓	0	✓	?	?	?	✓	✓	?	✓
<b>Preferred option:</b> Seeking the improvement of primary and secondary school provision, including [...]  <i>See policy wording above.</i>	✓	0	✓	0	✓	?	?	?	?	?	?	✓

<b>Preferred option:</b> Improving the range of leisure, recreation, sports, arts and cultural facilities	✓	✓	0	0	✓	✓	?	?	?	?	?	✓
<b>Preferred option:</b> Supporting the continued presence of the major public sports venues for football and tennis, subject to the local impact of the venues being managed without added detriment to local residents [...]  <i>See policy wording above.</i>	✓	0	0	0	✓	✓	✓	?	?	?		✓
<b>Preferred option:</b> Protecting all existing community facilities and services [...]  <i>See policy wording above.</i>	✓	✓	✓	0	✓	✓	?	?	?	?	?	✓
<b>Preferred option:</b> Requiring developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities.	✓	✓	✓	0	✓	?	0	?	?	?	?	✓
<b>Alternative option (1):</b> <i>Maintain a town centre focus, but with a more flexible approach to the use of sites where activities close down elsewhere.</i>	x	?	?	?	x	?	?	?	?	?	?	?
<b>Alternative option (2):</b> <i>Identify premises needs and safeguard sites, possibly as part of mixed use development.</i>	✓	✓	?	?	✓	?	?	?	?	?	?	✓

## Borough-wide Policy CF2 Enhancement of community uses

### Borough-wide Policy CF2

#### Enhancement of community uses

**Proposals for new or expanded community uses should meet local need, be compatible with and minimise impact on the local environment and be accessible to all in the community they serve.**

**The provision of new or expanded community uses should be provided as part of the necessary supporting social infrastructure for significant new housing and other development proposals. Where it is not appropriate to provide community uses on site or in total as part of a development scheme, a contribution to new and/or enhanced uses in the locality will be sought.**

**In any development proposal, existing community uses should be retained or**

**replaced, unless there is clear evidence that there is no longer an identified need for a particular facility or alternative community uses. In assessing need, the council will take into account the role the facility plays in the provision of space for community groups and whether the loss of such space would contribute to a shortfall in local provision. In addition a viability report that demonstrates to the Council's satisfaction that the facility or alternative community uses is not economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months, will be required.**

7.301 The preferred policy will ensure that the community has access to a wide range of services, including health and education uses. This will have a positive impact on social objectives. It will also help reduce the need to travel if community uses are available locally. It should also contribute to achieving a sustainable economy.

7.302 The policy will ensure that the number of existing facilities is not reduced if local needs exist. However, by including criteria against which proposed loss of uses will be assessed, the policy will allow for alternative uses where this is justified.

7.303 New major developments are likely to place additional strain on existing community uses such as schools and it is considered appropriate that the policy places an onus on developers to provide for additional facilities on site or in the locality, thereby contributing to sustainable development.

#### **Alternative Options – Policy CF2 (Enhancement of community uses)**

- Allow change if premises fall out of use.
- Do not seek new or replacement facilities.

7.304 Alternative option (1) would be acceptable, but only if subject to assessment of criteria that clearly showed, for example, evidence of lack of viability and that there was no continuing need for the premises for a specific use or alternative community use. The preferred approach includes such tests which are considered a more appropriate way forward than allowing change without satisfactory justification. The option could impact disproportionately upon already disadvantaged groups if community uses are allowed to close without replacement or suitable alternatives.

7.305 Alternative option (2) would be a less sustainable approach than the preferred option. It would not encourage investment in community services and facilities and is likely to result in excessive pressures on existing facilities as well as indirect effects, such as more transport movements as residents travel greater distances to find satisfactory facilities. By not seeking new community uses in regeneration areas, the developments in these locations would fail to meet local needs and would fall short in achieving many social and environmental sustainability objectives.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy CF2 Enhancement of community uses</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> Proposals for new or expanded community uses should meet local need, be compatible with and minimise impact on the local environment and be accessible to all in the community they serve.	✓	✓	0	0	✓	0	✓	?	✓	0	✓	✓
<b>Preferred option:</b> The provision of new or expanded community uses should be provided as part of the necessary supporting social infrastructure for significant new housing and other development proposals. Where it is not appropriate to provide community uses on site or in total as part of a development scheme, a contribution to new and/or enhanced uses in the locality will be sought.	✓	✓	0	0	✓	0	0	✓	✓	✓	0	✓
<b>Preferred option:</b> In any development proposal, existing community facilities should be retained or replaced, unless there is clear evidence that there is no longer an identified need for a particular facility or alternative community uses. In assessing need, the council will take into account the role the facility plays in the provision of space for community groups [...]  <i>See policy wording above.</i>	✓	✓	0	0	✓	0	0	✓	✓	✓	0	✓
<b>Alternative option (1):</b> Allow change if premises fall out of use.	x	x	x	0	x	?	0	?	?	?	?	x

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CF2 Enhancement of community uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Alternative option (2):</b> <i>Do not seek new or replacement facilities.</i>	x	x	?	0	x	?	0	?	x	?	?	x

### **Borough-wide Policy CF3 Enhancement of arts, culture, entertainment, leisure, recreation and sport uses**

#### **Borough-wide Policy CF3**

#### **Enhancement of arts, culture, entertainment, leisure, recreation and sport uses**

The council will support the enhancement of arts, culture, entertainment, leisure, recreation and sport uses by:

- Supporting the continued presence of the borough's arts, culture, entertainment, leisure, recreation and sports venues subject to the local impact of venues being managed without added detriment to local residents;
- Requiring proposals for new and expanded venues to be supported where appropriate by evidence of how impacts such as noise, traffic, parking and opening hours have been assessed, minimised and mitigated;
- Seeking retention or replacement of existing community arts, culture, entertainment, leisure, recreation and sport uses, unless there is clear evidence that there is no longer an identified need for a particular facility or alternative community arts, culture, entertainment, leisure, recreation and sport uses. A viability report that demonstrates to the Council's satisfaction that the facility or alternative arts, culture, entertainment, leisure, recreation and sport use is not economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months, will be required;
- Encouraging the temporary use of vacant buildings for community uses, including for performance and creative work.



7.306 Support for arts, culture, entertainment, leisure, recreation and sport uses will have social and economic benefits for the community as these uses contribute to health, education, the economy and many other aspects of the borough. These uses are often part of the borough's heritage and their retention can add to quality of life. The activities also provide an opportunity for local jobs. However, in recognition of the impact these uses can sometimes have on amenities, the policy seeks to manage impacts that may arise from these venues, thereby assisting in managing pollution and transport impact. The loss of existing facilities could detrimentally impact upon the quality of life of the community particularly those who are vulnerable in terms of mobility and income. The loss of community facilities is likely to adversely impact on levels of social cohesion in the affected community, particularly if no replacement is delivered in the area.

7.307 The preferred option will ensure that the number of existing facilities is not reduced if local needs exist. However, by including criteria against which proposed loss of uses will be assessed, the policy will allow for alternative uses where this is justified. This is considered to be a flexible approach that should mean that premises do not lie vacant for long periods.

**Alternative Options – Policy CF3 (Enhancement of arts, culture, entertainment, leisure, recreation and sport uses)**

- Allow change if premises fall out of use.
- Do not seek new or replacement facilities.

7.308 Alternative option (1) would be acceptable, but only if subject to assessment of criteria that clearly showed, for example, evidence of lack of viability and that there was no continuing need for the premises for a specific use or alternative community use. The preferred option includes such tests which are considered a more appropriate way forward than allowing change without satisfactory justification. The alternative option could impact disproportionately upon already disadvantaged groups. There is a likelihood that the loss of otherwise viable community facilities will disproportionately impact upon vulnerable groups.

7.309 Alternative option (2) proposes to not seek new or replacement facilities. This would be a less sustainable approach than the preferred option and could result in a loss of arts, cultural, etc uses. It would not encourage investment in community services and facilities and is likely to result in excessive pressures on existing facilities and indirect effects, such as more transport movements than the preferred option as residents would have to travel greater distances to find satisfactory facilities. By not seeking new community uses in regeneration areas, the developments in these locations would fail to meet local needs arising from these schemes and would fall short in achieving many social and environmental sustainability objectives.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CF3 Enhancement of arts, culture, entertainment, leisure, recreation and sport uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	✓	0	✓	?	✓	✓	?	0	0	✓
<b>Alternative option (1):</b> <i>Allow change if premises fall out of use.</i>	x	x	x	0	x	?	0	?	?	?	?	?
<b>Alternative option (2):</b> <i>Do not seek new or replacement facilities.</i>	x	x	?	0	x	?	0	?	x	?	?	x

## Borough-wide Policy CF4 Professional football grounds

### Borough-wide Policy CF4

#### Professional football grounds

**In considering any redevelopment proposal for all or part of an existing football ground, the council will normally require the provision of suitable facilities to enable the continuation of professional football or other field-based spectator sports.**

7.310 The three football clubs in this borough are an important part of the borough's fabric. They provide jobs and entertainment and contribute to education and skills and social cohesion objectives. However, redevelopment of these uses could also provide benefits to the borough in respect of homes, alternative employment, etc. In some cases, it might also be possible to envisage retaining football facilities, but introducing additional uses that could benefit the borough. In general the policy is considered to have a neutral impact on sustainability appraisal objectives.

#### Alternative Options – Policy CF4 (Professional football grounds)

- Not to actively promote the continued presence of football clubs in the borough.

7.311 It is possible to argue that alternative forms of development on the professional football grounds would lead to more sustainable developments, for example in the mix of uses on site and in the consumption of resources on site. Clearly, much would depend on the nature of the alternative use. However, the loss of the clubs could have a detrimental impact on sustainability objectives for heritage and social cohesion, as well as for jobs. In general, this option has unknown implications for the sustainability objectives.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CF4 Professional football grounds	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b>  <i>See policy wording above.</i>	0	0	0	0	0	0	0	0	0	0	0	0
<b>Alternative option (1):</b> <i>Not to actively promote the continued presence of football clubs in the borough.</i>	?	?	?	?	?	?	?	?	?	?	?	?

## Assessing secondary, cumulative and synergistic effects

7.312 Policies CF1 to CF3 have been found sustainable. These community facilities policies will positively contribute to a number of the Draft Local Plan's strategic objectives, including Objective 9 seeking to ensure that residents and visitors to the borough have access to a range of high quality facilities and services.

7.313 Policy CF1 Supporting community facilities and services is also anticipated to contribute towards the Draft Local Plan's strategic objective 10 which seeks to ensure that child care facilities and schools in the borough meet the needs of local parents and children as it seeks improvement to school provision and childcare nurseries. It will also contribute towards strategic objective 11 which seeks to maintain and improve the health care provision in the borough as it seeks high quality healthcare and retention of existing facilities. This policy will have a positive short to long term effect on the borough's residents.

7.314 Policy CF3 Enhancement of arts, culture, entertainment, leisure, recreation and sport uses is also anticipated to contribute towards the Draft Local Plan's strategic objective 7 which seeks to protect and enhance the borough's attractions for arts and creative industries as the policy supports the enhancement of these facilities and seeks retention or placement of these uses unless there is no longer an identified need. Policy CF3 will have a permanent and long term effect resulting in social and economic benefits for the community as these uses contribute to health, education, the economy and many other aspects of the borough.

7.315 The community facilities policies meet many of the social sustainability objectives and will also contribute to economic objectives, including a sustainable economy. Whilst Policy CF4 Professional football grounds is considered to have a neutral effect on the appraisal objectives.

## **GREEN AND PUBLIC OPEN SPACE**

### **Borough-wide Policy OS1 Protecting parks and open spaces**

#### **Borough-wide Policy OS1**

##### **Protecting parks and open spaces**

**To protect, enhance and increase provision of parks, open spaces and biodiversity in the borough by:**

- **Designating a hierarchy of open space that includes metropolitan open land (MOL), open space of borough wide importance and open space of local importance (see Appendix 3) as well as a hierarchy of nature conservation areas of metropolitan, borough and local importance, and green corridors along the borough's railway lines (see Appendix 4);**
- **Requiring a mix of new public and private open space in the Old Oak Regeneration Area, White City and Earls Court and West Kensington Opportunity Areas and the South Fulham Riverside Regeneration Area and in any new major development; and**
- **Improving existing parks, open spaces and recreational facilities throughout the borough.**

7.316 The protection of open space has a number of benefits. The majority of the borough's open spaces have been in existence for over a century and form an important part of the borough's cultural and environmental heritage. They also form a focal point for communities and provide opportunities for exercise, social interaction and relaxation. Open spaces provide a natural sink for carbon dioxide and particulates and protection of such spaces therefore has positive benefits in relation to climate change and pollution.

7.317 The provision of new open spaces as part of the development of the borough's regeneration areas will help to create sustainable mixed use developments. It will be important for green infrastructure to be part of regeneration if these areas are to be truly places where people will want to live, work and spend their leisure time. The open spaces, new parks, playspaces and nature conservation areas to be provided elsewhere will also contribute to the creation of sustainable communities throughout the borough.

#### **Alternative Options - Policy OS1 (Protecting parks and open spaces)**

- Do not designate and protect open spaces in the borough.
- Review MOL boundaries and consider whether new areas should be designated.

7.318 Alternative option (1) proposes to not designate and protect open spaces  
Open spaces are an integral part of the borough's land use structure and it is important to recognise a hierarchy of open space and protect these. The Mayor of London and the National Planning Policy Framework requires local authorities to set out a strategic approach to planning positively for the creation, protection, enhancement and management of open spaces and biodiversity.

7.319 Alternative option (2) proposes a review of MOL boundaries and consideration of new designations. It is understood that a review has not been considered necessary at this time. Any future review will need to be justified against the London Plan criteria. New designations will place further development restrictions on land, but they will have environmental benefits. Removing designation would require detailed justification, particularly as this is a strategic as well as a local resource.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy OS1 Protecting parks and open spaces</b>												
<b>Preferred option:</b> To protect, enhance and increase provision of parks, open spaces and biodiversity in the borough by	0	✓	0	0	✓	0	✓	✓	?	✓	✓	0
<b>Preferred option:</b> Requiring a mix of new public and private open space in the Old Oak Regeneration Area, White City and Earls Court and West Kensington Opportunity Areas and the South Fulham Riverside Regeneration Area and in any new major development; and	0	✓	0	0	✓	0	✓	✓	?	✓	✓	0
<b>Preferred option:</b> Improving existing parks, open spaces and recreational facilities throughout the borough.	0	✓	0	0	✓	0	✓	✓	?	✓	✓	0
<b>Alternative option (2):</b> Do not designate and protect open spaces in the borough.	x	x	x	0	x	0	x	x	0	0	x	x

<b>Alternative Option (2):</b> <i>Review MOL boundaries and consider whether new area should be designated.</i>	0	✓	0	?	0	0	✓	✓	0	✓	✓	✓
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## Borough-wide Policy OS2 Access to parks and open spaces

### Borough-wide Policy OS2

#### Access to parks and open spaces

The council will seek to reduce open space deficiency and to improve the quality of, and access to, existing open space by:

- Refusing development on public open space and other green open space of borough-wide importance (see Appendix 3 and Proposals Map) unless it can be demonstrated that such development would preserve or enhance its open character, its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity;
- Refusing development on open space that is not identified in the Local Plan where such land either on its own or cumulatively has local importance for its open character or as a sport, leisure or recreational facility, or for its contribution to local biodiversity or visual amenity unless:
  - the proposed development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic objectives of the Local Plan and provision is made for replacement of open space of equal or greater value elsewhere;
- Requiring accessible and inclusive new open space in any new major development, particularly in the regeneration areas and in any area of open space deficiency (see policy OS1); and
- Seeking improvements to existing open space and the facilities within them, such as Linford Christie Stadium, where appropriate and when development proposals impact upon provision.

7.320 Larger developments are likely to place additional strain on existing open spaces. The policy therefore places an onus on developers to provide new open spaces in any new major developments. This will help to create sustainable communities and will have a positive significant effect on the health of residents. Seeking improvements to existing open spaces and facilities will have similar sustainability benefits.

7.321 The preferred policy proposes to resist development on open space unless it leads to a qualitative improvement to the open space. It will have positive impacts on the community, heritage and sustainable economy objectives. Also, retaining open space will have positive effects on climate change and pollution because these areas provide a “natural sink” for carbon dioxide and particulates. There should be no impact on housing or employment objectives because enough land falling outside of the open space category is allocated for these uses.

**Alternative Options - Policy OS2 (Access to parks and open spaces)**

- Increase the amount of open space to be provided in all new developments in all areas of the borough.
- Have a strict presumption against development.
- Limit the possibility of improvement of facilities in parks

7.322 Alternative option (1) would increase open space across the whole of the borough. However, this option could restrict development viability on a number of sites, particularly smaller sites, and could have a detrimental impact on achieving sustainable communities.

7.323 Alternative option (2) is similar to the preferred option, but having a presumption against development is a very restrictive policy normally applied to Green Belt or MOL. The alternative option does not provide any detail regarding when it may be permitted to lose open space and when development would be permitted.

7.324 Alternative option (3) could prevent the improvement and provision of facilities that would meet the needs of the community and add value to the function of open spaces. The preferred policy will allow consideration of the acceptability of improvements.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy OS2 Access to parks and open spaces</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> refusing development on public open space and other green open space of borough-wide importance (see Appendix 3 and Proposals Map) unless it can be demonstrated that such development would preserve or enhance its open character, its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity;	✓	✓	0	0	✓	0	✓	✓	?	0	✓	✓

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy OS2 Access to parks and open spaces	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> Refusing development on open space that is not identified in the Local Plan where such land either on its own or cumulatively has local importance for its open character or as a sport, leisure or recreational facility, or for its contribution to local biodiversity or visual amenity unless: the proposed development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic objectives of the Local Plan and provision is made for replacement of open space of equal or greater value elsewhere;	✓	✓	0	✓	✓	✓	✓	✓	?	0	✓	✓
<b>Preferred option:</b> Seeking improvements to existing open space and the facilities within them, such as Linford Christie stadium where appropriate and when development proposals impact upon provision.	✓	✓	0	0	✓	0	✓	✓	0	0	✓	✓
<b>Alternative option (1):</b> <i>Increase the amount of open space to be provided in all new developments in all areas of the borough.</i>	?	✓	0	0	0	0	0	✓	0	0	✓	X
<b>Alternative option (2):</b> <i>Have a strict presumption against development.</i>	0	?	0	0	0	0	?	✓	0	0	✓	x
<b>Alternative option (3):</b> <i>Limit the improvement of facilities in parks.</i>	0	?	0	0	0	0	0	0	0	0	✓	X



## **Borough-wide Policy OS3 Playspace for children and young people**

### **Borough-wide Policy OS3**

#### **Playspace for children and young people**

**Development proposals should not result in the loss of existing children and young people's playspace or result in an increased deficiency in the availability of such playspace.**

**In new residential development that provides family accommodation, accessible and inclusive communal playspace will normally be required on site that is well designed and located and caters for the different needs of all children, including children in younger age groups, older children and disabled children.**

**The scale of provision and associated play equipment will be in proportion to the scale and nature of the proposed development.**

7.325 Protection of existing playspace and associated facilities is important because these are an important part of the social infrastructure of an area. Residential developments will lead to an increase in population and are likely to place additional strain on existing children and young peoples' playspace. The preferred policy therefore places an onus on developers to provide or pay for additional accessible and inclusive playspaces across all ages and groups, including disabled children, on-site or in the locality. By referring to the Mayor of London's SPG "Providing for children and young people's play and informal recreation", the policy will provide additional guidance. The preferred policy is likely to have positive effects on equity, social cohesion and health.

#### **Alternative Options - Policy OS3 (Playspace for Children and young people)**

- Require playspace for 0-8 year olds only in residential developments accommodating over 10 children.
- Do not provide for any playspace provision in development proposals.

7.326 Alternative option (1) proposes to require playspace for 0-8 year olds only in residential developments accommodating over 10 children. Whilst catering for 0-8 year olds will have positive benefits for this age group, a lack of provision for older children will mean existing deficiencies will remain or may worsen, putting extra pressure on existing public facilities. Lack of play facilities for older children could impact on residential amenity, health and safety as children find other outlets for play and recreation.

7.327 Alternative option (2) proposes to not provide any playspace provision in development proposals. However not providing any playspace provision in new developments would increase pressures on existing playspace facilities. Developments would not meet the needs of their occupants and this could impact upon a variety of objectives, including health and social cohesion.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy OS3 Playspace for children and young people	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b>  <i>See policy wording above.</i>	✓	✓	?	0	✓	0	0	0	?	0	0	✓
<b>Alternative option (1):</b> <i>Require playspace for 0-8 year olds only in residential developments accommodating over 10 children.</i>	X	X	0	0	?	0	0	0	?	0	0	0
<b>Alternative option (2):</b> <i>Do not provide for any playspace provision in development proposals.</i>	x	x	0	0	x	0	0	0	?	0	?	0

## Borough-wide Policy OS4 Nature conservation

### Borough-wide Policy OS4

#### Nature conservation

The nature conservation areas and green corridors identified on the Proposals Map (and shown on Map 8 and listed in Appendix 4) will be protected from development likely to cause demonstrable harm to their ecological (habitats and species) value.

In these areas, development will not be permitted unless:

- The proposed development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic regeneration objectives of the local plan, and measures are included for the protection and enhancement of any substantive nature conservation interest that the site may have so that there is no net loss of native species and no net loss of habitat; or
- Provision is made for replacement nature conservation interest of equal or greater value elsewhere in the locality.

Elsewhere on development sites, proposals should, where appropriate to the scale and nature of the development, enhance the nature conservation interest through initiatives such as new green infrastructure and habitats, tree planting and brown and green roofs and protect any significant interest on the site and any nearby nature conservation area.

Planning conditions will be imposed, or planning obligations sought to ensure the maintenance and enhancement of nature conservation areas where these are affected by development proposals.

7.328 The protection of nature conservation areas and green corridors will have significant positive effects on the heritage and environmental objectives. It will also have positive indirect effects on the quality of life of communities and social objectives by offering opportunity for recreation and enabling healthy lifestyles. These green areas will help in minimising flood risk by reducing run off.

7.329 The preferred policy aims to resist developments in nature conservation areas unless they lead to greater qualitative benefits, the condition being no net loss of native species and habitat. This will have significant positive effects on environmental SA objectives and will not preclude development where this improves or replaces existing nature conservation resources.

7.330 Seeking green infrastructure on development sites, for example in the regeneration areas, will add to the biodiversity stock of the borough and help in reducing flood risk. By placing the onus on developers to pay for the maintenance and enhancement of nature conservation areas affected by their developments there should be a guaranteed income stream to sustain this valuable resource.

#### **Alternative Options – Policy OS4 (Nature Conservation)**

- Not to permit any development on nature conservation areas or green corridors.
- Allow unconstrained development on nature conservation areas or green corridors unless these areas have higher level protection.

7.331 Alternative option (1) would afford protection for nature conservation areas and green corridors, but could unreasonably constrain development that could offer other benefits to the community. This alternative option would fail to acknowledge that there could be occasions where similar or enhanced nature conservation resources could be provided elsewhere.

7.332 Alternative option (2) could result in the loss of nature conservation areas of borough importance. This would have an adverse impact on local biodiversity, heritage features and people's access to open spaces and nature. It would also impact upon flood risk management. It would be contrary to many sustainability objectives.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy OS4 Nature conservation</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy OS4 Nature conservation</b>												
<b>Preferred option:</b> The nature conservation areas and green corridors identified on the Proposals Map (and shown on Map 8 and listed in Appendix 4) will be protected from development likely to cause demonstrable harm to their ecological (habitats and species) value.	✓	✓	0	0	✓	0	✓	✓	0	0	✓	0
<b>Preferred option:</b> In these areas, development will not be permitted unless: [...] See policy wording above.	✓	0	0	0	✓	✓	✓	✓	✓	0	✓	0
<b>Preferred option:</b> Planning conditions will be imposed or planning obligations sought to ensure the maintenance and enhancement of nature conservation areas where these are affected by development proposals.	0	0	0	0	0	0	✓	✓	0	0	✓	0
<b>Alternative option (1):</b> Not to permit any development on nature conservation areas or green corridors.	?	✓	0	x	0	0	0	✓	?	0	Y	x
<b>Alternative option (2):</b> Allow unconstrained development on nature conservation areas or green corridors unless these areas have higher level protection.	?	x	0	?	?	0	x	x	?	x	x	x

## Borough-wide Policy OS5 Greening the borough

### Borough-wide Policy OS5

#### Greening the borough

**The council will seek to enhance biodiversity and green infrastructure in the borough by:**

- **Maximising the provision of gardens, garden space and soft landscaping and seeking green or brown roofs and other planting as part of new development;**
- **Protecting back, front and side gardens from new development and encouraging planting in both back and front gardens;**
- **Seeking to prevent removal or mutilation of protected trees;**
- **Seeking retention of existing trees and provision of new trees on development sites; and**
- **Adding to the greening of streets and the public realm.**

7.333 The preferred policy will have significant positive effects on the heritage and environmental objectives and on the quality of life of the communities. However, the preferred policy will need to be applied in such a way that it does not constrain new housing development. It is understood that there will be additional planning guidance in supporting SPD on a number of the requirements set out in the policy. This should assist in the application of the policy and lead to developments of a high standard that will meet the needs of occupants and respect the principles of good neighbourliness.

**Alternative Options – Policy OS5 (Greening the borough)**

- Only seek biodiversity enhancement measures for major developments.
- Require all new developments to incorporate biodiversity enhancement measures.

7.334 Alternative option (1) would mean that smaller developments would not be subject to the need to provide biodiversity and greening initiatives. This would detract from the achievement of a number of sustainability objectives and limit the benefits that could accrue to the community.

7.335 Alternative option (2) could potentially increase development costs and could inhibit design freedom.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy OS5 Greening the borough	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	✓	0	0	0	0	✓	✓	0	0	✓	0
<b>Alternative option (1):</b> <i>Only seek biodiversity enhancement measures for major developments.</i>	?	✓	0	0	0	0	?	0	0	0	X	x
<b>Alternative option (2):</b> <i>Require all new developments to incorporate biodiversity enhancement measures.</i>	?	Y	0	0	0	0	?	Y	0	0	Y	x

### Assessing secondary, cumulative and synergistic effects

7.336 Policy OS1 Protecting parks and open spaces is anticipated to positively contribute towards the Draft Local Plan's strategic objective 15 which seeks to protect and enhance the borough's open green spaces and create new parks where there is major regeneration. Policy OS1 meets a number of the social and environmental sustainability objectives and is likely to have a cumulative impact as open space is important for people's quality of life, provides a space for social interaction, exercise and provides positive long term benefits for climate change and pollution.

7.337 Policy OS2 Access to parks and open spaces is anticipated to positively contribute to the Draft Local Plan's strategic objective 15 that seeks to protect and enhance the borough's open green spaces, strategic objective 9 which ensures that residents have access to recreation and strategic objective 11 which seeks to better sports facilities to reduce health inequalities. Overall, policy OS2 has been found sustainable and will have a positive short to long term impact on the health and welfare of the community.

- 7.338 Policy OS3 Playspace for children and young people is anticipated to positively contribute towards the Draft Local Plan strategic objective 15 that seeks to protect and enhance the borough's open green spaces as well as a number of other strategic objectives that enhance the environmental quality of the borough and the health and welfare of the community. Policy OS3 is likely to have a cumulative positive effect in terms of social justice as it promotes the provision of accessible and communal playspace to meet the needs of all children. This policy also links to the principles of accessible and inclusive design as promoted in policy DC2 Design of new build.
- 7.339 Policy OS4 Nature conservation will contribute towards the Draft Local Plan's strategic objective 15 which seeks to protect and enhance the borough's open green spaces and strategic objective 17 that seeks to reduce and mitigate local causes of climate change. The protection and provision of biodiversity should not impact on economic objectives if designed as an integral part of new developments. Overall, policy OS4 has been found sustainable.
- 7.340 Policy OS5 Greening the borough will contribute towards the Draft Local Plan's strategic objective 15 seeking to protect and enhance the borough's open green spaces but its impact on some of the other strategic objectives will depend on its application. Provision of green infrastructure will need to be balanced against provision of other social and physical infrastructure so that sustainable development is achieved throughout the borough. Overall, policy OS5 has been found sustainable.

## **RIVER THAMES AND GRAND UNION CANAL**

### **Borough-wide Policy RTC1 River Thames and Grand Union Canal**

#### **Borough-wide Policy RTC1**

##### **River Thames and Grand Union Canal**

**The council will work with its partner organisations, including the Environment Agency, Port of London Authority and Canal and River Trust, Thames Water and landowners to enhance and increase access to, as well as use of, the waterways in the borough, namely the River Thames and the Grand Union Canal, and improve waterside environments by:**

- **Identifying the Thames Policy Area on the Proposals Map and setting out general criteria for the design of development in this area in this Local Plan and in the planning framework for the South Fulham Riverside regeneration area;**
- **Encouraging the development of vacant and underused land along the waterways, namely the River Thames, Chelsea Creek and Grand Union Canal taking into account their local context and character;**
- **Protecting existing water dependent uses and requiring new development to provide opportunities for water based activities where appropriate and enhance river and canal related biodiversity, safeguard and enhance where necessary flood defences, as well as encouraging**

- **public access especially for leisure and educational activities; and**
- **Ensuring the provision, or improvement and greening, of the Thames Path National Trail (the Riverside Walk) in all riverside developments and the canalside tow path along the Grand Union Canal.**

7.341 Working with the identified partner organisations and, in the case of the river, identifying the Thames Policy Area, and setting out general criteria for development affecting the waterways will help ensure a coordinated and comprehensive approach to the river and canal and should allow thorough consideration of sustainability objectives as and when matters affecting the river and the canal arise.

7.342 Encouraging the development of vacant and underused land along the Thames, Chelsea Creek and Grand Union Canal will help to improve the local environmental of these waterways and reduce the amount of underused land. It is not clear what type of development will be encouraged or permitted but if this is mixed use it should allow the achievement of a number of sustainability objectives, including affordable housing and jobs.

7.343 The importance of the waterways to biodiversity and heritage will require sensitive development if these assets are to be protected and enhanced. It is noted that further detail is provided in the policies for those regeneration areas that include sections of the canal and river, namely the Old Oak Regeneration Area and South Fulham Riverside Regeneration Area.

7.344 Requiring new development to provide water based activities and enhance river related biodiversity and public access to the riverside will have social and environmental benefits in addition to benefitting the local economy by encouraging local water-based leisure activities, which are already an important feature of the borough. However, a balance must be struck with nature conservation interests. The provision or improvement of walkways along the waterways will improve accessibility and offer opportunities for healthy lifestyles.

7.345 Safeguarding and enhancing flood defences will assist in reducing the risk of flooding.

#### **Alternative Options – Policy RTC1 (River Thames and Grand Union Canal)**

- Protect existing water-dependant uses, but not explicitly seek an expansion of such activities.
- Oppose any new buildings in the riverside area.

7.346 Alternative option (1) proposes to protect existing water-dependent uses. However, not requiring new development to provide for additional water based activities would undermine the opportunities that these water resources have for leisure and transport. For developments to be sustainable in these locations it is important for water based activities to be included wherever appropriate.



7.347 Alternative option (2) could equally apply to the canal. Opposition to new development along the waterways would effectively blight land and stultify opportunities to meet many, if not all, the strategic objectives of the Local Plan as well as the sustainability objectives of the SA.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy RTC1 River Thames and Grand Union Canal</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> Identifying the Thames Policy Area and setting out general criteria for the design of development in this area	0	0	0	0	✓	0	✓	0	0	?	✓	0
<b>Preferred option:</b> Encouraging the development of vacant and underused land along the waterways,	✓	0	0	✓	✓	✓	✓	0	✓	?	✓	✓
<b>Preferred option:</b> Protecting existing water dependent uses and requiring new development to provide opportunities for water based activities where appropriate and enhance river and canal related biodiversity, safeguard and enhance where necessary flood defences, etc	✓	✓	0	0	✓	✓	✓	✓	✓	✓	✓	✓
<b>Preferred option:</b> Ensuring high standards of design on both riverside and canalside sites, with improved linkages to the river and riverside walk and the canal as appropriate.	0	0	0	0	0	0	✓	0	✓	0	✓	0
<b>Alternative option (1):</b> <i>Protect existing water- dependant uses, but not explicitly seek an expansion of such activities.</i>	0	0	0	0	0	✓	✓	0	✓	0	0	✓
<b>Alternative option (2):</b> <i>Oppose any new buildings in the riverside area.</i>	x	x	x	x	x	x	x	x	x	x	x	x

## **Borough-wide Policy RTC2 Access to the Thames riverside and foreshore**

### **Borough-wide Policy RTC2**

#### **Access to the Thames riverside and foreshore**

**The council will seek accessible and inclusive public access to the riverside and foreshore, including through-site links to the riverside when development takes place and the provision and enhancement of the Thames Path (riverside walk) and the retention and, where appropriate, enhancement of safe access to and from the foreshore in riparian development schemes, and will promote enjoyment of riverside heritage assets and open spaces.**

**The riverside walk should generally be at least 6 metres wide and should be accessible to cyclists if this can be achieved without risk to the safety of pedestrians or river users.**

**All proposals will need to ensure that flood defences are not adversely affected.**

7.348 The preferred policy seeks to improve access to the river by all local residents and will increase opportunities for healthy lifestyles by ensuring the provision of a riverside walk. It will also contribute to the borough's heritage in terms of enhancement of the character of the river, the buildings adjacent to it and open spaces, reducing pollution and possibly reducing the impact of climate change on the borough. There will also be transport benefits through improvements of the riverside walk.

7.349 Although a significant part of the borough is at risk of flooding, it is protected from flooding by the Thames Barrier and by river walls. However there is a risk of breach in or the over topping of the river walls and this risk is likely to increase with climate change. The preferred policy will positively contribute to the climate change objective by seeking to safeguard and enhance flood defence, thereby minimising the risk of flooding from storm events and overflow of the river.

#### **Alternative Options – Policy RTC2 (Access to the Thames riverside and foreshore)**

- Not allowing cyclists to use the riverside walk.

7.350 The alternative option would conflict with existing practice. Also, not allowing cyclists to use the riverside walk would impact negatively on transport and health objectives. If designed well and clearly signed, it should be possible for pedestrians and cyclists to both use and enjoy the riverside walk safely.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy RTC2 Access to the Thames riverside and foreshore</b>												
<b>Preferred option:</b> The council will seek accessible and inclusive public access to the riverside and foreshore, including through-site links to the riverside when development takes place and the provision and enhancement of the Thames Path (riverside walk) and the retention and, where appropriate, enhancement of safe access to and from the foreshore in riparian development schemes, and will promote enjoyment of riverside heritage assets and open spaces.	✓	✓	0	0	✓	0	✓	✓	✓	0	✓	0
<b>Preferred option:</b> The riverside walk should generally be at least 6 metres wide and should be accessible to cyclists if this can be achieved without risk to the safety of pedestrians or river users.	0	✓	0	0	0	0	0	✓	✓	0	0	0
<b>Preferred option:</b> All proposals will need to ensure that flood defences are not adversely affected.	0	✓	0	0	0	0	0	0	0	0	✓	0
<b>Alternative option (1):</b> <i>Not allowing cyclists to use the riverside walk.</i>	0	x	0	0	0	0	0	0	x	0	0	0

### Borough-wide Policy RTC3 Design and appearance of development within the Thames Policy Area

#### Borough-wide Policy RTC3

#### Design and appearance of development within the Thames Policy Area

**Development will not be permitted within the Thames Policy Area as shown on the Proposals Map unless it respects the riverside, including the foreshore, context and heritage assets, is of a high standard of accessible and inclusive design, and maintains or enhances the quality of the built and natural environment. Schemes that meet these requirements, and, by their design, contribute to creating an attractive, safe and interesting riparian environment will be welcomed.**

**There will be a presumption against tall buildings along the riverside, but in limited parts of South Fulham Riverside regeneration area, taller buildings may be appropriate if it can be demonstrated that a tall building would be a key design element in a masterplan for regeneration and that it would have a positive relationship to the riverside.**

7.351 Implementing the preferred policy is likely to result in increased protection of heritage assets and conservation areas located alongside the river. Many of the policy objectives are expanded upon in related Local Plan policies on design and conservation (see also policy on tall buildings in the South Fulham Riverside Regeneration Area) which have also been subject to sustainability appraisal and found to be sound.

7.352 Achievement of the policy objectives will depend on the implementation of the policy, with different development scenarios and land uses exerting varying impacts on sustainable development.

**Alternative Options – Policy RTC3 (The design and appearance of development within the Thames Policy Area)**

- Revise the boundary of the Thames Policy Area.
- Create an area based approach to design, taking into account the Conservation Area Character profiles and the Thames Strategy Kew to Chelsea character appraisal.
- Allow tall buildings along the riverside.

7.353 Alternative option (1) proposes to revise the boundary of the Thames Policy Area (TPA). Making more land subject to the special design considerations of the TPA could help development respond to the riverside and contribute to an attractive, safe and interesting riparian environment. However, when applying TPA criteria set out in the London Plan, there is no justification to extend the TPA further in this borough.

7.354 Alternative option (2) would create a more localised approach to design and conservation in the TPA. In practice, however, conservation area profiles will always be taken into account, along with other documents such as the Thames Strategy Kew to Chelsea, and there is no need to reword the policy.

7.355 Alternative option (3) could lead to developments that impact detrimentally on some of the sustainability objectives. In particular, the environmental objectives could be impacted upon as more intense development could affect climate change, transport and heritage. It may be possible to create more homes and jobs with taller buildings, but the benefits of more intense development may not outweigh the environmental costs and in addition may not always have social benefits. The preferred option, which identifies parts of the South Fulham Regeneration Area as having potential for tall buildings, is supported by a separate policy in the Local Plan and a supporting background paper.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy RTC3</b> <b>Design and appearance of development within the Thames Policy Area</b>												
<b>Preferred option:</b> <i>See policy wording above.</i>	0	✓	0	0	0	0	✓	0	?	0	✓	0
<b>Alternative option (1):</b> <i>Revise the boundary of the Thames Policy Area.</i>	0	0	0	0	0	0	✓	0	0	0	0	?
<b>Alternative option (2):</b> <i>Create an area based approach to design, taking into account the Conservation Area Character profiles and the Thames Strategy Kew to Chelsea character appraisal.</i>	0	0	0	0	0	0	✓	0	0	0	0	?
<b>Alternative option (3):</b> <i>Allow tall buildings along the riverside.</i>	0	?	0	?	0	?	X	?	x	0	X	?

## Borough-wide Policy RTC4 Water-based activity on the Thames

### Borough-wide Policy RTC4

#### Water-based activity on the Thames

Development will not be permitted if it would result in the loss of existing facilities in the river for water-based activities and uses, unless the facilities are demonstrably surplus to current or anticipated requirements, or unless alternative facilities of similar or greater utility are to be provided. Specific requirements regarding development of the borough's three safeguarded wharves are set out in the London Plan.

Developments that include provision in the river for water-based and river-related activities and uses, including passenger services, and for facilities associated therewith, particularly where these would be publicly accessible,

**will be welcomed, provided:**

- **they are compatible with the character of the river, the riverside, and the importance of the river as a wildlife habitat;**
- **they do not impede or give rise to hazards to navigation, water flow, the integrity of flood defences or public safety; and**
- **they accord with other objectives and policies of the Plan.**

7.356 Maintaining water-based uses could have a number of benefits, including retaining the character of the river (e.g. by retaining uses that have activities which add to the waterside ambience); reducing the impact of transport on the environment (e.g. by keeping wharves and pontoons that could be used by waterborne passengers or freight services); and improving health (e.g. by retaining rowing and sailing clubs).

7.357 By encouraging developments that include the provision of water-based and river-related activities, the policy will promote the sustainability objectives outlined above. Also by listing a number of identified criteria that developments have to meet, the policy will ensure consideration of environmental sustainability objectives.

#### **Alternative Options – Policy RTC4 (Water-based activity on the Thames)**

- Allow for mixed use development of wharves where that would enable a working wharf use and provide increased public access to the riverside.
- Identify appropriate locations for additional moorings for different purposes, and the scope for expansion.
- Encourage residential moorings.

7.358 Alternative option (1) proposes to allow for the mixed use development of wharves. Mixed use schemes at existing wharves could lead to amenity issues within schemes, thereby impacting on sustainability objectives such as those concerned with health and pollution if not carefully controlled. Such issues could especially prejudice provision of cargo-uses in mixed use schemes.. Also, such an approach could encourage redevelopment of existing viable wharves. However, there could be positive impacts in terms of housing and employment provision if these uses are included in mixed use developments, as well as improved public access to the river. Many of the environmental impacts will be dependent on implementation.

7.359 Alternative option (2) would allow a strategic council led approach to moorings. It is assumed that selection of locations would consider matters such as local character, biodiversity, navigation, access and servicing. However, it is considered that there are no material benefits to the council in such an approach that are over and above the council considering proposals as and when they arise against the identified policy criteria.

7.360 Alternative option (3) is not a council objective and would not significantly meet any sustainability objectives. Rather it is considered more appropriate for the policy to allow consideration of proposals if and when they come forward.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy RTC4 Water-based activity on the Thames</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Development will not be permitted if it would result in the loss of existing facilities in the river for water-based activities and uses, unless the facilities are demonstrably surplus to current or anticipated requirements, or unless alternative facilities of similar or greater utility are to be provided. Specific requirements regarding development of the three safeguarded wharves are set out in the London Plan.	?	✓	0	0	0	0	?	✓	✓	0	✓	✓
Developments that include provision in the river for water-based and river-related activities and uses, including passenger services, and for facilities associated therewith, particularly where these would be publicly accessible, will be welcomed, provided: [...] <i>See policy wording.</i>	✓	✓	0	✓	✓	0	✓	✓	✓	0	✓	✓
<i>Alternative option 1 Allow for mixed use development of wharves where that would enable a working wharf use and provide increased public access to the riverside.</i>	0	x	?	0	?	?	0	x	x	0	0	x
<b>Alternative option (2):</b> <i>Identify appropriate locations for additional moorings for different purposes, and the scope for expansion.</i>	0	✓	0	0	✓	0	✓	✓	✓	?	✓	?

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
<b>Borough-wide Policy RTC4 Water-based activity on the Thames</b>	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Alternative option (3):</b> <i>Encourage residential moorings.</i>	0	0	0	0	?	0	?	?	?	?	?	?

### **Borough-wide Policy RTC5 Enhancing the Grand Union Canal and improving access**

#### **Borough-wide Policy RTC5**

#### **Enhancing the Grand Union Canal and improving access**

**Development along the canal will be expected to provide a mix of uses. The council will expect canalside development to:**

- **enhance the canal and its environs and enable and support those uses and activities that require a water or waterside location where there is a need;**
- **provide public access, including the provision and enhancement of the long distance canalside walk, and promote, protect and enhance biodiversity and enjoyment of heritage assets;**
- **be of a high standard of accessible and inclusive design that take into account local context and character and create an attractive, safe and interesting canalside environment; and**
- **encourage the use of the canal for appropriate freight movement (for example construction and waste materials for HS2 and leisure passenger boats).**

7.361 Providing a mix of uses along the canal on sites that are currently in industrial and railway use provides opportunities to meet many of the sustainability objectives including new affordable homes, satisfying work and reducing pollution. Protecting, enhancing and increasing public access to the canal will allow all people to enjoy its environmental, biodiversity and open space attributes. This will be especially important given the large planned increase in population and the general lack of access to natural and open spaces in this area.

7.362 Enhancing and enabling better public access to the canal will also encourage people to engage in more physical activity and may be a contributory factor in improving the health of the local population.



7.363 Encouraging use of the canal for freight movement and leisure use will especially meet transport and health objectives. Using the canal for the transport of materials should also assist in ensuring that the regeneration of the area is undertaken in a sustainable way.

7.364 The preferred policy will need to be implemented in tandem with the policies for the Old Oak Regeneration Area. Together they have the potential to regenerate the area in a sustainable manner.

**Alternative Options – Policy RTC5 (Enhancing the Grand Union Canal and improving access)**

- Preserve the existing character of the canal as it passes through the borough by resisting new canalside development alongside and near the canal.

7.365 The alternative option would preserve the existing character of the canal. However, although the canal is a conservation area, much of the area it passes through in this borough is industrial land of no notable character. Restricting development along the canal would prevent these areas from being enhanced and could also result in preventing mixed use schemes that could, for example, provide affordable homes. Restrictions on development could also adversely impact upon the sustainability of the local economy.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	0	✓	✓	✓	?	✓	✓	0	0	✓
<b>Alternative option (1):</b> <i>Preserve the existing character of the canal as it passes through the borough by resisting new canalside development alongside and near the canal.</i>	X	0	0	X	0	✓	✓	X	0	0	0	X

## **Assessing secondary, cumulative and synergistic effects**

- 7.366 The riverside and canal policies RTC1 to 5 have been found to be generally sustainable. In two areas of the borough, namely the South Fulham Riverside Regeneration Area and the Old Oak Regeneration Area, it will be important to ensure that the regeneration area policies and borough wide policies are considered side by side. The SA has not picked up any inconsistencies, but as is the case with many policies it will be necessary for a balanced approach to be taken so that weight is given to all sustainability objectives.
- 7.367 All the policies have a slant towards protection and enhancement of heritage assets and careful design and conservation. Because there are particular development opportunities along the borough's waterways it will be necessary to ensure that development is of a high standard that balances the many functions of the waterways and their surrounds.
- 7.368 Policy RTC1 River Thames and Grand Union Canal is anticipated to positively contribute towards the Draft Local Plan's strategic objective 16 which seeks to increase public access and use of Hammersmith and Fulham's waterways as well as enhance their environment, quality and character and strategic objective 14 which seeks to preserve and enhance the borough's natural environment. Policy RTC1 is likely to have a positive cumulative and secondary effect in the medium to long term because it requires new development to provide water based activities and enhance river related biodiversity and public access to the riverside. This policy will have both social and environmental benefits in addition to benefitting the local economy by encouraging local water-based leisure activities, which are already an important feature of the borough.
- 7.369 Policy RTC2 Access to the Thames riverside and foreshore is anticipated to contribute positively towards Draft Local Plan strategic objective 11 which encourages and promotes healthier lifestyles and strategic objective 16 which seeks to increase public access and use of the waterways. It will also contribute positively towards strategic objective 18 which seek the development of sustainable transport network. Policy RTC2 seeks to improve access to the river by all local residents and this will increase opportunities for healthy lifestyles by ensuring the provision of a riverside walk. This is likely to have a positive short to long term effect, in particular on the health sustainability objective and in the long term will have a positive effect on climate change and reducing the effect of transport on the environment by encouraging walking and cycling via the riverside walk.
- 7.370 Policy RTC3 Design and appearance of development within the Thames Policy Area is anticipated to contribute positively towards the Draft Local Plan strategic objective 14 which seeks to preserve and enhance the quality and character of the borough's built environment and strategic objective 16 which seeks to increase public access and use of the borough's waterways. This policy is supported by the design and conservation policies and is therefore likely to have a positive cumulative effect in the medium to long term on the borough's riverside built environment.

7.371 Policy RTC4 Water-based activity on the Thames is anticipated to contribute positively towards the Draft Local Plan strategic objective 11 which encourages and promotes healthier lifestyles, strategic objective 16 which seeks to increase public access and use of the borough's waterways and strategic objective 17 which seeks to mitigate flood risk. Policy RTC4 could have a number of positive medium to long term benefits, including retaining the character of the riverside and reducing the impact of transport on the environment.

7.372 Policy RTC5 Enhancing the Grand Union Canal and improving access is anticipated to contribute positively towards the Draft Local Plan strategic objective strategic objective 14 which seeks to preserve and enhance the borough's built and natural environment and strategic objective 16 which seeks to increase public access and use of the borough's waterways. It will also contribute positively towards strategic objective 18 which seeks the development of a sustainable transport network. Providing a mix of uses along the canal on sites that are currently in industrial and railway use provides opportunities to meet many of the sustainability objectives including new affordable homes, satisfying work and reducing pollution.

## **DESIGN AND CONSERVATION**

### **Borough-wide Policy DC1 Built environment**

#### **Borough-wide Policy DC1**

##### **Built environment**

**All development within the borough, including in the regeneration areas should create a high quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that considers how good design, quality public realm, landscaping and land use can be integrated to help regenerate places.**

**Development within the borough which includes tall buildings which are significantly higher than the generally prevailing height of buildings in the surrounding area, particularly where they have a disruptive and harmful impact on the skyline, will generally be resisted.**

**However, areas where tall buildings may be appropriate are as follows:**

- **In parts of White City Regeneration Area.**
- **In parts of the Earls Court & West Kensington Opportunity.**
- **In limited parts of South Fulham Riverside Regeneration Area (see also policy in River Thames and Canal section).**
- **In parts of Hammersmith Town Centre. Not all parts of the town centre will be suitable and any proposals for tall buildings will need to respect the existing townscape and historic context and make a positive contribution to the skyline emphasising a point of civic or visual**

**significance.**

- In parts of the Old Oak Regeneration Area, tall buildings of exceptionally good design may be appropriate as part of the plan for regeneration, taking advantage of the high public transport accessibility that the HS2 proposals would afford the area.

**The character of the built form and the sensitivity of the setting of heritage assets may mean that some parts of these areas will be sensitive to, or inappropriate for, tall buildings. Any proposals for tall buildings will need to respect the existing townscape context, demonstrate tangible urban design benefits, and be consistent with the council's wider regeneration objectives.**

7.373 The preferred option focuses on ensuring that principles of accessible and inclusive urban design are incorporated into borough wide design policies. This will help to lead to more equitable and socially just outcomes insofar as the design of the public realm is concerned.

7.374 The preferred option will make a positive contribution towards the improving the health of the population. It aims to ensure that new developments are designed to be accessible and inclusive. This will help to improve the quality of life of all people living, working and visiting the borough including the young, the elderly and disabled people. Incorporating these design principles may also encourage people of all ages and abilities to participate more in the public domain, improving both their physical and mental health.

7.375 A focus on accessible and inclusive design is likely to encourage people of all ages and abilities to make greater use of the public domain. This in turn is likely to increase people's sense of being connected with their local community.

7.376 The preferred option places significant emphasis on helping to ensure that new development will respect and enhance its natural assets.

#### **Alternative Options - Policy DC1 (Built Environment)**

- Focus on the design attributes of individual buildings and the materials used rather than the wider design context.
- Allow the market to determine the location of tall buildings rather than identifying suitable areas for tall buildings in the Local Plan.

Alternative option (1) focuses on the design attributes of individual buildings and the materials used rather than the wider design context. However this approach may result in poorly located buildings that exert a negative impact on the character and amenity of surrounding area, particularly in terms of access to public transport, increased traffic impacts, and impacts on local communities.

Alternative option (2) will cause significant uncertainty for local communities. Tall buildings, if inappropriately located can exert a number of adverse impacts on surrounding areas, in particular to conservation areas and the Thames riverside. The costs of which would be disproportionately borne by people living in surrounding areas. This would therefore justify a policy to control this potential market failure.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC1 Built environment	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred options:</b> <i>See policy wording above.</i>	✓	✓	0	0	✓	0	✓	0	0	0	0	0
<b>Alternative option (1):</b> <i>Focus on the design attributes of individual buildings and the materials used rather than the wider design context.</i>	?	0	0	?	?	0	?/X	0	0	0	?	0
<b>Alternative option (2):</b> <i>Allow the market to determine the location of tall buildings rather than identifying suitable areas for tall buildings in the Local Plan.</i>	?	0	0	?	?	0	?	0	X/?	✓	?	✓

## Borough-wide Policy DC2 Design of new build

### Borough-wide Policy DC2

#### Design of new build

New build development will be permitted if it is of a high standard of design and compatible with the scale and character of existing development and its setting.

All proposals must be designed to respect:

- The historical context and townscape setting of the site, and its sense of place;
- The scale, mass, form and grain of surrounding development;
- The relationship of the proposed development to the existing townscape, including the local street pattern, local landmarks and the skyline;
- The local design context, including the prevailing rhythm and articulation of frontages, local building materials and colour, and locally distinctive architectural detailing, and thereby promote and reinforce local distinctiveness;
- The principles of good neighbourliness;
- The local landscape context and where appropriate should provide good landscaping and contribute to an improved public realm;
- Sustainability objectives; including adaptation to, and mitigation of, the effects of climate change;
- The principles of accessible and inclusive design;
- Principles of Secured by Design; and
- The concerns of the local community.

7.377 The preferred policy will have benefits in relation to heritage objectives, the responsible consumption of resources and climate change. Applying the principles of inclusive and accessible design, will have positive impacts on the community, social justice and cohesion, especially in regeneration and opportunity areas where most change will happen. There will be benefits for the wider community by increasing permeability through developments improving access and potentially reducing level of crime and anti-social behaviour through good design.

**Alternative Options - Policy DC2 (Design of new build)**

- Give priority to high quality proposals that are not constrained by heritage and design issues.
- Require preparation of Access and Design Statements for all developments.

7.378 Alternative option (1) proposes to give priority to high quality proposals that are not constrained by heritage and design issues. This option would require a definition of priority by defining what benefits a developer will gain by demonstrating high quality proposals. This would also require further explanation as to what is considered high quality. Furthermore, an explanation would be required as to why priority is being given and how it benefits the Council's initiative to improve the quality of development in the borough.

7.379 Alternative option (2) proposes to require the preparation of Access and Design Statements for all developments. There could be some benefit in requiring all development to submit a statement however, this could stifle development if onerous.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC2 Design of new build	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> New build development will be permitted if it is of a high standard of design and compatible with the scale and character of existing development and its setting.  All proposals must be designed to respect: [...] <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	✓	?	?	✓	✓	?
<b>Alternative option (1):</b> Give priority to high quality proposals that are not constrained by heritage and design issues.	0	?	?	✓	✓	?	?	0	0	0	0	?

<b>Alternative option (2):</b> <i>Require preparation of Access and Design Statements for all developments.</i>	✓	✓	0	0	✓	0	✓	✓	✓	?	0	?
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## Borough-wide Policy DC3 Tall buildings

### Borough-wide Policy DC3

#### Tall buildings

Apart from those areas identified in the Local Plan, tall buildings which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline will be generally resisted by the council. In the areas identified as appropriate for tall buildings, any proposal will need to demonstrate that it:

- a. Has an acceptable relationship to the surrounding townscape context in terms of scale, streetscape and built form;
- b. Has an acceptable impact on the skyline, and views from and to open spaces, the riverside and waterways and other locally important views and prospects;
- c. Has an acceptable impact in terms of the setting of, and views to and from, heritage assets;
- d. Is supported by appropriate transport infrastructure;
- e. Is of the highest architectural quality with an appropriate scale, form and silhouette;
- f. Has an appropriate design at the base of the tall building and provides ground floor activity;
- g. Interacts positively to the public realm and contributes to permeability of the area;
- h. Is of a sustainable design and construction where energy use is minimised and the design allows for adaptation of the space;
- i. Does not have a detrimental impact on the local environment in terms of microclimate, overshadowing, light spillage and vehicle movements; and
- j. Respects the principles of accessible and inclusive design.

7.380 Apart from those areas identified in the Local Plan, tall buildings will generally be resisted by the council. There should therefore be no significant negative impact on townscape assets outside of these areas and the policy should not impact negatively on other objectives.

7.381 The criteria to be used when considering planning applications should ensure benefits in relation to most of the sustainability objectives if applied appropriately and consistently.

#### Alternative Options - Policy DC3 (Tall buildings)

- Remove the general presumption against tall buildings across the borough to permit tall buildings subject to the proposal satisfying design criteria.
- Amend criteria to make the policy more or less restrictive or remove completely.

7.382 Alternative option (1) could increase the level of overall development in the borough resulting in a potential increase in housing (including affordable housing) and other suitable uses. Whilst this would benefit the local economy, a laissez faire approach to tall buildings may, despite the application of the borough wide policies result in poorly located buildings that exert a negative impact on the character and amenity of surrounding area, particularly in terms of access to public transport, increased traffic impacts, and impacts on local communities.

7.383 Alternative option (2) will cause significant uncertainty for local communities. A more restrictive policy on tall buildings could stifle development and therefore not take advantage of the benefits tall buildings have to offer such as reduced land take and better use of public transport by building high density buildings in areas of high public transport accessibility. Whilst the removal of this policy means that new tall buildings could be inappropriately located and this could have a number of adverse impacts on the surrounding communities and heritage.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC3 Tall buildings	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred options:</b> Apart from those areas identified in the Core Strategy, tall buildings which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline will be generally resisted by the council. [...] See policy wording above.	✓	0	0	0	0	✓	✓	✓	✓	✓	✓	0
<b>Alternative option (1):</b> Remove the general presumption against tall buildings across the borough to permit tall buildings subject to the proposal satisfying design criteria.	0/?	0	0	?	X/?	0	?/X	0	X	✓	?	✓
<b>Alternative option (2):</b> Amend criteria to make the policy more or less restrictive or remove completely.	?	?	0	0	?	0	?	?	?	?	0	?



## **Borough-wide Policy DC4 Alterations and extensions (including outbuildings)**

### **Borough-wide Policy DC4**

#### **Alterations and extensions (including outbuildings)**

The council will require a high standard of design in all alterations and extensions to existing buildings. These should be compatible with the scale and character of existing development, neighbouring properties and their setting. In most cases, they should be subservient to the original building. Alterations and extensions should be successfully integrated into the architectural design of the existing building. In considering applications for alterations and extensions the council will consider the impact on the existing building and its surroundings and take into account the following:

- a. **Scale, form, height and mass;**
- b. **Proportion;**
- c. **Vertical and horizontal emphasis;**
- d. **Relationship of solid to void;**
- e. **Materials;**
- f. **Relationship to existing building, spaces between buildings and gardens;**
- g. **Good neighbourliness; and**
- h. **The principles of accessible and inclusive design.**

7.384 The preferred policy on alterations and extensions seeks to ensure that developments respect the scale and character of existing buildings. Criteria used when considering applications will contribute positively to conserving and enhancing the local environmental heritage. The principles of accessible and inclusive design will impact positively on social objectives.

#### **Alternative Options – Policy DC4 (Alterations and extensions)**

- Prohibit all extensions and alterations in conservation areas to preserve the existing character of the area.
- Encourage design freedom and the development potential of land by removing constraints on the design and dimensions of proposed alterations and extensions.

7.385 Alternative option (1) will prevent affected individuals from developing their homes to cater to changing needs over time.

7.386 Alternative option (2) has the potential to be divisive and cause conflict in communities due to the increased potential for adverse impacts of extensions on neighbouring properties. Removing restrictions on the size of extensions is also likely to lead to loss of backyards and other green spaces around dwellings for extensions.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC4 Alterations and extensions (including outbuildings)	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	✓	0
<b>Alternative option (1):</b> <i>Prohibit all extensions and alterations in conservation areas to preserve the existing character of the area.</i>	x	0	0	0	x	0	✓	0	0	0	0	0
<b>Alternative option (2):</b> <i>Encourage design freedom and the development potential of land by removing constraints on the design and dimensions of proposed alterations and extensions</i>	0	0	0	0	x	0	x	✓	✓	✓	x	0

## Borough-wide Policy DC5 Shopfronts

### Borough-wide Policy DC5

#### Shopfronts

In order to improve the appearance of the borough's streets, the council will encourage high quality shopfronts that are designed in sympathy with the age and architectural style of the building concerned, achieving a satisfactory relationship between the ground floor and the rest of the building. The scale of the shopfront should be carefully considered with its proportions, detailing (including vertical and horizontal subdivision) and materials, which have an affinity with the building.

Where an original shopfront or a consistent traditional shopfront remains, the council will expect it to be retained and restored.

New developments which include retail areas should provide a framework into which a shop front of a suitable scale can be inserted.

New shopfronts should be designed to meet the principles of accessible and inclusive design.

The council will also take into account any relevant supplementary planning documents.

7.387 The preferred option has positive effects on the heritage, social and sustainable economy objectives. Accessible and inclusive design of shopfronts will particularly benefit disabled people.

#### Alternative Options – Policy DC5 (Shopfronts)

- Expect the retail style appearance of the frontage to be retained along with the shop surround of pilasters and fascia where they exist.

7.388 The alternative option will help to retain the character of streetscapes in the borough. It is unlikely to have any significant impacts other than on local heritage.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC5 Shopfronts	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	0	0	0	0	0	✓	0	0	0	0	✓
<b>Alternative option (1):</b> <i>Where a former retail unit is converted to another use such as residential, the council will expect the retail style appearance of the frontage to be retained along with the shop surround of pilasters and fascia where they exist.</i>	0	0	0	0	0	0	✓	0	0	0	0	0

#### Borough-wide Policy DC6 Replacement windows

##### Borough-wide Policy DC6

##### Replacement windows

**Replacement windows should respect the architectural character of the building and its surroundings. In this respect it will be important that the design of replacement windows matches the original windows in terms of material, type and size, method of opening, profile and section, and sub-division.**

7.389 The preferred policy will seek a high standard of design that is compatible with the local environment. It will have significant positive impact on the heritage objective. New windows could also have benefits in respect of consumption of resources and climate change objectives.

### Alternative Options – Policy DC6 (Replacement windows)

- Permit replacement windows of different materials to be used.

7.390 The alternative option proposes to permit replacement windows of different materials to be used. This approach is likely to erode the architectural character of buildings.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC6 Replacement windows	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	✓	✓	0
<b>Alternative option (1):</b> <i>Permit replacement windows of different materials to be used</i>	0	0	0	0	0	0	X	0	0	0	0	0

### Borough-wide Policy DC7 Views and landmarks

#### Borough-wide Policy DC7

#### Views and landmarks

The council will protect the strategic view of St Paul's Cathedral and important local views shown on the Proposals Map.

Local views afforded by the open nature of the borough's riverfront are important in determining the character of each stretch of the riverside. Many heritage assets are located along the river, and it is important that their setting and relationship with the river is preserved or enhanced. The Council will refuse consent where proposed development in these views would lead to substantial harm to the significance of a designated heritage asset and townscape generally, unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm caused.

1. Development within the Thames Policy Area will not be permitted if it would cause demonstrable harm to the view from the following points:

- From Hammersmith Bridge, the view along the river, foreshore, and riverside development and landscape between Hammersmith Terrace to the west and Fulham Football Ground to the south.
- From Putney Bridge, the views along the river, foreshore and riverside, extending upstream from All Saints Church and its environs, along Bishops Park as far as Fulham Football Ground, and from Putney Railway Bridge the view downstream to the grounds of the Hurlingham Club.

c. From Wandsworth Bridge, the view up and downstream of the river, its foreshore and banks, and of commercial wharves and riverside buildings.

2. Development will also not be permitted if it would cause demonstrable harm to the view from within the Thames Policy Area of any of the following important local landmarks identified on the proposals map, or their settings:

a. Upper and Lower Mall. The richness, diversity and beauty of the historical waterfront which includes Hammersmith Terrace, Kelmscott House and neighbouring group of listed buildings, and the open space of Furnivall Gardens allowing views of the skyline of Hammersmith and the spire of St. Paul's Church.

b. Bishops Park. The parallel avenues of mature London plane trees and dense shrubbery which define the character of this important open space and the riverfront.

c. Grounds of the Hurlingham Club. The landscaped edge of the grounds providing glimpsed views to the listed Hurlingham House.

d. Hammersmith Bridge. This fine example of a suspension bridge is particularly dominant, and is an important landmark along this stretch of the river.

e. Putney Bridge and the adjacent All Saints Church.

7.391 The implementation of the preferred policy will have a significant positive impact on preserving and enhancing the character and identity of the borough's natural and built environment including its heritage assets. The preferred policy will meet the heritage sustainability objective, but will have no significant effects on the other sustainability objectives as long as its application does not put an unnecessary brake on development within areas that are subject to identifiable views.

#### Alternative Options – Policy DC7 (Views and landmarks)

- Focus on the most important views in the borough, namely the riverside prospects.

7.392 Alternative option (1) would still have a positive effect on preserving heritage through protecting views. However, the effect will not be as significant as the proposed option which will widen the existing approach to identifying views.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC7 Views and landmarks	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	0
<b>Alternative option (1):</b> <i>Focus on the most</i>	0	?	0	0	✓	0	✓	0	0	0	0	0

<i>important views in the borough, namely the riverside prospects.</i>											
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## Borough-wide Policy DC8 Heritage and conservation

### Borough-wide Policy DC8

#### Heritage and conservation

The council will aim to protect, restore or enhance the quality, character, appearance and setting of the borough's conservation areas and its historic environment, including listed buildings, historic parks and gardens, buildings and artefacts of local importance and interest, archaeological priority areas and the Fulham Palace Moated site scheduled ancient monument. When determining applications for development affecting heritage assets, the council will apply the following principles:

- a. The presumption will be in favour of the conservation and restoration of heritage assets, and proposals should secure the long term future of heritage assets. The more significant the designated heritage asset, the greater the presumption should be in favour of its conservation.
- b. Proposals which involve substantial harm to, or loss of, any designated heritage asset will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 133 of the National Planning Policy Framework.
- c. Development affecting designated heritage assets, including alterations and extensions to buildings will only be permitted if the significance of the heritage asset is preserved or enhanced or if there is clear and convincing justification. Where measures to mitigate the effects of climate change are proposed, the benefits in meeting climate change objectives should be balanced against any harm to the significance of the heritage asset and its setting.
- d. Applications for development affecting non-designated heritage assets (buildings and artefacts of local importance and interest) will be determined having regard to the scale and impact of any harm or loss and the significance of the heritage asset.
- e. Development should preserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset. The presence of heritage assets should inform high quality design within its setting.
- f. Particular regard will be given to matters of scale, height, massing, alignment, materials and use.
- g. Where changes of use are proposed for heritage assets, the proposed use should be consistent with the aims of conservation of the asset concerned.
- h. Applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposed development upon it or its setting which should be carried out with the assistance of a suitably qualified person. The extent of the requirement should be proportionate to the nature and level of the asset's significance.
- i. Where a heritage asset cannot be retained in its entirety or when a change of use is proposed, the developer should ensure that a suitably qualified person carries out an analysis (including photographic surveys) of its design before it

is lost, in order to record and advance the understanding of heritage in the borough. The extent of the requirement should be proportionate to the nature and level of the asset's significance; and

j. The proposal respects the principles of accessible and inclusive design.

7.393 The preferred policy aims to protect, restore or enhance wherever possible the borough's built heritage assets and will therefore have positive benefits on the Heritage. Proposed development that could affect these assets will need to ensure among other things, a positive contribution to the setting and character of these heritage assets.

7.394 The preferred policy will have no significant effects on the other sustainability objectives and should not put an unnecessary brake on development if applied in an appropriate manner that ensures all sustainable development objectives are met.

#### Alternative Options – Policy DC8 (Heritage and conservation)

- Permit development without consideration of heritage assets or conservation area designations.
- Prohibit development and infrastructure in areas of identified sensitivity, such as conservation areas.

7.395 Alternative option (1) proposes to permit development without consideration of heritage assets or conservation area designations. This approach would lead to adverse impact on the special character of conservation areas, harm the setting of listed and locally listed buildings and archaeological remains.

7.396 Alternative option (2) proposes to prohibit development and infrastructure in areas of identified sensitivity, such as conservation areas. Although this approach would have a positive effect on protecting the character of conservation areas, it is too restrictive and would stifle development and prevent improvements to infrastructure.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC8 Heritage and conservation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b>  <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	0
<b>Alternative option (1):</b> <i>Permit development without consideration of heritage assets or conservation area designations.</i>	0	0	0	0	0	0	x	0	0	0	0	0

<b>Alternative option (2):</b> <i>Prohibit development and infrastructure in areas of identified sensitivity, such as conservation areas.</i>	0	0	0	0	0	0	✓	0	0	0	0	0
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## Borough-wide Policy DC9 Advertisements

### Borough-wide Policy DC9

#### Advertisements

The council will require a high standard of design of advertisements which are in keeping with the character of their location and do not impact on public safety and will resist excessive or obtrusive advertising and inappropriate illuminated signs. The design of advertisements should be appropriate to their context and should generally be restrained in quantity and form. The council will use its powers to remove unsightly and inappropriate signs.

Advertisements and hoardings displayed above ground floor level are normally unacceptable. Hoardings and other large advertisements, such as digital screens will be unacceptable where they are out of scale with their surroundings or are located within or adjacent to areas sensitive to the visual impact of hoardings such as conservation areas, listed buildings and other heritage assets, residential areas, open spaces or waterside land.

Advertisement shrouds secured on scaffolding or buildings will only be permitted in tightly defined circumstances. It is important that the advertisement shroud should not over-dominate the building in terms of its size, height or illumination or spoil the character or appearance of the area.

Advertisement shrouds should only be displayed for a limited period. The display of estate agents boards within Regulation 7 areas will not be permitted.

7.397 The preferred policy will seek a high standard of design for advertisements in keeping with their location and setting. The policy will have a positive effect in conserving areas of cultural and historical value and protecting characteristics.

#### Alternative Options – Policy DC9 (Advertisements)

- Not to have any specific criteria controlling advertisements.
- Prohibit advertisements in areas of identified sensitivity, such as conservation areas.



7.398 Alternative option (1) proposes to not have any specific criteria controlling advertisements. This option could lead to an adverse impact on the local character of an area, by adversely affecting the visual amenity of the street scene as it would not control the size, design and siting of advertisements. There would be a negative effect on the social cohesion and heritage sustainability objectives.

7.399 Alternative option (2) proposes to prohibit advertisements in areas of identified sensitivity, such as conservation areas. This approach would protect and conserve the character and appearance of the 45 conservation areas in the borough. There are areas in the borough which already have restrictions under the regulation 7 designation where the council can restrict the display of estate agents boards. However to completely prohibit all types of advertisements in conservation areas would be too restrictive because good design of advertisements can contribute towards the enhancement of the visual appearance of the street scene.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC9 Advertisements	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	0	0	0	✓	0	✓	0	0	0	0	0
<b>Alternative option (1):</b> <i>Not to have any specific criteria controlling advertisements.</i>	0	0	0	0	x	0	x	0	0	0	0	0
<b>Alternative option (2):</b> <i>Prohibit advertisements in areas of identified sensitivity, such as conservation areas.</i>	0	0	0	0	?	0	?	0	0	0	0	x

## Borough-wide Policy DC10 Telecommunications

### Borough-wide Policy DC10

#### Telecommunications

The Council support the expansion of Telecommunications networks, but are keen to avoid any detrimental impact on the local townscape. Proposals for telecommunications development should meet the following criteria:

- The proposed apparatus and associated structures should be sited and designed in order to integrate successfully with the design of the existing building, and thereby minimise its impact on the external appearance of the building;
- The siting and appearance of the proposed apparatus and associated structures should be compatible with the scale and character of existing

development, their neighbours and their setting, and should minimise impact on the visual amenity, character or appearance of the surrounding area;  
c. The siting and appearance of the apparatus and associated structures should not have an adverse impact on conservation areas, listed buildings, buildings of merit or areas of open space;  
d. Where appropriate, proposed apparatus and associated structures should share locations where there is an existing facility.

7.400 The preferred policy option will help to ensure that new telecommunications structures will respect local built character and will not adversely impact upon on the borough's heritage assets. Design should minimise the impact of telecommunications equipment on the environment.

7.401 The preferred option could have a potentially positive impact on sustainable economy objective by providing better communications.

#### Alternative Options – Policy DC10 (Telecommunications)

- Not to have any specific criteria controlling telecommunications apparatus but to apply general design criteria to assess applications.
- Prohibit the development of telecommunications apparatus and infrastructure in areas of identified sensitivity, such as conservation areas.

7.402 This alternative option (1) may be reasonable. However, relying on general design policies to control the development of telecommunications apparatus does not clearly state the council's position on the matter to prospective developers of this type of infrastructure.

7.403 This alternative option (2) is likely to be unduly restrictive and could hinder the development of this necessary infrastructure. There are also likely to be difficulties associated with identifying areas where this infrastructure is to be prohibited, especially given the potential for visual intrusiveness that may cause an adverse impact on sensitive areas which may be some distance away.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC10 Telecommunications	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b>  <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	?/✓
<b>Alternative Option 1:</b> <i>Not to have any specific criteria controlling telecommunications apparatus but to apply general design criteria to assess applications.</i>	0	0	0	0	0	0	x/?	0	0	0	0	0

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC10 Telecommunications	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Alternative Option 2:</b> <i>Prohibit the development of telecommunications apparatus and infrastructure in areas of identified sensitivity, such as conservation areas.</i>	0	0	0	0	0	0	✓	0	0	0	0	0

### Assessing secondary, cumulative and synergistic effects

7.404 Policy DC1 Built Environment is anticipated to contribute towards the Draft Local Plan strategic objective 14 which seeks to preserve and enhance the quality, character and identity of the borough's built environment by respecting the local context and seeking good quality developments. The policy is likely to have short, medium and long term effects. The effects are likely to be permanent, resulting in a cumulative impact on the social justice, health, sense of community and heritage sustainability objectives.

7.405 Policy DC2 Design of new build is anticipated to contribute towards the Draft Local Plan strategic objective 12 which seeks to promote the safety and security of those who live and work in the borough and strategic objective 13 which seeks to protect and enhance the amenity and quality of life of residents as well as strategic objective 14 which seeks to preserve and enhance the quality and character of the borough's built environment. Overall policy DC2 has been found sustainable and the few uncertain effects will need to be monitored. The effects of the preferred policy is likely to be short to long term and is likely to have a cumulative impact on the social sustainability objectives as proposals need to incorporate accessible and inclusive design.

7.406 Policy DC3 Tall buildings is anticipated to contribute towards the Draft Local Plan strategic objective 14 which seeks to preserve and enhance the quality, character and identity of the borough's built environment by respecting the local context, seeking good quality developments and compliance with the principles of inclusive and sustainable design. Overall policy DC3 has been found sustainable with no uncertain effects. It is likely that the timeframe for the effects of this policy will be medium to long term. It is anticipated that policy DC3 will positively contribute towards a number of the sustainability objectives.

- 7.407 Policy DC4 Alterations and extensions (including outbuildings) is anticipated to contribute towards the Draft Local Plan strategic objective strategic objective 13 which seeks to protect and enhance the amenity and quality of life of residents and strategic objective 14 which seeks to preserve and enhance the quality, character of the borough's built environment with inclusive and sustainable design. Overall, policy DC4 has been found sustainable. It is likely to have a short to long term effect of permanent and direct nature. Policy DC4 is anticipated to positively contribute towards the heritage and climate change sustainability objectives.
- 7.408 Policy DC5 Shopfronts is anticipated to contribute towards the Draft Local Plan strategic objective 14 which seeks to preserve and enhance the quality, character and identity of the borough's built environment by respecting the local context, seeking good quality developments and compliance with the principles of inclusive and sustainable design. Overall, policy DC5 has been found sustainable. Policy DC5 is anticipated to positively contribute towards the sustainability objectives for social justice, heritage and sustainable economy.
- 7.409 Policy DC6 Replacement windows is anticipated to contribute towards the Draft Local Plan strategic objective 14 which seeks to preserve and enhance the quality and character of the borough's built environment. Overall, policy DC6 has been found sustainable.
- 7.410 Policy DC7 Views and landmarks is anticipated to contribute towards the Draft Local Plan strategic objective 14 which seeks to preserve and enhance the quality, character and identity of the borough's built environment by respecting the local context, seeking good quality developments and compliance with the principles of inclusive and sustainable design. Overall, policy DC7 has been found sustainable. Policy DC7 is likely to have a long term effect on the heritage sustainability objective.
- 7.411 Policy DC8 Heritage and conservation is anticipated to positively contribute towards the achievement of the Draft Local Plan's strategic objective 14 preserving and enhancing the quality, character and identity of the borough's natural and built environment (including its heritage assets), and will have no significant effects on the other sustainability objectives. Overall, policy DC8 has been found sustainable.
- 7.412 Policy DC9 Advertisements is anticipated to positively contribute towards the achievement of strategic objective 14 (seeking to preserve and enhance the quality, character and identity of the borough's natural and built environment including its heritage assets) and will have no significant effects on the other sustainability objectives. Overall policy DC9 has been found sustainable.

7.413 Policy DC10 Telecommunications is anticipated to positively contribute towards the achievement of strategic objective 14. The impact of this policy is likely to have a short to long term impact as more equipment is installed. The effect is likely to be direct and permanent and likely to provide synergistic effects as telecommunications are a benefit to the economy and could increase business development and enhance competitiveness.

## **ENVIRONMENTAL ISSUES, INCLUDING TACKLING AND ADAPTING TO CLIMATE CHANGE**

### **Borough-wide Policy CC1 Reducing Carbon Dioxide Emissions**

#### **Borough-wide Policy CC1**

##### **Reducing Carbon Dioxide Emissions**

**The council will require all major developments to implement energy conservation measures by:**

- **Implementing the London Plan sustainable energy policies and meeting the associated carbon dioxide (CO<sub>2</sub>) reduction targets to ensure developments are designed to make the most effective use of passive design measures, minimise energy use and reduce CO<sub>2</sub> emissions;**
- **Requiring energy assessments for all major developments to demonstrate and quantify how the proposed energy efficiency measures and low/zero carbon technologies will reduce the expected energy demand and CO<sub>2</sub> emissions;**
- **Requiring major developments to demonstrate that their heating and/or cooling systems have been selected to minimise CO<sub>2</sub> emissions. This includes the need to assess the feasibility of connecting to any existing decentralised energy systems or integrating new systems such as Combined (Cooling) Heat and Power units or communal heating systems, including heat networks;**
- **Using on-site renewable energy generation to further reduce CO<sub>2</sub> emissions from major developments, where feasible;**
- **Where it is not feasible to make the required CO<sub>2</sub> reductions by implementing these measures on site or off site as part of the development, a payment in lieu contribution should be made to the council which will be used to fund CO<sub>2</sub> reduction measures in the borough; and**
- **Encouraging energy efficiency and other low carbon measures in all other (i.e. non-major) developments, where feasible.**

7.414 The preferred option will support the London Plan's policies by tackling climate change in relation to the built environment. It will have significant positive effects on climate change, pollution, careful consumption and ultimately on the health and quality of life of the communities.

7.415 Requiring energy assessments on major developments will improve the contribution of new schemes in mitigating and adapting to climate change. Incorporating such measures at an early stage will be essential part of the development process. Renewable energy generation on major sites will also be encouraged and will provide a further reduction of CO<sub>2</sub> emissions.

7.416 The council will seek planning obligations to mitigate the effects of a development on climate change on or off site. This will contribute positively to the pollution, climate change and careful consumption objectives and will improve the quality of life of communities in the borough.

7.417 The preferred policy will have significant positive effects. In the long-term, these measures could potentially lead to savings and contribute positively to the sustainable economy objective.

**Alternative Options – Policy CC1 (Reducing carbon dioxide emissions)**

- To make no additional requirements and accept construction to the Building Regulation Standards.

The alternative option proposes to make no additional requirements and accept construction to the Building Regulation Standards. However this will not achieve the same levels of reduction in carbon emissions as the preferred option and is therefore less sustainable.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC1 Reducing Carbon Dioxide Emissions	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> Implementing the London Plan sustainable energy policies and meeting the associated carbon dioxide (CO <sub>2</sub> ) reduction targets to ensure developments are designed to make the most effective use of passive design measures, minimise energy use and reduce CO <sub>2</sub> emissions.	0	✓	0	0	0	0	0	✓	0	✓	✓	0
<b>Preferred option:</b> Requiring energy assessments for all major development to demonstrate and quantify how the proposed energy efficiency measures and low/zero carbon technologies will reduce the expected energy demand and CO <sub>2</sub> emissions. [...] See policy wording above	0	✓	0	0	0	0	0	✓	0	✓	✓	?
<b>Preferred option:</b> Where it is not feasible to make the required CO <sub>2</sub> reductions by implementing these	0	✓	0	0	0	0	0	✓	0	✓	✓	0

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC1 Reducing Carbon Dioxide Emissions	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
measures on or off site as a part of the development, a payment in lieu contribution should be made to the council which will be used to fund CO2 reduction measures in the borough and;												
<b>Preferred option:</b> Encouraging energy efficiency and other low carbon measures in all other (i.e. non-major) developments where feasible.	0	✓	0	0	0	0	0	✓	0	✓	✓	0

## Borough-wide Policy CC2 Ensuring Sustainable Design and Construction

### Borough-wide Policy CC2

#### Ensuring Sustainable Design and Construction

The council will require the implementation of sustainable design and construction measures in all major developments by:

- Implementing the London Plan sustainable design and construction policies to ensure developments incorporate sustainability measures, including, but not limited to, minimising energy use, making the most effective use of resources such as water and aggregates, sourcing building materials sustainably, reducing pollution and waste, promoting recycling and conserving the natural environment;
- Requiring Sustainability Statements (or equivalent assessments such as the Code for Sustainable Homes or BREEAM) for all major developments to ensure the full range of sustainability issues have been taken into account during the design stage; and
- Encouraging the integration of sustainable design and construction measures in all other (i.e. non-major) developments, where feasible.

7.418 The preferred option will support the London Plan policies on sustainable design and construction which look to achieve the highest standards of sustainable design. The preferred option will have positive effects on the environment and heritage objectives by implementing sustainable measures. It will also contribute to improving quality of life. Effects on the social and economic objectives will depend on the implementation of the preferred policy.

7.419 Requiring sustainability assessments on major developments will improve the contribution of new schemes in mitigating and adapting to climate change and will promote sustainability. Incorporating such measures at an early stage will be an essential part of the development process.

7.420 The preferred option will have significant positive effects on sustainability matters and in the long-term this could potentially lead to savings and contribute positively to the sustainable economy objective. Effects on the social and economic objectives will depend on the implementation of the preferred policy.

**Alternative Options – Policy CC2 (Ensuring sustainable design and construction)**

- Not to seek sustainable design and construction through planning control.

7.421 The alternative option will have negative effects on the local environment as no planning controls may result in little or no sustainability measures to be incorporated into developments.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC2 Ensuring Sustainable Design and Construction	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> Implementing the London Plan sustainable design and construction policies to ensure developments incorporate sustainable measures, including, but not limited to making the most effective use of resources such as water and aggregates, sourcing building materials sustainably, reducing pollution and waste, promoting recycling and conserving the natural environment.	?	✓	0	0	?	0	✓	✓	0	✓	✓	?
<b>Preferred option:</b> Requiring Sustainability Statements for all major developments to ensure the full range of sustainability issues have been taken into account during the design stage.	?	✓	0	0	?	0	✓	✓	0	✓	✓	?
<b>Preferred option:</b> Encouraging the integration of sustainable	?	✓	0	0	?	0	✓	✓	0	✓	✓	?



POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC2 Ensuring Sustainable Design and Construction	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
design and construction measures in all other (i.e. non-major) developments, where feasible.												
<b>Alternative option (1):</b> <i>Not to seek sustainable design and construction through planning control.</i>	0	X	0	0	X	0	0	X	X	X	X	?

### Borough-wide Policy CC3 Reducing Water Use and the Risk of Flooding

#### Borough-wide Policy CC3

#### Reducing Water Use and the Risk of Flooding

The council will require developments to reduce the use of water and minimise current and future flood risk by implementing the following measures:

- All planning applications in the Environment Agency's Flood Zones 2 and 3 for new build, changes of use and conversions from a less to a more vulnerable use should include a site specific Flood Risk Assessment (FRA) which assesses the risk of flooding from all sources, in particular tidal, surface and ground water, as well as sewer flooding. Where there is a risk of flooding, appropriate flood proofing measures should be integrated, in accordance with the guidance in the H&F Strategic Flood Risk Assessment;
- Developments in the Environment Agency's Flood Zone 1 are still required to submit an FRA if they are located in one of the borough's Critical Drainage Areas, as defined in the council's Surface Water Management Plan. The FRA should demonstrate how flood risk from sewers and surface water run-off will be managed on site without increasing flood risk;
- Developments in the Environment Agency's Flood Zone 1 that include provision of new or extended structures below ground level are still required to submit an FRA if they are located in an area with increased potential for elevated groundwater, as defined in the council's Surface Water Management Plan. The FRA should demonstrate how flood risk from groundwater will be managed on site without increasing flood risk;
- Prior to undertaking a FRA, the developer needs to address the requirements of the National Planning Policy Framework and, where applicable, to carry out the Exception Test. Evidence that the Exception Test has been passed will need to be included in the FRA;
- All developments in the borough, particularly those that increase a site's

impermeable area in any of the Critical Drainage Areas, as defined in the council's Surface Water Management Plan, will be required to incorporate Sustainable Drainage Systems (SuDS) to reduce both the volume and speed of surface water run-off, unless there are practical reasons for not doing so. Where installed, SuDS measures should be retained and maintained for the lifetime of the development and details of their planned maintenance should be provided.

- Small-scale developments in Critical Drainage Areas such as householder extensions that increase surface water run-off will be required to manage this increase through the implementation of SuDS measures;
- SuDS should be implemented with the aim of achieving greenfield run-off rates where possible. If this is not feasible, a minimum of at least 50% attenuation of the undeveloped site's surface water run-off at peak times should be achieved;
- All new outdoor car parking areas and other hard standing surfaces shall be designed to be rainwater permeable with no run-off being directed into the sewer system, unless there are practical reasons for not doing so;
- New self-contained basement flats will not be permitted in the Environment Agency's Flood Zone 3 areas where there is a risk of rapid inundation by flood waters in the event of a breach of the river's flood defences, unless a satisfactory means of escape can be provided;
- All new developments should include water efficient fittings and appliances, where provided. In addition, major developments and high water use developments should include other measures such as rainwater harvesting and grey water re-use;
- All new development proposals will be required to demonstrate that there is sufficient water and wastewater infrastructure capacity both on and off site to serve the development or that any necessary upgrades will be delivered ahead of the occupation of development;
- Development adjoining the river will be expected to maintain the integrity of river defences and setback development in order to allow maintenance and improvement of the defences.

7.422 The preferred policy option is in conformity with the sustainability objective on reducing climate change impact by seeking to minimise the risk of flooding from storm events and overflow of watercourses. It is important to reduce run-off of water so that it does not exceed the capacity of the local drainage systems. This is already a serious London-wide problem and results in localised flooding in some streets and contamination of the River Thames by untreated sewage from the increasing intensity of rainfall. Also encouraging efficient water consumption will contribute towards reducing the impacts of climate change.

7.423 Although a significant part of the borough is at risk of flooding, it is protected from flooding by the Thames Barrier and by river walls. However there is a risk of breach in or the over topping of the river walls and this risk is likely to increase with climate change. The preferred option is therefore important as it requires development to contribute towards the maintenance of the river defences. It also requires an assessment of the flood risk of new developments and it also ensures that vulnerable uses are protected. Residential use can be particularly vulnerable where there are basement dwellings with no internal access to a higher level.

7.424 Implementing the preferred policy will increase the overall efficiency of water use, reducing per person daily consumption.

**Alternative Options – Policy CC3 (Reducing water use and the risk of flooding)**

- To resist the location of vulnerable uses in Flood Zones 2 and 3.

7.425 The alternative option would protect vulnerable groups from being accommodated in flood risk areas and would enable land to be developed for employment. However it would severely restrict the location of such vulnerable use development to the north of the borough and result in a loss of mixed sustainable communities in the south and central parts.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC3 Reducing Water Use and the Risk of Flooding	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b>  <i>See policy wording above.</i>	0	0	0	0	0	0	0	✓	0	✓	✓	0
<b>Alternative option:</b> <i>To resist the location of vulnerable uses in Flood Zones 2 and 3.</i>	✓	0	0	X	0	✓	0	0	0	0	✓	✓

**Borough-wide Policy CC4 Water Quality**

**Borough-wide Policy CC4**

**Water Quality**

The council will require that where a private supply or distribution system is proposed as part of a development, the quality of water is assessed so that any required treatment is identified and an on-going monitoring and maintenance plan is established.

7.426 The preferred option will protect and improve the water quality in the borough by requiring new developments to provide water quality assessment and if necessary an ongoing monitoring and maintenance plan. This option will contribute positively towards the pollution objectives by reducing the level of water pollution and improving water quality.

#### Alternative Options – Policy CC4 (Water quality)

- No reasonable alternative option identified.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC4 Water Quality	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0

#### Borough-wide Policy CC5 Strategic Waste Management

##### Borough-wide Policy CC5

##### Strategic Waste Management

The council will pursue sustainable waste management, including:

- Planning to manage 348,000 tonnes per annum of waste in H&F by 2031 (or 242,000 tonnes if the revised figure in the Further Alterations to the London Plan are approved);
- Promoting sustainable waste behaviour and maximum use of the WRWA Smuggler's Way facility; and
- Seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport, including the Grand Union Canal.

7.427 The current waste sites in the borough, Old Oak Sidings (Powerday) and the European Metal Recycling (EMR) site, will continue to meet the short and medium term needs. The locations of the current waste management facilities are in a predominantly non-residential area which minimises the impact of these waste facilities on the local community. However the proposed establishment of a Mayoral Development Cooperation for Old Oak would impact upon these waste site facilities and may require the council and the Mayor of London to jointly take responsibility for meeting the waste apportionment target.

7.428 The health sustainability objective will be influenced by the implementation of the preferred option. If waste is sustainably transported to minimise traffic and air quality impacts, then adverse health impacts may be somewhat mitigated. However, if transportation of waste is dependent on road transport, there are likely to be negative health impacts resulting from the increased traffic impacts including increased risk of noise and air pollution along the roads used.

7.429 Most of the waste managed at the sites located in the borough is imported into Hammersmith and Fulham from other London boroughs and the wider south east. Therefore relocating the sites would reduce transport impacts on the local environment.

7.430 The preferred policy promotes sustainable management of waste. This is likely to positively impact upon resource consumption in the borough. The reuse and recycling of construction and demolition waste would have a number of benefits including the reduction in the number of transport movements and the amount of waste going to landfill sites.

7.431 Developing the borough's waste sites into more high value uses will improve the local economy in a number of ways, including increasing the number of people living, working and visiting the borough, increasing local employment and generating increased levels of investment in the borough.

#### **Alternative Options – Policy CC5 (Strategic waste management)**

- To designate a part of the White City Opportunity area for a waste management site in accordance with the London Plan.

7.432 The alternative option proposes to designate a part of the White City Opportunity area for a waste management site in accordance with the London Plan. However there may be competing uses of the land for housing and employment uses and a waste management site may not be considered a compatible adjacent use. The White City Opportunity Area should however seek to manage at least its own waste on site.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC5 Strategic Waste Management	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> The council will pursue sustainable waste management, including: planning to manage 348,000 tonnes per annum of waste in H&F by 2031 (or 242,000 tonnes if the revised figure in the Further Alterations to the London Plan are approved)	0	0	0	0	0	✓	0	?	?	✓	?	✓
<b>Preferred option:</b> Promoting sustainable waste behaviour, and maximum use of the WRWA Smuggler's Way facility; and	0	0	0	0	0	0	0	✓	✓	✓	✓	0
<b>Preferred option:</b> Seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport, including the Grand Union Canal.	0	✓	0	0	0	0	✓	✓	✓	✓	✓	0
<b>Alternative option (1):</b> To designate a part of the White City Opportunity area for a waste management site in accordance with the London Plan.	0	0	0	?	0	?	0	?	?	✓	✓	0

## Borough-wide Policy CC6 On-site Waste Management

### Borough-wide Policy CC6

#### On-site Waste Management

**All new developments should include suitable facilities for the management of waste generated by the development, including the collection and storage of separated waste and where feasible on-site energy recovery.**

- **All developments, including where practicable, conversions and change of use, should aim to minimise waste and should provide convenient**

facilities with adequate capacity to enable the occupiers to separate, store and recycle their waste both within their own residence and via accessible and inclusive communal storage facilities, and where possible compost green waste on site;

- In major development proposals on-site waste management should be provided, particularly for commercial and industrial waste streams;
- Sustainable waste behaviour, including the re-use and recycling of construction, demolition and excavation waste will be encouraged and recyclable materials should wherever feasible be segregated on site, providing there is no significant adverse impact on either site occupants or neighbours. On larger demolition sites the council will expect details of the type and quantity of waste arising and details of proposed methods of disposal, including means of transport.

7.433 Encouraging efficient resource use and recycling during all stages of the development process will reduce the amounts of waste that are transported for disposal, reducing greenhouse gas emissions.

7.434 The implementation of the preferred option will reduce the amount of waste transported. This will have a positive impact by reducing emissions of greenhouse gases and other air and noise pollution. The preferred option will increase the overall efficiency of resource use and will contribute positively towards responsible consumption of resources sustainability objective.

#### Alternative Options – Policy CC6 (On-site waste management)

- Encourage a greater range of waste management types especially on existing waste transfer sites.
- Allocate sites that would be detrimental the achievement of environmental and regeneration objectives.

7.435 There are a number of uncertainties with alternative option (1) and the effects of this option will depend on the types of waste management techniques which are employed on these sites. Some types of waste management could have a negative effect on the local environment and local residents in terms of their health and social well-being.

7.436 Alternative option (2) is likely to have a negative impact because although waste facilities are a necessity this should not be at the expense of achieving environmental and regeneration objectives.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC6 On-site Waste Management	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Preferred option: <i>See policy wording above.</i>	0	0	0	0	0	0	0	✓	✓	✓	✓	0

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC6 On-site Waste Management	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Alternative option (2):</b> <i>Encourage a greater range of waste management types especially on existing waste transfer sites</i>	0	?	0	0	?	0	0	?	?	?	?	?
<b>Alternative option (2):</b> <i>Allocate sites that would be detrimental the achievement of environmental and regeneration objectives</i>	X	?	0	X	X	?	X	?	?	?	?	?

## Borough-wide Policy CC7 Hazardous Substances

### Borough-wide Policy CC7

#### Hazardous Substances

The council will ensure the protection of new and existing residents, by rejecting proposals involving provision for hazardous substances that would pose an unacceptable risk to the health and safety of occupants of neighbouring land, and rejecting development proposals in the vicinity of existing establishments if there would be an unacceptable risk to future occupants.

The council will ensure that development takes account of major hazards identified by the Health and Safety Executive, namely:

- Fulham North Holder Station, Imperial Road
- Fulham South Holder Station, Imperial road
- Swedish Wharf, Townmead Road

7.437 The preferred option will have positive impacts on the health objective and on reducing the level of potential pollution in the borough. There are no other significant effects associated with the implementation of the policy.

#### Alternative Options – Policy CC7 (Hazardous substances)

- Delete the policy and rely on existing statutory mechanisms to provide the required controls.



7.438 The alternative option is likely to be in breach of EU and/or UK statutory measures therefore is a less sustainable option than the preferred option.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0
<b>Alternative option (1):</b> <i>Delete the policy and rely on existing statutory mechanisms to provide the required controls.</i>	0	X	0	0	?/X	0	0	✓	0	✓	✓	0

### Borough-wide Policy CC8 Contaminated Land

#### Borough-wide Policy CC8

##### Contaminated Land

When development is proposed on or near a site that is known to be, or there is good reason to believe may be, contaminated, or where a sensitive use is proposed, an applicant should carry out a site assessment and submit a report of the findings in order to establish the nature and extent of the contamination. Development will not be permitted unless practicable and effective measures are to be taken to treat, contain or control any contamination so as not to:

- i. Expose the occupiers of the development and neighbouring land uses including, in the case of housing, the users of open spaces and gardens to unacceptable risk;
- ii. Threaten the structural integrity of any building built, or to be built, on or adjoining the site;
- iii. Lead to the contamination of any watercourse, water body or aquifer; and
- iv. Cause the contamination of adjoining land or allow such contamination to continue.

Any application will be assessed in relation to the suitability of the proposed use for the conditions on that site. Any permission for development will require that the measures to assess and abate any risks to human health or the wider environment agreed with the authority must be completed as the first step in the carrying out of the development.

7.439 The preferred option will have positive impacts on the overall health of the population and on reducing the level of pollution in the borough.

### Alternative Options – Policy CC8 (Contaminated land)

- Development should not be permitted unless action is taken to address any contamination on the site so as not to expose future users to any risk.

7.440 The alternative option proposes that development should not be permitted unless action is taken to address any contamination on the site so as not to expose future users to any risk. The alternative option is likely to act as a restriction on development as remediation costs may be too high and may threaten development viability.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC8 Contaminated Land	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0
<b>Alternative option (1):</b> <i>Development should not be permitted unless action is taken to address any contamination on the site so as not to expose future users to any risk.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0

### Borough-wide Policy CC9 Air Quality

#### Borough-wide Policy CC9

#### Air Quality

The council will seek to reduce the potential adverse air quality impacts of new developments by:

- Requiring all major developments to provide an air quality assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government's air quality objective concentration targets;
- Requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedance of the Government's air quality objectives; and
- Requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality.

7.441 The preferred option will have a number of positive effects on environmental amenity and social equity by helping to address the adverse health impacts of poor air quality on vulnerable groups. The requirement for all major developments to provide an air quality assessment will also promote better planning by ensuring that developers consider the wider implications of the development. This is likely to have a positive impact in relation to greenhouse gas emissions if sustainable transport and other design measures to reduce the need to travel are adopted as part of the mitigation measures for new development.

**Alternative Options – Policy CC9 (Air quality)**

- Delete the word 'major' from the first sentence of the policy so that all developments that are affected by poor air quality will require mitigation measures to reduce exposure to unacceptable levels of air quality.

7.442 The alternative option proposes to delete the word 'major' from the first sentence of the policy so that all developments that are affected by poor air quality will require mitigation measures to reduce exposure to unacceptable levels of air quality. The alternative option is likely to extend the protection currently only offered to major developments.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC9 Air Quality	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b>  <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	✓	✓	✓	0
<b>Alternative option (1):</b> <i>Delete the word 'major' from the first sentence of the policy so that all developments that are affected by poor air quality will require mitigation measures to reduce exposure to unacceptable levels of air quality.</i>	✓	✓	0	0	0	0	0	✓	✓	0	0	0

**Borough-wide Policy CC10 Noise**

**Borough-wide Policy CC10**

**Noise**

**Noise (including vibration) impacts of development will be controlled by implementing the following measures:**

- **Noise and vibration sensitive development should be located in the most appropriate locations and protected against existing and proposed sources of noise and vibration through careful design, layout and use of materials, and by ensuring adequate insulation of the building envelope and internal walls, floors and ceilings as well as protecting external amenity areas;**
- **Housing, schools, nurseries, hospitals and other noise-sensitive development will not normally be permitted where the occupants/users would be affected adversely by noise, both internally and externally, from existing or proposed noise generating uses. Exceptions will only be made if it can be demonstrated that adequate mitigation measures will be taken, without compromising the quality of the development; and**
- **Noise generating development will not be permitted, if it would be liable to materially increase the noise experienced by the occupants/users of existing or proposed noise sensitive uses in the vicinity.**

7.443 The preferred policy will have a positive effect on ensuring the amenity of residents who are likely to be affected by excessive noise or vibration associated with new development. The policy will benefit less well-off communities and other vulnerable groups which may be disproportionately affected by exposure to excessive noise or vibration based on a number of factors including the location of their homes and the lack of sound insulation measures in these. The preferred policy will limit exposure of noise sensitive uses to excessive noise or vibration, thus it will positively impact upon the objectives to promote social equality, health, well-being and reduce pollution. There is some uncertainty about the overall economic impacts of refusing new development that is deemed likely to materially increase noise levels and adversely impact upon nearby noise sensitive uses.

#### **Alternative Options – Policy CC10 (Noise)**

- Amend the policy to permit noise generating or sensitive uses in proximity to each other provided that the duration of noise generated is for acceptably short periods at times when their impact to affected parties would be minimal.

7.444 The alternative option proposes to amend the policy to permit noise generating or sensitive uses in proximity to each other provided that the duration of noise generated is for acceptably short periods at times when their impact to affected parties would be minimal. Adopting a more flexible approach to determining applications in this manner would allow for an increased range of uses to be permitted. However, implementing this alternative option may be problematic, particularly given that a more flexible approach increases the risk of future issues arising if businesses wish to change their practices or unforeseen sources of noise arise.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC10 Noise	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	0	0	0	?
<b>Alternative option (1):</b> <i>Consider amend the policy to permit noise generating or sensitive uses in proximity to each other provided that the duration of noise generated is for acceptably short periods at times when their impact to affected parties would be minimal.</i>	0	✓	0	0	0	0	?	0	✓	0	0	✓

### Borough-wide Policy CC11 Light Pollution

#### Borough-wide Policy CC11

##### Light Pollution

The potential adverse impacts from lighting arrangements will be controlled by requiring all developments that include proposals for external lighting including illuminated signs and advertisements, security and flood lights and other illuminations to submit details showing that it:

- is appropriate for the intended use;
- provides the minimum amount of light necessary to achieve its purpose;
- is energy efficient; and
- provides adequate protection from glare and light spill, particularly to nearby sensitive receptors such as residential properties and Nature Conservation Areas, including the River Thames and the Grand Union Canal.

7.445 The preferred option aims to ensure that external lighting provided as part of a new development are provided in the most efficient manner in terms of maximising safety and amenity objectives and minimising energy use and environmental impact. The preferred policy will have positive effects on the health sustainability objective by facilitating the extended use of outdoor sports facilities. As it also encourages the most efficient provision of external lighting in terms of design, energy efficiency and environmental and amenity impacts, it has positive effects on reducing pollution, the careful consumption of resources and reducing climate change impacts.

### Alternative Options – Policy CC11 (Light pollution)

- Adopt a market led approach to lighting control as cost pressures will lead to cost efficient use of lighting.
- Ensure that the policy addresses light pollution impacts on natural receptors.

7.446 Alternative option (1) proposes to adopt a market led approach to lighting control. However market driven solutions have so far not addressed light pollution issues as the costs of inefficient lighting arrangements are either borne by later users/occupiers or in the case of costs to the public are 'externalities', borne by no-one. This market failure necessitates the need for a policy to address this issue.

7.447 Alternative option (2) proposes to ensure that the policy addresses light pollution impacts on natural receptors. Light pollution adversely affects people as well as local wildlife. Impacts may be particularly significant in areas within close proximity to nature conservation areas including the river and the canal.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC11 Light Pollution	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	✓	✓	0
<b>Alternative option (1):</b> <i>Adopt a market led approach to lighting control as cost pressures will lead to cost efficient use of lighting.</i>	0	0	0	0	0	0	?	x	✓	X	0	✓
<b>Alternative option (2):</b> <i>Ensure that the policy addresses light pollution impacts on natural receptors.</i>	0	0	0	0	0	0	✓	0	0	0	✓	0

### Borough-wide Policy CC12 Control of Potentially Polluting Uses

#### Borough-wide Policy CC12

#### Control of Potentially Polluting Uses

All proposed developments (including new buildings, demolition of existing buildings, conversions and changes of use) will be required to show that there will be no undue detriment to the general amenities enjoyed by existing surrounding occupiers of their properties, particularly where commercial and service activities will be close to residential properties. In the case of mixed use developments, similar protection will also be afforded to the prospective residents and other users where there is potential for activities within the new development to impact on their immediate neighbours on the same site.

**The council will, where appropriate, require precautionary and/or remedial action if a nuisance for example, from smoke, fumes, gases, dust, steam, light, vibration, smell, noise, spillage of gravel and building aggregates or other polluting emissions would otherwise be likely to occur, to ensure that it will not.**

7.448 The preferred option seeks to ensure that new developments are not detrimental to the amenity of surrounding occupiers. By preventing pollution and other nuisances from occurring, the preferred option has a positive effect on the social justice and health objectives. There is some uncertainty associated with the costs of mitigation on the economic development in the borough but these are considered to be relatively minor when set against the benefits they will confer.

#### **Alternative Options – Policy CC12 (Control of potentially polluting uses)**

- Adopt a market led approach to pollution control.

7.449 Alternative option (1) proposes to adopt a market led approach to pollution control. Market driven solutions are unlikely to effectively address potential pollution issues as they will only be able to be developed reactively, after the pollution has in fact taken place (via legal action). It is important to preserve existing amenity rather than rectify a loss of amenity. This market failure necessitates the need for a policy to address this issue.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CC12 Control of Potentially Polluting Uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	0	0	0	?
<b>Alternative option (1):</b> <i>Adopt a market led approach to pollution control.</i>	X	X	0	0	X	0	?	x	0	0	0	✓

## **Assessing secondary, cumulative and synergistic effects**

- 7.450 Policy CC1 Reducing Carbon Dioxide Emissions is anticipated to positively contribute to the Draft Local Plan's strategic objective 11 which seeks to encourage healthier lifestyles and strategic objective 17 which seeks to reduce and mitigate the local causes of climate change and the move to a low carbon future. By tackling climate change in relation to the built environment it will have significant positive and cumulative effects on climate change, pollution, careful consumption and ultimately on the health and quality of life of the communities appraisal objectives. Particularly in the long-term, these measures could potentially lead to savings and contribute positively to the sustainable economy objective.
- 7.451 Policy CC2 Ensuring Sustainable Design and Construction is anticipated to positively contribute to the Draft Local Plan's strategic objective 14 which seeks to ensure that the built environment complies with the principles of sustainable design and strategic objective 17 which seeks to reduce and mitigate the local causes of climate change. There will be positive and permanent long term effects on the environment and heritage objectives by implementing sustainable measures. These will also contribute to improving quality of life.
- 7.452 Policy CC3 Reducing Water Use and the Risk of Flooding is anticipated to positively contribute towards the strategic objective 17 which seeks to reduce and mitigate the local causes of climate change and mitigate flood risk. The effects of policy CC3 are likely to be short to long term and will have a direct effect.
- 7.453 Policy CC4 Water Quality is anticipated to positively contribute towards the strategic objective 17 which seeks to reduce and mitigate the local causes of change. The effects of this policy are likely to be permanent and positive in the short to long term on reducing levels of pollution sustainability objective.
- 7.454 Policy CC5 Strategic Waste Management is anticipated to positively contribute towards the Draft Local Plan's strategic objective 16 which seeks to increase the use of Hammersmith & Fulham's waterways and objective 17 which seeks to reduce and mitigate the local causes of climate change as the policy encourages the movement of waste by water and seeks to deal with waste in a sustainable manner therefore reducing the potential negative impact waste management can have on pollution levels and on the local environment. This will have a permanent and cumulative effect in the long term.
- 7.455 Policy CC6 On-site Waste Management is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 13 and 17 as dealing with waste on site will benefit the local environment as waste is dealt with on site therefore reducing pollution caused by transport and reducing carbon emissions. Policy CC6 will have a positive short to long term effect on the environmental sustainability objectives.



- 7.456 Both Policy CC7 Hazardous Substances and Policy CC8 Contaminated Land are anticipated to positively contribute to the Draft Local Plan's strategic objective 11 and 17 which seeks to reduce and mitigate of climate change. Both of these policies will have a short to long term positive impact on the health objective and reducing the level of potential pollution in the borough.
- 7.457 Policy CC9 Air quality is anticipated to positively contribute to Draft Local Plan's strategic objectives 11,12, 13 and 17 as it promotes the health, amenity and quality of life of people living and working in the borough and mitigating the local causes of climate change across the borough. Policy CC9 will have a positive short to long term impact on the social, health and reduction of pollution sustainability objectives.
- 7.458 Policy CC10 Noise is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 11 to reduce health inequalities and strategic objective 13 which seeks to protect and enhance the amenity and quality of residents as it outlines measures to protect noise sensitive uses from incompatible developments. This policy will have a short to long term effect on the social, health and reduction of pollution sustainability objectives.
- 7.459 Policy CC11 Light Pollution is anticipated to positively contribute towards the Draft Local Plan's strategic objectives 11,12 and 13 and 17 as it outlines measures to control light pollution. This will have a positive short to long term effect on the health and reducing the level of pollution sustainability objectives. Overall, policy CC11 has been found sustainable.
- 7.460 Policy CC12 Control of Potentially Polluting Uses is anticipated to positively contribute to Strategic objectives 11,12, 13 and 17. By preventing pollution and other nuisances from occurring, the preferred option will have a positive short to medium term effect on the social justice and health objectives.

## **TRANSPORT AND ACCESSIBILITY**

### **Borough-wide Policy T1Transport**

#### **Borough-wide Policy T1**

##### **Transport**

**To work with strategic partners to improve transportation provision and accessibility in the borough, by improving and increasing the opportunities for cycling and walking, improving bus services, particularly north-south and by seeking better connections to national and regional rail by:**

- **Seeking a road tunnel replacing all or parts of the A4, including the Flyover through Hammersmith allowing for major new housing, community facilities and office developments within the town centre and improved links to the Thames;**
- **Continuing to promote major improvements with new stations and enhanced local and sub-regional passenger services on the West**

**London Line;**

- **Supporting the implementation of a HS2 Crossrail/Great Western interchange at Old Oak with an interchange with the West London Line;**
- **Extending the Mayor's Bike Hire scheme throughout the borough;**
- **Seeking a new station on the Central Line at Du Cane Road;**
- **Seeking the increased capacity and reliability of the Piccadilly and District Lines;**
- **Seeking a routing of the Chelsea-Hackney line (Crossrail 2) via Chelsea Harbour/Sands End;**
- **Seeking increased use of the Thames and the Grand Union Canal for passenger services and freight use where this is compatible with the capacity of the connecting road network and meets environmental concerns;**
- **Increasing the opportunities for walking, for example by extending the Thames Path National Trail, and for cycling by supporting the Mayor's Cycling Vision;**
- **Seeking localised improvements to the highway network to reduce congestion on north-south routes in the borough;**
- **Securing access improvements for all, particularly people with disabilities, as part of planning permissions for new developments in the borough; and**
- **Ensuring that traffic generated by new development is minimised so that it does not add to parking pressures on local streets or congestion, or worsen air quality; and**
- **Relating the intensity of development to public transport accessibility and highway capacity.**

7.461 Implementing the preferred option will bring very positive equity and social justice benefits. A number of public transport upgrades are proposed which will enable sustainable travel and improve the quality of life of people from all walks of life regardless of their socio-economic backgrounds, age and physical abilities.

7.462 The preferred policy aims to extend the Mayor's bike hire scheme throughout the borough and also seeks to increase opportunities for walking and cycling. These initiatives are likely to positively contribute towards improving overall health levels.

7.463 The replacement of Hammersmith Flyover with a tunnel will enable major housing led developments to be constructed on this space. The replacement of the Hammersmith Flyover will also bring very positive benefits to the local environment in the borough. It would enable the town centre and adjoining areas to be reconnected to the river, improving people's access to the open spaces of the river and Furnivall Gardens. The construction of new homes would provide additional opportunities for high quality developments to be built in this area, further improving the local environment. The transport improvements suggested will all promote social cohesion and a sense of community by curbing the negative impacts of uncontrolled car dependency, which can exert a significant severance effect on communities. In contrast, the policies focus on public transport oriented development, accessible to all will help the borough's town centres and regeneration areas to develop their own distinct identities and character and will enable people of all ages and abilities to actively participate in public life. The focus on public transport oriented development will result in lower levels of air, water and noise pollution compared to a scenario where this policy was not being implemented. The policy also aims to manage car dependency and use by controlling parking provision to avoid negative impacts on the quality of the urban environment. The preferred option also aims to increase the opportunities for sustainable transport modes such as walking and cycling. These initiatives will serve to reduce greenhouse gas emissions and will contribute to reducing climate change impacts.

7.464 The preferred policy aims to sustainably address the transport needs associated with the planned intensification of development in the borough. Doing so will ensure that the drivers of economic growth in the borough are provided with essential transport infrastructure, improving the movement of people and resources to provide them with the conditions to enable them to flourish.

7.465 The preferred policy promotes the responsible consumption of resources in the borough and will result in reduced levels of consumption of non-renewable fossil fuels.

#### **Alternative Options – Policy T1 (Transport)**

- Identify and safeguard land for bus depots and stands to facilitate provision of (extra) services.

7.466 This alternative option promotes a strategic approach which allows suitable sites to be identified for bus stands and depots, accounting for future travel demand and the need to protect local amenity and character. Safeguarding sites would ensure that suitable sites are not lost to higher value uses, but this option could also restrict the development of sites for other uses and in turn impact negatively on the local economy.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy T1 Transport	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred Option:</b> <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	0	✓	✓	✓	✓	✓
<b>Alternative Option (1):</b> <i>Identify and safeguard land for bus depots and stands to facilitate provision of (extra) services.</i>	✓	0	0	0	✓	0	✓	✓	✓	✓	✓	?

## Borough-wide Policy T2 Transport assessments and travel plans

### Borough-wide Policy T2

#### Transport assessments and travel plans

All development proposals will be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network, and against the existing and potential availability of public transport, and its capacity to meet increased demand.

The council will require a Transport Assessment (TA), together with a Travel Plan where a development is expected to generate more than a specified number of trips (see indicative thresholds set out below), or during peak hours. Construction Logistics Plans and Delivery and Servicing Plans should be secured in line with TfL's London Freight Plan and should be co-ordinated with Travel Plans.

7.467 The preferred option will require all developments to be assessed in terms of their impact on traffic generation. It will have a positive significant effect on the transport and environmental objectives and consequently on the health of residents.

#### Alternative Options – Policy T2 (Transport assessments and travel plans)

- Increasing the number of schemes that require a TIA.
- Reducing the need for TIAs by raising the threshold.

7.468 Alternative option (1) proposes to increase the number of schemes that require a TIA. However not all smaller schemes are likely to have a significant impact upon the transport network. It would therefore create unnecessary bureaucracy to require more schemes to submit a TIA, when the impacts are likely to be negligible. This alternative option could have cost and resource implications for both the applicant and the Local Authority.

7.469 Alternative option (2) would result in less schemes being assessed and could lead to schemes being granted permission that could potentially have unacceptable impacts, that could put undue pressure on the borough's highways and lead to increasing pollution levels.

POLICY OPTIONS	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy T2 Transport assessments and travel plans</b>												
<b>Preferred Option:</b> <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	✓	0	✓	0
<b>Alternative option (1):</b> <i>Increasing the number of schemes that require a TIA.</i>	0	0	0	0	0	0	?	?	?	?	✓	0
<b>Alternative option (2):</b> <i>Reducing the need for TIAs by raising the threshold.</i>	0	0	0	0	0	0	?	X	X	?	X	0

### Borough-wide Policy T3 Vehicle Parking Standards

#### Borough-wide Policy T3

#### Vehicle Parking Standards

The council will require any proposed development (new build, conversion or change of use) to conform to its car parking standards. The council has adopted the car parking standards of the London Plan which are given in the table below.

7.470 Policy 6.13 from the London Plan sets out maximum parking standards. Within this policy, a more flexible approach applies to town centres especially where there are issues of viability and vitality. The policy also requires that designated parking spaces should be provided for disabled people. It is anticipated that implementing the London Plan Policy will contribute positively towards transport objectives as excessive car-parking provision could undermine more sustainable modes of transport such as cycling, walking and public transport. It could reduce spatial disparities by encouraging more car-parking in town centres and therefore improve the local economy. It is likely to also contribute positively to the social objectives.

#### Alternative Options - Policy T3 (Vehicle parking standards)

- Retain borough specific vehicle parking standards.

7.471 The alternative option allows the council to implement standards that are specific to the borough. However, if these standards are similar to those in the London Plan, it would be preferable to use the standards in the latter document in the interest of avoiding confusion and maintaining consistency. Where parking standards are consistent across borough boundaries, this can facilitate more sustainable and competitive developments.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy T3 Vehicle Parking Standards	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred policy:</b> <i>See policy wording above.</i>	✓	0	0	0	✓	✓	0	✓	✓	0	✓	✓
<b>Alternative option (1):</b> <i>Retain borough specific vehicle parking standards.</i>	0	?	0	0	0	0	?	?	✓	X	?	0

#### Borough-wide Policy T4 Increasing opportunities for cycling and walking

##### Borough-wide Policy T4

##### Increasing opportunities for cycling and walking

The Council will encourage increased bicycle use by seeking:

- The provision of convenient and safe cycle parking and changing and showering facilities, in new developments in accordance with the cycle parking standards shown in the table below; and
- Developer contributions for improvements to cycling infrastructure, including contributions to the extension of TfL's Cycle Hire Scheme.

**The council will facilitate walking by requiring larger developments to provide:**

- **Accessible and safe pedestrian routes within and through the developments; and**
- **Pedestrian access to the river and canal, where appropriate.**

7.472 The policy will encourage more sustainable modes of transport in the borough. It will have positive effects on accessibility, will lead to a reduction of carbon emissions, and better use of resources. It will have a positive significant effect towards reducing stress and improving health. It will also lead to more accessible and legible developments and maximise connections with the river and the canal.

**Alternative Options - Policy T4 (Increasing the opportunities for cycling and walking)**

- Base cycle parking standards on an assessment of demand for this mode.
- Increase surface level crossings within Hammersmith.

7.473 This first option could create a chicken-or-egg situation. People may not currently cycle because the facilities are inadequate and it has been found that provision of cycle parking creates demand.

7.474 It is considered that the alternative option (2) would increase surface level crossings would be better considered through other delivery mechanisms, for example within the council's Local Implementation Plan.

POLICY OPTIONS	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy T4 Increasing opportunities for cycling and walking</b>												
<b>Preferred policy:</b> <i>See policy wording above.</i>	?	✓	0	0	✓	0	✓	✓	✓	✓	✓	0
<b>Alternative option (1):</b> <i>Base cycle parking standards on an assessment of demand for this mode.</i>	?	?	0	0	?	?	0	?	?	?	?	0
<b>Alternative option (2):</b> <i>Increase surface level crossings within Hammersmith.</i>	?	0	0	0	✓	0	?	?	?	?	?	0

## Borough-wide Policy T5 Housing with reduced parking

### Borough-wide Policy T5

#### Housing with reduced parking

Market and intermediate housing with zero or reduced parking will only be considered in areas with good levels of public transport accessibility, where the occupants are unlikely to need a car and where quality of life criteria such as access to shops are satisfied.

Ensure adequate provision of car parking space to meet the needs of blue badge holders.

Ensure that new social/affordable rented housing has sufficient car parking to meet the essential needs of the tenants.

7.475 Car free market and intermediate housing in suitable locations with good transport accessibility will reduce pollution and congestion on the borough's roads and should not impact upon mobility. The policy will also have a positive impact on the social justice objective by ensuring that car parking needs from tenants of social and affordable rented housing can be met.

#### Alternative Options – Policy T5 (Housing with reduced car parking)

- Retain borough specific vehicle parking standards.

7.476 The alternative option allows the council to implement standards that are specific to the borough. However, if these standards are similar to those in the London Plan, it would be preferable to use the standards in the latter document in the interest of avoiding confusion and maintaining consistency. Where parking standards are consistent across borough boundaries, this can facilitate more sustainable and competitive developments.

POLICY OPTIONS	SA OBJECTIVES											
Borough-wide Policy T5 Housing with reduced parking	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred policy:</b> <i>See policy wording above.</i>	✓	0	0	0	0	0	0	✓	✓	0	✓	0
<b>Alternative option (1):</b> <i>Retain borough specific vehicle parking standards.</i>	0	?	0	0	0	0	?	?	✓	X	?	0



## Borough-wide Policy T6 Parking for blue badge holders

### Borough-wide Policy T6

#### Parking for blue badge holders

**Blue Badge parking provision where developments are provided with vehicular access. New developments that include vehicular access should provide at least one accessible, off street car parking bay for Blue Badge holders even if no other general parking is provided as part of the development.**

7.477 The preferred option will contribute towards increasing equity and social justice and sense of community for disabled people. It will have uncertain effects on the pollution and transport objectives but it is considered that these are outweighed by the benefits for disabled people.

#### Alternative Options – Policy T6 (Parking for blue badge holders)

- Rely on the London Plan policies on disabled parking.

7.478 The alternative option would mean that smaller scale developments may not need to provide disabled parking because of the applicable thresholds.

POLICY OPTIONS	SA OBJECTIVES											
Borough-wide Policy T6 Parking for blue badge holders	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred policy:</b> <i>See policy wording above.</i>	✓	0	0	0	✓	0	0	?	?	0	0	0
<b>Alternative option (1):</b> <i>Rely on the London Plan policies on disabled parking.</i>	X	0/X	0	0	0	0	?	0	0	0	?	0

## Borough-wide Policy T7 Borough road network - hierarchy of roads

### Borough-wide Policy T7

#### Borough road network - hierarchy of roads

**Development affecting the borough's road network will be regulated according to the council's hierarchy of roads shown on the Proposals Map as follows:**

#### **Tier 1: Strategic routes (Transport for London Road Network)**

Development will not be permitted if it would prejudice the effectiveness of the strategic route network to provide safe and unobstructed road connections to national and international transport networks, to provide for long distance and commercial traffic to traverse the region, or to reduce traffic demand on lower tier roads. Direct frontage access from development sites to such routes will be resisted unless there is no prospect of alternative access to a lower tier road, and the particular section of frontage concerned already performs lower tier functions, and the safe flow of traffic will be maintained. Proposals likely to increase car commuting into central London along such routes will be resisted.

#### **Tier 2: London distributor roads**

Development will not be permitted if it would prejudice the effectiveness of these roads to provide links to the strategic route network, provide access to and between town centres, and distribute traffic to and around, but not within, local areas.

#### **Tier 3: Borough distributor roads**

Development will not be permitted if it would prejudice the effectiveness of these roads to distribute traffic to land and property within any local area bounded by the strategic route network and London distributor roads, or introduce additional through traffic on them.

#### **Tier 4: Local access roads**

Development will not be permitted if it would prejudice the effectiveness of these roads to provide safe and convenient access to individual properties, or result in their use by through traffic.

7.479 There are some uncertainties around the impacts of the policy in combating motor vehicle related pollution and minimising greenhouse gas emissions. On one hand the efficient functioning of the road network will maximise the efficiency of resource use while on the other, this may lead to more vehicles using the road increasing congestion and total vehicular emissions.

#### **Alternative Options – Policy T7 (Borough road network – hierarchy of roads)**

- Rely on other policies within the Local Plan to assess development on strategic and local roads.

7.480 Whilst there are a range of relevant policies in the Draft Local Plan which would help provide a sound assessment of access and transport issues, it is considered that a specific policy relating to the different categories of road will help contribute to a better environment and more sustainable developments.

POLICY OPTIONS	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Borough-wide Policy T7 Parking for blue badge holders</b>												
<b>Preferred policy:</b> <i>See policy wording above.</i>	0	0	0	0	0	0	0	?	?	✓	?	✓
<b>Alternative option (1):</b> <i>Rely on other policies within the Local Plan to assess development on strategic and local roads.</i>	0	0	0	0	0	0	0	?	?	✓	?	✓

### Assessing secondary, cumulative and synergistic effects

7.481 Policy T1 Transport is anticipated to positively contribute to the Draft Local Plan's strategic objective 18 which seeks to ensure the development of a safe, sustainable transport network that includes improvements to public transport, cycling and walking infrastructure which will improve transport accessibility and local air quality and reduce traffic congestion and the need to travel. It is predicted that this policy will have a positive secondary impact on the local economy by maintaining and improving accessibility. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. The policy could combine cumulatively and synergistically with the other transport policies to strengthen and improve transport infrastructure and provision for sustainable transport modes which in turn will help reduce pollution and have positive benefits for the environment and climate change.

7.482 Policy T2 Transport assessments and travel plans is anticipated to positively contribute to strategic objective 18 seeking to ensure there is a high quality transport infrastructure. It is predicted that this policy will have a positive secondary impact on the environment by ensuring that new developments are appropriately assessed for their transport impacts and appropriate mitigation measures are put in place to improve accessibility and ease congestion. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. The policy could combine cumulatively and synergistically with the other transport policies to strengthen and improve transport infrastructure and provision for sustainable transport modes which in turn will help reduce pollution and have positive benefits for the environment and climate change.

- 7.483 Policy T3 Vehicle Parking Standards is anticipated to positively contribute to strategic objective 18 seeking to ensure there is a high quality transport infrastructure. It is predicted that this policy will have a positive secondary impact on social objectives by ensuring that new developments provide an appropriate level of parking, improving accessibility to key services and facilities. It is predicted that the policy will have a positive effect on the objective, especially in the medium to long term. If parking provision is provided at the right level, this policy could combine cumulatively and synergistically with the other transport policies to strengthen and improve transport infrastructure and provision for sustainable transport modes which in turn will help reduce pollution and have positive benefits for the environment and climate change.
- 7.484 Policy T4 Increasing opportunities for cycling and walking is anticipated to positively contribute to strategic objective 18 seeking to ensure the development of a safe, sustainable transport network that includes improvements to public transport, cycling and walking infrastructure. It is predicted that this policy will have a positive secondary impact on environmental, health and social objectives by reducing car dependency and pollution and promoting active travel. It is predicted that the policy will have a positive effect on the objectives, especially in the medium to long term. This policy could combine cumulatively and synergistically with other Local Plan policies to improve accessibility in the borough, reduce pollution and improve the health of residents and visitors.
- 7.485 Policy T5 Housing and reduced parking is anticipated to positively contribute to strategic objective 18 seeking to ensure there is a high quality transport infrastructure. It is predicted that this policy will have a positive secondary impact on environmental objectives by ensuring that new housing developments provide an appropriate level of parking proportionate to accessibility to public transport. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. If parking provision on housing developments is provided at the right level, this policy could combine cumulatively and synergistically with the other transport policies to improve the sustainability of transport modes which in turn will help reduce pollution and have positive benefits for the environment and climate change.
- 7.486 Policy T6 Parking for blue badge holders is anticipated to positively contribute to strategic objective 18 seeking to ensure there is a high quality transport infrastructure. It is predicted that this policy will have a positive secondary impact on social objectives by ensuring that new housing developments provide an appropriate level of blue badge parking. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. If blue badge parking provision on housing developments is provided at the right level, this policy could combine cumulatively and synergistically with the other transport policies to improve access to services and facilities for disabled people and improve.

7.487 Policy T7 Borough road network – hierarchy of roads is anticipated to positively contribute to Strategic objectives 5, 6, 8, 9 and 18. These objectives broadly relate to supporting the local economy and businesses, attracting investment into the borough and to ensuring a high quality transport infrastructure. It is predicted that this policy will have a positive secondary impact on social objectives by maximising access for residents and visitors to town centre facilities and services. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. This policy could combine cumulatively and synergistically with other Local Plan policies to improve accessibility in the borough and support the local economy and businesses.

## **DELIVERY AND IMPLEMENTATION OF THE LOCAL PLAN**

### **Delivery and implementation**

**The council will implement the policies and proposals of the Local Plan by:**

- **working with stakeholders and partner organisations through a variety of fora and other arrangements, including Ward Panels;**
- **preparing other Local Plan documents, supplementary planning documents, joint Opportunity Area Planning Frameworks (OAPFs) development briefs, master plans and best practice guidance where necessary;**
- **utilising development management powers, including pre-application discussions and involving partner organisations where appropriate;**
- **having regard to the financial viability of development in the following ways:**
  - **Plan-making**
  - **CIL charge-setting**
  - **Negotiating Section 106 Agreements ('106s'), including for affordable housing**
- **allocating council funding and seeking other monies for projects which support the Local Plan; and**
- **preparing authority monitoring reports on an annual basis to review the effectiveness of policies and identifying alterations where necessary.**

7.488 This policy on delivery and implementation of the policies and proposals in the Local Plan will have a positive impact on all of the SA objectives. It emphasises that the council will work with partner organisations and Ward Panels when implementing the policies and proposals in the Local Plan. The introduction of Ward Panels in the borough will enable local communities to have more involvement in planning decisions that affect their local areas and will enable residents views to be considered at an early stage of a scheme's development.

7.489 The policy refers to negotiating section 106 agreements for affordable housing as well using council funding for other projects. Continual monitoring of the policies and proposals in the Local Plan will ensure that those which aren't effective will be reviewed and updated and this will have a positive effect in supporting the SA objectives.

7.490 Both Community Infrastructure Levy (CIL) and section 106 agreements will be levied at a rate that does not threaten the viability of development in the borough.

#### Alternative Options – Delivery and Implementation

- The council does not take a pro-active approach in planning for regeneration.

7.491 Pursuing this alternative option means that the lack of focus on planning for regeneration means that the opportunities that these areas have in terms of delivering new homes and jobs will not be realised. The alternative option is unlikely to allow the council to actively guide and assess whether development occurring in the borough is helping to achieve the Local Plan's strategic objectives. This option is also unlikely to offer the council any effective feedback on the effectiveness of implementing the Local Plan.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Delivery and implementation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Alternative option (1):</b> The council does not take a pro-active approach in planning for regeneration.	x	x	x	x	x	x	x	x	x	x	x	x

## PLANNING CONTRIBUTIONS AND INFRASTRUCTURE

### Planning contributions and infrastructure planning

The council will seek planning contributions to ensure the necessary infrastructure to support the Local Plan is delivered using two main mechanisms:

#### Community Infrastructure Levy (CIL)

The council will charge CIL on developments in accordance with the CIL Regulations (as amended) and the H&F CIL Charging Schedule (emerging), once in effect.

**The council will spend CIL on:**

- **Infrastructure in accordance with the H&F Regulation 123 (R123) List (emerging);**
- **Projects identified for 'Neighbourhood CIL'; and**
- **CIL administration expenses (no more than the statutory cap).**

**Section 106 Agreements ('S106s')**

**The council will seek to negotiate S106s, where the S106 'tests' are met, for:**

- **The provision of infrastructure projects or types *not* specified on the R123 List (through either financial contributions or 'in kind' delivery); and**
- **Non-'infrastructure' provisions, such as for affordable housing (see policy H2) and S106 monitoring expenses.**

7.492 Development contributions in the form of CIL and section 106 agreement payments will help ensure the provision of necessary physical, social and green infrastructure to meet the needs of planned growth. This will help to maintain and possibly enhance levels of equity and social justice.

7.493 Contributions for necessary infrastructure may include typical health infrastructure such as medical facilities and infrastructure to promote healthy lifestyles such as sports facilities, cycle and pedestrian pathways and improvements to parks, natural areas and open spaces. Health outcomes for the local population are likely to improve if this infrastructure is provided as required.

7.494 Development contributions may be used to provide necessary education infrastructure in line with projected needs in the borough.

7.495 Section 106 contributions are capable of being used to provide affordable homes in the borough and this will have a positive effect on the affordable homes sustainability objective.

7.496 Provision of the necessary infrastructure particularly social infrastructure is likely to positively impact upon local residents' sense of community and their sense of social cohesion.

7.497 Both CIL and section 106 agreements will need to be levied at a rate that does not threaten the viability of development in the borough. It is understood that the council's CIL Charging Schedule will be the subject to a hearing on 10<sup>th</sup> February 2015.

**Alternative Options – Planning contributions and infrastructure planning**

- No reasonable alternative option identified.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Planning contributions and infrastructure planning	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<b>Preferred option:</b> <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	0	0	✓	0	✓	0

## Assessing secondary, cumulative and synergistic effects

7.498 The Delivery and Implementation policy is anticipated to contribute positively towards the Draft Local Plan's strategic objectives including: 2 – which seeks to increase supply of housing, particularly affordable housing for local residents, 9 – which seeks to provide a range of high quality facilities and services and other community infrastructure and 19 – which seeks to ensure that regeneration benefits the whole community. The policy makes reference to the council negotiating Section 106 agreements for affordable housing and working with partner organisations and ward panels to deliver the policies and proposals in the plan. The delivery and implementation of the Local Plan's proposals and policies are likely to have a positive, short to long term cumulative effect on SA objectives.

7.499 The Planning Contributions and Infrastructure Planning policy is anticipated to contribute positively towards the Draft Local Plan's strategic objectives including: 2 – which seeks to increase supply of housing, particularly affordable housing for local residents and 9 – which seeks to provide a range of high quality facilities and services and other community infrastructure. The policy makes reference to spending CIL on infrastructure, this could be social or physical such as new community facilities or provision of new open space and it also refers to section 106 agreements for affordable housing. Using funding to provide the different types of infrastructure will have a positive, short to long term impact on many of the SA objectives.

## Cumulative Effects of the Draft Local Plan policies

7.500 Whilst for any one single development management or regeneration area or site policy, the preferred option might elicit a favourable sustainability comment, when they are considered together the overall assessment of significant impacts may be different. The provision of housing, schools, workplaces, health centres, recreation centres and shopping areas undeniably results in a sustainable positive outcome for local people and the quality of their lives, however any strategy that is based on 'regeneration through development' will have wider and deeper significant impacts both locally and on the wider environment.



- 7.501 Development inevitably consumes non-renewable resources in the form of land take, construction materials (including all forms of aggregates) energy and water. It also results in the generation of waste. The impacts of transport infrastructure and other requirements of modern living such as telecommunications infrastructure all have an effect on environmental sustainability. Despite the detail and apparent objectiveness of the SA approach now required to be applied to Local Plans and other such documents, the difficult target of 'achieving sustainable development' remains. There is a natural tension between the growth agenda and environment with short term environmental impacts versus the long term gain such as the provision of new development in sustainable locations such as town centres with good transport accessibility results in efficient use of land and reduces the impact of transport on the environment.
- 7.502 The Local Plan particularly promotes new housing with a target of 1031 dwellings a year up to 2025. Although the provision of housing is broadly sustainable against the majority of objectives, if its accompanied by the appropriate infrastructure the impact on the environmental objectives is dependent on the manner of implementation. The locational policies and the development management policies should ensure that the environmental impact of housing provision is minimised by ensuring high standards of efficiency and the Council's Planning Guidance SPD (July 2013) provides detailed guidance on sustainable construction and design. The location of housing should have regard to the Strategic Flood Risk Assessment for Hammersmith and Fulham, which identifies areas of high, medium and low flood risks and specifies where a flood risk assessment is required for development proposals.

## **8 TASK B4 – MITIGATING ADVERSE EFFECTS AND MAXIMISING BENEFICIAL EFFECTS**

### **Mitigation measures to minimise adverse effects and maximise beneficial effects**

- 8.1 The Draft Local Plan sits within a hierarchy of wider statutory planning instruments which broadly govern the strategic parameters of development in the borough. These instruments include national planning legislation, the National Planning Policy Framework, the London Plan and other statutory guidance issued by the Mayor of London. It is expected that the Local Plan policies should be in general conformity with those in the London Plan unless relevant conditions and evidence exist that justify a variation in policy approach. As these higher level planning policies must also comply with the SEA Directive and Regulations, the Local Plan's scope to cause significant adverse environmental impacts is already limited.
- 8.2 Furthermore, a number of the Draft Local Plan policies have already been adopted as part of the council's Core Strategy and Development Management Local Plan. These policies have therefore been subjected to a series of earlier SA's. This history of plan making further limits the possibility that the emerging draft Local Plan policies will result in significant adverse environmental effects.
- 8.3 Notwithstanding the above circumstances, the policy context as well as the issues facing the borough is subject to continuing change. The SA for this Draft Local Plan has revisited previous SAs and has updated and refreshed these policy appraisals where necessary. In the case of new policies, these have required completely new appraisals. A number of recommendations were made as part of the appraisal to improve the overall sustainability of the Draft Local Plan and to mitigate any negative effects that the SA considered might arise from policy options. In most instances, planning officers accepted the recommended changes and these have been incorporated into the current version of the Draft Local Plan's preferred policies. Recommendations included the following:
- Policy OORA2 Old Oak South and policy OORA3 Old Oak North were both found to be generally sustainable, however it is difficult to clarify the effect of these strategic site policies on some of the sustainability objectives. Therefore it is recommended that more detailed sustainability appraisals are carried out for the key regeneration areas, for example as individual area planning frameworks are prepared or updated, and that appropriate appraisals accompany major planning applications.
  - The White City Opportunity Area Planning Framework SPD will need to be updated to reflect the revised adopted policy WCRA (White City Regeneration Area) in the Local Plan. The accompanying sustainability appraisal of the SPD will also require updating.
  - Most of the Hammersmith Regeneration area (HRA) is at risk from tidal flooding and is located in Flood Zone 3a. As such specific Flood Risk Assessments will be required for any planning application and more

vulnerable uses will need to pass the Exception Test in accordance with National Planning Policy Framework and national Planning Practice Guidance.

- SFFRA (South Fulham Riverside Regeneration Area) suffers from relatively poor accessibility and therefore it is essential that public transport and accessibility improvements should be sought for this area.
- Policy HO10 Gypsy and traveller accommodation is an interim policy option and is awaiting the completion of the joint Gypsy and Traveller Accommodation Needs Assessment. Following the completion of this assessment then changes to the wording of this policy will be required and further appraisal undertaken.
- Policy TLC7 Addressing the concentration and clustering of betting shops and payday loan shops will need to be supported by robust evidence to justify the Council's approach to restricting betting shops in the borough. Evidence could focus on the potential health impacts of betting shops and payday loan shops on the local community as well their finances.

## **9 TASK B5 - DRAFT LOCAL PLAN PROPOSED MONITORING OF THE SIGNIFICANT EFFECTS**

- 9.1 The council is legally required to monitor the significant environmental effects of the implementation of the Draft Local Plan with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.
- 9.2 The results of this monitoring will be included in the council's Monitoring Reports. Among other things, the Monitoring Reports will identify and assess a number of indicators linked to the Sustainability Objectives. A list of proposed indicators is included in the table below – most will fall upon the council to gather information and monitor, but some will require the input of other public bodies. It will be necessary for sufficient resources to be allocated for the task of monitoring. In addition it will be important to keep the list of indicators under review so that monitoring remains effective.
- 9.3 The list of indicators, if monitored consistently, will enable any significant sustainability effects to be identified, demonstrating progress made towards the achievement of the objectives or alerting the council on remedial action that may need to be taken if negative effects have arisen. Although it is recognised that monitoring is subject to factors such as quality of data and resources, the benefits of monitoring will increase as a time series of performance is built up which will assist in identifying trends and suitable policy responses.

**Table 9: The Sustainability Appraisal Framework – objectives and monitoring indicators**

Topic	Headline Sustainability Objective	Sustainability sub-objective	Indicators measuring the sustainability objective
Social justice	1.Increase equity and social justice	<ul style="list-style-type: none"> <li>• Make essential services affordable to all</li> <li>• Reduce differences in standards between different communities</li> <li>• Improve support to groups that are vulnerable and have special needs including those with disabilities</li> </ul>	<ul style="list-style-type: none"> <li>• Index of Multiple Deprivation (IMD)</li> </ul>
Health	2.Improve health of population overall	<ul style="list-style-type: none"> <li>• Increase expected years of health life</li> <li>• Enable healthy lifestyles including mode of travel</li> </ul>	<ul style="list-style-type: none"> <li>• All age, all causes mortality rate (SMRs)</li> <li>• Obesity among primary school age children in year 6</li> <li>• Adult participation in sport</li> </ul>
Education and skills	3.Improve the education and skills of young people and adults	<ul style="list-style-type: none"> <li>• Raise the standard of achievement at all ages</li> </ul>	<ul style="list-style-type: none"> <li>• Achievement of 5 or more A* - C grades at GCSE or equivalent including English and Mathematics</li> </ul>
Affordable homes	4.Provide decent and affordable homes	<ul style="list-style-type: none"> <li>• Reduce homelessness</li> <li>• Increase the range and affordability of housing</li> <li>• Reduce the number of unfit homes</li> </ul>	<ul style="list-style-type: none"> <li>• Number of net additional dwellings granted permission and completed (total, regeneration areas and rest of the borough) for current year and since the policy was first published, adopted or approved.</li> <li>• Net additional affordable homes permitted and completed by tenure for the current year and since the policy was first published, adopted or approved Proposed units from conversions with 2 or more bedrooms</li> <li>• Number and % of homes granted permission</li> </ul>

			<p>that are wheelchair accessible in developments providing ten or more residential units</p> <ul style="list-style-type: none"> <li>• % of homes granted permission achieving Lifetime Homes standards</li> <li>• % of homes permitted meeting the Code for Sustainable Homes Levels 3,4,5 and 6</li> </ul>
Social cohesion	5.Increase local residents' sense of community and social cohesion	<ul style="list-style-type: none"> <li>• Increase participation and voluntary activity</li> <li>• Reduce levels of crime and non-criminal anti-social disturbances</li> <li>• Increase sense of security and safety at home and in the street</li> </ul>	<ul style="list-style-type: none"> <li>• Net change in D2 use class floorspace</li> <li>• Number of total offences in the borough</li> </ul>
Satisfying work	6.Increase the opportunities for satisfying and well paid work	<ul style="list-style-type: none"> <li>• Reduce unemployment, especially long term unemployment</li> <li>• Improve earnings and reduce work related stress to improve health</li> </ul>	<ul style="list-style-type: none"> <li>• Overall employment rate</li> <li>• Working age people on out of work benefits</li> <li>• Working age people claiming out of work benefits in the most deprived areas of the borough</li> </ul>
Heritage	7.Improve the local environment and preserve and enhance the setting of heritage assets	<ul style="list-style-type: none"> <li>• Conserve and enhance the setting of heritage assets including sites, features and areas of cultural, historical and archaeological value</li> <li>• Maintain and enhance sites and species of nature conservation interest</li> <li>• Retain and enhance the character and use of the river</li> </ul>	<ul style="list-style-type: none"> <li>• % of conservation areas with up to date conservation area statements/management plans</li> <li>• Proportion of designated Heritage assets (including building at risk, conservation areas and scheduled monuments)</li> <li>• Length of riverside walk</li> <li>• Net change in total area of public open space</li> <li>• Net change to areas of nature conservation interest</li> <li>• Number of planning applications that include any of the following measures to protect and/or enhance biodiversity:</li> </ul>

			<ul style="list-style-type: none"> <li>- Green or Brown roofs</li> <li>- Living walls</li> <li>- Native planting schemes</li> <li>- Bird and/or bat boxes</li> </ul>
Reduce pollution	8.Reduce the level of pollution	<ul style="list-style-type: none"> <li>• Improve local air and water quality and reduce noise levels</li> <li>• Reduce the amount of litter, derelict, degraded and underused land</li> </ul>	<ul style="list-style-type: none"> <li>• Number of times the level of pollution exceeds the guide limits for PM10 and NO2</li> <li>• Number of planning permissions granted where Health and Safety Executive (HSE) objected</li> </ul>
Reduce transport impacts	9.Reduce the effect of transport on the environment	<ul style="list-style-type: none"> <li>• Reduce the need for travel and therefore reduce traffic volume</li> <li>• Encourage use of more sustainable modes of transport</li> </ul>	<ul style="list-style-type: none"> <li>• Method of children's travel to school (5-16 year olds)</li> <li>• Number of planning permissions involving Transport Impact Assessments</li> <li>• Cycle parking provision in permitted development schemes</li> </ul>
Careful consumption	10.Responsible consumption of resources in the borough	<ul style="list-style-type: none"> <li>• Increase efficiency in use of resources in future plans</li> <li>• Reuse, recover and/or recycle waste</li> </ul>	<ul style="list-style-type: none"> <li>• % of household waste sent to recycling</li> </ul>
Climate change	11.Reduce climate change and its impact on the borough	<ul style="list-style-type: none"> <li>• Reduce emissions of greenhouse gases and ozone depleting substances</li> <li>• Reduce energy and water use and increase use of renewable sources</li> <li>• Minimise the risk of flooding from storm events and overflow of watercourses</li> </ul>	<ul style="list-style-type: none"> <li>• Per capita CO<sub>2</sub> emissions in the borough</li> <li>• Number of developments permitted where on-site renewable energy generation is integrated</li> <li>• Number of properties permitted connected to decentralised energy networks</li> <li>• Types and number of SuDS measures approved for installation</li> </ul>
Sustainable economy	12.Improve the sustainability of the local economy	<ul style="list-style-type: none"> <li>• Improve the level of investment in community services and shopping facilities</li> <li>• Improve access to key local services,</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of frontage in A1, A2 and other use classes in frontages identified in policy C2</li> <li>• Percentage of frontage in A1, A2 and other</li> </ul>

		<p>shopping and other local facilities</p> <ul style="list-style-type: none"> <li>• Encourage indigenous investment and training of local workers</li> </ul>	<p>use classes in the non-prime frontage areas</p> <ul style="list-style-type: none"> <li>• Percentage of frontages in non-A1 use; percentage in A3, A4 and A5 uses in frontages identified in policy C4</li> <li>• Percentage of frontage in non-A1 use; percentage in A3, A4 and A5 uses non-designated parades and clusters and corner shops</li> <li>• Proportion of vacant shopping frontages in retail designations</li> <li>• Employment land available by type</li> <li>• Amount of permitted/completed employment floorspace (by type, regeneration areas and rest of the borough)</li> <li>• The business stock</li> </ul>
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## APPENDIX 1 - REPRESENTATIONS RECEIVED ON THE DRAFT LOCAL PLAN SCOPING REPORT

Consultee	Comment	Response
Environment Agency	Pleased to see that the report has highlighted the need to reduce flood risk in the borough and to protect and enhance biodiversity. It is also pleasing to note that relevant policies relating to the future effects of climate change have been included within the evidence base.	Comments noted.
Natural England	Objectives within the SA, against which Local Plan objectives are assessed, are in line with the approach and methodology Natural England would wish to see. There are broadly a good range of monitoring indicators for most of the sustainability objectives.	Comments noted.
Natural England	A category should be added to Table 3 The Sustainability Appraisal Framework that could be used to help with identifying changes in biodiversity or wildlife in the borough. This will be useful in helping to assess whether policies in the Local Plan do have a positive impact (or not as the case may be) upon the wider environment in the borough area and thus further afield. Baseline data to be collected should also include an assessment of the current state of biodiversity in the Borough, through checks	<p>The Heritage topic is intended to allow for identification to changes to biodiversity and wildlife – see in particular the sub-objective in bullet point 2 and indicators included in bullet points 5 to 7.</p> <p>The council does not have its own BAP. It will seek to ensure that its actions do not impact detrimentally on London Habitat Regional Targets.</p>

	against current Biodiversity Action Plan (BAP) targets, for instance.	
<b>Natural England</b>	Within Table 3, under the objective relating to Climate Change it might also be useful to add in targets relating to the number of planning application approved that had some element of Green Infrastructure (GI) included in them. This could include elements that worked toward creation of new habitat or for instance were used for rainwater attenuation in heavy rainfall events – which would contribute to a more resilient borough in adverse weather conditions. Use of rain gardens or green and brown roofs would also be useful to look out for under the targets section, all being positive additions to any new development.	The issue of green infrastructure, whilst not referred to in the climate change topic, is included in the heritage topic. A list of key green infrastructure indicators is included in bullet point 7. The council will keep this list under review.
<b>English Heritage</b>	Amend ninth bullet point on page 20, namely “Conserving and enhancing the historic built environment of the borough wherever appropriate to do so”, to read “conserving and enhancing the historic environment of the borough” or replaced with “conserving and enhancing the borough’s heritage assets in a manner appropriate to their significance”. This would better reflect the NPPF.	Comments noted. The Draft Local Plan strategic objective 14 and this SA Report has been updated.
<b>English Heritage</b>	Welcome the Scoping Report’s coverage of the topic of “Improving the Quality of the Local	Reference has been made to Registered Parks and Gardens of Historic Interest in section 3 of this

	Environment". In the section on "Improving Parks and Open Spaces", English Heritage requests that Registered Parks and Gardens of Historic Interest are included, as the borough definitely has some of these – for example Fulham Palace's gardens, and Bishops Park.	SA Report under the sub-section "Open Space and Green Infrastructure."
<b>English Heritage</b>	Request that the particular archaeological value of the River Thames is recognised in the section on Increasing Access and Use of the River Thames and Grand Union Canal.	Reference has been made to the archaeological value of the River Thames in section 3 of this SA Report under the sub-section "Open Space and Green Infrastructure."
<b>English Heritage</b>	All of the Sustainability Issues appear to be framed more as objectives. We would expect issues to more explicitly target areas of concern such as how to integrate the substantial amount of new housing required in a manner that is compatible with the conservation and enhancement of the borough's heritage assets and their settings. English Heritage observes that if the issues are not addressed this way it is harder to be certain that the plan is tackling them.	The sustainability issues are identified in Table 2 of the Scoping Report. The point made by English Heritage is understood, however the issues will be considered holistically when policy options are considered in the sustainable appraisal. In a similar way, when development proposals come forward in the borough, these will be considered against all policies in the Local Plan to ensure that sustainable development is achieved.
<b>English Heritage</b>	Note that the Sustainability Appraisal Framework includes a heritage specific objective – i.e. improve the local environment and heritage. Request that the objective addresses the matter of setting and note that the first sub-objective is more effective than the	Comments noted. The headline sustainability objective and the first sub-objective have been amended in Table 9 of this SA Report.

	objective as currently framed, albeit still needs to incorporate the setting of heritage assets as this is a matter for management according to the NPPF.	
<b>English Heritage</b>	Welcome the indicator concerning conservation area statements. We request, however, that the building at risk indicator is expanded to include Heritage at Risk as this is what we measure with our Heritage at Risk Register.	The buildings at risk indicator has been expanded to include Heritage at Risk in section 8 of this SA Report.
<b>English Heritage</b>	The vast majority of local plan objectives are going to need very careful implementation in order to remain in step with the Heritage Sustainability Appraisal Objective. We welcome all opportunities to work with the borough towards ensuring that its objectives are achieved in a way that sustains its historic environment.	The council welcomes involvement of English Heritage as the Government's adviser on the historic environment. It will continue to ensure that English Heritage is involved in the protection of the historic environment at all stages and levels of the local plan-making process and in the consideration of development proposals impacting upon heritage assets.
<b>English Heritage</b>	English Heritage strongly advises that the local authority's conservation staff be involved throughout the preparation and implementation of the Local Plan and the Environmental Statement	The council can confirm that design and conservation colleagues are fully involved in the plan making process.

## APPENDIX 2 - POLICY LINKAGES – DRAFT LOCAL PLAN (2014) AND THE CORE STRATEGY AND DEVELOPMENT MANAGEMENT LOCAL PLAN

<b>Draft Local Plan (November 2014)</b>	<b>Core Strategy (adopted October 2011)/ Development Management (July 2013)</b>
<b>Regeneration Area Strategies</b>	
<b>Strategic Policy - Regeneration Areas</b>	This is a new policy.
<b>Old Oak Regeneration Area</b>	
<b>Strategic Policy OORA – Old Oak Regeneration Area</b>	This policy replaces the Park Royal Opportunity Area in the Core Strategy. The OORA forms part of the Old Oak and Park Royal Opportunity Area which is designated in the Further Alterations to the London Plan 2014. This policy reflects the London Plan alterations and the government's proposals for a new train line HS2.
<b>Strategic Site Policy OORA1 – Old Oak Common Station</b>	This is a new site allocation policy.
<b>Strategic Site Policy OORA2 – Old Oak South</b>	This is a new site allocation policy.
<b>Strategic Site Policy OORA3 – Old Oak North</b>	This is a new site allocation policy.
<b>White City Regeneration Area</b>	
<b>Strategic Policy WCRA – White City Regeneration Area</b>	Formerly Core Strategy policy WCOA.
<b>Strategic Site Policy WCRA1 – White City East</b>	Formerly Core Strategy site policy WCOA1.
<b>Strategic Site Policy WCRA2 – White City West</b>	Formerly Core Strategy site policy WCOA2.
<b>Strategic Site Policy WCRA3 – Shepherd's Bush Market and adjacent land</b>	Formerly Core Strategy site policy WCOA3.
<b>Hammersmith Regeneration Area</b>	
<b>Strategic Policy HRA – Hammersmith Regeneration Area</b>	Formerly Core Strategy policy HTC.
<b>Strategic Site Policy HRA1 – Town Hall Extension and adjacent land, Nigel Playfair Avenue</b>	Formerly Core Strategy policy HTC1.

<b>Strategic Site Policy HRA2 – King Street East</b>	Formerly Core Strategy policy HTC2.
<b>Strategic Site Policy HRA3 – A4, Hammersmith Flyover and adjoining land</b>	Formerly Core Strategy policy HTC3.
<b>Fulham Regeneration Area</b>	
<b>Strategic Policy FRA – Fulham Regeneration Area</b>	Formerly Core Strategy policy FRA.
<b>Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area</b>	Formerly Core Strategy policy FRA1.
<b>South Fulham Riverside Regeneration Area</b>	
<b>Strategic Policy SFRRA – South Fulham Riverside Regeneration Area</b>	Formerly Core Strategy policy SFR.
<b>Strategic Site Policy SFRRA1 – Imperial Gasworks National Grid</b>	This is a new site allocation policy.
<b>Meeting Housing Needs and Aspirations</b>	
<b>Borough-wide Policy HO1 Housing supply</b>	Formerly Core Strategy policy H1.
<b>Borough-wide Policy HO2 Housing conversion and retention</b>	Formerly DMLP policy A1.
<b>Borough-wide Policy HO3 Affordable Housing</b>	Formerly Core Strategy policy H2.
<b>Borough-wide Policy HO4 Housing quality and density</b>	Formerly Core Strategy policy H3 and DMLP policy A2.
<b>Borough-wide Policy HO5 Housing mix</b>	Formerly DMLP policy A3.
<b>Borough-wide Policy HO6 Accessible housing</b>	Formerly DMLP policy A4.
<b>Borough-wide Policy HO7 Meeting needs of people who need care and support</b>	Formerly DMLP policy A5.
<b>Borough-wide Policy HO8 Hostels and houses in multiple occupation</b>	Formerly DMLP policy A6.
<b>Borough-wide Policy HO9 Student accommodation</b>	Formerly Core Strategy policy H6 and DMLP policy A7.
<b>Borough-wide Policy HO10 Gypsy and traveller accommodation</b>	Formerly Core Strategy policy H5.
<b>Borough-wide Policy HO11 Basement accommodation and lightwells</b>	Formerly DMLP policy A8.
<b>Borough-wide Policy HO12 Detailed residential</b>	Formerly DMLP policy A9.

<b>standards</b>	
<b>Local Economy and Employment</b>	
<b>Borough-wide Policy E1 Providing for a range of employment uses</b>	Formerly DMLP policy B1.
<b>Borough-wide Policy E2 Land and premises for employment uses</b>	Formerly Core Strategy policy LE1.
<b>Borough-wide Policy E3 Provision for visitor accommodation and facilities</b>	Formerly DMLP policy B2.
<b>Borough-wide Policy E4 Local employment, training and skills development initiatives</b>	Formerly DMLP policy B3.
<b>Town and Local Centres</b>	
<b>Borough-wide Policy TCL1 Hierarchy of town and local centres</b>	Formerly Core Strategy policy C.
<b>Borough-wide Policy TCL2 Managing uses in the prime retail frontage areas of town centres</b>	Formerly DMLP policy C2.
<b>Borough-wide Policy TCL3 Managing uses in the non-prime frontage areas of town centres</b>	Formerly policy DMLP policy C3.
<b>Borough-wide Policy TCL4 Managing uses in key local centres, neighbourhood parades and satellite parades</b>	Formerly DMLP policy C4.
<b>Borough-wide Policy TCL5 Small non designated parades, clusters and corner shops</b>	Formerly DMLP policy C5.
<b>Borough-wide Policy TCL6 Managing the impact of food, drink and entertainment uses</b>	Formerly DMLP policy C6.
<b>Borough-wide Policy TCL7 Addressing the concentration and clustering of betting shops and payday loan shops</b>	This is a new policy.
<b>Borough-wide Policy TCL8 Public houses</b>	This is a new policy.

<b>Community Facilities, Leisure, Recreation</b>	
<b>Borough-wide Policy CF1 Supporting community facilities and services</b>	Formerly Core Strategy policy CF1.
<b>Borough-wide Policy CF2 Enhancement of community uses</b>	Formerly DMLP policy D1.
<b>Borough-wide Policy CF3 Enhancement of arts, culture, entertainment, leisure, recreation and sport uses</b>	Formerly DMLP policy D2.
<b>Borough-wide Policy CF4 Professional football grounds</b>	This is a new policy.
<b>Green and Public Open Space</b>	
<b>Borough-wide Policy OS1 Protecting parks and open spaces</b>	Formerly Core Strategy OS1.
<b>Borough-wide Policy OS2 Access to parks and open spaces</b>	Formerly DMLP policy E1.
<b>Borough-wide Policy OS3 Playspace for children and young people</b>	Formerly DMLP policy E2.
<b>Borough-wide Policy OS4 Nature conservation</b>	Formerly DMLP policy E3.
<b>Borough-wide Policy OS5 Greening the borough</b>	Formerly DMLP policy E4.
<b>River Thames and Grand Union Canal</b>	
<b>Borough-wide Policy RTC1 River Thames and Grand Union Canal</b>	Formerly Core Strategy policy RTC1.
<b>Borough-wide Policy RTC2 Access to the Thames riverside and foreshore</b>	Formerly DMLP policy F1.
<b>Borough-wide Policy RTC3 Design and appearance of development within the Thames Policy Area</b>	Formerly DMLP policy F2.
<b>Borough-wide Policy RTC4 Water-based activity on the Thames</b>	Formerly DMLP policy F3.
<b>Borough-wide Policy RTC5 Enhancing the Grand Union Canal and improving access</b>	Formerly DMLP policy F4.
<b>Design and Conservation</b>	
<b>Borough-wide Policy DC1</b>	Formerly Core Strategy.



<b>Built environment</b>	
<b>Borough-wide Policy DC2 Design of new build</b>	Formerly DMLP policy G1.
<b>Borough-wide Policy DC3 Tall buildings</b>	Formerly DMLP policy G2.
<b>Borough-wide Policy DC4 Alterations and extensions (including outbuildings)</b>	Formerly DMLP policy G3.
<b>Borough-wide Policy DC5 Shopfronts</b>	Formerly DMLP policy G4.
<b>Borough-wide Policy DC6 Replacement windows</b>	Formerly DMLP policy G5.
<b>Borough-wide Policy DC7 Views and landmarks</b>	Formerly DMLP policy G6.
<b>Borough-wide Policy DC8 Heritage and conservation</b>	Formerly DMLP policy G7.
<b>Borough-wide Policy DC9 Advertisements</b>	Formerly DMLP policy G8.
<b>Borough-wide Policy DC10 Telecommunications</b>	This is a new policy.
<b>Environmental Issues, including Tackling and Adapting to Climate Change</b>	
<b>Borough-wide Policy CC1 Reducing Carbon Dioxide Emissions</b>	Formerly DMLP policy H1.
<b>Borough-wide Policy CC2 Ensuring Sustainable Design and Construction</b>	Formerly DMLP policy H2.
<b>Borough-wide Policy CC3 Reducing Water Use and the Risk of Flooding</b>	Formerly DMLP policy H3.
<b>Borough-wide Policy CC4 Water Quality</b>	Formerly DMLP policy H4.
<b>Borough-wide Policy CC5 Strategic Waste Management</b>	Formerly Core Strategy policy CC3.
<b>Borough-wide Policy CC6 On-site Waste Management</b>	Formerly DMLP policy H5.
<b>Borough-wide Policy CC7 Hazardous Substances</b>	Formerly DMLP policy H6.
<b>Borough-wide Policy CC8 Contaminated Land</b>	Formerly DMLP policy H7.
<b>Borough-wide Policy CC9 Air Quality</b>	Formerly DMLP policy H8.
<b>Borough-wide Policy CC10 Noise</b>	Formerly DMLP policy H9.
<b>Borough-wide Policy CC11 Light Pollution</b>	Formerly DMLP policy H10.
<b>Borough-wide Policy CC12</b>	Formerly DMLP policy H11.

<b>Control of Potentially Polluting Uses</b>	
<b>Transport and Accessibility</b>	
<b>Borough-wide Policy T1 Transport</b>	Formerly Core Strategy policy T1.
<b>Borough-wide Policy T2 Transport assessments and travel plans</b>	Formerly DMLP policy J1.
<b>Borough-wide Policy T3 Vehicle Parking Standards</b>	Formerly DMLP policy J2.
<b>Borough-wide Policy T4 Increasing opportunities for cycling and walking</b>	Formerly DMLP policy J5.
<b>Borough-wide Policy T5 Housing with reduced parking</b>	Formerly DMLP policy J3.
<b>Borough-wide Policy T6 Parking for blue badge holders</b>	Formerly DMLP policy J4.
<b>Borough-wide Policy T7 Borough road network - hierarchy of roads</b>	Formerly DMLP policy J6.
<b>Delivery and Implementation of the Local Plan</b>	
<b>Delivery and Implementation</b>	Formerly Core Strategy Delivery and monitoring.
<b>Planning Contributions and Infrastructure</b>	
<b>Planning Contributions and Infrastructure</b>	This is a new section.