



London Borough of Hammersmith & Fulham

**Strategic Environmental Assessment
(SEA) Adoption Statement for the
Hammersmith & Fulham
Local Plan**

(February 2018)

SEA Adoption Statement- Hammersmith & Fulham Local Plan February 2018

Introduction

This statement has been prepared in compliance with the requirements of regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004, regulation 16 (3) and (4). The Hammersmith and Fulham Local Plan was adopted on 28th February 2018. The Local Plan as adopted, accompanying sustainability appraisal and a copy of this statement may be viewed online at www.lbhf.gov.uk/localplan or is available to view at the Town Hall and the boroughs three main libraries (Hammersmith, Shepherd's Bush and Fulham) during normal opening hours.

In accordance with European and national legislation, development plans must be subject to the Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) processes.

A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from implementing development plans. It is a process for understanding whether policies, strategies or plans promote sustainable development, and for improving them to deliver more sustainable outcomes.

The Strategic Environmental Assessment (SEA) aims to predict and assess the environmental effects that are likely to arise from plans, policies and strategies, such as a Local Plan. It is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes. For the purposes of the Hammersmith and Fulham Local Plan, the SEA process was incorporated into the SA process.

Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 (from hereon in referred to as the SEA Regulations) sets out the requirements with regard to the post adoption procedures of the SA/SEA. This statement has been prepared in accordance with this regulation.

In accordance with the SEA Regulations, this statement sets out the following:

- (a) how environmental considerations have been integrated into the Plan;
- (b) how the environmental report has been taken into account;
- (c) how opinions expressed in response to public consultation have been taken into account;
- (d) the reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with; and

(e) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan

Preparation of the Local Plan

Hammersmith and Fulham Council took account of the following considerations in preparing the Local Plan:

a) How environmental considerations have been integrated into the plan

Sustainability considerations have been incorporated into the plan through an iterative process where the sustainability appraisal (SA) has informed each stage of the development of policy, through:

SA Scoping Report (Jan 2014) - the SA Scoping Report was published for a 5-week consultation and sent to the three statutory consultees with environmental responsibilities (Environment Agency, Natural England & Historic England). Neighbouring boroughs and other relevant stakeholders were also consulted. The Scoping Report set out the framework for the development of the SA, with a number of strategic objectives identified that were derived from analysis of the specific sustainability issues facing the borough.

Draft Local Plan (Jan 2015) - building on initial scoping work undertaken in January 2014, a Sustainability Appraisal (Appendix 1) was prepared and consulted on alongside the draft Local Plan in 2015. The SA assessed and presented the relevant sustainability issues for Hammersmith and Fulham, undertook an assessment of options for policies to deal with the relevant range of issues and contributed to the decision on the preferred options and drafting of the draft Local Plan policies.

Local Plan Publication (Sept 2016) and Submission (Feb 2017) - further assessment against Hammersmith and Fulham's sustainability objectives was carried out on the various iterations of the preferred options. Where sustainability issues were identified, the mitigating effect of other policies was assessed and further mitigation measures were promoted where appropriate. The results of this assessment were published in the Sustainability Appraisal September 2016 (Appendix 3) and were consulted on alongside the Submission Local Plan in September 2016.

Examination (June 2017) – as part of the public examination hearings, a number of main modifications were proposed to the Submission Local Plan. The council prepared a schedule of modifications following the hearings (EX26 & EX27). These modifications were screened and an assessment of any additional sustainability impacts was made. This assessment (Appendix 4) and the modifications were published for consultation in July 2017.

The Inspector's Report (December 2017) - In his assessment of the Local Plan's legal compliance, the Inspector states that *"an SA has been carried out and is adequate"*.

He suggested some minor amendments to the Main Modifications. The Inspector's Report notes that:

"The amendments do not significantly alter the content of the modifications as published for consultation or undermine the participatory processes and sustainability appraisal that has been undertaken"

(b) How the environmental report has been taken into account

At each stage of development of the Local Plan, the findings of the sustainability appraisal were taken into account to inform policy development and ensure that sustainability has been at the heart of the Local Plan process.

Importantly, the SA identified and appraised options (reasonable alternatives) and draft policies against the Sustainability Framework. Details of the process and individual appraisals on policy options can be found in the series of SA reports carried as part of preparing the Local Plan (see Appendices). By identifying environmental and wider sustainability issues the SA was able to recommend the most sustainable options, propose mitigation measures and refine policy wording.

For example, where a preferred policy was found to be generally the most sustainable option but could be improved, recommendations and mitigation measures were put forward and included in the policy. For example, the South Fulham Riverside Regeneration Area suffers from poor public transport accessibility. To ensure sustainable development, it is important that Strategic Policy SFRRA requires developments taking place in the South Fulham area to make improvements to public transport and accessibility in order to reduce car dependency and therefore improve air quality.

Full details of how the findings of each of the SA reports were taken into account in the development of the Local Plan policies can be found in the series of sustainability reports produced which are contained in Appendices 1-4 of this report.

(c) How opinions expressed as a result of consultation have been taken into account

Extensive consultation was carried out on the SA reports in line with Regulation 13 of the SEA Regulations and ran in parallel with the consultation on the development of the policies in the Local Plan.

The SA Scoping Report was sent to the three statutory consultees with environmental responsibilities (Environment Agency, Historic England & Natural England) and comments were received from all three.

A wide range of stakeholders, including statutory environmental bodies, developers/landowners, businesses and local residents/groups, were consulted at each stage of the statutory consultation process on the Local Plan (Regulation 18 & 19). The consultation responses were taken into account alongside the sustainability appraisal and other evidence studies in the drafting of subsequent policies.

No specific responses were raised in relation to the SA. The Local Plan Consultation Statement prepared in February 2017 provides comprehensive details of the consultation process which accompanied the development of the Local Plan and demonstrates how responses were taken into account. In response to the representations received as part of the Regulation 19 consultation, the council proposed a number of minor modifications to the Local Plan for consideration by the Inspector as part of the examination hearings.

(d) Any trans-boundary consultations with other Member States

No trans-boundary consultations with other Member States were deemed necessary for this document.

(e) Reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

The series of SA's developed for the Local Plan (Jan 2015 & Sept 2016) and Consultation Statement (Feb 2017) demonstrate that all reasonable options and alternatives have been considered, setting out a clear explanation of how options and alternatives were generated, appraised, selected or rejected and the role that Sustainability Appraisal and community engagement have played in this process. The council believe that the Hammersmith and Fulham Local Plan will direct development in a sustainable manner over the plan period, and this was supported by the Inspector.

(f) Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

The effects of the Local Plan policies will be monitored in the council's Annual Monitoring Report (AMR) by way of indicators which are outlined in Appendix 6 of the Local Plan. This will enable the significant effects (including negative effects) of implementing the Plan to be monitored. The council publishes the AMR annually and monitors and analyses the performance of planning policies.

The AMR assess performance for a range of areas, environmental factors include air quality, open space, biodiversity, sustainable transport, heritage, sustainable drainage, waste and energy as well as, housing and economic factors such as employment and town centres. Monitoring Reports and their implications for future plans will be analysed through subsequent SA Scoping reports.

Appendices

[Appendix 1 –Sustainability Scoping Report of Hammersmith and Fulham's Local Plan: 2014](#)

[Appendix 2 - Sustainability Appraisal of Hammersmith and Fulham's draft Local Plan: 2015](#)

[Appendix 3 - Sustainability Appraisal of Hammersmith and Fulham's Proposed Submission Local Plan - 2016](#)

[Appendix 4 - Sustainability Appraisal of Proposed Main Modifications for Hammersmith & Fulham's Local Plan- July 2017](#)

Appendix 1

London Borough of Hammersmith & Fulham

REVISED DRAFT LOCAL PLAN

**SUSTAINABILITY APPRAISAL
SCOPING REPORT**

January 2014

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Non – Technical Summary

Introduction

This document is the Scoping Report which will inform the development of the Sustainability Appraisal (SA) of the London Borough of Hammersmith's principal planning policy, herein referred to as the 'Draft Local Plan'.

This Scoping Report is a consultation document for the three statutory consultees with environmental responsibilities in England and has also been sent to neighbouring local authorities and other relevant stakeholders for comment.

Once finalised, the Scoping Report will form the framework for the Sustainability Appraisal of the Draft Local Plan by setting out sustainability objectives and indicators against which the Draft Local Plan policies will be appraised and monitored respectively.

The Draft Local Plan

The London Borough of Hammersmith & Fulham has commenced revision its principal planning policy documents which will guide development across the borough over the long term.

This revision involves the production of a planning policy document, termed as the Draft Local Plan which among other things, amalgamates the adopted Core Strategy (adopted in October 2011) and the Development Management Draft Local Plan (adopted in July 2013) into one document.

The policies in the Draft Local Plan document consist of:

- existing policies contained in the Core Strategy and the Development Management Draft Local Plan, which have been reviewed to ensure their relevance and applicability; and
- new regeneration policies which will focus on guiding development in five specific parts of the borough.

Upon adoption, following an examination in public, the Local Plan will comprise a key part of the suite of statutory planning policies that will guide development across the borough over the long term.

Purpose of the Sustainability Appraisal

The council is legally required to prepare a 'Sustainability Appraisal' ('SA') of the Draft Local Plan in order to ensure that social, environmental and economic considerations are taken into account during all the stages of the Draft Local Plan's preparation.

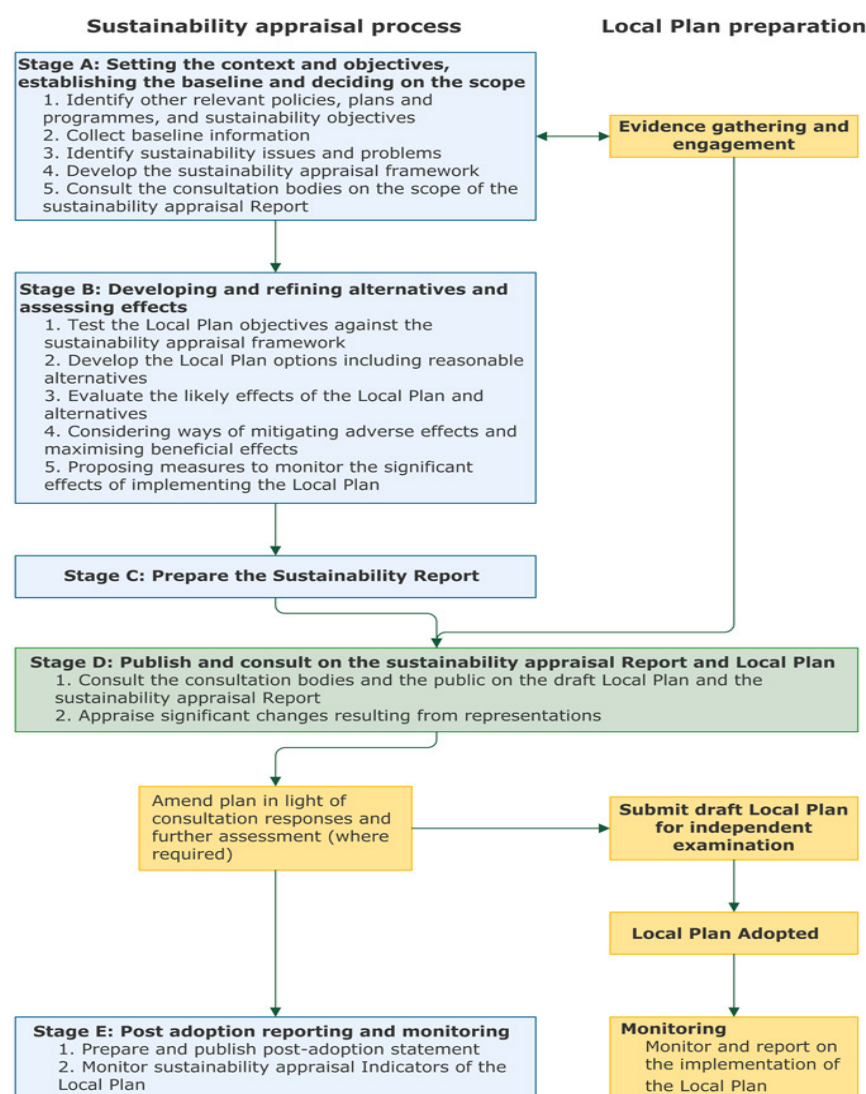
The overall purpose of the SA (incorporating SEA) is to assess the Draft Local Plan to determine whether it takes account of environmental, social and economic considerations by:

- ensuring compliance with the European SEA Directive and national 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 key stages of the Local Plan preparation and their relationship with the SA process are detailed in the table below.¹

The Five Stages of Sustainability Appraisal



¹ National Planning Policy Guidance: Strategic environmental assessment and sustainability appraisal (2013), <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/what-documents-in-a-local-plan-require-a-sustainability-appraisal/#paragraph_013> , accessed 7 January 2013.

Purpose and objectives of this Scoping Report

This document represents the first stage (Stage A) in the SA process. The purpose of this Scoping Report is to set out the framework of the sustainability appraisal, the principal element of which consists of a number of sustainability objectives that have been derived from an analysis of the specific sustainability issues facing the borough. The Scoping Report consists of five separate steps as listed in the box below:

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

A1. Identify and review other relevant plans, programmes and policies, and sustainable development objectives that will affect or influence the Draft Local Plan. **(Context Review)**

A2. Collect relevant information on the social, environmental and economic characteristics of the London Borough of Hammersmith & Fulham and their likely evolution without the implementation of the Local Plan. **(Baseline)**

A3. Identify key **sustainability issues** for the SA to address.

A4. Develop the **SA framework**, consisting of the sustainability objectives, indicators and targets.

A5. Produce a **Scoping Report** (this report) and consult relevant authorities, the public and other key stakeholders on the scope of the appraisal and the key issues and possible options for solutions.

The essential elements of the five steps constituting the Scoping Report are elaborated further below.

Task A1: Identify other relevant plans, programmes and sustainability objectives

The policies in the Draft Local Plan are likely to be influenced by other relevant international, national and regional legislation and policies. The Scoping Report lists all the relevant legislation and policies and their key objectives and details the way in which the Draft Local Plan will take these objectives into account during its preparation.

Task A2: Develop relevant social, environmental and economic baseline information

Data on relevant social, environmental and economic conditions in the borough, termed as 'baseline information' provides the basis both for identifying emerging or existing sustainability issues and determining sustainability objectives which will be used to conduct the sustainability appraisal of the Draft Local Plan. The Scoping

Report contains current data on the social, environmental and economic conditions of the borough obtained from a number of sources including the 2011 census.

Task A3: Identify key sustainability issues

The baseline information referred to above provides the evidence base from which existing and emerging sustainability (social, environmental and economic) issues in the borough are identified. Some sustainability issues are of greater significance than others and as such, attention will be drawn to these issues within the Sustainability Appraisal.

Task A4: Develop the SA framework

The sustainability issues facing the borough have formed the basis for developing a set of sustainability objectives ('SA objectives'), which will be used to appraise the Draft Local Plan. The SA objectives are a recognised way of considering the environmental effects of the Draft Local Plan and comparing the effects of identified, viable alternatives. The identified SA objectives will help show whether the objectives and policies of the Draft Local Plan will contribute towards achieving sustainability. Additionally, the SA objectives, which are expressed in the form of targets wherever possible provide the framework for the development of indicators which can measure the extent of the achievement of the sustainability objectives during the implementation of the Draft Local Plan. The SA objectives have also been tested amongst themselves to help identify any tensions and incompatibilities that may exist between these.

Task A5: Consulting on the scope of the SA

The Scoping Report will be issued to the statutory consultees and other relevant stakeholders along with a covering letter clarifying their input and requirements within the statutory five-week period. Specific consultation questions have been included within the document and on a separate form to assist consultees with their responses.

Task A6: Testing the Plan objectives against the SA framework

The Draft Local Plan contains a draft set of strategic objectives. These have been tested against the SA objectives to identify any potential tensions and incompatibilities. However, these objectives may be refined further based on progress and consultation.

1. Introduction

The London Borough of Hammersmith & Fulham has commenced revision of its principal planning policy documents that will guide development across the borough over the long term.

This revision will involve the production of a planning policy document, termed as the Draft Local Plan which, among other things amalgamates the adopted Core Strategy (adopted in October 2011) and the Development Management Draft Local Plan (adopted in July 2013) into one document.

Upon adoption, the Draft Local Plan will comprise part of the suite of statutory planning policies that will guide development across the borough over the long term. All the policies that are proposed for retention in the Draft Local Plan have been reviewed to ensure their continued applicability. Additionally, the Draft Local Plan also introduces new policies that relate to specific areas identified for regeneration.

There is a statutory need to prepare a sustainability assessment of the Draft Local Plan in order to ensure that social, environmental and economic considerations are taken into account during all the stages of the plan's preparation. The sustainability appraisal process itself follows a prescribed staged approach. This document represents the first stage in this process, setting out the context, the sustainability issues facing the borough and the proposed sustainability objectives against which the policies in the Draft Local Plan will be assessed.

2. Statutory requirement to prepare Sustainability Appraisal

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.

2.1 EU Statutory framework

The (SEA) Directive 2001/42/EC (the 'SEA Directive')² 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.

2.2 National statutory planning framework

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

² Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment ('the SEA Directive')

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.

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.'

3. Purpose and Function of the Sustainability Appraisal process and this Scoping Report

3.1 Purpose of Sustainability Appraisal process

The overall purpose of the sustainability appraisal process is to appraise the social, environmental and economic effects of the Draft Local Plan at all stages of its preparation. This will help ensure that upon adoption and implementation the Draft Local Plan will contribute to achieving sustainable development. As such, the sustainability appraisal is integral to the plan making process. It should:

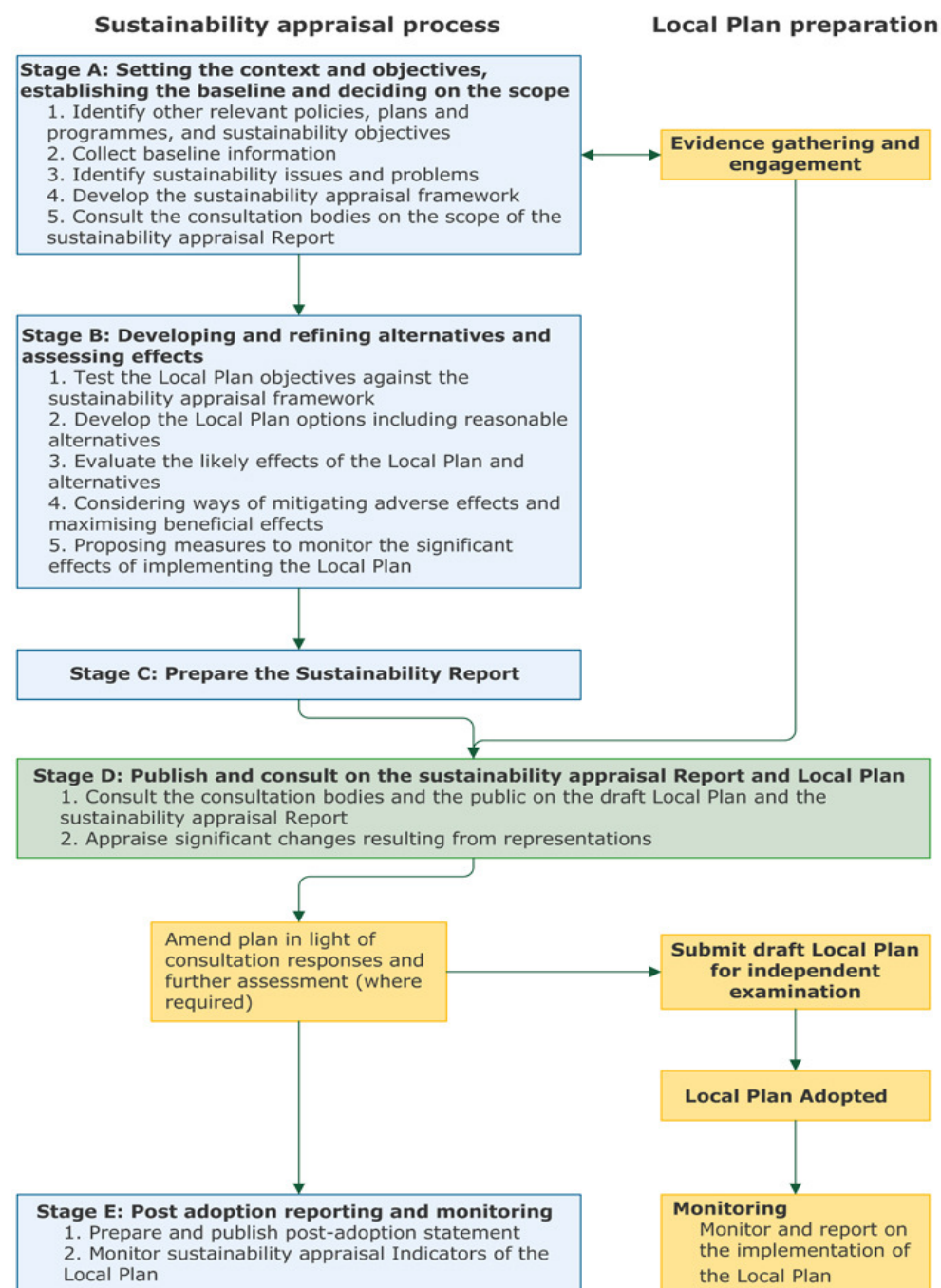
- reflect global, national and local concerns;
- form an integral part of all stages of plan preparation³;
- take a long term view of how the area covered by the Plan is expected to develop, taking account of social, environmental and economic effects of the proposed plan
- perform a key role in providing a sound evidence base for the Draft Local Plan;
- be transparent and open to public participation;
- provide a mechanism for ensuring that sustainability objectives are translated into sustainable planning policies;
- provide an audit trail of how the plan has been revised to take account the findings of the SA
- inform the decision making process to facilitate the evaluation of alternatives; and

³ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001.

- help demonstrate that the plan is the most appropriate given the reasonable alternatives.⁴

The SEA Directive identifies five discrete stages in the preparation of a Sustainability Appraisal as detailed in Figure 1 below. This Sustainability Appraisal Scoping document constitutes Stage A in this process.

Figure 1: Stages in the SEA/SA process



⁴ PAS Sustainability Appraisal Guidance, <<http://archive.pas.gov.uk/pas/core/page.do?pageld=152450>> (accessed 20 December 2013)

3.2 Purpose of this Scoping Report

The purpose of this Scoping Report is to set out the framework of the sustainability appraisal which will be used to assess the overall sustainability of the policies in the Draft Local Plan.

Upon finalisation, following consultation with relevant stakeholders, the final Scoping Report will establish the framework for the next stages of Sustainability Appraisal by:

- assessing how the Draft Local Plan policies relate to other relevant plans and programmes;
- setting out the broad environmental, social and economic characteristics of the borough of Hammersmith and Fulham;
- identifying sustainability issues particular to the borough;
- developing sustainability objectives against which the Draft Local Plan policies may be assessed; and
- assessing the objectives of the Draft Local Plan against the identified sustainability objectives.

A SA Progress Report and a final SA report will accompany the final version of the Draft Local Plan that is submitted for examination. The Hammersmith & Fulham Authority's Monitoring Report (AMR) will provide the means by which to monitor the Sustainability indicators identified in this Scoping Report on an annual basis.

3.3 Structure of the Scoping Report

The structure of this Scoping Report mirrors the key steps detailed in Stage A of the SA process above. These steps are listed below.

Task A1: Identify other relevant policies, plans, programmes (PPPs) and sustainability objectives

The policies in the Draft Local Plan are likely to be influenced by other relevant international, national and regional legislation and policies. The Scoping Report lists the relevant legislation and policies and their key objectives and details the way in which the Draft Local Plan will take these objectives into account during its preparation.

Task A2: Develop relevant social, environmental and economic baseline information

Data on relevant social, environmental and economic conditions in the borough, termed as 'baseline information' provides the basis both for identifying emerging or existing sustainability issues and determining sustainability objectives which will be used to conduct the sustainability appraisal of the Draft Local Plan. The Scoping Report contains current data on the social, environmental and economic conditions of the borough obtained from a number of sources including the 2011 census.

Task A3: Identify key sustainability issues

The baseline information referred to above provides the evidence base from which existing and emerging sustainability (social, environmental and economic) issues in the borough are identified. Some sustainability issues are of greater significance than others and as such, attention will be drawn to these issues within the Sustainability Appraisal.

Task A4: Develop the SA framework

The sustainability issues facing the borough have formed the basis for developing a set of sustainability objectives ('SA objectives'), which will be used to appraise the Draft Local Plan. The SA objectives are a recognised way of considering the environmental effects of the Draft Local Plan and comparing the effects of identified, viable alternatives. The identified SA objectives will help show whether the objectives and policies of the Draft Local Plan will contribute towards achieving sustainability. Additionally, the SA objectives, which are expressed in the form of targets wherever possible provide the framework for the development of indicators which can measure the extent of the achievement of the sustainability objectives during the implementation of the Draft Local Plan. The SA objectives have also been tested amongst themselves to help identify any tensions and incompatibilities that may exist between these.

Task A5: Consulting on the scope of the SA

The Scoping Report will be issued to the statutory consultees and other relevant stakeholders along with a covering letter clarifying their input and requirements within the statutory five-week period. Specific consultation questions have been included within the document and on a separate form to assist consultees with their responses.

Task A6: Testing the Plan objectives against the SA framework

The Draft Local Plan contains a draft set of objectives. These have been tested against the SA objectives to identify any potential tensions and incompatibilities. However, these objectives may be refined further based on progress and consultation on the SA Plan.

Task A1: Identifying other relevant Policies, Plans, Programmes and Sustainability Objectives

TASK A1: Identifying other relevant Policies, Plans, Programmes (PPPs) and Sustainability Objectives.

The Scoping Report should provide information on the Draft Local Plan's 'relationship with other relevant policies, plans and programmes' and their 'environmental protection objectives, established at international, (European) Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.'⁵

A list of relevant policies, plans and programmes is provided in Table 1 below. A table containing the summaries of the objectives of key policies is provided in Appendix 1. This list will be kept under review during the SA process and updated as appropriate.

TABLE 1: Related Policies, Plans and Programmes

International Policies, Plans and Programmes

Conservation of Natural Habitats of Wild Fauna and Flora Directive 92/43/EEC
The Wild Birds Directive 2009/147/EC
The Convention on Biological Diversity 93/626/EEC
The EU Water Framework Directive 2000/60/EC
Ambient air quality assessment and management Directive 1996/62/EC
Limit values for sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air Directive 1999/30/EC
Air Quality Directive 2008/50/EC
Environmental Noise Directive 2002/49/EC
Approval of the Kyoto Protocol on Climate Change Decision 2002/358/EC
Allocation of emission levels under the Kyoto Protocol Decision 2010/778/EU
Landfill Directive 1999/31/EC
EU Renewable Energy Directive 2001/77/EC
EU Energy Efficiency Directive 2012/27/EU
EU Floods Directive 2007/60/EC
Pan-European Biological and Landscape Diversity Strategy 2003
Mainstreaming sustainable development into EU policies: Review of the European Union Strategy for Sustainable Development 2009
European Spatial Development Perspective 1999
Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system, White Paper 2011
European Landscape Convention 2000
Proposal for a new EU Environment Action Programme to 2020 - "Living well, within the limits of our planet" 2012
The Johannesburg Declaration on Sustainable Development 2002
Living Planet Report 2012 – Biodiversity, biocapacity and better choices

⁵ Regulation 12(3), Environmental Assessment of Plans and Programmes Regulations 2004

National Policies, Plans and Programmes

National Planning Policy Framework 2012
Technical Guidance to the National Planning Policy Framework 2012
Planning policy for traveller sites 2012
PPS 10: Planning for Sustainable Waste Management 2011
Planning for Renewable Energy: A Companion Guide to PPS22 2004
Planning for Sustainable Waste Management: A Companion Guide to PPS10 2006
Planning for Town Centres: Practice guidance on need, impact and the sequential approach 2009
Historic Environment Planning Practice Guide to PPS5 2010
Planning for climate change – guidance for local authorities 2012
Practice Guide to PPS25 on Development and Flood Risk 2009
Good Practice Guide on Planning for Tourism 2006
Localism Act 2011
Public Services (Social Value) Act 2012
'Reuniting health with planning: healthier homes, healthier communities' 2012
UK Sustainable Development Strategy "Securing the Future" 2005
Conservation of Habitats and Species Regulations 2010
Biodiversity 2020: A strategy for England's wildlife and ecosystem services 2011
UK Biodiversity Action Plan (UK BAP) 1994
UK Post-2010 Biodiversity Framework 2012
Transport White Paper – "Creating Growth, Cutting Carbon: making sustainable local transport happen" 2011
Draft aviation policy framework 2012
The Wildlife and Countryside Act (as amended) 1981
Sustainable Communities Act 2007 (as amended)
UK Energy Efficiency Strategy 2012
Climate Change Act 2008
UK Climate Projections 2009
The Air Quality Strategy (Volume 2) 2007
Air Pollution: Action in a Changing Climate 2010
National Flood and Coastal Erosion Risk Management Strategy for England
Natural England Corporate Plan 2012-2015
The Code for Sustainable Homes: Setting the Sustainability Standards for new homes 2008
The Code for Sustainable Homes: Technical Guide 2012
English Heritage Corporate Plan 2011 - 2015
Suburbs and the Historic Environment 2007
Guidance on Tall Buildings 2007
The Water Resources Act 1991
The Water Act 2003
Flood Risk Regulations 2009
Flood and Water Management Act 2010
Healthy Lives, Healthy People: Our Strategy for Public Health in England
CL:AIRE Definition of Waste: Development Industry Code of Practice 2011
The Plan for Growth 2011
A Practical Guide to the SEA Directive 2006
"The Natural Choice: Securing the value of nature" White Paper (2011)
Planning Practice Guidance: Advertisements (2014)
Planning Practice Guidance: Air quality (2014)
Planning Practice Guidance: Appeals (2014)

Planning Practice Guidance: Assessment of housing and economic development needs (2014)
Planning Practice Guidance: Assessment of land availability (2014)
Planning Practice Guidance: Before submitting an application (2014)
Planning Practice Guidance: Climate change (2014)
Planning Practice Guidance: Conserving and enhancing the historic environment (2014)
Planning Practice Guidance: Consultation and pre-decision matters (2014)
Planning Practice Guidance: Crown Development (2014)
Planning Practice Guidance: Design (2014)
Planning Practice Guidance: Determining a planning application (2014)
Planning Practice Guidance: Duty to cooperate (2014)
Planning Practice Guidance: Ensuring effective enforcement (2014)
Planning Practice Guidance: Ensuring the vitality of town centres (2014)
Planning Practice Guidance: Environmental Impact Assessment (2014)
Planning Practice Guidance: Flexible options for planning permissions (2014)
Planning Practice Guidance: Flood Risk and Coastal Change (2014)
Planning Practice Guidance: Hazardous Substances (2014)
Planning Practice Guidance: Land remediation (2014)
Planning Practice Guidance: Lawful development certificates (2014)
Planning Practice Guidance: Light pollution (2014)
Planning Practice Guidance: Local Plans (2014)
Planning Practice Guidance: Making an application (2014)
Planning Practice Guidance: Minerals (2014)
Planning Practice Guidance: Natural Environment (2014)
Planning Practice Guidance: Neighbourhood Planning (2014)
Planning Practice Guidance: Noise (2014)
Planning Practice Guidance: Open space, green space and rights of way (2014)
Planning Practice Guidance: Planning obligations (2014)
Planning Practice Guidance: Rural housing (2014)
Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal (2014)
Planning Practice Guidance: Travel plans, transport assessments and statements in decision-taking (2014)
Planning Practice Guidance: Tree Preservation Orders (2014)
Planning Practice Guidance: Use of Planning Conditions (2014)
Planning Practice Guidance: Viability (2014)
Planning Practice Guidance: Water supply, wastewater and water quality (2014)
Planning Policy for Traveller Sites (March 2012)
Planning Practice Guidance for Renewable and Low Carbon Energy (July 2013)
Updated National Waste Planning Policy: Planning for Sustainable Waste Management: Consultation Draft (July 2013)
National Infrastructure Plan 2013 (December 2013)

Sub-Regional Plans and Programmes

Level: Regional Context
The London Plan: Spatial Development Strategy for Greater London 2011
The Mayor's Housing Strategy (draft) 2012
The Mayor's Transport Strategy (draft) 2010
The Mayor's Ambient Noise Strategy 2004
The Mayor's Air Quality Strategy 2010
The Mayor's Biodiversity Strategy 2002
The Mayor's Cultural Strategy 2010
The Mayor's Economic Development Strategy 2010

The Mayor's Climate Change Mitigation and Energy Strategy 2011
The Mayor's Climate Change Adaptation Strategy (draft) 2010
London Biodiversity Action Plan 2001
Sub Regional Development Framework for the south sub region 2006
Thames Waterway Plan 2006-2011
Thames Corridor Catchment Abstraction Management Strategy 2004
Thames River Basin Management Plan 2009
Thames Catchment Flood Management Plan 2009
The Thames Estuary 2100 Plan 2012
The Lower Thames Flood Risk Management Strategy (draft) 2010
London Strategic Parks Project 2006
Transport Assessment Best Practice Guidance 2010
A New Way to Plan – Travel planning for new development in London 2010
Managing Freight Effectively: Delivery and Servicing Plans 2010
The Mayor's Equality Framework 2009

Local authority Policies, Plans and Programmes

Level: Local Context
Core Strategy 2011
Development Management Local Plan 2013
Planning Guidance Supplementary Planning Document 2013
Community Strategy 2007-14
Community Strategy 2014-2022 (Draft)
Housing Strategy 2012
Housing Allocation Scheme 2012
Homelessness Strategy 2012
Contaminated Land Strategy 2001
Economic Development Strategy 2007-2012
Earls Court and West Kensington Opportunity Area Joint SPD 2012
White City Opportunity Area Planning Framework 2013
South Fulham Riverside Regeneration Area SPD 2013
A Transport Plan for H & F (LIP 2) 2011-2031
Air Quality Progress Report and Air Quality Action Plan Review (April 2011)
Biodiversity Action Plan (2004)
Parks and Open Spaces Strategy 2008-2018 (May 2008)
Parks Capital Programme 2013/16 (April 2013)
Hammersmith and Fulham CSPAN Physical Activity Strategy 2011-2016 (November 2011)
A Water Management Policy for Hammersmith and Fulham (September 2013)
Contaminated Land Strategy (2001)
Housing Strategy: Building a Housing Ladder of Opportunity (October 2012)
Economic Development Strategy (2007)
Third Sector Strategy (2009)
Children and Young People's Plan 2009 Review (March 2010)
Schools Organisational Strategy 2012/13 (January 2013)
Community Safety Strategy (2005)
Hammersmith and Fulham Crime Reduction Partnership Plan 2008-2011 (June 2008)
Hammersmith and Fulham Community Safety Partnership Strategic Assessment 2012-15 (April 2012)
LBHF Strategic Flood Risk Assessment (2010)
Surface Water Management Plan (January 2014)
Park Royal Opportunity Area Planning Framework (January 2011)
Conservation Area Character Profiles
Thames Strategy Kew to Chelsea.(2002)

Old Oak: A Vision for the Future (June 2013)
Revised Statement of Community Involvement in Planning (October 2013)
Local Economic Assessment (pending?)
NHS Hammersmith and Fulham Strategic Plan 2009-2014 (November 2009)
Better Care Closer to Home. Our Strategy for Coordinated, High Quality Out of Hospital Care. Hammersmith and Fulham. 2012-2015. (October 2012)
Secretary of State for Health Decision on Shaping a Healthier Future (October 2013)
Joint Health and Wellbeing Strategy (Consultation Draft June 2013 OR January 2014)

A1.1 Key findings of the analysis of relevant policies, plans and programmes

The objectives of the abovementioned PPPs have been reviewed as part of the preparation of this Scoping Report to:

- help establish the sustainability objectives in the Scoping Report;
- ensure that these objectives do not conflict with the objectives of the PPPs; and
- highlight areas of potential conflict which may need to be addressed.

The PPPs listed above will influence the development of the policies in the Draft Local Plan in varying degrees, depending upon their relevance and applicability to the social, environmental and economic characteristics of the London Borough of Hammersmith & Fulham.

The clear hierarchy between the PPPs ranging from high level international Conventions and European legislation and Directives to the sub-regional and local borough plans will also influence the degree to which the Draft Local Plan will have regard to these PPPs. Generally, national legislation and policies and regional and Draft Local Plans will have a greater direct relevance and influence on the Draft Local Plan. The higher level international conventions and European legislation and directives will exert a more indirect influence by shaping national legislation and policies themselves. To illustrate this, the requirements of International Conventions and European legislation and directives have already been considered in the preparation of national legislation and planning policy and the Mayor's London Plan and other Mayoral policies. The Draft Local Plan must conform with these national and regional statutory instruments and in so doing will thereby be consistent with the objectives of relevant high level international conventions and European legislation and policies.

Additionally, during the course of its development, the Draft Local Plan will be subjected to a rigorous statutory consultation process. The consultation will involve a number of consultees, including prescribed government agencies, neighbouring local authorities and relevant departments within Hammersmith & Fulham council itself. The agencies and other bodies that are consulted will be familiar with the requirements of both higher and lower level legislation and policies and can be expected to comment on how the Draft Local Plan takes account of these. The statutory consultation process therefore provides a useful additional mechanism to help ensure that the final version of Draft Local Plan conforms to all relevant PPPs.

Notwithstanding the above, the review of the objectives of the identified PPPs indicates that the policy framework of the Draft Local Plan should take account of the following elements and principles:

- The principles of Sustainable Development;
- The need to address climate change by aiming to reduce carbon dioxide emissions to move towards a low carbon economy in sectors including building design, transport and energy;
- Mitigating the likely harmful effects of climate change at borough level, notably by taking measures to reduce flood risk and the effects of heat waves;
- Protecting and enhancing local biodiversity wherever possible by planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;
- Aiming to reduce carbon dioxide emissions by improving waste management and recycling and improving efficiencies in the consumption of energy, water and materials;
- Aiming to reduce and better manage all types of pollution including air, water, noise and land pollution and contamination;
- Promoting sustainable economic development by protecting viable employment sites and regenerating suitable areas;
- Aiming to provide a mixture of new housing types and tenure to allow people from diverse backgrounds better access to the housing market; and
- Conserving and enhancing the historic built environment of the borough wherever appropriate to do so.

Consultation Question

1. Are there any other relevant policies, plans or programmes, in addition to those listed that are likely to affect or influence the Sustainability Appraisal?

Task A2 – Collecting Baseline information

Task A2 Collecting Baseline Information

A2.1 The collection of baseline information

Data on relevant social, environmental and economic conditions in the borough, termed as 'baseline information' provides the basis both for identifying emerging or existing sustainability issues and determining sustainability objectives to address these issues, which will be used to conduct the sustainability appraisal of the Draft Local Plan. The data presented below provides a broad overall picture of the conditions in the borough and the key challenges that have been identified.

A2.2 Characteristics of the London Borough of Hammersmith & Fulham

Hammersmith and Fulham is an Inner London borough in a strategic location on the transport routes between the City and Heathrow. The borough is oriented north-south with most major transport links, both road and rail carrying through traffic east-west across the borough. Some of the busiest road junctions in London are located in the borough at Hammersmith Broadway, Shepherd's Bush and at Savoy Circus and the borough suffers disproportionately from the effects of through traffic. However north-south movement in the borough is less well served.

The borough benefits from a long frontage along the River Thames (7km/4 ½ miles) and from a section of the Grand Union Canal in the north of the borough. These waterways enhance the environment and character of the borough and provide the potential for further benefit to the borough.

The borough is an area of contrasts, of wealth and poverty, and of attractive environments, many of which are protected by conservation designations and other areas that are less attractive and are in need of improvement. It has at least four distinct areas each with their own character - Fulham, Hammersmith, Shepherd's Bush and the area to the north of Wormwood Scrubs – the College Park/Hythe Road area. In addition, there are five designated regeneration areas which overlap with these areas:

- The White City Opportunity Area;
- The Fulham Regeneration Area (including Earls Court and West Kensington Opportunity Area);
- The Hammersmith Town Centre; and
- The South Fulham riverside and Old Oak Opportunity Area.

The council has identified these regeneration areas as offering future growth potential. It is likely that these areas will face some of the key challenges for sustainable development.

The People

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). According to the 2012 GLA Population projections (SHLAA),⁶ the Borough population is expected to increase by 13,680 people (7.5%) between 2011 and 2021; this compares to 9.7% increase in London as a whole. The further projected increase in population between 2021 and 2031 is 6%; the same level as London average.

While there will be growth in the Borough population in all age groups, the main growth will occur for ages between 85 and over. The population of that age group is expected to increase by 1,840 by 2031, equivalent to 91%. The population aged 65 to 84 is expected to grow by 31% during the same period, and population aged 50 to 64 to grow by 27%.

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%.

date

The Economy

Hammersmith and Fulham's economy is part of the wider London and West London economic area. The borough occupies a favourable location in west London and is attractive to a variety of businesses. It has enjoyed significant growth in employment and economic activity over the last three decades with the central Hammersmith area becoming an important sub-regional location for offices.

In 2011, 121,753 people worked in the borough which is an increase from the 107,900 people employed in the borough in 2003 (Annual Business Inquiry).

The BBC is one of the largest employers within Hammersmith and Fulham in and around the White City area, the equivalent of almost 9.4% of employment in the borough. The potential move of the BBC from the borough will have a significant impact on the local economy and competitiveness of the area.

The development of the Westfield Shopping centre has seen an increase in importance of the retail sector in the borough, and Westfield also provide approximately 8,000 jobs. Other key employers include education and health providers. The latter having expanded its research facilities in recent years.

In recent decades there has been a substantial change in the composition of businesses with a significant decline in traditional manufacturing, whilst the publishing, printing and recorded media sector has grown. Smaller firms have become much more important; 13.3% worked in the borough 'micro enterprises' (less than 10 employees) and these make up 90% of the total enterprises of the borough. At the other extreme, 58.4% of all employees work in large enterprises with more than 250 or more employees.

⁶ Linked to development trajectories from the Strategic Housing Land Availability Assessment (SHLAA)

Challenges

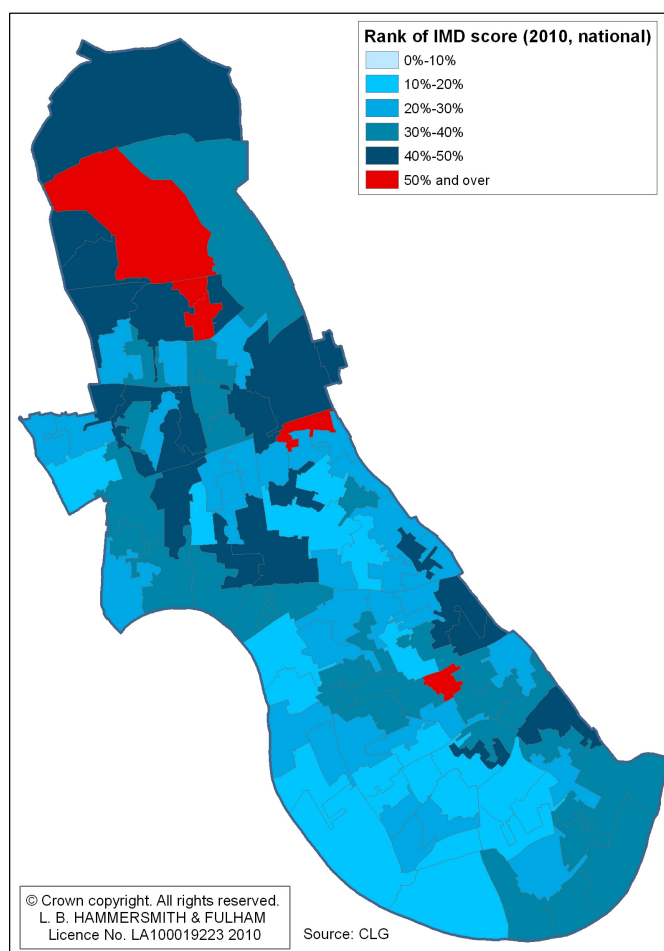
The key challenges that the Draft Local Plan aims to address are provided below:

Reducing deprivation and polarisation

The borough has high levels of deprivation and social and economic polarisation. It is ranked 31st most deprived local authority area in the country in 2010 (38th in 2007 and 42nd in 2004) and there are significant pockets of deprivation, particularly in the north of the borough. Four (4%) of the borough's Lower Super Output Areas (LSOAs) – Lower Super Output Areas are used by the Office of National Statistics (ONS) to identify local neighbourhoods of about 700 households) are within the top 10% most deprived nationally. Four of these comprise major public sector housing estates: White City, Wormholt, Clem Atlee and Charecroft.

A further 23% of the borough's LSOAs are in the 10-20% worst nationally. Most of these areas are in the north of the borough, but also extend into parts of Hammersmith and north Fulham (see Map 1).

Map 1 – Levels of deprivation by LSOA



H&F not only has high levels of deprivation, but it is a very polarised borough. For example, in the last census 41.6% of household heads classified themselves as “managers or professionals”, while more than a quarter said they were entirely dependent on benefit.

Some 27.1% of households in H&F depend on less than £20,000 per annum compared to 29.9% for London and 36.3% for Great Britain. Just over 40% of borough households have a unequalised household income between £20k and £50k per year and 17.5% have an income between £50k and £75k per year. Fifteen percent of households have an income greater than £75k per annum; this is equivalent to more than 12,000 households.

Until the 1970s, social housing and council estates tended to be occupied by households with a greater mix of incomes than is now the case. The mix of social housing tenants has come to include proportionally more people on lower incomes, some experiencing multiple deprivation. Approximately 70% of social housing tenants in Hammersmith & Fulham are currently workless and dependent on benefits and they make up the largest single group within the estimated 20,250 (2008) workless residents in the borough. Nearly 4,000 lone parents are dependent on benefits.

Deprivation and low household incomes also impact on health inequalities and result in high levels of child poverty. About 27% of people are in poverty in H&F compared to 51% of children in poverty. Childhood poverty in H&F does not follow the general north-south divide, but is much more scattered geographically across the borough. In 2005 over 10,000 children were living in families receiving means-tested benefits.

In 2013, 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 15% and 12% respectively.

Further details of the health, wellbeing and social care needs of the borough can be found in the Joint Strategic Needs Assessment 2009/10 carried out by the council and NHS Hammersmith and Fulham (now NHS Hammersmith & Fulham Clinical Commissioning Group).

Increasing housing supply and diversifying tenure

The very high cost of private sector housing in the borough means that there are very few opportunities for households on low to middle incomes to progress up the housing ladder from private and social renting to homeownership. Many younger households either have to move out of the borough when they no longer want to share with others or need a larger house, or they look to be housed in social housing. This lack of opportunity for homeownership for low and middle income households increases economic and social polarisation in the borough. Hammersmith & Fulham has increased its stock of social rented housing by nearly 7% since 1981 and approximately one third of the housing stock is now social rented housing (31%) compared to an average of 24.1% in London. Social rented housing is particularly concentrated in the north of the borough, where over 40% of the housing is in this tenure. Shared ownership and other intermediate low cost housing only makes up 1.6% of housing stock in the borough (Census 2011).

Another issue in relation to housing supply is the continuing need for family size social rented housing when compared to the council's and the housing associations' stock of social rented housing. 40% of council stock is one bedroom accommodation and the Registered Provider stock is relatively small, the average size of all Registered Provider stock (12,220 units) is 3 rooms, compared to the average for private sector dwellings of 4.2 rooms.

Improving the quality of housing

About two thirds of the housing stock in H&F is owned by the private sector. About 85% of this private housing stock is over 60 years old and about two thirds of the dwellings constitute flats.

Nearly one fifth of the borough's private sector housing does not meet the government's decent homes standard. The decent homes standard considers four main factors – disrepair, unfitness, modern facilities and thermal comfort. In the private sector, improvements to energy efficiency will be mainly through government legislation and initiatives, for example through the building regulations and programmes such as Renew, Warm Front and through private investment. Planning policies can help to ensure that new housing is built to meet higher standards of energy efficiency and accessibility.

Nearly a quarter of council rented dwellings are in 66 high rise blocks and a further 60% are within 1,213 medium rise blocks. The properties are largely based within inward looking large estates with non-permeable layouts as opposed to traditional streets. Whilst amenity space is provided, this is often poorly designed and has become unattractive, underused or misused space. The council's experience of the redevelopment of a small number of social housing blocks over the past 15 years has demonstrated that the application of modern planning and design principles results in an increase in numbers of homes can be achieved, with an improvement to the communal space and environment through making better use of land previously used for pram sheds and other ancillary outbuildings.

Recent satisfaction surveys indicate that residents on the council's housing estates have significantly lower levels of satisfaction with their neighbourhood than the borough average.

The way that public housing has been funded in the past means that new housing built over the past 20 years or so has tended to be smaller sized units. This has meant that overcrowding has become an issue as families grow and cannot move on to more suitable accommodation, which can impact on the health of residents. As a result, there is need for more family sized housing in the borough both from new and existing demand; this also applies across low income households who wish to rent or purchase.

The national Decent Homes programme is ensuring that council owned housing meets a minimal quality standard. However in the long term there is an issue about the level of expenditure that will be needed to ensure that the properties are fit for purpose and will meet the changing aspirations of residents for accessible and energy efficient homes within a decent, safe environment. Current investment planning projections show that just maintaining the stock at decent homes standard will be a challenge for the council over the next 30 years. The structure and layouts of existing blocks also limits the opportunity to further improve energy efficiency and

accessibility. As a result, the properties compare unfavourably with new build homes which are achieving much higher levels of energy efficiency.

The design of the current social housing stock also makes it difficult to increase the number of dwellings that are accessible to residents who need to use a wheelchair. Of 508 medium-rise mansion or deck access blocks only 85 (17%) have lift access. Retrofitting lifts to blocks that were not designed to have such a facility is often difficult, if not impossible, and where possible, the cost of installation is prohibitive. Access ways into blocks and homes are not wide enough and there are often stairs and raised thresholds which would need to be removed to allow full access. New homes are being built to a Lifetime Homes standard which offers residents the opportunity to remain in their home regardless of their changing circumstances.

Maintaining the economy and increasing local employment

The Draft Local Plan needs to provide the conditions for businesses to thrive to ensure that there is a broad range of employment opportunities and for the qualifications and skills of local people to be improved so that the levels of worklessness can be reduced. It also needs to continue to contribute to London's world city role.

H&F has developed as a centre for a range of creative and media industries, due partly to the presence of the BBC in the White City area but also to good transport links. There is the potential to further develop these activities. Many of the sites that were previously designated for employment uses are no longer appropriate for the location of H&F's new employment activities, particularly offices and creative activities. The areas that are most appropriate for growth are those areas with high levels of public transport accessibility.

Hammersmith Hospital and Imperial College Healthcare NHS Trust provide a significant potential for expansion of medical research and for related activities to be established in the borough.

The continued growth of the local economy and the regeneration of deprived and run down parts of the borough depends on improvement in access and the reduction of the adverse effects of traffic congestion, especially on north-south routes.

Regenerating town centres and local centres

The main challenge in relation to the town centres – Hammersmith, Shepherd's Bush and Fulham - is the need for their regeneration and better utilisation of sites within the designated town centres to ensure the continued provision of a wide range of high quality retailing, services, arts and cultural and other leisure facilities to serve local residents, visitors and workers.

The regeneration of the Shepherd's Bush Market is a priority as it will improve the attraction of Shepherd's Bush Town Centre and act as a catalyst for further integration of the Westfield centre with the older part of Shepherd's Bush Town Centre.

There have been public realm improvements in all three town centres and others are planned, and there is a need for regeneration to respect local context as well as

provide for further improvements to increase the vitality and quality of each centre. The economic health varies in different parts of each town centre and specific policies and intervention is needed to improve these areas.

There is also a concern that too many independent and specialist shops and services are being displaced by retail chains and that there is little difference in offer between centres.

Despite the variation between the different centres, there are common challenges which affect the centres to a greater or lesser extent including:

- Pressure to change from shopping to other uses;
- Ensuring that the network of local centres and other parades and shops are easily accessible to local residents so that they are able to reach local shops and services easily and safely
- A desire for a wider range of shops, particularly independent shops and services that are valued by local residents;
- In some centres and parades too many vacant shops and premises and poor quality environment;
- Concern about takeaways close to schools and the potential impact on children's health; and
- Underutilisation of sites and older premises.

Developing the regeneration areas

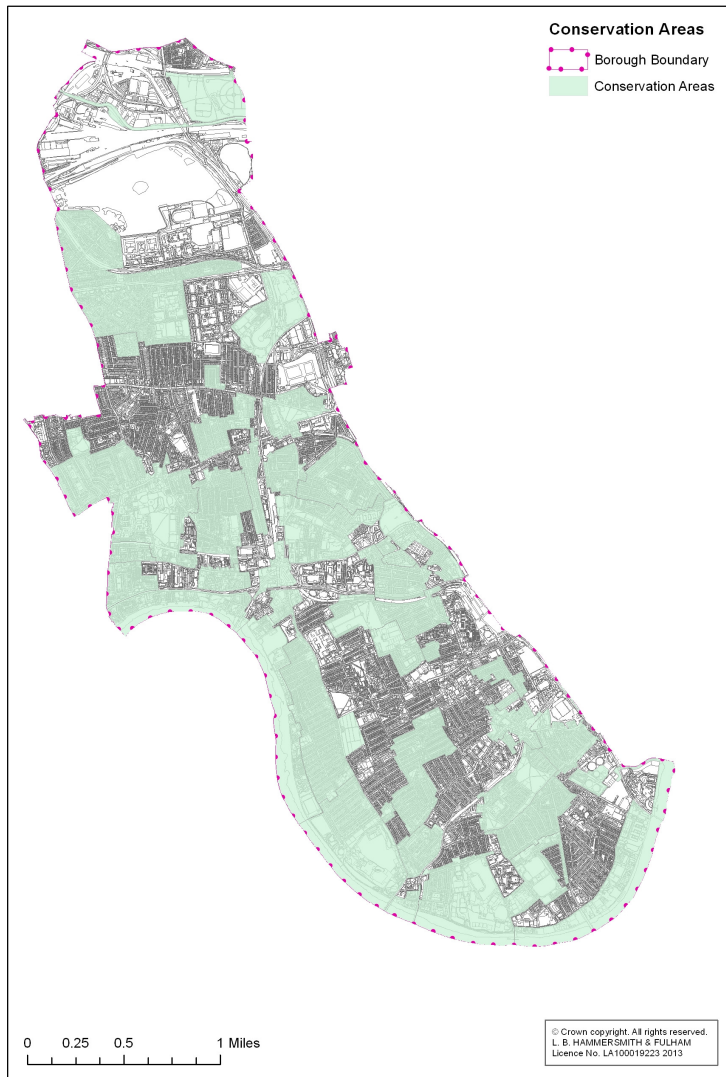
The five regeneration areas in the borough, namely Old Oak, White City, Hammersmith Town Centre, Earls Court and West Kensington and South Fulham Riverside, offer significant opportunities for growth in terms of new housing, employment and provision of supporting infrastructure. The areas are at different stages of development and will require careful management for at least the next 20 years. Plans for Earls Court and West Kensington are well advanced, but for Old Oak in particular, regeneration plans are longer term and subject to provision of much improved transport infrastructure in the form of HS2, Crossrail and associated improvements. White City is also well advanced. In all areas there will be housing to meet the borough's needs, jobs, supporting community facilities, local shopping, open space and transport provision. In all cases it will be important for the new development to integrate seamlessly with the rest of the borough and west London.

Improving the quality of the local environment

The quality of the local environment is a key issue for many local people and businesses and is influenced by many factors. The borough's heritage, streets, buildings, open spaces and waterways give H&F its character and sense of place. The borough's rich and varied townscape that is evident today is largely a result of its historical development. The River Thames was the major influence on early settlement patterns in the borough and it remains a major asset in the environmental quality of Hammersmith and Fulham. Most of the borough's built fabric dates from the extensive building programmes in the nineteenth and early twentieth centuries and it has maintained a much-valued built heritage, much of

which falls within the borough's 45 designated conservation areas (See Map 2). In many of these areas, the street provides a sense of scale and the setting for the consistent terraces of uniform architectural design.

Map 2 – Designated conservation areas



Within the borough, there are approximately 500 statutorily Listed Buildings and approximately 2,150 locally designated Buildings of Merit, as well as a number of archaeological priority areas and the ancient monument of the Fulham Palace moated site. The heritage assets make an important contribution to the townscape character of the borough. The town centres at Hammersmith, Fulham and Shepherd's Bush have developed from the earliest patterns of settlement, and now have their own character and sense of place. Their architectural and historic quality is reflected in their conservation area designations. Historically they developed at accessible locations, an advantage that remains today. The areas around these centres, at Fulham in the southern part of the Borough, Hammersmith in the central part of the Borough, and Shepherd's Bush in the northern part, have their own character which reflects their development over time. Each of the areas have strong, identifiable townscape characters defined by their form, grain, building

typology and architectural design. It will be important that the rich and varied character of the Borough is preserved. Any design for proposals in these areas will therefore need to be informed and inspired by careful analysis of the character and form of the specific area in order that it enhances the locality and respects its history.

Although some parts of the borough are very attractive, other areas are of very poor quality. The areas of poor quality often exist within the designated regeneration areas and include:

- Areas of vacant and underused land, such as some riverside sites, transport related sites such as railway sidings and surface level car parks;
- Public and communal areas on some housing estates which are not well used by the residents and often misused by a minority of people;
- The areas adjacent to major roads and railways.

There is the challenge of encouraging redevelopment and regeneration in the borough whilst preserving and enhancing valued local character especially in the areas that are protected by the borough's conservation areas. The provision of green infrastructure in regeneration schemes can help to improve the quality of the local environment.

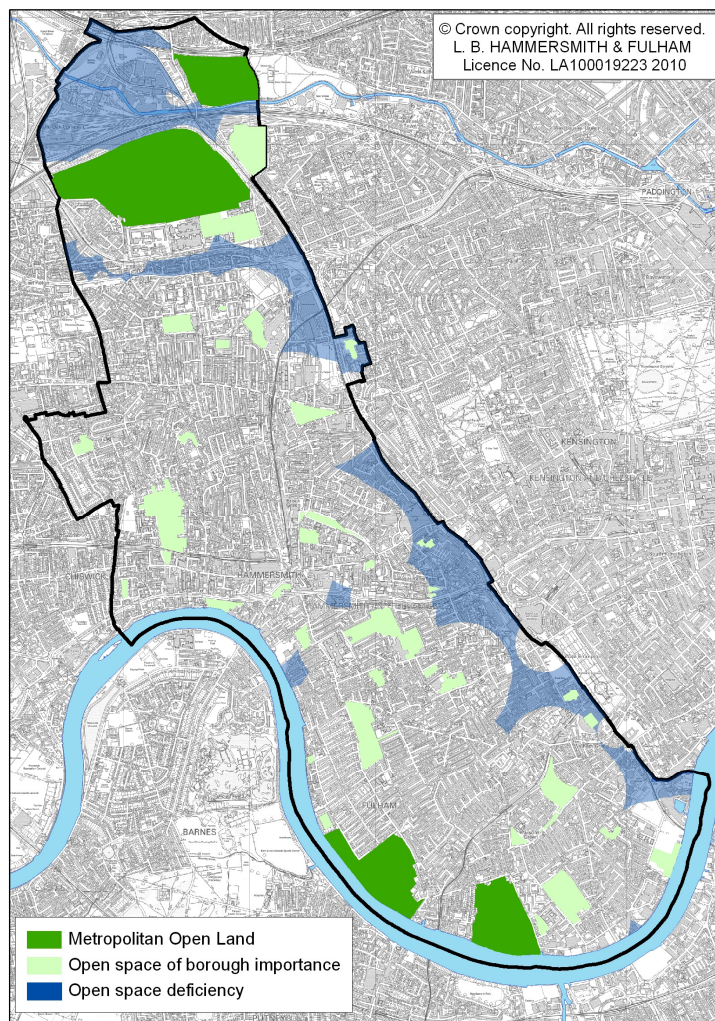
Improving parks and open spaces

H&F has relatively little open space per person, just 231 ha of public open space, or 1.3 ha of open space per 1,000 residents. In some parts of the borough, particularly to the east, many residents do not have convenient access to local parks (See Map 3).

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, such as the new park at Imperial Wharf and within the regeneration areas in general.

Parks and open spaces fulfil a number of different and sometimes conflicting roles – providing for walking and sitting, active play and recreation. Many borough parks and open spaces are also subject to nature conservation area designations.

Map 3 – Areas of poor access to open spaces



Increasing access and use of the River Thames and Grand Union Canal

There are vacant and underused sites and premises along the Thames which have significant potential for more intensive development. However, any development of riverside sites will need to respect the unique character of the river and will need to enhance the vitality of the riverfront whilst improving public access to the Thames for recreation and sporting activities. The Thames Strategy Kew to Chelsea provides detail of the riverside environment, and the Riverside Walk Enhancement Report outlines opportunities for improvement along the river.

H&F has three safeguarded wharves in the south of the borough identified in the London Plan. Only one of these wharves still uses the river for freight movements and one wharf has been vacant since 1997. The London Plan seeks to protect these wharves for cargo-handling uses and all three wharves are designated as safeguarded wharves on the Proposals Map. However, it is the council's view that vacant and under-used wharves should be comprehensively assessed to determine their longer term use as part of the Mayor of London's review of safeguarding in London. A long stretch of the Thames is in the South Fulham Riverside regeneration area.

The Grand Union Canal has many of the characteristics and environmental features of the River Thames. The stretch within the borough lies within the Old Oak Opportunity Area which will be subject to considerable change to accommodate and take advantage of HS2 and CrossRail. The canal is a designated conservation area and nature conservation area and is also a valuable recreational and transport resource which should be enhanced and improved. The challenge for this strategy will be to balance the various functions and roles of the canal and canal side.

Improving the quality of education

H&F project a 16% increase in the child population over the next 10 years. It is estimated that the borough will require 1,050 additional secondary school places by 2018. 600 of these additional school places will be provided by the new Hammersmith Academy. The remaining additional places will be provided at existing schools where some additional capacity can be created. The cancellation of the Building Schools for the Future programme means that the Council will need to ensure that there are other funding sources to ensure that these additional places are provided and the quality of the schools improved.

Additional primary schools will also be needed to support the projected population growth resulting from proposed development, particularly in the Wood Lane and Earls Court areas.

Many of the schools in H&F are built on sites with limited outdoor space and therefore it is important to improve access to and provision of sports facilities in order to improve health and to reduce child obesity levels.

Improving health and reducing health inequalities

Among the key health issues in relation to the council's spatial strategy is the health of residents as well as ensuring that health care is provided to meet the needs of local residents. Life expectancy in the north of the borough is on average 6 years less than in the south. Improving health is not just about providing better facilities, but is also about enabling residents and workers to live and to participate in healthier lifestyles. Tackling overcrowding and poor housing, improving air quality and reducing the impact of climate change can all help to reduce health inequalities in the borough.

Improving the quality and access to recreation facilities

Accessible recreation facilities are very important to local residents and workers, not only for enjoyment but because of their contribution to improving health, particularly children's health. In addition, recreation facilities can provide diversionary activities and help reduce anti-social behaviour and crime.

Of the open space in the borough, just 58.6 ha, a quarter of the public open spaces, is available as outdoor playing space. This equates to 0.34 ha of space per 1,000 residents, which is only 14% of the national standard recommended by the National Playing Fields Association. The difficulty of providing additional open space means that all opportunities to increase the provision or improve access to and the quality of outdoor playing space or other forms of sports provision need to be taken.

Improving the quality and access to leisure activities

H&F has a wide range of arts, cultural and entertainment facilities which are important to both local residents and in some cases to residents of a much wider area. Facilities such as the Apollo, Lyric Theatre, Riverside Studios, Bush Theatre and the three professional football clubs are of London-wide significance. Some of the facilities including the Riverside Studios and the Bush Theatre would benefit from upgrading to ensure that they are high quality venues in the future. The challenge is to enable their renovation or replacement without losing the uses.

Although leisure activities bring many benefits to the local area, including jobs, they can in some cases cause problems for local residents. Pubs and clubs that stay open late and serve alcohol can lead to significant environmental disadvantages including concerns over crime and disorder.

Improving access to community uses

H&F has a wide range of community uses, provided by the public, private and voluntary sectors. These are located across the borough in numerous buildings and spaces of varying quality. Although these uses are a valuable resource they often do not work in a joined up and focused way to meet the needs of vulnerable households.

Therefore as part of the development of area based social regeneration initiatives, the council is assessing whether there is the opportunity to improve the quality and access to community uses-by the co-location of services.

Mitigating the impact of climate change

Climate change is a major long term challenge that needs to be addressed in this Core Strategy and in future development in H&F. The key issue is the reduction in carbon emissions through a range of measures, including transport in the borough, energy efficiency of the building stock and the management of waste and flood risk management.

Significant areas of this borough are subject to some risk of flooding. This is an important consideration in planning for future development in the borough. Climate change, leading to more frequent extreme weather events, increases the risk of flooding in H&F, particularly from surface water and sewer flooding. Government legislation and guidance requires local authorities to plan for all levels and types of flood risk and to adopt a risk based approach to planning. Climate change could also cause impacts such as increased frequency of heatwaves that affect people's health. Consideration of how best to adapt to climate change impacts in addition to flooding, such as heatwaves and drought is also required.

Reducing congestion and improving transport accessibility

The strategic location of the borough and its position in relation to London's transport network means that H&F suffers from the worst road congestion in London. Congestion on north-south routes, particularly the Fulham Palace Road – Shepherd's Bush – Wood Lane – Scrubs Lane corridor is a major issue. The only alternative north-south route in Fulham is North End Road and that is also heavily congested.

Road traffic is one of the main causes of carbon emissions, poor air quality and noise pollution in the borough. Nearly one sixth of carbon emissions in H&F in 2011 was from road transport and pollution levels exceed air quality targets. The other main cause of noise pollution and to a lesser extent air pollution is air traffic and the flightpaths to Heathrow. In 2000 the whole borough was designated an Air Quality Management Area with the aim of meeting the government's national air quality objectives for nitrogen dioxide and particulates. Exposure to high levels of these pollutants has been shown to cause respiratory and cardiovascular diseases. Any further expansion of capacity at Heathrow will also impact on borough residents through increased surface transport congestion, as well as increased noise and air pollution.

Most of the borough has good public transport apart from pockets in the south and particularly the north of the borough, where some borough residents have relatively poor levels of personal accessibility. There is also overcrowding of passenger rail services, particularly at peak times, but increasingly at other times as well. The future growth in the demand for travel will impact on the environment of the borough, including on air quality.

There is also an issue with the lack of access to London Underground services for disabled and other less mobile people. Only 5 of the 14 stations are accessible from the street and one is accessible travelling in one direction only. The provision of a lift at Shepherd's Bush Central Line Station is particularly important in this respect, serving the major transport interchange and Westfield shopping centre; however the council recognises that due to financial constraints this will not be installed in the near future, but remains as a longer term aspiration. The council supports improved provision for cycling and walking as both are environmentally friendly means of transport and can help improve people's health. A key issue is the difficulty of providing attractive and safe routes within and through the borough. The council's Streetsmart design guide will help in the provision of such attractive routes by reducing clutter and providing high quality paving and street furniture.

Consultation Questions

1. Do you agree that the baseline data collected is appropriate in terms of its scope and coverage?
2. Do you recommend whether any additional baseline data should be added?
3. Are there any errors in the baseline data presented?

Task A3 - Identifying Sustainability Issues for the SA/Draft Local Plan to address

Task A3 - Identifying Sustainability Issues for the SA/Draft Local Plan to address

A 'sustainability issue' can consist of any environmental, social or economic problem or uncertainty which needs to be understood and addressed before the plan can be confidently considered to be sustainable. Identifying sustainability issues is critical in helping to determine an informed view on the sustainability of the plan.

Sustainability issues do not need to be precisely defined, but they can include matters which give rise to concern or controversy. On the basis of the issues identified, sustainability appraisal objectives can be defined to test how likely the proposals in the plan and alternative options are to lead to sustainable outcomes. Additionally, the sustainability objectives can also be used as a basis for testing and comparing the effects of alternative options considered in the plan.

Sustainability appraisal objectives which can be derived from these issues may be used to check and refine the plan. In particular they build on the concept of SEA objectives, which are not mandatory but are a widely used tool in SEA for comparing alternatives.

The identification of sustainability issues and problems provides an opportunity to define the key issues for the Draft Local Plan to address. Issues should be identified based on:

- evidence relating to the baseline information;
- earlier experience with issues identified in other plans and programmes;
- identification of possible tensions with other plans, programmes and environmental protection objectives;
- identification of possible tensions between current or future baseline conditions and existing objectives, targets or obligations; and
- consultation with the Consultation Bodies and the public.⁷

The sustainability issues facing the London Borough of Hammersmith & Fulham have been identified from the following sources:

- Issues identified following the review of relevant plans and programmes(see task A1);
- Analysis of baseline data and trends (see task A2);
- Issues identified in the London Borough of Hammersmith & Fulham's Community Strategy, 'Furthering the Borough of Opportunity – A Shared Vision for Hammersmith & Fulham 2014 - 22'(Consultation Draft); and
- Previous responses on the 2008 SA Scoping Report for the Sustainability Appraisal of the Core Strategy.

⁷ 'A Practical Guide to the Strategic Environmental Assessment Directive'(2005) Office of the Deputy Prime Minister. <
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf> (accessed 24 December 2013)

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
Social	<ul style="list-style-type: none"> • Reduce deprivation and polarisation • Improve provision of essential social infrastructure to cater to projected changes in the population(Health, education and sports and leisure facilities) • Reduce crime and anti-social behaviour • Promoting housing opportunities for all by increasing housing supply, home ownership rates and diversifying tenure • Improving housing quality • Reduce the relatively high mortality(early deaths) ratio by improving health outcomes for residents and reducing health inequalities • Reduce the polarisation of employment opportunities and reduce dependency on benefits • Improve the quality of education in state schools • Increase council support for the third sector and volunteering • Improve amenity and quality of life for residents by creating safe and pleasant environments with a strong sense of place
Economic	<ul style="list-style-type: none"> • Reduce unemployment and increase investment in the borough; • Improve the level of education, training and local employment opportunities; • Prevent the loss of viable employment land • Enhance the vitality and viability of town and local centres • Identify and regenerate suitable areas to boost economic investment and employment
Environmental	<ul style="list-style-type: none"> • Improve the quality of the borough's public realm and green spaces and expand the borough's green infrastructure; • Conserve and enhance the borough's natural and built environment • Increase biodiversity across the borough • Reduce congestion and improve transport accessibility • Ensure a high quality public realm and design • Reduce and mitigate the local causes of climate change • Reduce flood risk • Improve efficiency in resource(water, materials and energy) consumption; • Reduction of waste generated and an increase in waste treatment and recycling; • Improving street cleanliness and environmentally responsible behaviour with regard to fly tipping and waste disposal.

Consultation Questions

1. Do you consider there are any other sustainability issues arising from the characterisation of the borough provided in this document that should be incorporated into the sustainability objectives for the Sustainability Appraisal?
2. Do you agree that section A3 of this document correctly identifies the key sustainability issues for Hammersmith & Fulham?
3. Are there any sustainability issues which, in your opinion, should be added, or any that should be removed?

Task A4 - Develop the Sustainability Appraisal Framework – Sustainability Objectives, Indicators and targets

Task A4 - Develop the Sustainability Appraisal Framework – Sustainability Objectives, Indicators and targets

Table 3 below contains the proposed Sustainability Appraisal framework which consists of Sustainability objectives, indicators to measure the achievement of these objectives and targets wherever appropriate to benchmark progress made towards the achievement of the sustainability objectives.

Sustainability objectives

Sustainability objectives are a recognised way of considering the sustainability of the Draft Local Plan's own objectives. The table below lists a number of sustainability objectives which have been derived from an analysis of the sustainability issues facing the borough and any relevant policies, plans or strategies that aim to address these identified issues. Wherever possible, these objectives have been expressed in the form of achievable targets.

Sustainability monitoring indicators and targets

Indicators that can measure the achievement of these objectives are also provided. The sustainability of the Draft Local Plan as it is implemented will be assessed using these indicators. In accordance with the Planning Regulations 2012, information monitored by the Council regarding the implementation of adopted Draft Local Plans will be published in the Authority's Monitoring Report (AMR). Any issues arising from implementation of the Draft Local Plan policies will be reviewed as part of the monitoring process. The effectiveness of the incorporation of sustainability principles as contained in the SA/SEA appraisals will also be monitored by the continued collection of baseline data based on the selected indicators. Sustainability targets have been included wherever appropriate to enable the council to monitor and benchmark progress made towards the achievement of sustainability objectives.

Table 3 – The Sustainability Appraisal Framework – Objectives, Indicators, Monitoring and Targets

Topic	Headline Sustainability Objective	Sustainability sub-objective	Indicators measuring the sustainability objective	Target	Sustainability sub-elements		
					Social	Environmental	Economic
Social justice	1. Increase equity and social justice	<ul style="list-style-type: none"> • Make essential services affordable to all • Reduce differences in standards between different communities • Improve support to groups that are vulnerable and have special needs including those with disabilities 	<ul style="list-style-type: none"> • Proportion of children in poverty 		Y		
Health	2. Improve health of population overall	<ul style="list-style-type: none"> • Increase expected years of health life • Enable healthy lifestyles including mode of travel 	<ul style="list-style-type: none"> • All age, all cause mortality rate • Obesity among primary school age children in Year 6 • Adult participation in sport 		Y		Y
Education and skills	3. Improve the education and skills of young	<ul style="list-style-type: none"> • Raise the standard of achievement at all ages 	<ul style="list-style-type: none"> • Achievement of 5 or more A* - C grades at GCSE or equivalent including English and Mathematics 		Y		Y

	people and adults						
Affordable homes	4. Provide decent and affordable homes	<ul style="list-style-type: none"> • Reduce homelessness • Increase the range and affordability of housing • Reduce the number of unfit homes 	<ul style="list-style-type: none"> • Net affordable housing permissions/completions by tenure (market, rented, intermediate and social rented) by regeneration areas and rest of borough • Net additional homes granted permission/completed by overall borough; regeneration areas and major developments • Proportion of conversions of two or more bedrooms • % of homes built to wheelchair standards • % of homes granted permission/completed built to Lifetime Homes standards • % of homes meeting the Code for Sustainable Homes Levels 3,4,5 and 6 	<ul style="list-style-type: none"> - 40% of all additional dwellings built between 2011/21 to be affordable - All new dwellings to be built to Lifetime Homes standards - 10% of all new dwellings to be wheelchair accessible 	Y	Y	Y
Social cohesion	5. Increase local residents' sense of community and social cohesion	<ul style="list-style-type: none"> • Increase participation and voluntary activity • Reduce levels of crime and non-criminal anti-social disturbances • Increase sense of security and safety at home and in the street 	<ul style="list-style-type: none"> • Net change of use of community facilities and services (D2 use class) • Serious acquisitive crime rate 	<ul style="list-style-type: none"> - No net loss of D2 uses 	Y		

Satisfying work	6. Increase the opportunities for satisfying and well paid work	<ul style="list-style-type: none"> • Reduce unemployment, especially long term unemployment • Improve earnings and reduce work related stress to improve health 	<ul style="list-style-type: none"> • Overall employment rate • Working age people on out of work benefits • Working age people claiming out of work benefits in the most deprived areas of the borough 		Y		Y
Heritage	7. Improve the local environment and heritage	<ul style="list-style-type: none"> • Conserve and enhance sites, features and areas of cultural, historical and archaeological value • Maintain and enhance sites and species of nature conservation interest • Retain and enhance the character and use of the river 	<ul style="list-style-type: none"> • % of conservation areas with up to date conservation area statements/management plans • Proportion of listed buildings at risk • Length of riverside walk • Net change in total area of public open space • net change to areas of nature conservation interest • Improved local biodiversity – active management of local sites • Number of planning applications that include any of the following measures to protect and/or enhance biodiversity: <ol style="list-style-type: none"> 1. Green or Brown roofs 2. Living walls 3. Native planting schemes 4. Bird and/or bat boxes 		Y	Y	Y
Reduce pollution	8. Reduce the level of pollution	<ul style="list-style-type: none"> • Improve local air and water quality and 	<ul style="list-style-type: none"> • Number of times the level of pollution exceeds the guide limits for PM10 and NO2 		Y	Y	Y

		<ul style="list-style-type: none"> reduce noise levels • Reduce the amount of litter, derelict, degraded and underused land 	<ul style="list-style-type: none"> • Number of planning permissions granted where Health and Safety Executive (HSE) objected 				
Reduce transport impacts	9. Reduce the effect of transport on the environment	<ul style="list-style-type: none"> • Reduce the need for travel and therefore reduce traffic volume • Encourage use of more sustainable modes of transport 	<ul style="list-style-type: none"> • Method of children's travel to school (5-16 year olds) • Number of planning permissions involving Transport Impact Assessments • Cycle parking provision in permitted development schemes 		Y	Y	
Careful consumption	10. Responsible consumption of resources in the borough	<ul style="list-style-type: none"> • Increase efficiency in use of resources in future plans • Reuse, recover and/or recycle waste 	<ul style="list-style-type: none"> • Amounts of household waste recycled and composted 			Y	Y
Climate change	11. Reduce climate change and its impact on the borough	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gases and ozone depleting substances • Reduce energy and water use and increase use of renewable 	<ul style="list-style-type: none"> • Per capital CO2 emissions in the borough • Renewable energy capacity permitted for installation by type • Number of permissions granted/completions of properties connected to decentralised energy systems • Number of planning applications that include 		Y	Y	Y

		<p>sources</p> <ul style="list-style-type: none"> Minimise the risk of flooding from storm events and overflow of watercourses 	<p>sustainable drainage</p>				
Sustainable economy	12. Improve the sustainability of the local economy	<ul style="list-style-type: none"> Improve the level of investment in community services and shopping facilities Improve access to key local services, shopping and other local facilities Encourage indigenous investment and training of local workers 	<ul style="list-style-type: none"> Percentage of frontages in A1, A2 and other use classes in frontages in prime retail frontage areas Percentage of frontages in A1, A2 and other use classes in frontages in non-prime retail frontage areas; Percentage of frontages in non A1-use; percentage in A3, A4 and A5 uses in frontages in key local centres, neighbourhood parades and satellite parades Percentage of frontages in non-A1 use; percentage in A3,A4 and A5 uses in small non-designated parades and clusters and corner shops Proportion of vacant shopping frontages in Town centres, local centres, neighbourhood parades, satellite parades and outside designated centres Employment land available by type Amount of permitted/completed employment floorspace by 		Y		Y

			type, regeneration areas and rest of the borough (gross and net) <ul style="list-style-type: none"> • VAT registration rate 				
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Consultation Questions

1. Are the sustainability objectives used in the Sustainability Appraisal Framework suitable in the context of Hammersmith & Fulham?
2. Are there any additional objectives that should be included or should any be removed?
3. Do the recommended indicators provide a relevant measure for the associated objective? If not, please suggest additional indicators.
4. Do you agree that the recommended indicators are appropriate for the baseline report?
5. Are there any other indicators that should be added, or any that should be deleted?
6. Which of the indicators in Table A4 are the most important for the baseline report?

A4.1 Assessing the compatibility of Sustainability objectives

The internal compatibility of the sustainability objectives has been tested to identify any conflicts that may exist between these objectives. These are set out in the table below. The purpose of the compatibility assessment is to clarify any incompatibilities that may arise between these objectives so that subsequent decisions are well based and allow mitigation measures or alternatives to be considered.

Table 3 - Testing compatibility of sustainability 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	+		+	+	+/?	++	?	-/?	+/-/?		?	
	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9	Obj 10	Obj 11	Obj 12

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

Generally, the sustainability objectives show a broad internal compatibility. There are some inevitable tensions between the conservation of natural and heritage features and the need to increase the number of homes. There are also some uncertainties between some land uses in terms of competition for space, including potential conflicts between the objective to improve education and skill levels and that concerning the increased provision of housing. Some expected uncertainty also exists between the objective aimed at improving the local economy and those aimed at:

- conserving natural and heritage features;
- reducing the level of pollution; and
- reducing the effect of transport on the environment.

When implementing the Local Plan, it will be important that the council becomes aware of any potential conflicts between these objectives at an early stage so that any negative effects can also be recognised and mitigated as far as possible.

Task A5 – Consulting on the Scope of the SA

Task A5 – Consulting on the Scope of the SA

Consultation on the Scoping Report

In accordance with regulations (12)5 and 6 of the SEA Regulations 2004, this Scoping Report was subjected to a five week consultation with the following statutory agencies:

- English Heritage
- Natural England; and
- Environment Agency

Specific consultation questions have been included within the document and on a separate form to assist consultees with their responses.

The following organisations with a sustainability remit or local environmental interest were also consulted:

- Greater London Authority (GLA)
- Neighbouring boroughs and other councils in the area of the GLA West London Sub-Regional Development Framework.
- London Fire Service
- Hammersmith and Fulham Clinical Commissioning Group
- Metropolitan Police
- Jobcentre plus
- Community and Voluntary Sector Association
- Hammersmith London (Business Improvement District)

The Scoping Report has also been placed on the Council's website in accordance with the Council's Statement of Community Involvement (SCI).

The consultation sought views on:

- whether all relevant plans and programmes were accurately identified;
- the appropriateness of the baseline data;
- on the appropriateness of the key sustainability issues;
- the appropriateness of the identified sustainability indicators; and
- whether the identified sustainability objectives were robust and reflected the sustainability objectives contained in relevant plans and programmes and would contribute in the preparation of the sustainability appraisal of the Draft Local Plan;

Consultation Questions

1. Do you have any comments on the proposed consultation arrangements?
2. Does your organisation collect any data relevant to the monitoring of the Draft Local Plan which you would be prepared to provide to the council?
3. Do you have any other comments on the draft Scoping Report?

A5.1 Question for Consultees

The specific questions posed to consultees are set out below.

1. Are there any other relevant policies, plans or programmes, in addition to those listed in Table A1, that will affect or influence the Sustainability Appraisal?
2. Do you agree that the baseline data collected is appropriate in terms of its scope and coverage?
3. Do you recommend whether any additional baseline data should be added?
4. Are there any errors in the baseline data presented?
5. Do you consider there are any other sustainability issues arising from the characterisation of the borough provided in this document that should be incorporated into the sustainability objectives for the Sustainability Appraisal?
6. Do you agree that section A3 of this document correctly identifies the key sustainability issues for Hammersmith & Fulham?
7. Are there any issues which, in your opinion, should be added, or any that should be removed?
8. Are the sustainability objectives used in the Sustainability Appraisal Framework suitable in the context of Hammersmith & Fulham?
9. Are there any additional objectives that should be included or should any be removed?
10. Do the recommended indicators provide a relevant measure for the associated objective? If not, please suggest additional indicators.
11. Do you agree that the recommended indicators in Table A4 are appropriate for the baseline report?
12. Are there any other indicators that should be added, or any that should be deleted?
13. Which of the selected indicators are the most important for the baseline report?
14. Do you have any comments on the proposed consultation arrangements?
15. Does your organisation collect any data relevant to the monitoring of the Draft Local Plan which you would be prepared to provide to the council?
16. Do you have any other comments on the draft Scoping Report?

A5.2 Consultation Period

The statutory consultation period on the original Scoping Report runs for a five week period, from 9 January 2014 to 13 February 2014. The council will consider the representations received and based on these will make appropriate changes to the Scoping Report.

To further guide the consultees through the Scoping Report, specific questions were set out at the end of each section of this report.

Task A6 – Testing the Draft Local Plan objectives

Task A6 – Testing the Draft Local Plan objectives

Introduction

The objectives of the Draft Local Plan set out what the Plan is aiming to achieve in spatial planning terms. The compatibility testing of the Plan's objectives with the SA objectives is a formal stage in the SA Scoping process and is advocated in Sustainability Appraisal guidance. It is important that the Plan's objectives reflect sustainable development principles and for this reason, they should be 'tested' for compatibility with the SA objectives. This stage may also help in further refining the Draft Local Plan objectives. The Draft Local Plan objectives should also be tested for compatibility with one another.

It must be noted that whilst the aim should be to achieve consistency between plan objectives, in practice there may be tensions between objectives. Where win-win outcomes cannot be achieved, it is advised that decision makers will need to determine where the priorities should lie and this should be recorded explicitly as part of the SA process.

Draft SA Plan objectives

A draft set of objectives for the Draft Local Plan has been developed; however, these may be refined further based on progress and consultation on the SA Plan. The draft objectives of the Plan are as follows:

1. In particular, encourage regeneration of the most deprived parts of the borough, especially in the White City area, North Fulham area and Hammersmith town centre area.
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 home ownership and for homes for families.
3. Encourage regeneration of key council housing estates.
4. Reduce polarisation and worklessness to create more stable, mixed and balanced communities.
5. Support the local economy and inward investment to ensure that existing and new businesses can compete and flourish.
6. Support businesses so that they maximise job opportunities and recruit and maintain local people in employment
7. Build on 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 to the borough, have access to a range of high quality facilities and services, including retail, leisure, recreation, arts, entertainment, health, education and training and other community infrastructure, such as policing facilities and places of worship.
10. Ensure that the schools in the borough meet the needs and aspirations of local parents and their children.
11. Encourage and promote healthier lifestyles and reduce health inequalities.

12. Promote the health, safety and security of those who live, work and visit Hammersmith & Fulham.
13. Improve and protect the amenity and quality of life of residents and visitors by ensuring a safe, accessible and pleasant local environment, where there is 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) through respect for local context, good quality, 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
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 there is a high quality transport infrastructure, including a Crossrail station and a High Speed 2 rail hub to support development in the north of the borough and improve transport accessibility and reduce traffic congestion and the need to travel.
19. Ensure that regeneration meets the diverse needs of not only the Hammersmith & Fulham of today, but also all its future residents and visitors.

Testing the objectives

The starting point of the Sustainability Appraisal is to assess whether the objectives developed for the Draft Local Plan provide a sustainable basis for developing scenarios and options. The Draft Local Plan objectives were tested against the sustainability framework to ascertain how compatible the aims for the borough are with the principles of sustainable development. The results of the appraisal are shown in Table 5 below.

Table 5 – Compatibility of the Draft Local Plan objectives against the Sustainability Objectives

Draft Local Plan 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

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

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.

Appendix 1 – Relevant Policies, Plans and Programmes

Relevant Policies, Plans and Programmes

Relevant Plan/Programme	Objectives and/or requirements of the relevant Plan/Programme
Level: International / European Context	
<p>Title: EC Directive on the Conservation of Natural Habitats of Wild Fauna and Flora 92/43/EEC of 21 May 1992</p> <p>Author: European Commission</p> <p>Status: Statutory</p> <p>Date: 1992</p> <p>http://europa.eu/legislation_summaries/environment/nature_and_biodiversity/l28076_en.htm</p>	<ul style="list-style-type: none"> • Member States are required to take legislative and administrative measures to maintain and restore natural habitats and wild species at a favourable conservation status in the Community. • An assessment of the impact and implications of any plan or project that is likely to have a significant impact on a designated site.
<p>Title: The Wild Birds Directive 2009/147/EC/</p> <p>Author: European Commission</p> <p>Status: Statutory</p> <p>Date: 2009</p> <p>http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm</p>	<ul style="list-style-type: none"> • Member States have a duty to sustain populations of naturally occurring wild birds by sustaining areas of habitats in order to maintain populations at ecologically and scientifically sound levels. This applies to birds, their eggs, nests and habitats. • Introduced Special Protection Areas into NATURA 2000
<p>Title: The Convention on Biological Diversity 93/626/EEC</p> <p>Author: European Commission</p> <p>Status: Statutory</p> <p>Date: 1993</p> <p>http://europa.eu/legislation_summaries/development/sectoral_development_policies/l28102_en.htm</p>	<ul style="list-style-type: none"> • The Convention on Biological Diversity was signed by the EC and all Member States at the United Nations Conference on Environment and Development in Rio de Janeiro in 1992; this Decision approves the Convention on behalf of the European Community. • Article 6A requires each Contracting Party to develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity.
Title: Directive 2000/60/EC establishing a framework for the Community action in	

<p>the field of water policy (The EU Water Framework Directive - FWD) Author: European Commission Status: Statutory Date: 2000 http://ec.europa.eu/environment/water/water-framework/index_en.html</p>	<ul style="list-style-type: none"> • Requires all Member States to achieve good ecological status of inland water bodies by 2015. • Objectives to promote sustainable use of water, reduce pollution of water, lessen the effects of floods and droughts and rationalise and update existing legislation and introduce a coordinated approach to water management.
<p>Title: Directive 1996/62/EC on ambient air quality assessment and management Author: European Commission Status: Statutory Date: 1996 http://europa.eu/legislation_summaries/other/l28031a_en.htm</p>	<ul style="list-style-type: none"> • Establishes mandatory standards for air quality. • Make information on air quality available to the public.
<p>Title: Directive 1999/30/EC Limit values for sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air Author: European Commission Status: Statutory Date: 1999 http://europa.eu/legislation_summaries/other/l28098_en.htm</p>	<ul style="list-style-type: none"> • Establishes limit values for sulphur and nitrogen dioxide, suspended particulates and lead in air. • Up-to-date air ambient concentrations of each are to be made available to the public. • Sets limits and deadline for SO₂ for 2005 and health limit values for NO₂ and Pb to be met by 2010.
<p>Title: Directive 2008/50/EC on ambient air quality and cleaner air for Europe (Air Quality Directive) Author: European Commission Status: Statutory Date: 2008 http://ec.europa.eu/environment/air/quality/legislation/existing_leg.htm</p>	<ul style="list-style-type: none"> • This new Directive has merged most of existing legislation into a single directive with no change to previous air quality objectives, except for the Framework Directive 96/62/EC, 1-3 daughter Directives 1999/30/EC, 2000/69/EC, 2002/3/EC and Decision on Exchange of Information 97/101/EC • New air quality objectives for PM_{2.5} (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target. • The possibility to discount natural sources of pollution when assessing compliance against limit values. • The possibility for time extensions of three years (PM₁₀) or up to five years (NO₂, benzene) for complying with limit values, based on conditions and the assessment by the European Commission.

<p>Title: Directive 2002/49/EC Assessment and management of environmental noise (Environmental Noise Directive – END) Author: European Commission Status: Statutory Date: 2002 http://ec.europa.eu/environment/noise/directive.htm</p>	<ul style="list-style-type: none"> • Requires competent authorities in member states to use Strategic Noise mapping on the basis of harmonised indicators to create action plans to address noise issues. • The objective is to monitor the impact of noise on health and the environment with the use of strategic Noise Maps for major sources such as roads, railways, aircraft and agglomerations. • Informing the public on noise exposure and the action plans that have been draw up to address the issues
<p>Title: Decision 2002/358/EC concerning the approval of the Kyoto Protocol to the United Nations Framework Convention on Climate Change and the joint fulfilment of commitments thereunder Author: European Commission Status: Statutory Date: 2002 http://europa.eu/legislation_summaries/environment/tackling_climate_change/l28060_en.htm</p>	<ul style="list-style-type: none"> • The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialised countries and the European community for reducing greenhouse gas (GHG) emissions. These amount to an average of five per cent against 1990 levels over the five-year period 2008-2012. • The Kyoto Protocol tackles emissions of six greenhouse gases: carbon dioxide (CO₂); methane (CH₄); nitrous oxide (N₂O); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); sulphur hexafluoride (SF₆). • It represents an important step forward in the effort to tackle global warming as it includes binding, quantified objectives for limiting and reducing greenhouse gases. • The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialised countries and the European community for reducing greenhouse gas (GHG) emissions. These amount to an average of five per cent against 1990 levels over the five-year period 2008-2012. • The Kyoto Protocol tackles emissions of six greenhouse gases: carbon dioxide (CO₂); methane (CH₄); nitrous oxide (N₂O); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); sulphur hexafluoride (SF₆). • It represents an important step forward in the effort to tackle global warming as it includes binding, quantified objectives for limiting and reducing greenhouse gases.
<p>Title: Decision 2010/778/EU determining the respective emission levels allocated to the Community and each of its Member States under the Kyoto Protocol pursuant to Council Decision 2002/358/EC</p>	<p>This decision has allocated to the Union and Member States the respective emission levels in terms of tonnes of carbon dioxide, equivalent for the first quantified emission limitation and reduction commitment period under the Kyoto Protocol</p>

<p>Author: European Commission Status: Statutory Date: 2010 http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32010D0778:EN:NOT</p>	
<p>Title: Directive 1999/31/EC on the landfill of waste (Landfill Directive) Author: European Commission Status: Statutory Date: 1999 http://ec.europa.eu/environment/waste/landfill_index.htm</p>	<ul style="list-style-type: none"> • The objective of the Directive is to prevent or reduce as far as possible negative effects on surface water, groundwater, soil, air and human health caused by the land filling of waste. • The Directive introduces stringent technical requirements for waste and landfill sites and a standard waste acceptance procedure and a system of operating permits for landfill sites. If a site does not comply with operational requirements, they would no longer continue to operate. • Sets targets for reduction of biodegradable municipal solid waste going to landfill.
<p>Title: Directive 2001/77/EC to promote electricity produced from renewable energy sources in the internal electricity market Author: European Commission Status: Statutory Date: 2001 http://europa.eu/legislation_summaries/energy/renewable_energy/l27035_en.htm</p>	<ul style="list-style-type: none"> • Directive aims to promote an increase in the contribution of renewable energy sources to electricity production in the internal market for electricity and to create a basis for a future Community Framework thereof. • Member States are obliged to take steps to increase the consumption of electricity produced from renewable energy sources, by setting national indicative targets, in terms of a percentage of electricity consumption by 2010. • UK target is for renewables to account for 10% of UK consumption by 2010.
<p>Title: Directive 2012/27/EU on Energy Efficiency Author: European Commission Status: Statutory Date: 2012 http://ec.europa.eu/energy/efficiency/eed/eed_en.htm</p>	<ul style="list-style-type: none"> • This Directive establishes a common framework of measures for the promotion of energy efficiency within the European Union in order to ensure the achievement of the EU's 2020 20% headline target on energy efficiency and to pave the way for further energy efficiency improvements beyond that date. • It lays down rules designed to remove barriers in the energy market and overcome market failures that impede efficiency in the supply and use of energy, and provides

	for the establishment of indicative national energy efficiency targets for 2020.
<p>Title: Directive 2007/60/EC on the Assessment and Management of Flood Risks (EU Floods Directive) Author: European Commission Status: Statutory Date: 2007 http://ec.europa.eu/environment/water/flood_risk/index.htm</p>	<ul style="list-style-type: none"> • The Directive aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity. • It requires Member States to assess whether all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas, and to take adequate and coordinated measures to reduce this flood risk. • The Directive shall be carried out in co-ordination with the Water Framework Directive, most notably through flood risk management plans and river basin management plans, and also through co-ordination of the public participation procedures in the preparation of these plans.
<p>Title: Pan-European Biological and Landscape Diversity Strategy Author: Council of Europe, UNEP Status: Non-Statutory Date: July 2003 http://www.pebls.org</p>	<ul style="list-style-type: none"> • Aims to stop and reverse the degradation of biological and landscape diversity values in Europe. • Strategy to introduce a coordinating and unifying framework for strengthening and building on existing initiatives. The strategy assesses the strengths and weaknesses of existing initiatives, and promotes practical action where there is a lack of suitable instruments or where existing mechanisms are not implemented to their full potential.
<p>Title: Mainstreaming sustainable development into EU policies: 2009 Review of the European Union Strategy for Sustainable Development Author: European Commission Status: Non-Statutory Date: 2009 http://ec.europa.eu/environment/eussd/</p>	<ul style="list-style-type: none"> • The review takes stock of EU policy measures in the areas covered by the EU SDS and launches a reflection on the future of the EU SDS and its relation to the Lisbon strategy. • Long-term vision and overarching policy framework for all Union policies and strategies. • A number of unsustainable trends require urgent action. Significant additional efforts are needed to curb and adapt to climate change, to decrease high energy consumption in the transport sector and to reverse the current loss of biodiversity and natural resources. • The shift to a safe and sustainable low-carbon and low-input economy will require a stronger focus in the future. • Priority actions should be more clearly specified in future reviews.

	<ul style="list-style-type: none"> Governance, including implementation, monitoring and follow-up mechanisms should be reinforced for example through clearer links to the future EU 2020 strategy and other cross-cutting strategies.
<p>Title: European Spatial Development Perspective Author: EU Ministers for Spatial Planning, published by the European Commission Status: Non-Statutory Date: May 1999 http://europa.eu/legislation_summaries/regional_policy/management/g24401_en.htm</p>	<ul style="list-style-type: none"> Aim of balanced and sustainable development of the Territory of the European Union. Emphasis is on achieving the three fundamental goals of European Policy equally in all regions: <ul style="list-style-type: none"> Economic and social cohesion Conservation and management of natural resources, and the cultural heritage. More balanced competitiveness of the European Territory.
<p>Title: Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system Author: European Commission Status: White Paper Date: 2011 http://ec.europa.eu/transport/themes/strategies/2011_white_paper_en.htm</p>	<ul style="list-style-type: none"> The European Commission adopted a roadmap of 40 concrete initiatives for the next decade to build a competitive transport system that will increase mobility, remove major barriers in key areas and fuel growth and employment. At the same time, the proposals will dramatically reduce Europe's dependence on imported oil and cut carbon emissions in transport by 60% by 2050. By 2050, key goals will include: <ul style="list-style-type: none"> No more conventionally-fuelled cars in cities. 40% use of sustainable low carbon fuels in aviation; at least 40% cut in shipping emissions. A 50% shift of medium distance intercity passenger and freight journeys from road to rail and waterborne transport. All of which will contribute to a 60% cut in transport emissions by the middle of the century.
<p>Title: European Landscape Convention (ELC) Author: Council of Europe Status: Statutory Date: 2000 http://www.coe.int/t/dg4/cultureheritage/heritage/landscape/default_en.asp</p>	<ul style="list-style-type: none"> The aims of this Convention are to promote landscape protection, management and planning, and to organise European co-operation on landscape issues. It also aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes

	throughout Europe.
<p>Title: Proposal for a Decision on a General Union Environment Action Programme to 2020 – “Living well, within the limits of our planet” Author: European Commission Status: Non-Statutory Date: 2012 http://ec.europa.eu/environment/newprg/index.htm</p>	<ul style="list-style-type: none"> The proposed programme provides an overarching framework for environment policy to 2020, identifying nine priority objectives for the EU and its Member States to attain.
<p>Title: The Johannesburg Declaration on Sustainable Development (Earth Summit 2002) Author: United Nations Status: Non-Statutory Date: 2002 http://www.un-documents.net/jburgdec.htm</p>	<ul style="list-style-type: none"> States a commitment to building a humane, equitable and caring global society. Key commitments include sustainable production and consumption; renewable energy & energy efficiency; production of chemicals in ways that do not lead to significant adverse effects on human health and the environment; develop integrated water resources management and water efficiency plans by 2005.
<p>Title: Living Planet Report 2012 – Biodiversity, biocapacity and better choices Author: World Wildlife Fund in collaboration with Global Footprint Network, Zoological Society of London and the European Space Agency (ESA) Status: Non-Statutory Date: 2012 http://wwf.panda.org/about_our_earth/all_publications/living_planet_report/</p>	<ul style="list-style-type: none"> Reviews and surveys the ecological state and health of the planet; it reports an alarming rate of biodiversity loss – in total 28% global reduction between 1970 and 2008. Determines the human impact on Earth's resources; the 2012 report shows that we are using 50% more resources than the Earth can provide.
National Context	
<p>Title: National Planning Policy Framework Author: UK Government Status: Government Policy</p>	<ul style="list-style-type: none"> The new simplified National Planning Policy Framework (NPPF) has replaced Planning Policy Statements and Planning Policy Guidance except PPS10 regarding Waste. The Framework sets out planning policies for England and how they are

<p>Date: 2012 https://www.gov.uk/government/publications/national-planning-policy-framework--2</p>	<p>expected to be applied. It provides guidance for Draft Local Planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications. It includes a general presumption in favour of sustainable development, and requires developments to:</p> <ul style="list-style-type: none"> • Support a genuinely plan-led system and plan positively for growth • Secure high quality design standards • Take account of the roles and character of different areas • Support transition to a low carbon future • Contribute to conserving and enhancing the natural environment and reducing pollution • Prioritise the use of previously developed land • Promote mixed use development • Conserve heritage assets • Manage patterns of growth to make full use of public transport, walking and cycling • Take account of and support local strategies to improve health, social and cultural wellbeing and deliver facilities and services to meet local needs. <p>• The Framework does not contain specific waste policies, since national waste planning policy will be published as part of the National Waste Management Plan for England.</p>
<p>Title: Technical Guidance to the National Planning Policy Framework Author: UK Government Status: Government Policy Date: 2012 https://www.gov.uk/government/publications/national-planning-policy-framework-technical-guidance</p>	<ul style="list-style-type: none"> • This document provides additional guidance to Draft Local Planning authorities to ensure the effective implementation of the planning policy set out in the NPPF on development in areas at risk of flooding and in relation to mineral extraction.
<p>Title: Planning policy for traveller sites Author: UK Government Status: Government Policy Date: 2012 https://www.gov.uk/government/publications/planning-policy-for-traveller-sites</p>	<ul style="list-style-type: none"> • The government has published its new planning policy for traveller sites at the same time as the NPPF. This planning policy for traveller sites should be read in conjunction with the NPPF.

<p>Title: PPS 10: Planning for Sustainable Waste Management Author: Central Government, Department of Communities and Local Government. Status: Government Policy Date: 2005 https://www.gov.uk/government/publications/planning-for-sustainable-waste-management-planning-policy-statement-10</p>	<ul style="list-style-type: none"> • Help deliver sustainable development by pushing waste up the hierarchy of Reduce, Reuse, Recycle & Compost, Energy Recovery and Disposal treating waste as a resource and encouraging communities to take responsibility for their waste. Ensure that opportunities for incorporating re-use/ recycling facilities in new developments are properly considered, whilst avoiding risks to human health, designated areas of landscape and nature conservation value and to minimise adverse environmental impacts resulting from the handling, processing, transport and disposal of waste.
<p>Title: Planning for Renewable Energy: A Companion Guide to PPS22 Author: UK Government Status: Government Guidance Date: 2004 https://www.gov.uk/government/publications/planning-for-renewable-energy-a-companion-guide-to-planning-policy-statement-22</p>	<ul style="list-style-type: none"> • The Government's target is to generate 20% of our electricity from renewable sources by 2020. The policy context for action on renewable energy is now set out in the NPPF (this superseded PPS22), whereby the Companion Guide offers practical advice as to how these policies can be implemented on the ground. Both this Guide and the NPPF are intended to encourage the appropriate development of further renewable energy schemes, throughout England. This will include schemes in urban as well as rural locations, ranging in size from the domestic to the commercial scale.
<p>Title: Planning for Sustainable Waste Management: A Companion Guide to PPS10 Author: UK Government Status: Government Guidance Date: 2006 https://www.gov.uk/government/publications/planning-for-sustainable-waste-management-a-companion-guide-to-planning-policy-statement-10</p>	<ul style="list-style-type: none"> • This guide supports the implementation of PPS10 Planning for Sustainable Waste Management. The guide provides advice, ideas, examples of current practice and signposts to further sources of information that will be of relevance to planning authorities, to developers and to communities. Specifically, the guide aims to assist: <ul style="list-style-type: none"> • in the development of regional spatial strategies; • in the preparation of local development documents; • in the consideration of planning applications; and • potential developers in understanding the requirements of the spatial planning system for waste management.
<p>Title: Planning for Town Centres: Practice guidance on need, impact and the sequential approach Author: UK Government Status: Government Guidance</p>	<ul style="list-style-type: none"> • One of the Government's overarching objective is to promote the vitality and viability of town and other centres as important places for communities. The main objectives of the practice guidance are: <ul style="list-style-type: none"> • To promote the development of positive strategies to underpin the planning and

<p>Date: 2009 https://www.gov.uk/government/publications/planning-for-town-centres-practice-guidance-on-need-impact-and-the-sequential-approach</p>	<p>development of town centres.</p> <ul style="list-style-type: none"> • To provide advice on preparing and understanding need and impact assessments to guide the development of effective town centre strategies in plans, and assist in the determination of planning applications. • To illustrate how the sequential approach can be applied when allocating sites in plans and assessing planning applications, providing some illustrations of good practice. • To encourage a greater degree of consistency and transparency in terms of the approach and key data required to assist those preparing and reviewing need and impact assessments.
<p>Title: PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide Author: UK Government, English Heritage Status: Government Guidance Date: 2010 http://www.english-heritage.org.uk/publications/pps-practice-guide/</p>	<ul style="list-style-type: none"> • The purpose of this guide is to assist local authorities, owners, applicants and other interested parties in implementing and interpreting Government policy on the historic environment. The Government policy and this Guide recognise the unique place the historic environment holds in England's cultural heritage and the multiple ways it supports and contributes to the economy, society and daily life. The historic environment's fragile and finite nature is a particularly important consideration in planning. Conserving this resource for future generations accords with the principles of sustainable development. Government places a priority on its conservation and has set out tests to ensure that any damage or loss is permitted only where it is properly justified.
<p>Title: Planning for climate change – guidance for local authorities 2012 Author: Planning & Climate Change Coalition Status: Guidance Date: 2012 http://www.tcpa.org.uk/pages/planning-for-climate-change-guide.htm</p>	<ul style="list-style-type: none"> • This guide is designed primarily for local authorities and other bodies who want both to tackle climate change and to reap the positive economic benefits that solutions such as renewable energy, sustainable transport and flood resilience can bring. The guide has been drawn up to support planning under the Localism Act and the NPPF and has been developed through cross-sector dialogue, using the wide-ranging expertise of the members of the Planning and Climate Change Coalition.
<p>Title: Planning Policy Statement 25: Development and Flood Risk - Practice Guide Author: UK Government Status: Government Policy</p>	<ul style="list-style-type: none"> • This practice guide is now complementary to the NPPF and provides guidelines on how to implement development and flood risk policies by the land use planning system. This Practice Guide also contains a checklist to help developers and applicants to prepare an appropriate, site-specific flood risk assessment in accordance with the NPPF

<p>Date: 2009 https://www.gov.uk/government/publications/development-and-flood-risk-practice-guide-planning-policy-statement-25</p>	<p>and the advice in the Practice Guide.</p>
<p>Title: Good Practice Guide on Planning for Tourism Author: UK Government Status: Guidance Date: 2006 https://www.gov.uk/government/publications/planning-for-tourism</p>	<ul style="list-style-type: none"> • Tourism makes a major contribution to the national economy and to the prosperity of many cities, towns and rural areas. Its continuing growth generates a range of economic activity and new job opportunities. • Tourism can bring broader benefits to the local community including regeneration in urban areas. • Tourism often depends on a high quality environment; it can act as a positive force for environmental protection and enhancement. It is important to identify and consider ways of protecting these, as well as to consider ways in which new development can help the industry.
<p>Title: Localism Act Author: UK Government Status: Statutory Date: 2011 http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted</p>	<ul style="list-style-type: none"> • The Localism Act has wide-ranging measures aimed at taking power away from Central Government so that local communities, through their directly elected local representatives, have more say in the provision of local services. The Act has the following key planning implications: • Abolition of Regional Spatial Strategies (with the exception of London); • Nationally Significant Infrastructure Projects: Abolition of the Infrastructure Planning Commission; • National Planning Policy Statements: the streamlining of national planning policy guidance into a single document – the National Planning Policy Framework; • Community Infrastructure Levy: some CIL funds now have to be passed to neighbourhoods where the development has taken place; • Inspectors Reports not binding upon the Authority; • Neighbourhood Planning: This is a key component of the Act as it introduces a new tier of spatial planning concept - namely neighbourhood planning. The Act introduces the right for communities to shape their local areas by creating "Neighbourhood Planning Authority" (NPA). The NPA could be based on existing parishes - or a group of parishes or by an organisation designated by the LPA as a "Neighbourhood Forum." Neighbourhoods can also establish general policies that will steer decisions on traditional planning applications. NPA's can therefore prepare their own

	<p>"Neighbourhood Development Plan", which will form part of the statutory development plan once adopted.</p> <ul style="list-style-type: none"> Requirement for pre-application consultation for prospective developers; Changes specifically for London Planning: <ul style="list-style-type: none"> Devolution of powers over housing investment from the Homes and Communities Agency to the GLA; Abolition of the London Development Agency; New powers for the Mayor of London to create Mayoral Development Corporations for regeneration.
<p>Title: Public Services (Social Value) Act 2012 Author: UK Government Status: Statutory Date: 2012 http://www.legislation.gov.uk/ukpga/2012/3/enacted</p>	<ul style="list-style-type: none"> In accordance with the Public Services (Social Value) Act, an authority must consider: how what is proposed to be procured might improve the economic, social and environmental well-being of the relevant area, and how, in conducting the process of procurement, it might act with a view to securing that improvement. This Act therefore places a duty on public bodies to consider social value ahead of a procurement. The Act applies to the provision of services, or the provision of services together with the purchase or hire of goods or the carrying out of works.
<p>Title: Reuniting health with planning: healthier homes, healthier communities' Author: UK Government Status: Guidance Date: 2012 http://www.tcpa.org.uk/pages/reuniting-health-with-planning-healthier-homes-healthier-communities.html</p>	<ul style="list-style-type: none"> This guide is the first of its kind since the Government set out a radical reform agenda across the planning and health sectors in England, including a requirement on planners to work with public health organisations, and a new public health responsibility for local authorities. It explains the relevance of these reforms for health and planning, and gives planners and public health practitioners ideas for how they can work together. Using case studies from around England, it explores how places are using this time of change to push forward their intention to integrate their work across both sectors.
<p>Title: UK Sustainable Development Strategy "Securing the Future" Author: UK Government Status: Non-Statutory</p>	<ul style="list-style-type: none"> The Strategy incorporates a framework to enhance the achievement of the following aims: social progress, effective protection of the environment, prudent use of natural resources and maintenance of high and stable levels of economic growth and employment. The framework has a set of overarching principles, which form the basis

<p>Date: 2005 http://www.defra.gov.uk/publications/2011/03/25/securing-the-future-pb10589/</p>	<p>for policy in the UK:</p> <ul style="list-style-type: none"> • Living within environmental limits • Ensuring a strong, healthy and just society • Achieving a sustainable economy • Promoting good governance • Using sound science responsibly
<p>Title: Conservation of Habitats and Species Regulations 2010 (Habitats Regulation) Author: UK Government Status: Statutory Date: 2010 http://www.legislation.gov.uk/ukxi/2010/490/contents/made</p>	<ul style="list-style-type: none"> • The regulations affect any proposed works within or adjacent to a Special Protected Area (SPA) or a proposed/ candidate SPA or a Special Area of Conservation (SAC) or a proposed/ candidate SAC. • The consenting authority needs to test whether the proposed works would have an adverse impact on the site. In so doing, it will have regard to the advice of the appropriate nature conservation body. Unless the conclusion is that there will be no adverse impact, the applicant will have to consider measures to mitigate these effects. If appropriate and adequate mitigation measures are not possible, the project may only be consented if the Secretary of State decides there is no alternative approach, that there are reasons of overriding public interest for it to proceed, and after a suitable compensation package has been agreed.
<p>Title: Biodiversity 2020: A strategy for England's wildlife and ecosystem services Author: UK Government, DEFRA Status: Non-Statutory Date: 2011 http://www.defra.gov.uk/publications/2011/08/19/pb13583-biodiversity-strategy-2020/</p>	<ul style="list-style-type: none"> • This biodiversity strategy for England provides a comprehensive picture of how the UK is implementing the international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. • The mission for this strategy, for the next decade, is to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.
<p>Title: UK Biodiversity Action Plan (UK BAP) 1992–2012 Author: UK Government Status: Statutory Date: 1994 http://jncc.defra.gov.uk/page-5155</p>	<ul style="list-style-type: none"> • The UK BAP was the UK Government's response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992 in Rio de Janeiro. The UK BAP described the biological resources of the UK and provided detailed plans for conservation of these resources. Action plans for the most threatened species and habitats were set out to aid recovery, and national reports, produced every three- to

	<p>five-years, showed how the UK BAP was contributing to the UK's progress towards the significant reduction of biodiversity loss called for by the CBD.</p>
<p>Title: UK Post-2010 Biodiversity Framework Author: UK Government Status: Statutory Date: 2012 http://jncc.defra.gov.uk/page-6189</p>	<ul style="list-style-type: none"> • Environment Departments and Ministers of all four governments in the UK have signed a framework of priorities for UK-level work for the Convention on Biological Diversity. The 'UK Post-2010 Biodiversity Framework' covers the period from 2011 to 2020. • Most work which was previously carried out under the UK • Biodiversity Action Plan (UK BAP) is now focussed in the countries. The UK BAP partnership no longer operates. • Many of the tools developed under UK BAP remain of use, for example, background information about the lists of priority habitats and species. The lists of priority species and habitats agreed under UK BAP still form the basis of much biodiversity work in the countries.
<p>Title: Transport White Paper "Creating Growth, Cutting Carbon: making sustainable local transport happen" Author: UK Government Status: Statutory Date: 2011 https://www.gov.uk/government/publications/creating-growth-cutting-carbon-making-sustainable-local-transport-happen</p>	<ul style="list-style-type: none"> • The local transport white paper sets out the government's vision for a sustainable local transport system that supports the economy and reduces carbon emissions. • It explains how the government is placing localism at the heart of the transport agenda, taking measures to empower local authorities when it comes to tackling these issues in their areas. • The white paper also underlines central government's direct support to local authorities, including through the Local Sustainable Transport Fund.
<p>Title: Draft Aviation Policy Framework Author: UK Government Status: Draft for consultation Date: 2012 https://www.gov.uk/government/consultations/draft-aviation-policy-framework</p>	<ul style="list-style-type: none"> • The government's primary objective is to achieve long-term economic growth. The aviation sector is a major contributor to the economy, and the government supports its growth within a framework that maintains a balance between the benefits of aviation and its costs, particularly climate change and noise. • The framework seeks to strengthen the arrangements for involving communities near airports in decisions, which affect them. • The aviation industry also needs to have confidence that the framework is sufficiently

	stable to underpin long-term planning and investment in aircraft and infrastructure.
<p>Title: The Wildlife and Countryside Act (as amended) 1981 Author: UK Government Status: Statutory Date: 1981 (as amended) http://jncc.defra.gov.uk/page-1377</p>	<ul style="list-style-type: none"> The Wildlife and Countryside Act 1981 is an Act of Parliament in the UK implemented to comply with Directive 2009/147/EC. In short, the act gives protection to native species (especially those at threat), controls the release of non-native species, enhances the protection of Sites of Special Scientific Interests (SSSIs) and builds upon the rights of way rules in the National Parks and Access to the Countryside Act 1949.
<p>Title: Sustainable Communities Act 2007: decisions on local councils' proposals to improve local areas (amended in 2010) Author: UK Government Status: Statutory Date: 2007, 2010 http://www.legislation.gov.uk/ukpga/2007/23/contents</p>	<ul style="list-style-type: none"> This Act provides a statutory framework for councils in England – working with local people and community groups – to put forward proposals on sustainable improvements to economic, environmental and social wellbeing
<p>Title: The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK Author: UK Government Status: Statutory Date: 2012 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf</p>	<ul style="list-style-type: none"> The Energy Efficiency Strategy sets the direction for energy efficiency policy for the coming decades. It makes clear the government's ambition, the barriers that need to be addressed and the additional steps to be taken to stimulate the energy efficiency market. The Government's plans are aimed at changing the way energy is used in housing, transport and manufacturing. It shows that there is a clear role for ambitious Government leadership and spells out how the government will act to connect finance with demand, encourage innovation, and make energy efficiency information more accessible to the consumer. The EU Energy Efficiency Directive, which must be transposed into national laws and fully implemented by spring 2014, imposes various measures on EU member states to reduce their primary energy consumption by 20% of their 2007 business as usual projections by 2020.
<p>Title: Climate Change Act Author: UK Government</p>	<ul style="list-style-type: none"> The Climate Change Act creates a new approach to managing and responding to climate change in the UK, by:

<p>Status: Statutory Date: 2008 http://www.legislation.gov.uk/ukpga/2008/27/contents</p>	<ul style="list-style-type: none"> • setting ambitious, legally binding targets • taking powers to help meet those targets • strengthening the institutional framework • enhancing the UK's ability to adapt to the impact of climate change • establishing clear and regular accountability to the UK Parliament and to the devolved legislatures. • Legally binding targets: Green house gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.
<p>Title: UK Climate Projections 2009 Author: UK Government Status: Non-Statutory Date: 2009 http://ukclimateprojections.defra.gov.uk/</p>	<ul style="list-style-type: none"> • The 2009 UK Climate Projections (UKCP09) describe the methodology and some key projections of future climate change for the UK over the 21st century. • The UKCP09 Projections provide a basis for studies of impacts and vulnerability and decisions on adaptation to climate change in the UK over the 21st century. • Projections are given of changes to climate, and of changes in the marine and coastal environment; recent trends in observed climate are also discussed.
<p>Title: The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 2) Author: UK Government Status: Statutory Date: 2007 http://www.defra.gov.uk/publications/files/pb12670-air-quality-strategy-vol2-070712.pdf</p>	<p>The strategy:</p> <ul style="list-style-type: none"> • sets out a way forward for work and planning on air quality issues; • sets out the air quality standards and objectives to be achieved; • introduces a new policy framework for tackling fine particles; • identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives.
<p>Title: Air Pollution: Action in a Changing Climate Author: UK Government Status: Non-Statutory Date: 2010 http://www.defra.gov.uk/publications/2011/04/13/pb13378-air-pollution/</p>	<ul style="list-style-type: none"> • Details the UK's plan to tackle air pollution from 2010 to 2020 • Sets out to maximise the benefits of the similar goals of reducing CO2 emissions and reducing air pollution

<p>Title: National Flood and Coastal Erosion Risk Management (FCERM) Strategy for England – Understanding the risks, empowering communities, building resilience Author: Environment Agency, Defra Status: Non-Statutory Date: 2011 http://www.environment-agency.gov.uk/research/policy/130073.aspx</p>	<ul style="list-style-type: none"> • The Flood and Water Management Act 2010 requires the Environment Agency (EA) to 'develop, maintain, apply and monitor a strategy for flood and coastal erosion risk management in England'. • This strategy describes what needs to be done by all organisations involved in flood and coastal erosion risk management. These include local authorities, internal drainage boards, water and sewerage companies, highways authorities and the EA. • The strategy sets out a statutory framework that will help communities, the public sector and other organisations to work together to manage flood and coastal erosion risk. It will support local decision-making and engagement in FCERM, making sure that risks are managed in a coordinated way across catchments and along each stretch of coast. This includes the development of local flood risk management strategies by lead local flood authorities, as well as the EA's strategic overview of all sources of flooding and coastal erosion.
<p>Title: Natural England Corporate Plan 2012-2015 Author: Natural England Status: Non-Statutory Date: 2012 http://naturalengland.etraderstores.com/NaturalEnglandShop/ne188</p>	<ul style="list-style-type: none"> • This Plan sets out Natural England's (NE) priorities for the next three years against a set of four strategic outcomes, developed in the context of the new local delivery landscape: <ul style="list-style-type: none"> • A healthy, well-functioning natural environment • People are inspired to value and conserve the natural environment • Sustainable use of the natural environment • A secure environmental future
<p>Title: The Code for Sustainable Homes: Setting the Sustainability Standards for new homes Author: UK Government, DCLG Status: Non-Statutory Date: 2008 http://www.planningportal.gov.uk/buildingregulations/greenerbuildings/sustainablehomes/technicalguide</p>	<ul style="list-style-type: none"> • The Code for Sustainable Homes (CSH) is an environmental assessment method. The Code is a voluntary standard designed to improve the overall sustainability of new homes by setting a single framework within which the home building industry can design and construct homes to higher environmental standards and offers a tool for developers to differentiate themselves within the market.
<p>Title: The Code for Sustainable Homes: Technical Guide</p>	

<p>Author: UK Government, DCLG Status: Non-Statutory Date: 2010 http://www.planningportal.gov.uk/uploads/code_for_sustainable_homes_techguide.pdf</p>	<ul style="list-style-type: none"> The Technical guide sets out the requirements for the Code and the process by which a Code assessment is reached. It aims to make gaining a Code assessment as simple, transparent and rigorous as possible.
<p>Title: English Heritage Corporate Plan 2011 - 2015 Author: English Heritage Status: Non-Statutory Date: 2011 http://www.english-heritage.org.uk/about/who-we-are/corporate-information/corporate-strategy/</p>	<ul style="list-style-type: none"> English Heritage has four aims, underpinned by a fifth relating to excellence. They are: Understanding: Identify and protect our most important heritage Valuing: Champion England's heritage Caring: Support owners, local authorities and voluntary organisations to look after England's heritage Enjoying: Help people appreciate and enjoy England's national story Excellence: Achieve excellence, openness and efficiency in all we do
<p>Title: Suburbs and the Historic Environment Author: English Heritage Status: Non-Statutory Date: 2007 http://www.helm.org.uk/guidance-library/suburbs-and-the-historic-environment/</p>	<ul style="list-style-type: none"> In this position statement, English Heritage sets out how it sees the future planning suburbs and how local authorities can best respond to the challenges they face. It also provides a "checklist" for local authorities that can be used to ensure the adequate protection of existing conservation areas.
<p>Title: Guidance on Tall Buildings Author: English Heritage, CABE Status: Non-Statutory Date: 2007 http://www.english-heritage.org.uk/professional/advice/advice-by-topic/setting-and-views/tall-buildings/</p>	<ul style="list-style-type: none"> English Heritage and the Commission for Architecture and the Built Environment (CABE) have produced a joint guidance on tall buildings. It sets out how CABE and English Heritage evaluate proposals for tall buildings and offers advice on good practice in relation to tall buildings in the planning process.
<p>Title: Water Resources Act Author: UK Government Status: Statutory Date: 1991</p>	<ul style="list-style-type: none"> This Act aims to prevent and minimise pollution of water. The policing of this Act is the responsibility of the Environment Agency. Under the Act, it is an offence to cause or knowingly permit any poisonous, noxious or polluting material, or any solid waste to

http://www.legislation.gov.uk/ukpga/1991/57/contents	enter any controlled water.
<p>Title: Water Act Author: UK Government Status: Statutory Date: 2003 http://www.legislation.gov.uk/ukpga/2003/37/contents</p>	<ul style="list-style-type: none"> The four broad aims of the Act are the sustainable use of water resources; strengthening the voice of consumers; a measured increase in competition; and the promotion of water conservation.
<p>Title: Flood Risk Regulations 2009 Author: UK Government Status: Statutory Date: 2009 http://www.legislation.gov.uk/uksi/2009/3042/contents/made</p>	<ul style="list-style-type: none"> Introduces Lead Local Flood Authorities, who gain new powers and responsibilities such as: Developing Flood Risk Management Strategies Designation and registration of assets Creation of SUDS approval bodies Investigation of flooding
<p>Title: White Paper: Healthy Lives, Healthy People: Our Strategy for Public Health in England Author: Department of Health Status: Statutory Date: 2010 http://www.dh.gov.uk/health/2011/07/healthy-lives-healthy-people/</p>	<ul style="list-style-type: none"> This paper seeks to address the root causes of poor health and wellbeing, reaching out to the individuals and families who need the most support – and be: Responsive – owned by communities and shaped by their needs; Resourced – with ring-fenced funding and incentives to improve; Rigorous – professionally-led and focused on evidence; efficient and effective; and Resilient – strengthening protection against current and future threats to health.
<p>Title: Definition of Waste: Development Industry Code of Practice Author: Contaminated Land: Applications in Real Environments (CL:AIRE) Status: Non-Statutory Date: 2011 http://www.claire.co.uk/index.php?option=com_content&view=article&id=210&Itemid=82</p>	<ul style="list-style-type: none"> This Definition of Waste Code of Practice (DoWCoP) is an initiative to improve the sustainable and cost effective development of land. It provides a clear, consistent and streamlined process which enables the legitimate reuse of excavated materials on-site or their movement between sites with a significantly reduced regulatory burden. In many instances the DoWCoP can provide an alternative to Environmental Permits or Waste Exemptions when seeking to reuse excavated materials. It enables the

	<p>direct transfer and reuse of clean naturally occurring soil materials between sites.</p> <ul style="list-style-type: none"> • It creates the conditions to support the establishment and operation of fixed soil treatment facilities, which have a key role to play in the future of sustainable materials management. • It allows the reuse of both contaminated and uncontaminated materials on the site of production and between sites within defined Cluster projects.
<p>Title: The Plan for Growth Author: UKI Government, HM Treasury, Department for Business, Innovation and Skills Status: Government statement Date: March 2011 http://cdn.hm-treasury.gov.uk/2011budget_growth.pdf</p>	<ul style="list-style-type: none"> • The ambitions are: <ol style="list-style-type: none"> 1. to create the most competitive tax system in the G20; 2. to make the UK one of the best places in Europe to start, finance and grow a business; 3. to encourage investment and exports as a route to a more balanced economy; and 4. to create a more educated workforce that is the most flexible in Europe.
<p>Title: A Practical Guide to the Strategic Environmental Assessment Directive Author: ODPM (UK Government) Status: Government Policy Date: 2006 https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance</p>	<ul style="list-style-type: none"> • Practical guidance on applying European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”.
Regional Plans and Programmes	
<p>Title: The London Plan: Spatial Development Strategy for Greater London Author: The Mayor of London Status: Statutory Date: 2011 http://www.london.gov.uk/priorities/planning/londonplan</p>	<ul style="list-style-type: none"> • The London Plan is the overall strategic plan for London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. • The London Plan forms part of the development plan for Greater London. London boroughs’ Draft Local Plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.
<p>Title: The Mayor’s Housing Strategy (draft) Author: The Mayor of London</p>	<ul style="list-style-type: none"> • Since the Mayor published the first statutory London Housing Strategy in February 2010, a new investment period has begun. There have been major changes to the

<p>Status: Draft Date: 2012 http://www.london.gov.uk/publication/revised-london-housing-strategy-public-consultation</p>	<p>allocation of government funding for housing, including significant new housing and regeneration powers for the Mayor.</p> <ul style="list-style-type: none"> The 2010 strategy has now been reviewed and a number of areas have been identified where change is needed, and a revised housing strategy is being produced.
<p>Title: The Mayor's Transport Strategy (draft) Author: The Mayor of London Status: Draft Date: 2010 http://www.london.gov.uk/publication/mayors-transport-strategy</p>	<ul style="list-style-type: none"> The Mayor's transport vision states: 'London's transport system should excel among those of world cities, providing access to opportunities for all its people and enterprises, achieving the highest environmental standards and leading the world in its approach to tackling urban transport challenges of the 21st century.' Six goals set out how this overarching vision should be implemented. The transport strategy should: <ul style="list-style-type: none"> Support economic development and population growth Enhance the quality of life for all Londoners Improve the safety and security of all Londoners Improve transport opportunities for all Londoners Reduce transport's contribution to climate change and improve its resilience Support delivery of the London 2012 Olympic and Paralympic Games and its legacy
<p>Title: The Mayor's Ambient Noise Strategy: Sounder City Author: The Mayor of London Status: Non-Statutory Date: 2004 http://static.london.gov.uk/mayor/strategies/noise/</p>	<ul style="list-style-type: none"> The aim of the strategy is: 'to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework'. It recognises the importance of London's 'Soundscape'. Three key issues have been identified: <ul style="list-style-type: none"> Securing good, noise reducing surfaces on Transport for London's roads. Securing night aircraft ban across London. Reducing noise through better planning and design of new housing
<p>Title: The Mayor's Air Quality Strategy: Clearing the Air Author: The Mayor of London Status: Non-Statutory</p>	<ul style="list-style-type: none"> The Strategy focuses on reducing PM10 and NO2 pollution levels The Mayor's aim is to improve London's air quality to the point where pollution no

<p>Date: 2010</p> <p>http://www.london.gov.uk/publication/mayors-air-quality-strategy</p>	<p>longer poses a significant risk to human health. As road traffic is one of the biggest contributors to air pollution the strategy focuses on reducing this.</p> <ul style="list-style-type: none"> • The measures to be implemented: • Reduce the amount of traffic • Reduce emissions from individual vehicles • Reducing emissions from air travel • Adoption of more energy efficient buildings • Improving the energy efficiency of existing buildings • Improving fuel efficiency • Using renewable energy technologies • Reducing pollution from industry and construction
<p>Title: The Mayor's Biodiversity Strategy: Connecting with London's Nature Author: The Mayor of London Status: Non-Statutory Date: 2002 http://legacy.london.gov.uk/mayor/strategies/biodiversity/index.jsp</p>	<ul style="list-style-type: none"> • The strategy and its implementation aim to meet the biodiversity objectives within the context of the Mayor's overall vision for London. The objectives for biodiversity are: • Biodiversity for people – ensure access for all to wildlife and natural green space. • Nature for its own sake – conserve plants, animals and their habitats. Biodiversity has an intrinsic right to be conserved for its own sake. • Economic Benefits – open space attracts tourists, green space provides jobs, ensure the economic benefits of natural greenspace are fully realised. • Functional Benefits – vegetation can reduce flood risk, local climate benefits, and absorption of some pollutants. • Sustainable Development – recognise that biodiversity conservation as an essential element of sustainable development.
<p>Title: The Mayor's Cultural Strategy: Cultural Metropolis Author: The Mayor of London Status: Non-Statutory Date: 2010 http://www.london.gov.uk/who-runs-london/mayor/publications/culture/cultural-strategy</p>	<ul style="list-style-type: none"> • The Strategy seeks to <ul style="list-style-type: none"> Maintain London position as a world city of culture Widen the reach to excellence Improve education, skills and careers Improve infrastructure, the environment and public realm Incorporate cultural enhancements into the 2012 Olympics plans and legacy

<p>Title: The Mayor's Economic Development Strategy for London Author: The Mayor of London Status: Non-Statutory Date: 2010</p> <p>http://www.london.gov.uk/who-runs-london/mayor/publications/business-and-economy/eds</p>	<ul style="list-style-type: none"> • The Mayors economic development objectives: • To promote London as the world capital of business, the world's top international visitor destination, and the world's leading international centre of learning and creativity. • To ensure that London has the most competitive business environment in the world. • To make London one of the world's leading low carbon capitals by 2025 and a global leader in carbon finance. • To give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their careers. • To attract the investment in infrastructure and regeneration which London needs, to maximise the benefits from this investment and in particular from the opportunity created by the 2012 Olympic and Paralympic Games and their legacy.
<p>Title: Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy Author: The Mayor of London Status: Non-Statutory Date: 2011</p> <p>http://www.london.gov.uk/who-runs-london/mayor/publication/climate-change-mitigation-energy-strategy</p>	<ul style="list-style-type: none"> • This strategy sets out a strategic approach to limiting further climate change and securing a low carbon energy supply for London. The Mayor has set a target to reduce London's CO2 emissions by 60% of 1990 levels by 2025. Delivering London's Energy Future details the programmes and activities that are ongoing across London to achieve this. These include: • RE:NEW – retrofitting London's homes with energy efficiency measures, and helping Londoners save money off their energy bills. • RE:FIT – retrofitting London's public sector buildings, saving millions of pounds every year. • RE:CONNECT – ten low carbon zones in London aiming to reduce CO2 emissions by 20% by 2012 across the community. • Decentralised energy programme – aiming to supply 25 per cent of London's energy from secure, low carbon local sources.
<p>Title: The Mayor's Climate Change Adaptation Strategy (Draft) Author: The Mayor of London Status: Draft Date: 2010</p> <p>http://www.london.gov.uk/climatechange/strategy</p>	<ul style="list-style-type: none"> • The Mayor's Climate Change Adaptation Strategy does three things: • identifies who and what is most at risk today • analyses how climate change will change the risk of flood, drought and heatwave through the century • describes what action is needed to manage this and who is responsible for it. • The key actions proposed in the strategy are:

	<ul style="list-style-type: none"> • To improve our understanding and management of surface water flood risk • An urban greening programme to increase the quality and quantity of greenspace and vegetation in London – this will buffer us from floods and hot weather • To retro-fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes
<p>Title: London Biodiversity Action Plan Author: London Biodiversity Partnership Status: Non-Statutory Date: 2001 http://www.lbp.org.uk/</p>	<ul style="list-style-type: none"> • London Biodiversity Action Plan is an audit of London's key habitats and species. The audit is an important foundation for the implementation of action to conserve London's biodiversity. • Also includes action plans for individual species, habitat action plans and generic action plans.
<p>Title: Thames Waterway Plan 2006-2011 Author: River Thames Alliance Status: Non-Statutory Date: 2006 http://www.environment-agency.gov.uk/homeandleisure/recreation/133175.aspx</p>	<ul style="list-style-type: none"> • The plan aims to achieve coordinated planning between councils on the following matters: • river front development and protecting and promoting access, transport and open spaces • protection of habitats and environment • more and better riverside leisure facilities such as moorings, toilets and tourism information • plans to regenerate old industrial and working sites • more cost effective promotion of the river, boating and leisure to encourage more visitors and support local businesses
<p>Title: Thames River Basin Management Plan Author: Environment Agency Status: Statutory Date: 2009 http://www.environment-agency.gov.uk/research/planning/125035.aspx</p>	<ul style="list-style-type: none"> • The Core objectives of the plan are: • improve and promote access and information for all users (on water and land) • improve and maintain the river infrastructure, facilities and services for all users • contribute to enhanced biodiversity, heritage, and landscape value in the waterway corridor • increase use of the river and its corridor
<p>Title: Thames Catchment Flood Management Plan (CFMP) Author: Environment Agency</p>	<ul style="list-style-type: none"> • Aids understanding of the scale and extent of flooding now and in the future, and set policies for managing flood risk within the catchment.

<p>Status: Statutory Date: 2009 http://www.environment-agency.gov.uk/research/planning/127387.aspx</p>	
<p>Title: Thames Estuary 2100: Managing flood risk through London and the Thames estuary (TE2100 Plan) Author: Environment Agency Status: Statutory Date: 2012 http://www.environment-agency.gov.uk/homeandleisure/floods/125045.aspx</p>	<ul style="list-style-type: none"> • The TE2100 Plan sets out the strategic direction for managing flood risk in the Thames estuary to the end of the century and beyond. It sets out how we will continue to protect 1.25 million people and £200 billion worth of property from tidal flood risk. • Communities in London and along the Thames estuary already benefit from world-class defences, but flood risk is increasing. The TE2100 Plan recommends what actions the Environment Agency and others will need to take – in the short term (next 25 years), medium term (the following 15 years) and long term (to the end of the century). • The plan is based on current guidance on climate change, but is adaptable to changes in predictions for sea-level rise and climate change over the century.
<p>Title: Lower Thames Flood Risk Management Strategy (draft) Author: Environment Agency Status: Draft Date: 2010 https://consult.environment-agency.gov.uk/portal/re/flood/thames/lts?pointId=909489</p>	<ul style="list-style-type: none"> • The Lower Thames Strategy is a long-term plan to manage flood risk in the Lower Thames area. The strategy aims to reduce the risk of river flooding to 15,000 properties with a 1% annual (1 in 100 year) chance of flooding, from Datchet to Teddington. The Strategy will be carried out in two phases. Phase 1 includes: <ul style="list-style-type: none"> • ecological surveys of the River Thames; • individual property protection measures; • capacity increases to Sunbury, Molesey and Teddington weirs; • widening and deepening the Desborough Cut; • developing outline planning proposals for the engineering channel. • Phase 2 includes: <ul style="list-style-type: none"> • the detailed engineering design; • securing detailed planning permission; • building three flood diversion channels.
<p>Title: London Strategic Parks Project Author: Mayor of London</p>	<ul style="list-style-type: none"> • This project report provides guidance on how to implement a new strategic park by developing a generic methodology which is tested through four case studies. The

<p>Status: Non-Statutory Date: 2006 http://legacy.london.gov.uk/mayor/planning/parks/index.jsp</p>	<p>case studies consider the constraints, opportunities, spatial context, demography, management and funding options for two regional park areas of search and two metropolitan park opportunities.</p>
<p>Title: Transport Assessment Best Practice Guidance Author: Transport for London (TfL) Status: Non-Statutory Date: 2010 http://www.tfl.gov.uk/assets/downloads/businessandpartners/transport-assessment-best-practice-guidance.pdf</p>	<ul style="list-style-type: none"> • The purpose of the document is to provide high-level guidance to improve the process for TfL and its Land Use Planning Team • The guidance is relevant to developments that are deemed to be strategically important and which are referred to the Mayor. • This document offers advice and guidance to those producing transport assessments for referred applications.
<p>Title: New Way to Plan – Travel planning for new development in London Author: Transport for London (TfL) Status: Non-Statutory Date: 2010 http://www.lscpl.org.uk/newwaytoplan/travelplan_guidance.html#h1</p>	<ul style="list-style-type: none"> • This guidance provides advice on workplace, residential and other developments. It details the process, responsibilities and timescales for preparing a travel plan; content of the plan; implementation and monitoring requirements.
<p>Title: Delivery and Servicing Plans: Making freight work for you Author: Transport for London Status: Non-Statutory Date: 2010 http://www.tfl.gov.uk/microsites/freight/delivery_servicing_plans.aspx</p>	<ul style="list-style-type: none"> • A Delivery and Servicing Plan (DSP) will help organisation to better manage deliveries and could save you money. A DSP provides a framework to make sure that freight vehicle activity to and from a building is working effectively. It will help to: • Manage deliveries to reduce the number of trips, particularly during peak hours; • Identify where safe and legal loading can take place; • Commission delivery companies who can demonstrate their commitment to best practice; • Help to reduce CO2 emissions, congestion and collisions.
<p>Title: The Mayor's Equality Framework: Equal Life Chances for</p>	<ul style="list-style-type: none"> • Ensure the capital's diverse communities, particularly the most vulnerable and

<p>All</p> <p>Author: Mayor of London</p> <p>Status: Non-Statutory</p> <p>Date: 2009</p> <p>http://www.london.gov.uk/who-runs-london/mayor/publications/society/mayors-equality-framework-equal-life-chances-all</p>	<p>disadvantaged people, benefit from London's success and are protected in the economic downturn.</p> <ul style="list-style-type: none"> • Support the development across the London economy of diverse markets, workforces and suppliers, in particular through the GLA Diversity Works for London and Responsible Procurement programmes • Embed equality into the heart of business and corporate planning exemplifying the gold standard for best practice which brings real change to people's quality of life • Require working with GLA group and more widely with London councils, and the public, private, voluntary and community sectors to provide practical solutions to effectively tackle inequality • Ensure services delivered by the Functional Bodies are accessible and appropriate to all Londoners • Ensure delivery of an accessible and inclusive London 2012 Olympic and Paralympic Games with a legacy to benefit all Londoners
<p>Draft Local Plans and Programmes</p>	
<p>Title: Core Strategy</p> <p>Author: London Borough of Hammersmith & Fulham</p> <p>Status : Statutory</p> <p>Date: 2011</p> <p>http://www.lbhf.gov.uk/Directory/Environment_and_Planning/Planning/Planning_policy/164525_Core_Strategy.asp</p>	<ul style="list-style-type: none"> • Overarching Draft Local Planning policy document that sets out the long term vision for development in the borough. • Highlights the strategic objectives for the borough, focussing on the key issues to be addressed and includes a delivery strategy for achieving these objectives. • Identifies major regeneration areas and allocates strategic sites for development
<p>Title: Development Management Draft Local Plan ('DMLP')</p> <p>Author: London Borough of Hammersmith & Fulham</p> <p>Status – Statutory</p> <p>Date- 2013</p> <p>http://www.lbhf.gov.uk/Directory/Environment_and_Planning/Planning/Planning_policy/181505_Development_Management_Local_Plan.asp</p>	<ul style="list-style-type: none"> • Together with the Core Strategy the DMLP the DMLP sets out the development management policies to be used by the council in helping to determine individual planning applications. • The policies in the DMLP aim to ensure development in the borough accords with the spatial vision and strategic objectives set out in the Core Strategy.
<p>Title: Planning Guidance Supplementary Planning Document</p> <p>Author: London Borough of Hammersmith & Fulham</p> <p>Status – Statutory</p>	<ul style="list-style-type: none"> • Provides supplementary detail to policies contained in the Core Strategy and DMLP to guide development in the borough

<p>Date – 2013 http://www.lbhf.gov.uk/Directory/Environment_and_Planning/Planning/Planning_policy/171437_LDF_SPD.asp</p>	
<p>Title: Community Strategy 2007-14 Author: London Borough of Hammersmith & Fulham Status – Statutory Date – 2007 http://www.lbhf.gov.uk/Images/Community%20Strategy%202007%20to%202014_tcm21-78710.pdf</p>	<p>The Community Strategy sets out the means for delivering the following key priorities in the borough over the period 2007-14:</p> <ul style="list-style-type: none"> • provide a top quality education for all; • tackle crime and antisocial behaviour; • deliver a cleaner, greener borough; • promote home ownership; • set the framework for a healthier borough; • deliver high quality, value for money public services; and • regenerate the most deprived parts of the borough;
<p>Title: Housing Strategy Author: London Borough of Hammersmith & Fulham Author: London Borough of Hammersmith & Fulham Status – Non- statutory Date: 2012 http://www.lbhf.gov.uk/Images/HF_Housing_Strategy_Oct_2012_tcm21-80328.pdf</p>	<p>The Strategy aims to deliver the Community Strategy vision which is to ‘create a borough of opportunity for all’ by focusing on the contribution housing can make to deliver this vision. The key objectives of the strategy are as follows:</p> <ul style="list-style-type: none"> • Deliver major economic and housing growth; • Tackle economic and social polarisation • Manage a better, streamlined council housing service
<p>Title – Housing Allocation Scheme Author: London Borough of Hammersmith & Fulham Status: Non-statutory Date: 2012 http://www.lbhf.gov.uk/Images/HF_Housing_Allocation_Scheme_FINAL_Dec_2012_tcm21-63353.pdf</p>	<p>This reports sets out the council’s criteria for the allocation of council housing. These criteria are:</p> <ul style="list-style-type: none"> • Eligibility • Qualification and Reasonable Preference • Exceptional Cases including Classes of Persons who do not qualify • Local Residency Qualification • Condition and Size of Accommodation • Suitability of Housing Offers • Transfers • Local Lettings Plans

<p>Title: Homelessness Strategy Author: London Borough of Hammersmith & Fulham Status: Non-statutory Date: 2012</p>	<p>This Homelessness Strategy begins with a brief analysis of homelessness trends based on evidence ; a brief review of the Council's recent homelessness work to date; and based on the review and current housing policy trends, what the future direction of travel for this area of work might take; and finally, identifying future areas of homelessness work for future action.</p>
<p>Title: Contaminated Land Strategy Author: London Borough of Hammersmith & Fulham Status: Non-statutory Date: 2001</p>	<p>The strategy aims to identify and remediate any remaining contaminated sites in the borough. The strategy lists the following objectives:</p> <ul style="list-style-type: none"> • To provide a clear, practical, accountable framework for the identification and remediation of contaminated land in the borough. • To ensure that the risks posed by contamination are effectively addressed under either the development control process when a site is subject to redevelopment, or under the new regime or other appropriate regimes where the existing use is to remain. • To set up an efficient contaminated land information management system, using information technology as effectively as possible. This will be designed to collate, analyse and output the required data, and will include the contaminated land register. This will enable clear, effective and speedy information to be provided to the public, relevant Agencies (particularly Environment Agency), developers etc. • To inspect the Council's existing and proposed land holdings in order to address any liability issues associated with current or intended land ownership. • To develop a system to deal with the Council's own liabilities as landowner and prevent the acquisition of further liabilities. • To develop an effective contaminated land risk communication strategy. • To regularly monitor and review the Strategy and Council policy in dealing with contaminated land.
<p>Title: Economic Development Strategy 2007-2012 Author: London Borough of Hammersmith & Fulham Status: Non-statutory Date: 2007</p>	<p>The EDS sets out a five year framework to steer the activities and actions of the Council and other partners in ensuring the sustainable and equitable development of the local economy. Overall the EDS will be used for the following purposes:</p> <ul style="list-style-type: none"> • To provide a ladder of opportunity • To provide a framework to coordinate the achievement of the vision • To assist in determining priorities and the allocation of resources • To coordinate activity with other local, regional and sub regional strategies and bodies • To set targets and a monitoring framework to measure progress

	<p>The strategy aims to achieve these objectives by focusing on three major themes:</p> <ul style="list-style-type: none"> • Social regeneration reducing welfare benefit dependency • Creating opportunities through learning and skills • Economic regeneration – job creation
<p>Title: Earls Court and West Kensington Opportunity Area Joint SPD Author: London Borough of Hammersmith & Fulham Status :Statutory Date : 2012</p>	<p>The SPD sets out guidelines for future development in the Earls Court and West Kensington Opportunity Area. The document sets out a number of objectives relating to:</p> <ul style="list-style-type: none"> • Urban Form • Employment • Retail • Social and Community Facilities • Transport • Housing • Culture • Energy; and • Environment
<p>Title: White City Opportunity Area Planning Framework Author: London Borough of Hammersmith & Fulham Status –Statutory Date - 2013</p>	<p>The OAPF provides guidance on the approach to future development in the eastern part of the OA (White City East). It considers how, in line with policy, development in White City East could bring social, physical and economic benefits to the western part of the OA (White City West), which largely comprises the local council estates by increasing housing choice in the area as a whole and providing further jobs and local facilities.</p>
<p>Title: South Fulham Riverside Regeneration Area SPD Author: London Borough of Hammersmith & Fulham Status – Statutory Date - 2013</p>	<p>The SPD sets out guidelines for development in the South Fulham riverside regeneration area.</p>

Appendix 2

London Borough of Hammersmith and Fulham
Draft Local Plan

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

January 2015

For further information please contact:

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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')² 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 9th January to 20th February 2015.

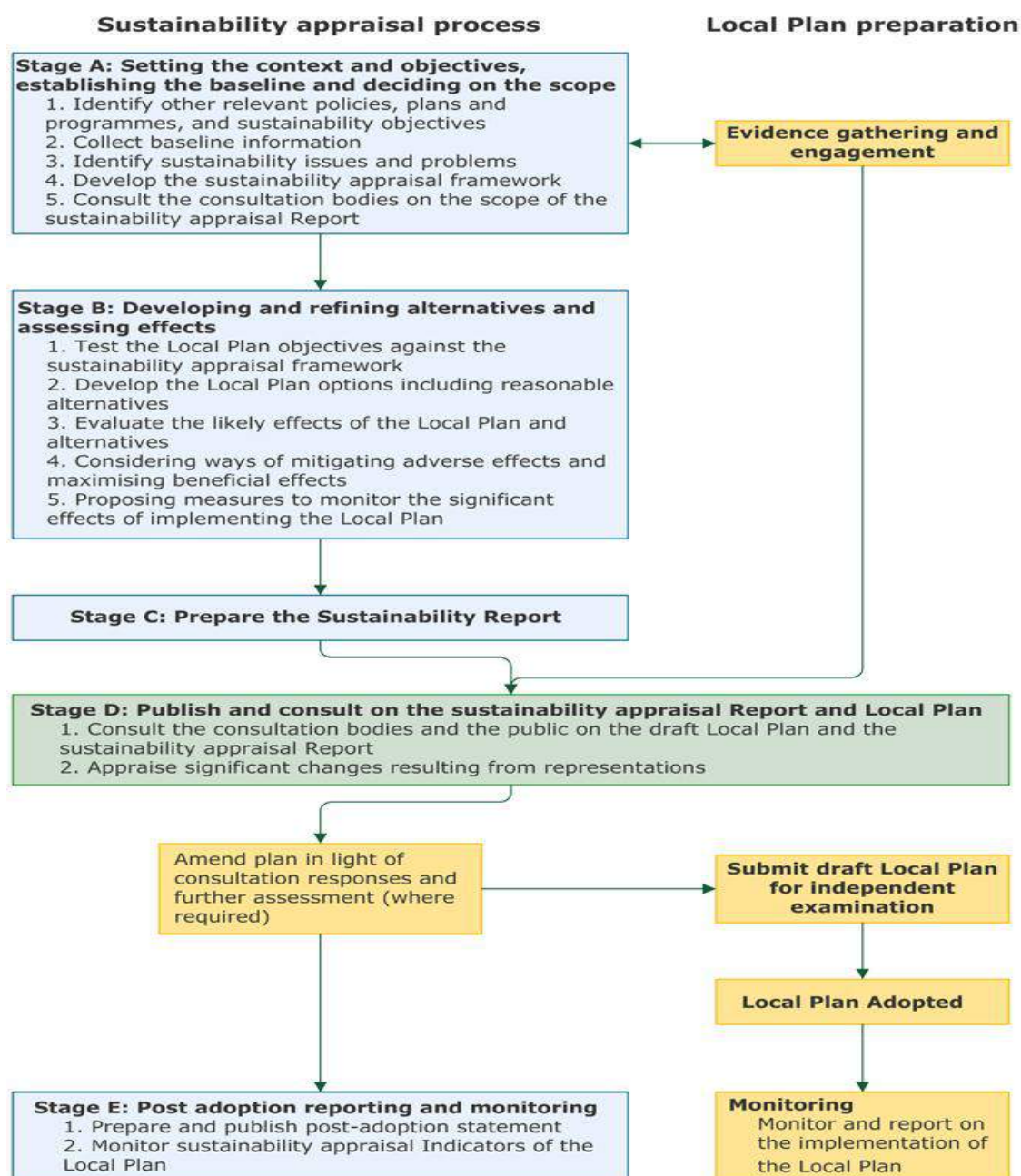
2.24 The environmental bodies as listed in the guidance will be consulted along with any other stakeholders who may be interested in the methodology and outcome of the assessments.

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.¹

Diagram 1: The Five Stages of Sustainability Appraisal



¹ 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>B1. Test the Local Plan objectives against the sustainability appraisal objectives</p> <p>B2. Develop the Local Plan options including reasonable alternatives</p> <p>B3. Evaluate the likely effects of the Local Plan and alternatives</p> <p>B4. Consider ways of mitigating adverse effects and maximising beneficial effects</p> <p>B5. Propose measures to monitor the significant effects of implementing the Local Plan</p> |
|---|

Stage C: Developing and refining alternatives and assessing effects

- | |
|--|
| <p>C. Prepare the Sustainability Report</p> |
|--|

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

Symbol	Definition of Impact
✓	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

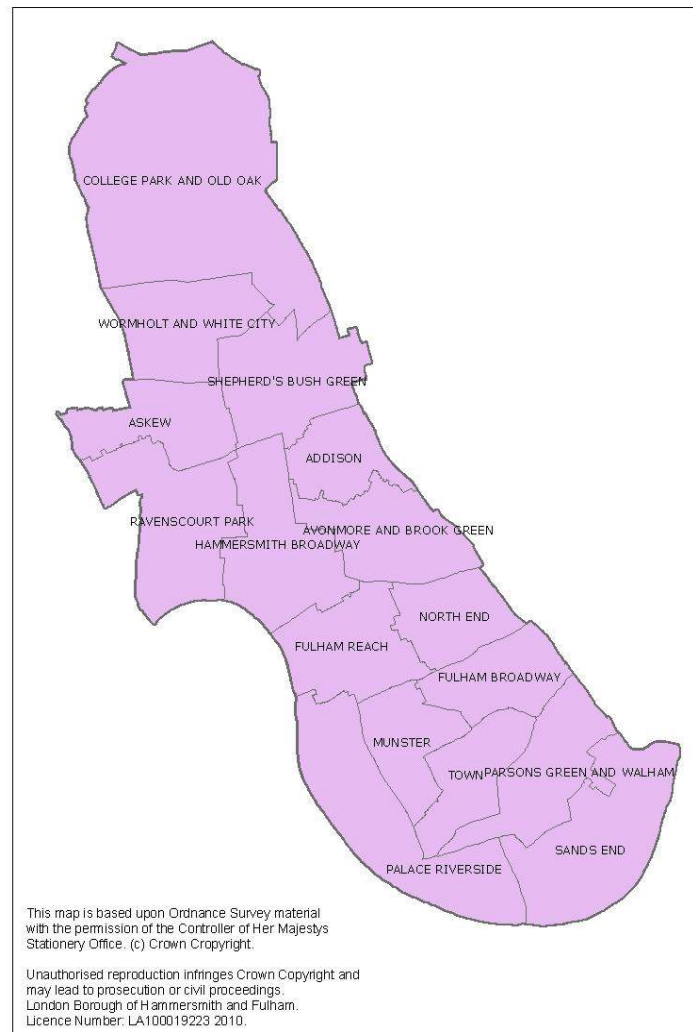
- 4.1 Baseline information on the borough has been set out in the Scoping Report and is not replicated in its entirety in this document. A summary profile is set out below in the context and baseline data section and data has been updated wherever appropriate. For reference the Scoping Report can be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

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.²

² 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 81,620³ 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 12th 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.⁴

³ Source: HSSA, Regulatory Statistical Return and Joint Regional returns.

⁴ Borough profile, 2014.

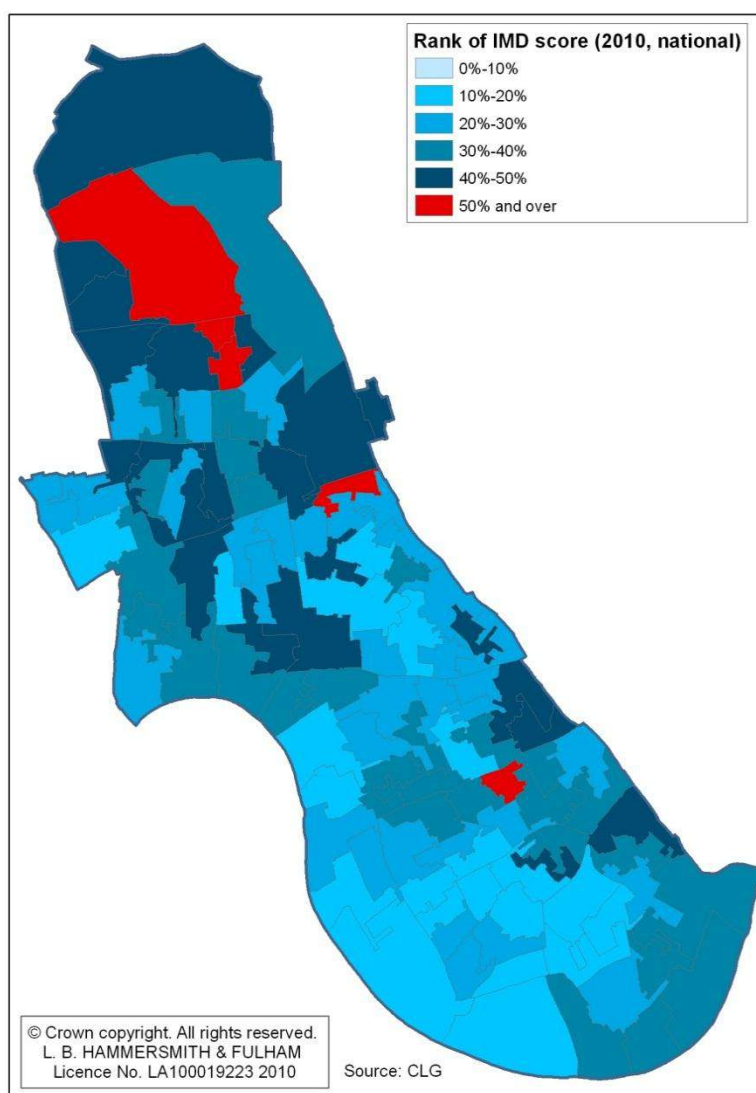
Deprivation

- 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 31st 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.⁵ 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 2010/11⁶ carried out by the council and NHS Hammersmith and Fulham (now NHS Hammersmith & Fulham Clinical Commissioning Group).

⁵ Children and Young People's Plan 2008-11

⁶ 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.⁷ In some schools, the percentage of passes was much higher than the average, while in others it was much lower.

Crime

⁷ 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.⁸

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.⁹

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, 127,173¹⁰ people worked in the borough which is an increase from the 103,200¹¹ people employed in the borough in 2002 and 113,600¹² 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.

⁸ Borough profile, 2014.

⁹ Borough profile, 2014.

¹⁰ 2012 BRES

¹¹ 2002 Annual Business Inquiry

¹² 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 transport¹³ 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 residents¹⁴. 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.

¹³ DECC

¹⁴ 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 21st 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
Social	<ul style="list-style-type: none"> • Reduce deprivation and polarisation • Improve provision of essential social infrastructure to cater to projected changes in the population(Health, education and sports and leisure facilities) • Reduce crime and anti-social behaviour • Promoting housing opportunities for all by increasing housing supply, home ownership rates and diversifying tenure • Improving housing quality • Reduce the relatively high mortality(early deaths) ratio by improving health outcomes for residents and reducing health inequalities • Reduce the polarisation of employment opportunities and reduce dependency on benefits • Improve the quality of education in state schools • Increase council support for the third sector and volunteering • Improve amenity and quality of life for residents by creating safe and pleasant environments with a strong sense of place
Economic	<ul style="list-style-type: none"> • Reduce unemployment and increase investment in the borough; • Improve the level of education, training and local employment opportunities; • Prevent the loss of viable employment land • Enhance the vitality and viability of town and local centres • Identify and regenerate suitable areas to boost economic investment and employment
Environmental	<ul style="list-style-type: none"> • Improve the quality of the borough's public realm and green spaces and expand the borough's green infrastructure; • Conserve and enhance the borough's natural and built environment • Increase biodiversity across the borough • Reduce congestion and improve transport accessibility

	<ul style="list-style-type: none"> • Ensure a high quality public realm and design • Reduce and mitigate the local causes of climate change • Reduce flood risk • Improve efficiency in resource(water, materials and energy) • consumption; • Reduction of waste generated and an increase in waste treatment and recycling; • Improving street cleanliness and environmentally responsible behaviour with regard to fly tipping and waste disposal.
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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
Social justice	1. Increase equity and social justice	<ul style="list-style-type: none"> • Make essential services affordable to all • Reduce differences in standards between different communities • Improve support to groups that are vulnerable and have special needs including those with disabilities
Health	2. Improve health of population overall	<ul style="list-style-type: none"> • Increase expected years of health life • Enable healthy lifestyles including mode of travel
Education and skills	3. Improve the education and skills of young people and adults	<ul style="list-style-type: none"> • Raise the standard of achievement at all ages
Affordable homes	4. Provide decent and affordable homes	<ul style="list-style-type: none"> • Reduce homelessness • Increase the range and affordability of housing • Reduce the number of unfit homes
Social cohesion	5. Increase local residents' sense of community and social cohesion	<ul style="list-style-type: none"> • Increase participation and voluntary activity • Reduce levels of crime and non-criminal anti-social disturbances • Increase sense of security and safety at home and in the street
Satisfying work	6. Increase the opportunities for satisfying and well paid work	<ul style="list-style-type: none"> • Reduce unemployment, especially long term unemployment • Improve earnings and reduce work related stress to improve health

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

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

Sustainability appraisal objective	Effect on compatibility with Draft Local Plan strategic objectives
1. Increase equity and social justice	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.
2. Improve health of population overall	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.
3. Improve the education and skills of young people and adults	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.
4. Provide decent and affordable homes	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.

Sustainability appraisal objective	Effect on compatibility with Draft Local Plan strategic objectives
5. Increase local residents' sense of community and social cohesion	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.
6. Increase the opportunities for satisfying and well paid work	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.
7. Improve the local environment and heritage	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.

Sustainability appraisal objective	Effect on compatibility with Draft Local Plan strategic objectives
8. Reduce the level of pollution	<p>There is general compatibility between the objectives with strong compatibility with DLP objectives 11,13,17 & 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>
9. Reduce the effect of transport on the environment	<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 & 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 & 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>

Sustainability appraisal objective	Effect on compatibility with Draft Local Plan strategic objectives
10. Responsible consumption of resources in the borough	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.
11. Reduce climate change and its impact on the borough	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.
12. Improve the sustainability of the local economy	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
- *Sustainability Appraisal of Core Strategy Options* (May 2009) 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
- *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
- *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

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
Preferred Option: 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	✓	✓	✓	✓	✓	✓	✓	✓	✓
Preferred Option: Provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion;	✓	✓	0	0	✓	0	✓	✓	✓	✓	✓	✓

Preferred Option: 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	✓	✓	✓	✓	✓
Preferred Option: 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	✓
Preferred Option: Deliver new physical, social and environmental infrastructure that meets the needs of new residents as well delivering tangible benefits for surrounding communities.	✓	✓	✓	0	✓	0	✓	✓	✓	✓	✓	✓
Alternative Option (1): <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											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Strategic Policy OORA – Old Oak Regeneration Area												
Preferred Option <i>See policy wording above.</i>	✓	✓	0	✓	✓	✓	✓/?	✓	✓	✓	✓	✓
Alternative Option (1): <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
Alternative Option (2): <i>Defer the regeneration of parts of the site until suitable transport nodes are operational.</i>	?	?	?	✓/?	?	0	0	✓/?	?	✓	0	?
Alternative Option (3): <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
Alternative Option (4): <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/✓	✓
Alternative Option (5): <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
Preferred Option: <i>See policy wording above.</i>	✓	✓/ ?	0	0	✓	✓	?	✓	✓	✓	✓	✓
Alternative Option: <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
Preferred Option: <i>See policy wording above.</i>	0	✓	0	✓/?	✓	✓	✓/?	0	✓/?	✓	0	✓
Alternative Option (1): Land use should be weighted towards the provision of residential uses throughout the area.	?	0	0	✓/?	?/X	X	?	0	✓	0	0	X
Alternative Option (2): 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
Preferred Option: <i>See policy wording above.</i>	✓	✓	✓/ ?	✓	✓/ ?	✓	✓	0	✓	✓	0	✓
Alternative Option (1) <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	?
Alternative Option (2) <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
Alternative Option (3) <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

Indicative additional homes	Indicative new jobs
6,000	10,000

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.

Alternative Options – Strategic Policy WCRA (White City Regeneration Area)

- Develop an updated SPD for the area.
- Extend the regeneration area boundary and exclude the area of land to the west and/or the town centre from the regeneration area boundary.

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

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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Strategic Policy WCRA - White City Regeneration Area	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	✓	✓
Alternative Option (1) <i>Develop an updated SPD for the area.</i>	?	?	?	?	?	?	?	?	?	?	?	?
Alternative Option (2) <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>Alternative Options – Strategic Site Policy WCRA1 (White City East)</p> <ul style="list-style-type: none"> • Separate planning development of individual sites east of Wood Lane. • Encourage predominantly employment or housing with little mix.
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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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Strategic Site Policy WCRA1 - White City East	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>	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	✓
Alternative Option (1): <i>Separate planning development of individual sites east of Wood Lane.</i>	?	?	?	?	?	?	?	?	?	?	?	?
Alternative Option (2): <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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Strategic Site Policy WCRA2 - White City West	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
Alternative Option (1): <i>Not to seek a comprehensive approach to planning this area and allow piecemeal development and improvements on the estates as opportunities arise.</i>	?	?	?	?	?	?	?	?	?	?	?	?
Alternative Option (2): <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
Preferred Option: <i>See policy wording above.</i>	0	0	0	0	0	✓	x/ ?	0	0	0	0	✓
Alternative Option (1): <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
Preferred Option: <i>See policy wording above.</i>	0	✓/ ?	0	✓	✓	✓	?	0	0	0	0	✓
Alternative Option (1): 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	✓
Alternative Option (1): <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	?
Alternative Option (2): <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
Preferred Option: <i>See policy wording above.</i>	0	✓	0	✓	✓	✓	✓	0	0	0	0	✓
Alternative option (1): <i>Focus on only upgrading the retail element in this area.</i>	x	0	0	?/x	?	✓	0	0	0	0	0	✓
Alternative option (2): <i>Comprehensive redevelopment of the shopping centre site.</i>	0	0	0	0	?/x	x	?/x	0	0	0	0	x

Alternative option (3): <i>Encourage development to be residential rather than office led.</i>	x	x	0	0/?	x	?	0	0	0	0	0	x
Alternative option (4): <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
Preferred Option: <i>See policy wording above.</i>	✓	✓	?/ ✓	✓	✓	✓	?	?	✓	0	0	✓
Alternative option (1): <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
Alternative option (2): <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
Alternative option (3): <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
Preferred Option: <i>See policy wording above.</i>	✓	0	0	✓/ ?	?	✓	0	0	✓	0	✓	✓
Alternative option (1): <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
Preferred Option: <i>See policy wording above.</i>	✓	✓/?	✓/?	✓/?	✓/?	✓	✓	0	?	0	0	✓
Alternative option (1): <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
Strategic Policy SFRRA - South Fulham Riverside Regeneration Area												
Preferred Option: <i>See policy wording above.</i>	0	✓/?	✓/?	✓/?	✓	✓	✓/?	?	✓/?	0	0	✓
Alternative option (1): <i>Prioritise the safeguarding of wharves over other land uses.</i>	X	?/X	0	0	?	0	0	0	0	0	?	?
Alternative option (2): <i>Promote employment led development across the site.</i>	?	0	✓	✓	?	✓	0	0	?/X	0	0	X
Alternative option (3): <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											
Strategic Site SFRRRA1 - Imperial Gasworks National Grid	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	0	0
Alternative option (1): <i>Maintain the site for employment purposes.</i>	?/X	?	✓	X	?	✓	0	X	X	0	?	✓
Alternative option (2): <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
Preferred Option: <i>See policy wording above.</i>	✓	✓	0	0	✓	0	0	?	✓	✓	✓	✓
Alternative option (1) Allow more employment land to be redeveloped for housing.	?	0	0	✓	0	X	0	?	?	?	?	X
Option 2.1.5 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
Preferred Option: 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
Alternative option (1): <i>Allow the loss of existing housing.</i>	X	X	0	X	X	0	X	0	0	X	0	0
Alternative option (2): <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
Preferred Option: 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
Preferred Option: 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
Preferred option: 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.												
Alternative option (1): <i>Set differential affordable housing targets in different parts of the borough.</i>	✓	0	0	✓	✓	0	0	0	0	0	0	0
Alternative option (2): <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	
Preferred Option: 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	
Preferred Option: 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	
Preferred Options: 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.												
Preferred Options: 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
Preferred Options: 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
Alternative option (1): <i>Set a specific mix and density of homes for different areas within the borough.</i>	✓	0	0	✓	✓	0	?	0	0	0	0	0
Alternative option (2): <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
Preferred Option: 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
Preferred option: 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.												
Alternative option (1): Apply a mix of housing flexibly on a site-by-site basis.	?	?	0	?	?	0	0	0	0	0	0	0
Alternative option (2): 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
Alternative option (3): 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
Preferred Option: <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	0	0	✓	0	0	0
Alternative option (1): <i>Apply a development size threshold of 20 or more units when seeking wheelchair housing.</i>	x	x	0	x	x	0	?	?	?	?	?	0
Alternative option (2): <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											
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
Preferred option: 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.												
Preferred option: 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	✓
Alternative option (1): <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
Alternative option (2): <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
Alternative option (1): <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
Alternative option (2): <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>												
Alternative option (3): <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
Preferred Option: 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.												
Preferred Option: An application for student accommodation will need to show that [...]. <i>See policy wording above.</i>	✓	?	?	✓	?	0	✓	?	✓	?	?	✓
Alternative option (1): <i>Restrict student housing unless it meets the needs of a local college or institutions.</i>	0	0	?	✓	0	✓	0	✓	✓	0	0	✓
Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	?	?	0	?	0	0	0	0	0	0	0	0
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	0	0	0	✓	0	0	✓	0	0	✓	✓	0
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	✓	✓	✓	✓	✓	✓
Alternative option (1): <i>Not to have any standards.</i>	0	X	0	X	?	0	X	X	0	X	X	0
Alternative option (2): <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 reprovision there could be a negative impact upon a sustainable economy and also on satisfying work.

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy E1 Providing for a range of employment uses	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											
Borough-wide Policy E1 Providing for a range of employment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Preferred Option: 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	?	?	✓
Alternative option (1): <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
Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	0	0	✓	0	0	✓	0	0	0	0	0	✓
Alternative option (1): <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											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Borough-wide Policy E3 Provision for visitor accommodation and facilities												
Preferred option: <i>See policy wording above.</i>	✓	0	0	✓	?	✓	✓	✓	✓	0	✓	✓
Alternative option (1): <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	?

Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	✓	0	✓	0	✓	✓	0	0	✓	0	0	✓
Alternative option (1): <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
Policy TLC1: Hierarchy of Town and Local Centres Preferred Option 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	✓
Preferred Option 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	✓
Alternative Option 1: <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
Alternative Option 2: <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
Borough-wide Policy TLC2 Managing uses in the prime retail frontage areas of town centres												
Preferred option: <i>See policy wording above.</i>	✓	✓	0	0	✓	0	0	0	✓	0	0	✓
Alternative option (1): <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
Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	0	0	?	0	0	0	✓	0	0	✓
Alternative option (1): <i>Alter the boundaries of the town centres and prime retail frontages.</i>	0	0	?	0	0	0	0	0	X	0	0	X
Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	0	0	?	0	0	0	✓	0	✓	✓
Alternative option (1): <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
Borough-wide Policy TLC5 Small non designated parades, clusters and corner shops												
Preferred option: <i>See policy wording above.</i>	✓	✓	0	0	✓	✓	0	0	✓	0	0	✓
Alternative option (1): <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	?
Alternative option (2): <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											
Borough-wide Policy TLC6 Managing the impact of food, drink and entertainment uses	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>Alternative option (1): <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>Alternative option (2): <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
Preferred Option: <i>See policy wording above.</i>	0	✓/!	0	0	✓	0	0	0	0	0	0	✓
Alternative Option (1): Permit betting shops subject to existing non-A1 quota policies.	0	✓/!	0	0	0	0	0	0	0	0	0	✓
Alternative Option (2): Only permit new betting shops in designated shopping areas.	0	×	0	0	×	0	0	0	0	0	0	×
Alternative Option (3): 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
Borough-wide Policy TLC8 Public houses Preferred Option: 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											
Borough-wide Policy TLC8 Public houses	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>Preferred Option</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											
Borough-wide Policy TLC8 Public houses	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.												
Preferred Option 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
Alternative Option 1: <i>Permit change of use subject to existing non-A1 quotas.</i>	x	0	0	0	x	0	x/?	x/?	x/?	0	0	0
Alternative Option 2: <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
Preferred option: 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	✓	?	?	?	✓	✓	?	✓
Preferred option: Seeking the improvement of primary and secondary school provision, including [...] <i>See policy wording above.</i>	✓	0	✓	0	✓	?	?	?	?	?	?	✓

Preferred option: Improving the range of leisure, recreation, sports, arts and cultural facilities	✓	✓	0	0	✓	✓	?	?	?	?	?	✓
Preferred option: 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	✓	✓	✓	?	?	?		✓
Preferred option: Protecting all existing community facilities and services [...] <i>See policy wording above.</i>	✓	✓	✓	0	✓	✓	?	?	?	?	?	✓
Preferred option: Requiring developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities.	✓	✓	✓	0	✓	?	0	?	?	?	?	✓
Alternative option (1): <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	?	?	?	?	?	?	?
Alternative option (2): <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											
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
Preferred option: 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	✓	✓
Preferred option: 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	✓
Preferred option: 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	✓
Alternative option (1): 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
Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	✓	0	✓	?	✓	✓	?	0	0	✓
Alternative option (1): <i>Allow change if premises fall out of use.</i>	x	x	x	0	x	?	0	?	?	?	?	?
Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	0	0	0	0	0	0	0	0	0	0	0	0
Alternative option (1): <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
Borough-wide Policy OS1 Protecting parks and open spaces												
Preferred option: To protect, enhance and increase provision of parks, open spaces and biodiversity in the borough by	0	✓	0	0	✓	0	✓	✓	?	✓	✓	0
Preferred option: 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
Preferred option: Improving existing parks, open spaces and recreational facilities throughout the borough.	0	✓	0	0	✓	0	✓	✓	?	✓	✓	0
Alternative option (2): Do not designate and protect open spaces in the borough.	x	x	x	0	x	0	x	x	0	0	x	x

Alternative Option (2): <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											
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
Preferred option: 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
Preferred option: 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	✓	✓
Preferred option: 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	✓	✓
Alternative option (1): <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
Alternative option (2): <i>Have a strict presumption against development.</i>	0	?	0	0	0	0	?	✓	0	0	✓	x
Alternative option (3): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	?	0	✓	0	0	0	?	0	0	✓
Alternative option (1): <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
Alternative option (2): <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											
Borough-wide Policy OS4 Nature conservation	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
Borough-wide Policy OS4 Nature conservation												
Preferred option: 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
Preferred option: In these areas, development will not be permitted unless: [...] See policy wording above.	✓	0	0	0	✓	✓	✓	✓	✓	0	✓	0
Preferred option: 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
Alternative option (1): Not to permit any development on nature conservation areas or green corridors.	?	✓	0	x	0	0	0	✓	?	0	Y	x
Alternative option (2): 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
Preferred option: <i>See policy wording above.</i>	0	✓	0	0	0	0	✓	✓	0	0	✓	0
Alternative option (1): <i>Only seek biodiversity enhancement measures for major developments.</i>	?	✓	0	0	0	0	?	0	0	0	X	x
Alternative option (2): <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											
Borough-wide Policy RTC1 River Thames and Grand Union Canal	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Preferred option: 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
Preferred option: Encouraging the development of vacant and underused land along the waterways,	✓	0	0	✓	✓	✓	✓	0	✓	?	✓	✓
Preferred option: 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	✓	✓	✓	✓	✓	✓	✓	✓
Preferred option: 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
Alternative option (1): <i>Protect existing water-dependant uses, but not explicitly seek an expansion of such activities.</i>	0	0	0	0	0	✓	✓	0	✓	0	0	✓
Alternative option (2): <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
Borough-wide Policy RTC2 Access to the Thames riverside and foreshore												
Preferred option: 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
Preferred option: 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
Preferred option: All proposals will need to ensure that flood defences are not adversely affected.	0	✓	0	0	0	0	0	0	0	0	✓	0
Alternative option (1): <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
Borough-wide Policy RTC3 Design and appearance of development within the Thames Policy Area												
Preferred option: <i>See policy wording above.</i>	0	✓	0	0	0	0	✓	0	?	0	✓	0
Alternative option (1): <i>Revise the boundary of the Thames Policy Area.</i>	0	0	0	0	0	0	✓	0	0	0	0	?
Alternative option (2): <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	?
Alternative option (3): <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											
Borough-wide Policy RTC4 Water-based activity on the Thames	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</i> <i>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
Alternative option (2): <i>Identify appropriate locations for additional moorings for different purposes, and the scope for expansion.</i>	0	✓	0	0	✓	0	✓	✓	✓	?	✓	?

POLICY OPTIONS	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy RTC4 Water-based activity on the Thames	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Alternative option (3): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	0	✓	✓	✓	?	✓	✓	0	0	✓
Alternative option (1): <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											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Borough-wide Policy DC1 Built environment												
Preferred options: <i>See policy wording above.</i>	✓	✓	0	0	✓	0	✓	0	0	0	0	0
Alternative option (1): <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
Alternative option (2): <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
Preferred option: 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	✓	?	?	✓	✓	?
Alternative option (1): Give priority to high quality proposals that are not constrained by heritage and design issues.	0	?	?	✓	✓	?	?	0	0	0	0	?

Alternative option (2): <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:

- Has an acceptable relationship to the surrounding townscape context in terms of scale, streetscape and built form;
- 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;
- Has an acceptable impact in terms of the setting of, and views to and from, heritage assets;
- Is supported by appropriate transport infrastructure;
- Is of the highest architectural quality with an appropriate scale, form and silhouette;
- Has an appropriate design at the base of the tall building and provides ground floor activity;
- Interacts positively to the public realm and contributes to permeability of the area;
- Is of a sustainable design and construction where energy use is minimised and the design allows for adaptation of the space;
- Does not have a detrimental impact on the local environment in terms of microclimate, overshadowing, light spillage and vehicle movements; and
- 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
Preferred options: 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
Alternative option (1): 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	✓	?	✓
Alternative option (2): 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
Preferred option: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	✓	0
Alternative option (1): <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
Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	✓	0	0	0	0	0	✓	0	0	0	0	✓
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	✓	✓	0
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	0
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	0
Alternative option (1): <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

Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	0	0	0	0	✓	0	✓	0	0	0	0	0
Alternative option (1): <i>Not to have any specific criteria controlling advertisements.</i>	0	0	0	0	x	0	x	0	0	0	0	0
Alternative option (2): <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
Preferred Option: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	?/✓
Alternative Option 1: <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
Alternative Option 2: <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 (CO₂) reduction targets to ensure developments are designed to make the most effective use of passive design measures, minimise energy use and reduce CO₂ 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 CO₂ emissions;**
- **Requiring major developments to demonstrate that their heating and/or cooling systems have been selected to minimise CO₂ 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 CO₂ emissions from major developments, where feasible;**
- **Where it is not feasible to make the required CO₂ 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 CO₂ 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 CO₂ 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
Preferred option: Implementing the London Plan sustainable energy policies and meeting the associated carbon dioxide (CO ₂) reduction targets to ensure developments are designed to make the most effective use of passive design measures, minimise energy use and reduce CO ₂ emissions.	0	✓	0	0	0	0	0	✓	0	✓	✓	0
Preferred option: 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 ₂ emissions. [...] See policy wording above	0	✓	0	0	0	0	0	✓	0	✓	✓	?
Preferred option: Where it is not feasible to make the required CO ₂ 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;												
Preferred option: 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
Preferred option: 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	✓	✓	?
Preferred option: 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	✓	✓	?
Preferred option: 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.												
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	0	0	0	0	0	0	0	✓	0	✓	✓	0
Alternative option: <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
Preferred option: <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)
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- | |
|--|
| <ul style="list-style-type: none">• 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
Preferred option: 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	?	?	✓	?	✓
Preferred option: Promoting sustainable waste behaviour, and maximum use of the WRWA Smuggler's Way facility; and	0	0	0	0	0	0	0	✓	✓	✓	✓	0
Preferred option: 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
Alternative option (1): 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
Alternative option (2): <i>Encourage a greater range of waste management types especially on existing waste transfer sites</i>	0	?	0	0	?	0	0	?	?	?	?	?
Alternative option (2): <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											
Borough-wide Policy CC7 Hazardous Substances	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	0	0
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	✓	✓	✓	0
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	0	0	0	?
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	✓	✓	0
Alternative option (1): <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	✓
Alternative option (2): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	0	0	0	?
Alternative option (1): <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 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	✓	✓	✓	✓	✓
Alternative Option (1): <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
Borough-wide Policy T2 Transport assessments and travel plans												
Preferred Option: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	✓	0	✓	0
Alternative option (1): <i>Increasing the number of schemes that require a TIA.</i>	0	0	0	0	0	0	?	?	?	?	✓	0
Alternative option (2): <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
Preferred policy: <i>See policy wording above.</i>	✓	0	0	0	✓	✓	0	✓	✓	0	✓	✓
Alternative option (1): <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
Borough-wide Policy T4 Increasing opportunities for cycling and walking												
Preferred policy: <i>See policy wording above.</i>	?	✓	0	0	✓	0	✓	✓	✓	✓	✓	0
Alternative option (1): <i>Base cycle parking standards on an assessment of demand for this mode.</i>	?	?	0	0	?	?	0	?	?	?	?	0
Alternative option (2): <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
Preferred policy: <i>See policy wording above.</i>	✓	0	0	0	0	0	0	✓	✓	0	✓	0
Alternative option (1): <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
Preferred policy: <i>See policy wording above.</i>	✓	0	0	0	✓	0	0	?	?	0	0	0
Alternative option (1): <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
Borough-wide Policy T7 Parking for blue badge holders												
Preferred policy: <i>See policy wording above.</i>	0	0	0	0	0	0	0	?	?	✓	?	✓
Alternative option (1): <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
Preferred option: <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Alternative option (1): 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 10th 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
Preferred option: <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"> • Make essential services affordable to all • Reduce differences in standards between different communities • Improve support to groups that are vulnerable and have special needs including those with disabilities 	<ul style="list-style-type: none"> • Index of Multiple Deprivation (IMD)
Health	2.Improve health of population overall	<ul style="list-style-type: none"> • Increase expected years of health life • Enable healthy lifestyles including mode of travel 	<ul style="list-style-type: none"> • All age, all causes mortality rate (SMRs) • Obesity among primary school age children in year 6 • Adult participation in sport
Education and skills	3.Improve the education and skills of young people and adults	<ul style="list-style-type: none"> • Raise the standard of achievement at all ages 	<ul style="list-style-type: none"> • Achievement of 5 or more A* - C grades at GCSE or equivalent including English and Mathematics
Affordable homes	4.Provide decent and affordable homes	<ul style="list-style-type: none"> • Reduce homelessness • Increase the range and affordability of housing • Reduce the number of unfit homes 	<ul style="list-style-type: none"> • 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. • 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 • Number and % of homes granted permission

			<p>that are wheelchair accessible in developments providing ten or more residential units</p> <ul style="list-style-type: none"> • % of homes granted permission achieving Lifetime Homes standards • % of homes permitted meeting the Code for Sustainable Homes Levels 3,4,5 and 6
Social cohesion	5.Increase local residents' sense of community and social cohesion	<ul style="list-style-type: none"> • Increase participation and voluntary activity • Reduce levels of crime and non-criminal anti-social disturbances • Increase sense of security and safety at home and in the street 	<ul style="list-style-type: none"> • Net change in D2 use class floorspace • Number of total offences in the borough
Satisfying work	6.Increase the opportunities for satisfying and well paid work	<ul style="list-style-type: none"> • Reduce unemployment, especially long term unemployment • Improve earnings and reduce work related stress to improve health 	<ul style="list-style-type: none"> • Overall employment rate • Working age people on out of work benefits • Working age people claiming out of work benefits in the most deprived areas of the borough
Heritage	7.Improve the local environment and preserve and enhance the setting of heritage assets	<ul style="list-style-type: none"> • Conserve and enhance the setting of heritage assets including sites, features and areas of cultural, historical and archaeological value • Maintain and enhance sites and species of nature conservation interest • Retain and enhance the character and use of the river 	<ul style="list-style-type: none"> • % of conservation areas with up to date conservation area statements/management plans • Proportion of designated Heritage assets (including building at risk, conservation areas and scheduled monuments) • Length of riverside walk • Net change in total area of public open space • Net change to areas of nature conservation interest • Number of planning applications that include any of the following measures to protect and/or enhance biodiversity:

			<ul style="list-style-type: none"> - Green or Brown roofs - Living walls - Native planting schemes - Bird and/or bat boxes
Reduce pollution	8.Reduce the level of pollution	<ul style="list-style-type: none"> • Improve local air and water quality and reduce noise levels • Reduce the amount of litter, derelict, degraded and underused land 	<ul style="list-style-type: none"> • Number of times the level of pollution exceeds the guide limits for PM10 and NO2 • Number of planning permissions granted where Health and Safety Executive (HSE) objected
Reduce transport impacts	9.Reduce the effect of transport on the environment	<ul style="list-style-type: none"> • Reduce the need for travel and therefore reduce traffic volume • Encourage use of more sustainable modes of transport 	<ul style="list-style-type: none"> • Method of children's travel to school (5-16 year olds) • Number of planning permissions involving Transport Impact Assessments • Cycle parking provision in permitted development schemes
Careful consumption	10.Responsible consumption of resources in the borough	<ul style="list-style-type: none"> • Increase efficiency in use of resources in future plans • Reuse, recover and/or recycle waste 	<ul style="list-style-type: none"> • % of household waste sent to recycling
Climate change	11.Reduce climate change and its impact on the borough	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gases and ozone depleting substances • Reduce energy and water use and increase use of renewable sources • Minimise the risk of flooding from storm events and overflow of watercourses 	<ul style="list-style-type: none"> • Per capita CO₂ emissions in the borough • Number of developments permitted where on-site renewable energy generation is integrated • Number of properties permitted connected to decentralised energy networks • Types and number of SuDS measures approved for installation
Sustainable economy	12.Improve the sustainability of the local economy	<ul style="list-style-type: none"> • Improve the level of investment in community services and shopping facilities • Improve access to key local services, 	<ul style="list-style-type: none"> • Percentage of frontage in A1, A2 and other use classes in frontages identified in policy C2 • Percentage of frontage in A1, A2 and other

		<p>shopping and other local facilities</p> <ul style="list-style-type: none"> • Encourage indigenous investment and training of local workers 	<p>use classes in the non-prime frontage areas</p> <ul style="list-style-type: none"> • Percentage of frontages in non-A1 use; percentage in A3, A4 and A5 uses in frontages identified in policy C4 • Percentage of frontage in non-A1 use; percentage in A3, A4 and A5 uses non-designated parades and clusters and corner shops • Proportion of vacant shopping frontages in retail designations • Employment land available by type • Amount of permitted/completed employment floorspace (by type, regeneration areas and rest of the borough) • The business stock
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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.	
Natural England	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.
English Heritage	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.
English Heritage	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."
English Heritage	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."
English Heritage	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.
English Heritage	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.	
English Heritage	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.
English Heritage	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.
English Heritage	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

Draft Local Plan (November 2014)	Core Strategy (adopted October 2011)/ Development Management (July 2013)
Regeneration Area Strategies	
Strategic Policy - Regeneration Areas	This is a new policy.
Old Oak Regeneration Area	
Strategic Policy OORA – Old Oak Regeneration Area	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.
Strategic Site Policy OORA1 – Old Oak Common Station	This is a new site allocation policy.
Strategic Site Policy OORA2 – Old Oak South	This is a new site allocation policy.
Strategic Site Policy OORA3 – Old Oak North	This is a new site allocation policy.
White City Regeneration Area	
Strategic Policy WCRA – White City Regeneration Area	Formerly Core Strategy policy WCOA.
Strategic Site Policy WCRA1 – White City East	Formerly Core Strategy site policy WCOA1.
Strategic Site Policy WCRA2 – White City West	Formerly Core Strategy site policy WCOA2.
Strategic Site Policy WCRA3 – Shepherd's Bush Market and adjacent land	Formerly Core Strategy site policy WCOA3.
Hammersmith Regeneration Area	
Strategic Policy HRA – Hammersmith Regeneration Area	Formerly Core Strategy policy HTC.
Strategic Site Policy HRA1 – Town Hall Extension and adjacent land, Nigel Playfair Avenue	Formerly Core Strategy policy HTC1.

Strategic Site Policy HRA2 – King Street East	Formerly Core Strategy policy HTC2.
Strategic Site Policy HRA3 – A4, Hammersmith Flyover and adjoining land	Formerly Core Strategy policy HTC3.
Fulham Regeneration Area	
Strategic Policy FRA – Fulham Regeneration Area	Formerly Core Strategy policy FRA.
Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area	Formerly Core Strategy policy FRA1.
South Fulham Riverside Regeneration Area	
Strategic Policy SFRRA – South Fulham Riverside Regeneration Area	Formerly Core Strategy policy SFR.
Strategic Site Policy SFRRA1 – Imperial Gasworks National Grid	This is a new site allocation policy.
Meeting Housing Needs and Aspirations	
Borough-wide Policy HO1 Housing supply	Formerly Core Strategy policy H1.
Borough-wide Policy HO2 Housing conversion and retention	Formerly DMLP policy A1.
Borough-wide Policy HO3 Affordable Housing	Formerly Core Strategy policy H2.
Borough-wide Policy HO4 Housing quality and density	Formerly Core Strategy policy H3 and DMLP policy A2.
Borough-wide Policy HO5 Housing mix	Formerly DMLP policy A3.
Borough-wide Policy HO6 Accessible housing	Formerly DMLP policy A4.
Borough-wide Policy HO7 Meeting needs of people who need care and support	Formerly DMLP policy A5.
Borough-wide Policy HO8 Hostels and houses in multiple occupation	Formerly DMLP policy A6.
Borough-wide Policy HO9 Student accommodation	Formerly Core Strategy policy H6 and DMLP policy A7.
Borough-wide Policy HO10 Gypsy and traveller accommodation	Formerly Core Strategy policy H5.
Borough-wide Policy HO11 Basement accommodation and lightwells	Formerly DMLP policy A8.
Borough-wide Policy HO12 Detailed residential	Formerly DMLP policy A9.

standards	
Local Economy and Employment	
Borough-wide Policy E1 Providing for a range of employment uses	Formerly DMLP policy B1.
Borough-wide Policy E2 Land and premises for employment uses	Formerly Core Strategy policy LE1.
Borough-wide Policy E3 Provision for visitor accommodation and facilities	Formerly DMLP policy B2.
Borough-wide Policy E4 Local employment, training and skills development initiatives	Formerly DMLP policy B3.
Town and Local Centres	
Borough-wide Policy TCL1 Hierarchy of town and local centres	Formerly Core Strategy policy C.
Borough-wide Policy TCL2 Managing uses in the prime retail frontage areas of town centres	Formerly DMLP policy C2.
Borough-wide Policy TCL3 Managing uses in the non-prime frontage areas of town centres	Formerly policy DMLP policy C3.
Borough-wide Policy TCL4 Managing uses in key local centres, neighbourhood parades and satellite parades	Formerly DMLP policy C4.
Borough-wide Policy TCL5 Small non designated parades, clusters and corner shops	Formerly DMLP policy C5.
Borough-wide Policy TCL6 Managing the impact of food, drink and entertainment uses	Formerly DMLP policy C6.
Borough-wide Policy TCL7 Addressing the concentration and clustering of betting shops and payday loan shops	This is a new policy.
Borough-wide Policy TCL8 Public houses	This is a new policy.

Community Facilities, Leisure, Recreation	
Borough-wide Policy CF1 Supporting community facilities and services	Formerly Core Strategy policy CF1.
Borough-wide Policy CF2 Enhancement of community uses	Formerly DMLP policy D1.
Borough-wide Policy CF3 Enhancement of arts, culture, entertainment, leisure, recreation and sport uses	Formerly DMLP policy D2.
Borough-wide Policy CF4 Professional football grounds	This is a new policy.
Green and Public Open Space	
Borough-wide Policy OS1 Protecting parks and open spaces	Formerly Core Strategy OS1.
Borough-wide Policy OS2 Access to parks and open spaces	Formerly DMLP policy E1.
Borough-wide Policy OS3 Playspace for children and young people	Formerly DMLP policy E2.
Borough-wide Policy OS4 Nature conservation	Formerly DMLP policy E3.
Borough-wide Policy OS5 Greening the borough	Formerly DMLP policy E4.
River Thames and Grand Union Canal	
Borough-wide Policy RTC1 River Thames and Grand Union Canal	Formerly Core Strategy policy RTC1.
Borough-wide Policy RTC2 Access to the Thames riverside and foreshore	Formerly DMLP policy F1.
Borough-wide Policy RTC3 Design and appearance of development within the Thames Policy Area	Formerly DMLP policy F2.
Borough-wide Policy RTC4 Water-based activity on the Thames	Formerly DMLP policy F3.
Borough-wide Policy RTC5 Enhancing the Grand Union Canal and improving access	Formerly DMLP policy F4.
Design and Conservation	
Borough-wide Policy DC1	Formerly Core Strategy.

Built environment	
Borough-wide Policy DC2 Design of new build	Formerly DMLP policy G1.
Borough-wide Policy DC3 Tall buildings	Formerly DMLP policy G2.
Borough-wide Policy DC4 Alterations and extensions (including outbuildings)	Formerly DMLP policy G3.
Borough-wide Policy DC5 Shopfronts	Formerly DMLP policy G4.
Borough-wide Policy DC6 Replacement windows	Formerly DMLP policy G5.
Borough-wide Policy DC7 Views and landmarks	Formerly DMLP policy G6.
Borough-wide Policy DC8 Heritage and conservation	Formerly DMLP policy G7.
Borough-wide Policy DC9 Advertisements	Formerly DMLP policy G8.
Borough-wide Policy DC10 Telecommunications	This is a new policy.
Environmental Issues, including Tackling and Adapting to Climate Change	
Borough-wide Policy CC1 Reducing Carbon Dioxide Emissions	Formerly DMLP policy H1.
Borough-wide Policy CC2 Ensuring Sustainable Design and Construction	Formerly DMLP policy H2.
Borough-wide Policy CC3 Reducing Water Use and the Risk of Flooding	Formerly DMLP policy H3.
Borough-wide Policy CC4 Water Quality	Formerly DMLP policy H4.
Borough-wide Policy CC5 Strategic Waste Management	Formerly Core Strategy policy CC3.
Borough-wide Policy CC6 On-site Waste Management	Formerly DMLP policy H5.
Borough-wide Policy CC7 Hazardous Substances	Formerly DMLP policy H6.
Borough-wide Policy CC8 Contaminated Land	Formerly DMLP policy H7.
Borough-wide Policy CC9 Air Quality	Formerly DMLP policy H8.
Borough-wide Policy CC10 Noise	Formerly DMLP policy H9.
Borough-wide Policy CC11 Light Pollution	Formerly DMLP policy H10.
Borough-wide Policy CC12	Formerly DMLP policy H11.

Control of Potentially Polluting Uses	
Transport and Accessibility	
Borough-wide Policy T1 Transport	Formerly Core Strategy policy T1.
Borough-wide Policy T2 Transport assessments and travel plans	Formerly DMLP policy J1.
Borough-wide Policy T3 Vehicle Parking Standards	Formerly DMLP policy J2.
Borough-wide Policy T4 Increasing opportunities for cycling and walking	Formerly DMLP policy J5.
Borough-wide Policy T5 Housing with reduced parking	Formerly DMLP policy J3.
Borough-wide Policy T6 Parking for blue badge holders	Formerly DMLP policy J4.
Borough-wide Policy T7 Borough road network - hierarchy of roads	Formerly DMLP policy J6.
Delivery and Implementation of the Local Plan	
Delivery and Implementation	Formerly Core Strategy Delivery and monitoring.
Planning Contributions and Infrastructure	
Planning Contributions and Infrastructure	This is a new section.

Appendix 3

London Borough of Hammersmith and Fulham
Local Plan

**Proposed Submission Local Plan Environmental Report
(Sustainability Appraisal)**

September 2016

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Appendix 2: SA Framework- Objectives and Monitoring

Appendix 3: List of Plans, Policies and Programmes

Appendix 4: Representations to the SA – Draft Local Plan Consultation
(Regulation 18)

1 INTRODUCTION

Legal Requirements

- 1.1 The council is legally required under both European and UK law to prepare a 'Sustainability Appraisal' ('SA') of the Local Plan in order to help ensure that social, environmental and economic considerations are taken into account during all the stages of the 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.
- 1.2 Both European Union (EU) and national legislative provisions require local authorities to prepare sustainability appraisals of proposed land use or planning policies.

EU Statutory framework

- 1.3 The (SEA) Directive 2001/42/EC (the 'SEA Directive')² 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.
- 1.4 The SA for the Local Plan has been undertaken together with the SEA. Government guidance suggests that the SA should identify where the requirements of the SEA have been met- this is shown in Table 1 below.

Table 1: SA/SEA report and conformity with SEA Directives

SEA Directive Requirements	Location within Report
a) An outline of report contents, the main objectives of the plan and the relationship with other plans and programmes.	SA Scoping Report 2014
b) The current state of the environment & likely evolution thereof without the implementation of the plan	The Baseline Information. SA Scoping Report (2014) and Submission SA (2016)
c) Environmental characteristics of areas likely to be significantly affected	The Baseline Information SA Scoping Report (2014) and Submission SA (2016) section 5.
d) Existing environmental problems which are relevant to the plan, including in particular, those relating to any areas of a particular environmental importance	The Baseline Information and Key Sustainability Issues SA Scoping Report (2014) and Submission SA (2016) section 5 and 6.
e) Environmental protection objectives, established at international, national or community level and the way those objectives and any environmental	Policies, Plans, Programmes & Objectives SA Scoping Report (2014) and Submission SA (2016) section 4 and Appendix 3.

considerations have been taken into account during its preparation	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and interrelationship between the above factors.	Stage B- developing and refining alternatives and assessing effects Draft SA Report (2015) and Submission SA (2016) sections 7, 8, 9 and appendix 1.
g) The measures envisaged to prevent, reduce and as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	Stage B-developing and refining alternatives and assessing effects Draft SA Report (2015) and Submission SA (2016) sections 10, 11 and appendix 1.
h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.	Stage B-developing and refining alternatives and assessing effects Draft SA Report (2015) section xx
i) a description of measures envisaged concerning monitoring in accordance with regulation 17	Stage E- Monitoring Draft SA Report (2015) and Submission SA Report (2016) sections 11, 13 and appendix 2.
j) A non-technical summary of the information provided within the SA/SEA report	Non-Technical Summary

Habitats Regulations

- 1.5 The European Directive 92/43/EEC ('The Habitats Directive') on the conservation of natural habitats, wild fauna and flora requires an Appropriate Assessment (AA) to be undertaken to assess the impacts of a land-use plan against the conservation objectives of any European Site(s) (or so-called Natura 2000 sites¹⁷) and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. The SA of the Core Strategy (2011) and the SA of the Development Management Local Plan (2013) established that there are no European sites within Hammersmith and Fulham, nor are there any adjacent to its administrative boundaries. The nearest is Richmond Park, an area for conservation (SAC) which is 5km to the south west of the borough. However, It is not considered that this site would be significantly adversely impacted upon by any of the policies in the Local Plan.

National statutory planning framework

- 1.6 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 to prepare a report of the findings of the appraisal.
- 1.7 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.
- 1.8 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.
- 1.9 National Planning Policy Framework (NPPF) - Paragraph 14 states that a presumption in favour of sustainable development lies at the heart of the NPPF.
- 1.10 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

- 1.11 The overall purpose of the SA (incorporating SEA) is to:
 - systematically assess the 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.
- 1.12 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 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 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 Hammersmith and Fulham Local Plan

- 1.13 The London Borough of Hammersmith & Fulham (LBHF) has revised its principal planning policy documents which will guide development across the borough over the next 15-20 years.
- 1.14 This revision has resulted in the production of a key strategic planning policy document termed as the Hammersmith and Fulham Local Plan, which amalgamates the adopted Core Strategy (adopted in October 2011) and the Development Management Local Plan (adopted in July 2013) into one single document.
- 1.15 The policies in the Hammersmith and Fulham 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;
 - new regeneration and strategic site policies which will focus on guiding development in specific parts of the borough;
 - new borough-wide development management policies, including TLC6 Addressing the concentration and clustering of betting shops and payday loan shops, TLC7 Public houses, CF4 Professional football grounds and DC10 Telecommunications and T7 Construction and Demolition Logistics; and
 - a new policy on planning contributions and infrastructure planning.
- 1.16 The council wishes to transform the borough over the next 15- 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.
- 1.17 Major regeneration and growth in the borough's four regeneration areas will deliver 19,800 new homes in the period 2015-2035 to meet local housing needs and it will also deliver 29,500 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.
- 1.18 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 next 15-20 years.

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

- 1.19 The council originally commenced preparation of Development Plan Documents (DPDs) for the Core Strategy, Development Management policies and Site Specific Allocations in 2005.
- 1.20 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.
- 1.21 The Core Strategy and Site Specific Allocations preferred options documents were made available for public consultation in June/August 2007.
- 1.22 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.
- 1.23 The Development Management Options document was subjected to public consultation in November 2009. A SA report was also prepared for this document.
- 1.24 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.
- 1.25 The council commenced preparation of the Local Plan in 2013. Preferred options for the Local Plan were subsequently developed, taking into account the responses to the issues and options consultation in 2013 and the results of the SA of the options. The draft Local Plan and preferred options were subject to public consultation in January 2015.

The 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.
- 1.26 The majority of policies from these adopted policy documents have been included in the 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 Local Plan also contains some new policies, notably those relating to the Hammersmith Regeneration Area. There are also new borough-wide development management policies to reflect changes to the planning context.
 - 1.27 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 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;

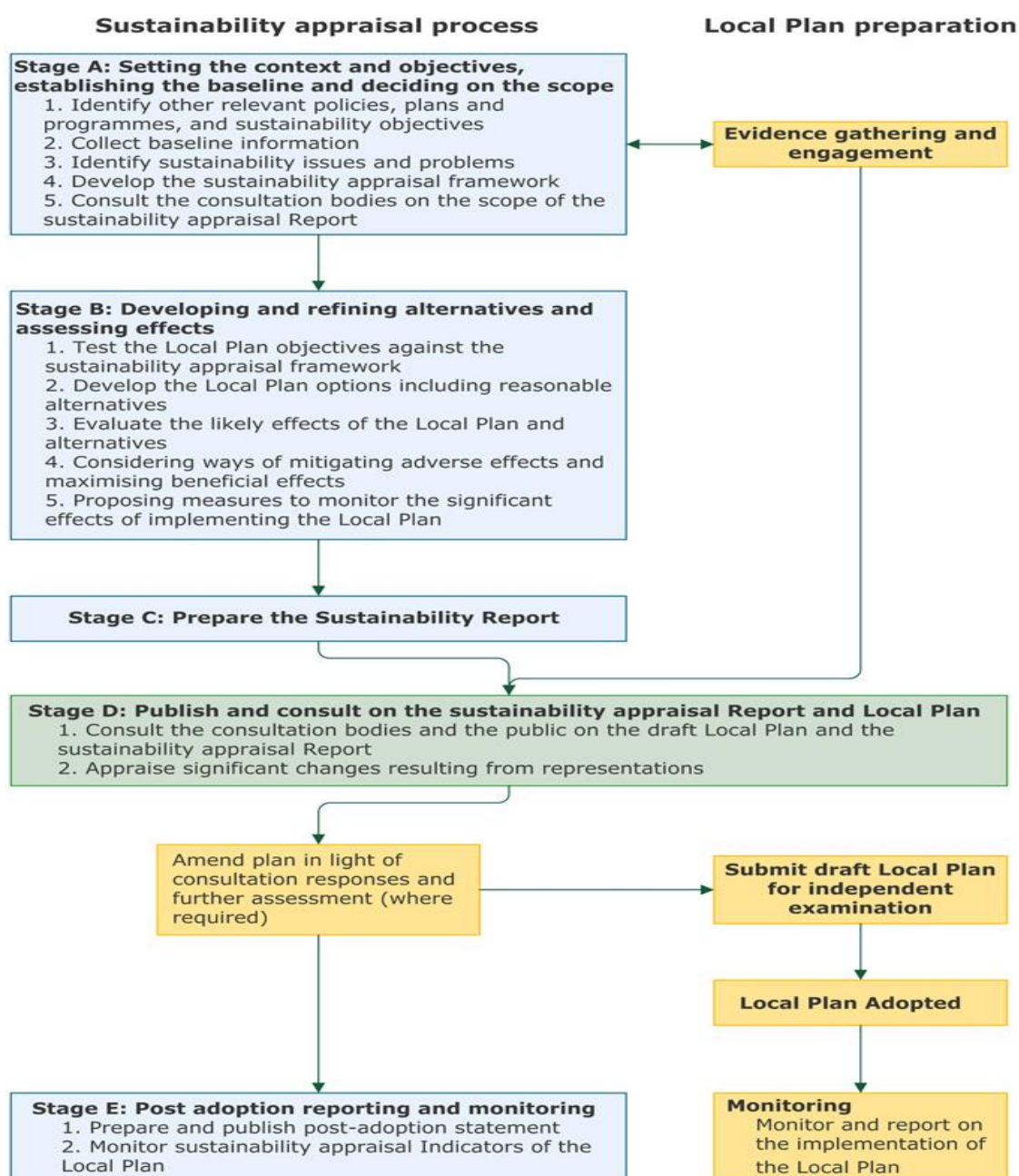
- the designation of the Old Oak and Park Royal Development Corporation covering northern parts of the borough and the removal of this area from H&F's planning authority; and
- the practical advantages of producing one comprehensive policy document, including avoiding having to duplicate the lengthy process associated with adopting Local Plans.

2 APPRAISAL METHODOLOGY

The stages of Sustainability Appraisal

- 2.1 There are five key stages in preparing a SA and these should be undertaken in parallel with the development of the Local Plan. The table below illustrates the key stages of the SA process and their relationship with the development of the Local Plan.¹

Diagram 1: The Five Stages of Sustainability Appraisal



¹ 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.

3 STAGE A: THE SA SCOPING REPORT

- 3.1 The first stage of the SA process (Stage A) for the Local Plan was the preparation of an initial SA report termed the 'SA Scoping Report'. The Scoping Report involved the following tasks:-
- Identifying and reviewing other relevant plans, programmes and policies and sustainable development objectives
 - 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.
- 3.2 The SA Scoping Report was completed in January 2014 and sent out to prescribed agencies and other relevant stakeholders, particularly those with a sustainability remit for consultation.
- 3.3 Three comments were received to the SA Scoping Report consultation from English Heritage, Natural England and the Environment Agency. Their responses to the Consultation, including officer comments are set out in the draft SA (January 2015). This exercise established the overall framework of the sustainability appraisal.

Please see the [SA Scoping Report \(2014\)](#) in full for further information.

4 STAGE A (A1): POLICIES, PLANS, PROGRAMMES AND OBJECTIVES

- 4.1 The policies in the Local Plan have been influenced by a number of existing relevant international, national, regional and local legislation and policies.
- 4.2 The SEA regulations and government guidance require that existing policies, plans programmes and objectives that may influence the production of a Local Plan are reviewed and identified within the SA Scoping Report. The key plans, policies and programmes that have been reviewed during the SA process are listed below, with a full list provided within Appendix 3 of this document. Additional relevant documents that have been published since the production of the SA Scoping Report (2014) have also been included in this list.

National

- National Planning Policy Framework (2012) DCLG
- Planning Practice Guidance (2014) DCLG
- UK Sustainable Development Strategy “Securing the Future” (2005)
- The Code for Sustainable Homes: Setting the Sustainability Standards for new homes (2008)
- The Code for Sustainable Homes: Technical Guide (2012)
- Sustainable Communities: Building for the Future (2003) OPDM
- Sustainable Communities in London: Building for the Future (2003) OPDM
- National Infrastructure Plan 2014
- National Planning Policy for Waste (2014)
- Historic England Good Practice Advice in Planning (2015) Historic England
- Sustainable Drainage Systems- an Introduction (2003) Environment Agency
- Planning Policy for Travellers Sites (2012 & 2015) DCLG

London/Sub Regional

- Mayor of London, The London Plan: spatial development strategy for Greater London, GLA March (2016)
- The Mayor of London’s Housing SPG (2016)
- Town Centres SPG (2014) The London Strategic Housing Land Availability Assessment (SHLAA) 2013
- The Mayor’s Economic Development Strategy for London (2010)
- London Infrastructure Plan 2050 Update (2015) Mayor of London
- OPDC draft Local Plan (2015) Mayor of London

Local

- Core Strategy (2011) LBHF
- Development Management Local Plan (2013) LBHF
- Planning Guidance Supplementary Planning Document (2013) LBHF
- Earls Court and West Kensington Opportunity Area Joint SPD (2012)
- White City Opportunity Area Planning Framework (2013)
- South Fulham Riverside Regeneration Area (2013)
- Strategic Housing Market Assessment (2014, 2015 & 2016) LBHF

- Community Infrastructure Levy Charging Schedule (2015) LBHF
- Community Infrastructure Levy Viability Assessment (2014) Peter Brett
- Affordable Housing Viability Assessment (2016) BNP
- Employment Study Borough of Hammersmith and Fulham 2015 & 2016
- Retail Needs Study (2016)
- Waste Background Paper (2016) LBHF
- Open Space Background Paper (2016) LBHF
- Five Year Housing Land Supply Paper (2016) LBHF
- Tall Buildings Background Paper (2016) LBHF
- Strategic Flood Risk Assessment (2015) LBHF
- Surface Water Management Plan (2015) LBHF
- Parks and Open Space Survey (2008) LBHF

5 STAGE A (A2): BASELINE INFORMATION

Baseline information and sustainability issues

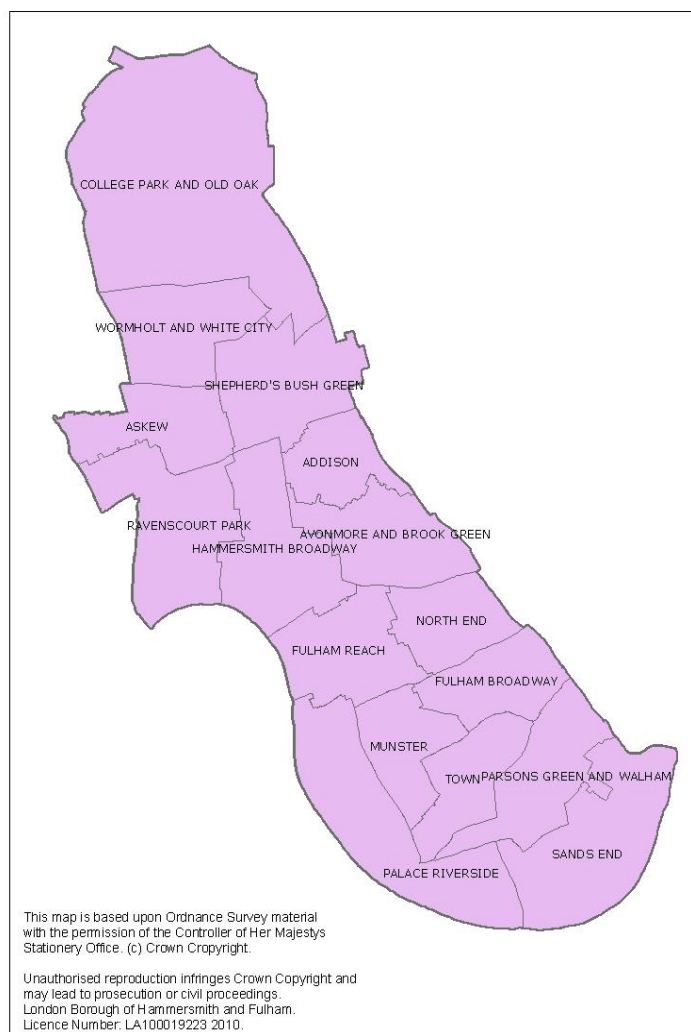
- 5.1 In order to carry out the Sustainability Appraisal of the Local Plan, information was collected and analysed to establish social, environmental and economic conditions of the borough. This is known as 'baseline data' and is primarily collected from the latest census data (2011) the council's own monitoring records and statistics as well as those collected from the GLA and other statutory partners.
- 5.2 Baseline information on the borough was gathered as part of the SA Scoping Report (January 2014). A summary profile of the information is set out below and data has been updated wherever appropriate. For further information, please see the SA Scoping Report (2014).

Context and baseline data

- 5.3 Hammersmith & Fulham 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.²
- 5.4 It is an area of contrasts, of wealth and poverty, and of attractive environments, many of which are protected by conservation area designations and other areas that are less attractive and that need improvement.

² Borough profile, 2014.

Map 1: Wards in H&F



Population

- 5.5 Hammersmith and Fulham 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 GLA's 2015 projections estimate the population to be 186,800. 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).
- 5.6 According to the 2015 GLA population projections (SHLAA)³ the borough's population is expected to increase by 11,895 people (6.7%) between 2011 and 2021. This compares to a 9.1% increase in London as a whole. The further projected

³ Linked to the development trajectories from the Strategic Housing Land Availability Assessment (SHLAA)

increase in population between 2021 and 2031 is 8.2% a similar level to the London average (8.3%).

- 5.7 The main growth will occur for people aged 85 and over and is expected to increase by 2,260 by 2031, equivalent to 110%. During the same period, the population aged 65 to 84 is expected to grow by 61% and the population aged 50 to 64 to grow by 30%. 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.
- 5.8 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

- 5.9 In 2010, there were 81,620⁴ dwellings in the borough. In 2011, only 34% of households in Hammersmith and Fulham were owner occupiers compared to an average of 56.5% across 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.
- 5.10 Approximately one third of Hammersmith and Fulham's housing stock is social rented housing (31%) compared to an average of 24.1% in London. Social rented housing is particularly concentrated in the north of the borough, where over 40% of the housing is in this tenure. Shared ownership and other intermediate low cost housing only makes up 1.6% of housing stock in the borough (Census, 2011).
- 5.11 House 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, particularly those on low to middle incomes. As a simple measure of affordability, the ratio between lower quartile income and lower quartile house prices is calculated. Hammersmith and Fulham 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. The need for more affordable housing is demonstrated by the number of households on the Housing Register – 850 applicants.
- 5.12 Another key challenge in relation to housing supply is overcrowding. Hammersmith and Fulham is ranked 12th in terms of boroughs with the most overcrowded properties. All four wards in the northern sub area of the borough rank within the top

⁴ Source: HSSA, Regulatory Statistical Return and Joint Regional returns.

five for overcrowding. According to the 2011 census, 13% of dwellings are overcrowded by at least one bedroom. Private rented and social rented households have proportionately more overcrowding (17%) than owner occupied households (5%). Around two thirds of the housing stock in Hammersmith and Fulham is owned by the private sector. About 85% of this private housing stock is over 60 years old and about two thirds of the dwellings are in flats. Nearly one fifth of the boroughs private sector housing does not meet the governments decent homes standard.

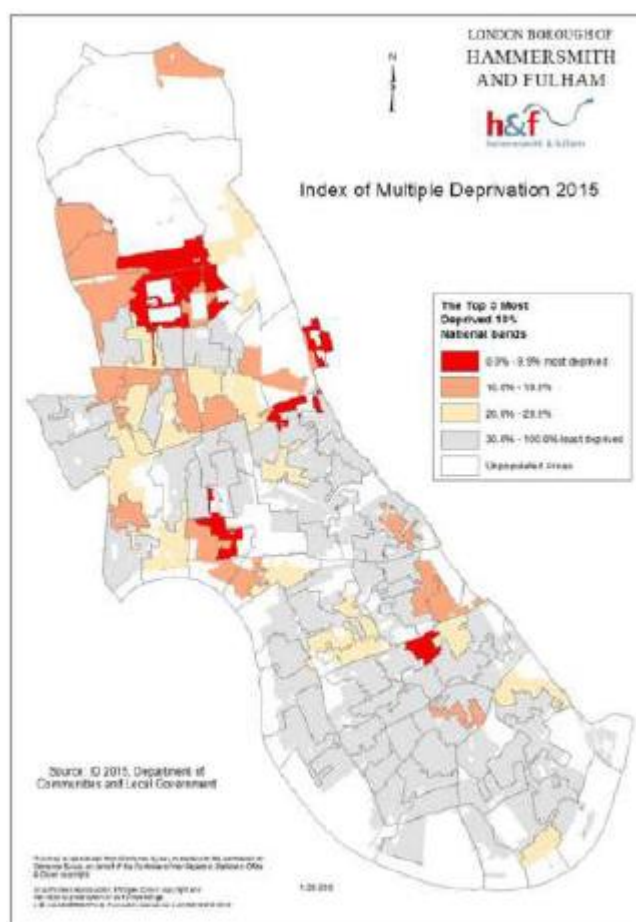
Deprivation

- 5.13 The borough has high levels of deprivation, with 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. According to the 2015 indices of deprivation, it is ranked 76th most deprived Local Authority area in the Country (31st in 2010 and 38th in 2007). In some parts of the borough, in particular the north of the borough the proportion is significantly higher with significant pockets of deprivation. Eight (7%) 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, Edward Woods, Ashcroft Square, Wormholt and Charecroft. A further 15% of the borough's LSOAs are in the 10-20% worst nationally. Hammersmith and Fulham not only has high levels of deprivation, it is polarised socially and economically. E.g. in the last census (2011) 41% of household heads classified themselves as managers or professionals, while more than ¼ said they were entirely dependent on benefits.
- 5.14 Deprivation and low household incomes result in high levels of child poverty and health inequalities. About 20% of people are in poverty in Hammersmith and Fulham compared to 32% of children in poverty.⁵ Childhood poverty in Hammersmith and Fulham 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 Hammersmith and Fulham compared to national figures of 15% and 12% respectively. Further details of the health, wellbeing and social care needs of the borough can be found in the Joint Strategic Needs Assessment 2013/14⁶ carried out by the council and NHS Hammersmith and Fulham (now NHS Hammersmith & Fulham Clinical Commissioning Group).

⁵ Children and Young People's Plan 2008-11

⁶ Joint Strategic Needs Assessment 2013/14

Map 2: Index of Multiple Deprivation (IMD), 2015



Education

- 5.15 Hammersmith and Fulham'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.⁷ In some schools, the percentage of passes was much higher than the average, while in others it was much lower.
- 5.16 According to GLA projections, by 2031 the number of 4-10 year olds (Primary School) is predicted to rise from 13,368 to 16,208. For the age range 11-15 (Secondary School) numbers will rise from 7,337 to 9,975. Projections clearly show that the need for additional secondary places will increase after 2017 at a much faster rate than primary.

⁷ Borough profile, 2014.

Crime

5.17 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.⁸

Health

5.18 In 2013, the standard mortality ratio (SMR) for Hammersmith and Fulham was 96 compared to 91 in London (England SMR=100). For deaths from all causes in Hammersmith and Fulham 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.⁹

Employment and the economy

5.19 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. It has a very successful and diverse economy and makes a significant contribution to the economies of London and the UK, with its concentration of businesses, retail and tourism.

5.20 In 2014, 155,450¹⁰ people worked in the borough which is an increase from the 127,173 in 2012 and 113,600 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.

5.21 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.

⁸ Borough profile, 2014.

⁹ Borough profile, 2014.

¹⁰ LBHF Employment Study 2016

Transport

- 5.22 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 London¹¹. Nearly one sixth of carbon emissions in Hammersmith and Fulham in 2011 was from road transport¹² and traffic related emissions contribute to the exceedance of air quality targets in the borough. The continuing population growth could increase congestion on the roads and transport systems and impact on the environment of the borough including air quality.
- 5.23 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. However, pockets in the south and particularly those in the north of the borough have relatively poor levels of personal accessibility. The proposed HS2/Crossrail/Great Western Main Line interchange at Old Oak Common will significantly increase public transport capacity.
- 5.24 A specific challenge will involve ensuring that proposed growth in the borough, especially in the regeneration areas is adequately provided with new and improved transport infrastructure. The Council also supports more environmentally friendly means of transport, such as cycling and walking, and is investigating options for removing barriers to cycling and walking by replacing the Hammersmith flyover and other sections of the A4 with a tunnel.

Heritage assets

- 5.25 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. The river Thames is important site of archaeological value.

The borough has 45 conservation areas, with approximately 500 statutorily Listed Buildings, 2,150 locally designated Buildings of Merit, as well as a number of archaeological priority areas and the ancient monument of Fulham Palace moated site.

Open Space and Green infrastructure

- 5.26 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 waterways enhance the environment and character of the borough and provide the potential for further benefit to the borough.

¹¹ TfL RNPR Tech Note 3 April 2006

¹² Local & Regional CO₂ Emissions Estimates for 2005-06, DEFRA

- 5.27 The Thames performs many functions, ranging from being a transport resource to a refuge for plants and wildlife. Hammersmith and Fulham has three safeguarded wharves in the south of the borough identified in the London Plan (2016)¹³. The stretch of the Grand Union Canal within the borough now lies within the Old Oak Park Royal Development Corporation.
- 5.28 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, Hammersmith and Fulham has relatively little open space per person, just 231 hectares of public open space or 1.3 hectares of open space per 1,000 residents¹⁴. 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.

Efficient resource management

- 5.29 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.
- 5.30 The cleanliness of local streets and open spaces is one of the most important issues for residents, with 40% of local people ranking cleanliness as the most important area for improvement in the borough, with 16% stating that parks are the most important area for improvement.
- 5.31 Although, the total amount of local authority collected waste has fallen from 79,407 tonnes in 2009-10 to 74,848 in 2014-15 the council's percentage of household waste sent for reuse, recycling or composting has also fallen. In 2014/15, 20.72% was sent for re-use, recycling or composting compared to 30.1% in 2011-12 and 23% in 2012-13. It is considered that this reduction in domestic recycling performance is largely based on the behaviour of individual households and can therefore be difficult to understand and predict.

Climate change

- 5.32 Climate change is, perhaps, the most significant issue for the 21st 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.
- 5.33 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, the use of transport that has low/zero carbon emissions such as modal shift to water and rail transport, reducing energy use, increasing energy efficiency in buildings and the management of waste and flood risk.

¹³ Mayor of London, The London Plan GLA 2016

¹⁴ Open Spaces and Outdoor Recreation Facilities in H&F 2006

- 5.34 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 Hammersmith and Fulham, 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.
- 5.35 A further serious challenge is that of air quality. Road traffic is one of the main causes of carbon dioxide emissions, poor air quality and noise pollution in the borough. The main other cause of noise pollution and air pollution is air traffic, the flightpaths to Heathrow and its associated road traffic. In 2000, the whole of the borough was designated as an Air Quality Management Area for Nitrogen Dioxide, with an Action Plan adopted with the aim of meeting the government's national air quality objectives for nitrogen dioxide and particulates.

6 STAGE A (A3) KEY SUSTAINABILITY ISSUES

- 6.1 The review of relevant policies, plans and programmes and the baseline information gathered helped to identify a number of key sustainability issues and problems for which the Local Plan needs to address.
- 6.2 The key sustainability issues have been categorised under the sub-elements of sustainability, namely environmental, social and economic issues and are set out in table 2 below.

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

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

	<ul style="list-style-type: none"> • Reduce flood risk • Improve efficiency in resource (water, materials and energy) • consumption; • Reduction of waste generated and an increase in waste treatment and recycling; • Improving street cleanliness and environmentally responsible behaviour with regard to fly tipping and waste disposal.
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7 STAGE B: DEVELOPING AND REFINING ALTERNATIVES AND ASSESSING EFFECTS

7.1 In order to ensure that the Local Plan addresses the sustainability issues identified in the Scoping Report each policy option was assessed against the SA objectives in order to choose the most sustainable and preferred policy option. This stage included:-

- Testing the Local Plan objectives against the SA framework established in the SA Scoping Report.
- Developing the Local Plan options including reasonable alternatives
- Evaluating the likely effects of the Local Plan and alternatives
- Considering ways of mitigating adverse effects and maximising beneficial effects
- Proposing measures to monitor the significant effects of implementing the Local Plan.

8 STAGE B (B1) – TESTING THE LOCAL PLAN OBJECTIVES AGAINST THE SUSTAINABILITY OBJECTIVES

8.1 The strategic objectives of the Local Plan set out what the Plan is aiming to achieve in spatial planning terms. Testing the compatibility of the Local Plan's strategic objectives with the SA objectives is a formal stage in the SA 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 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 Local Plan's strategic objectives were first tested for compatibility with one another.

8.2 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 need to determine where the priorities should lie and this should be recorded explicitly as part of the SA process.

The objectives of the Local Plan

8.3 The 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:

Table 3: Strategic Objectives of the Local Plan

Strategic Objectives	
Regenerating the Borough	<ol style="list-style-type: none"> 1. To regenerate the most deprived parts of the borough and the designated town centres, regeneration and opportunity areas by improving their viability and vitality and promoting a network of supporting key local centres providing local services. 2. To 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.
Achieving sustainable communities	<ol style="list-style-type: none"> 3. To create opportunities for education, training and employment in order to reduce polarisation and worklessness and create more stable, mixed and balanced communities. 4. To 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.
Delivering affordable homes for local people	<ol style="list-style-type: none"> 5. To 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 for local residents to rent or buy and for homes for families. 6. To protect social housing, improve services for council residents and provide more new affordable homes for local residents to buy or rent.
Building a stronger local economy	<ol style="list-style-type: none"> 7. To encourage inward investment, help foster job growth and promote the borough's many smaller and younger firms enabling a highly entrepreneurial economy to develop and remain in the borough. 8. To help advance 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. 9. To protect and enhance the borough's attractions for arts, science and technology and creative industries.
Delivering an environmentally sustainable borough	<ol style="list-style-type: none"> 10. To 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 high quality, intelligent developments and design and ensuring compliance with the principles of inclusive design. 11. To protect and enhance the boroughs open green spaces and create new parks and open spaces where there is major regeneration, promote biodiversity and protect private gardens.

	<p>12. To increase public access and use of Hammersmith and Fulham's waterways as well as enhance their environment, quality and character.</p> <p>13. To reduce and mitigate local causes of climate change, mitigate flood risk and other impacts and support the move to a low-carbon future.</p> <p>14. 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.</p>
Improving local health and adult social care provision	15. To 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.
Tackling crime and anti-social behaviour and ensuring a safer borough	<p>16. To 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.</p> <p>17. To promote the safety and security of those who live, work and visit Hammersmith and Fulham.</p>
Delivering social and digital inclusion	18. To work with partner organisations to reduce social exclusion and facilitate access to high-speed internet across the borough.
Providing the best start for younger people	19. To ensure that the child care facilities and schools in the borough meet the needs and aspirations of local parents and their children.

Testing the compatibility of the Local Plan objectives

- 8.4 The internal compatibility of the Local Plan objectives have been tested using the matrix in table 5, with the results shown in table 4. This identified any inconsistencies between these objectives that could give rise to adverse environmental effects and if so mitigation measures or alternatives should be considered.

Table 4: 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 5: Methodology

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

8.5 Generally, the Local Plan strategic objectives show a general internal compatibility subject to the actual implementation of the Local Plan policies. While no obvious incompatibilities were identified between the 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

8.6 The sustainability objectives developed during the SA Scoping Report are listed in the table below:

Table 6: Sustainability Objectives

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

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

Testing the Local Plan strategic objectives against the sustainability appraisal objectives

8.7 In order to identify any potential synergies or inconsistencies, the compatibility of the Local Plan objectives and the SA objectives were tested against each other. The SA objectives and most of the Local Plan objectives remain substantially unchanged since the adoption of the Core Strategy in 2011.

8.8 The SA prepared for the Core Strategy included a detailed assessment of the compatibility between both the Core Strategy 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. The assessment of the Local Plan objectives against the SA objectives came to similar conclusions as the Core Strategy, these are explained in more detail below.

8.9 The compatibility of the Local Plan objectives against the SA objectives were tested using the matrix in Table 8, with the results given in Table 7. A more detailed commentary is provided in Table 9.

Table 7: Compatibility of the Local Plan objectives against the Sustainability Appraisal Objectives

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 8: Methodology

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

8.10 Overall, an analysis of Table 7 shows that the 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. The results are explained in more detail below.

Table 9: Explanation of compatibility test between the Sustainability Appraisal Objectives and Local Plan Strategic Objectives

Sustainability Appraisal Objective	Effect on compatibility with Local Plan strategic objectives
1. Increase equity and social justice	Overall positive and very positive compatibility, particularly for Local Plan (LP objectives 14,10 & 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.
2. Improve health of population overall	Overall positive and very positive compatibility, particularly for LP objectives 15,12 11 & 12. Care should be taken when implementing LP objectives 1,5,6,7 & 8. 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.
3. Improve the education and skills of young people and adults	Broadly positive compatibility. Care should be taken when implementing policies supporting LP objectives 1, 5, 2 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.
4. Provide decent and affordable homes	Very strong positive compatibility with LP objectives 1,5 & 6, with positive compatibility with other objectives. However, care should be taken when implementing policies furthering LP objectives 7,12,16 & 14 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 overall scheme viability and with other priorities such as 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.
5. Increase local residents' sense of	Generally, there is a positive compatibility between objectives, with a very strong positive compatibility with LP objectives 17,16 ,10 & 11 . LP objectives 8,15 ,14 & 2 pose some uncertainty and care

Sustainability Appraisal Objective	Effect on compatibility with Local Plan strategic objectives
community and social cohesion	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 S106 developer contributions or allocating Community Infrastructure Levy funds towards suitable infrastructure projects in the areas concerned.
6. Increase the opportunities for satisfying and well paid work	While there is general compatibility with the LP objectives, a strong compatibility between the objectives will be dependent on the implementation of relevant policies. Policies supporting LP objectives 1,5,7,8,14 & 2 all offer varying potential to help achieve Sustainability objective 8. 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 LP objectives 15 ,17 & 16 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.
7. Improve the local environment and heritage	While there is a strong positive compatibility with LP objectives 10 and 11, overall, the compatibility of this SA objective with other LP objectives will be dependent upon the implementation of relevant LP 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.
8. Reduce the level of pollution	There is general compatibility between the objectives with strong compatibility with LP objectives 15,16,13 & 14. 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

Sustainability Appraisal Objective	Effect on compatibility with Local Plan strategic objectives
	<p>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 Drainage Systems in new developments to divert polluted runoff away from waterways.</p>
<p>9. Reduce the effect of transport on the environment</p>	<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 LP objectives 15 & 13 and positive compatibility generally with objectives aimed at improving amenity and quality of life for people within the borough. The compatibility of LP objectives 1, 5, 6, 7, 8, 4 & 19 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>
<p>10. Responsible consumption of resources in the borough</p>	<p>The compatibility of this SA objective with those of the LP objectives will be dependent on the implementation of relevant LP 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.</p>
<p>11. Reduce climate change and its impact</p>	<p>The compatibility of this SA objective with those of the LP objectives will be dependent on the implementation of the relevant LP policies. Local authorities have a statutory duty to address climate change;</p>

Sustainability Appraisal Objective	Effect on compatibility with Local Plan strategic objectives
on the borough	the London Plan also contains a number of policies aimed at addressing this issue. As such, it is reasonable to surmise that LP policy implementation will contribute towards ensuring compatibility between the LP objectives and the SA.
12. Improve the sustainability of the local economy	There is very strong compatibility with LP objectives 4, 7, 8 & 14. The compatibility with LP objectives 16, 10, 11, 12 & 13 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.

9 STAGE B (B2 & B3) - DEVELOPING THE LOCAL PLAN OPTIONS AND EVALUATING THE LIKELY EFFECTS OF THE LOCAL PLAN

- 9.1 This section of the SA covers task B2: Developing the Local Plan options and task B3: Evaluate the likely effects of the Local Plan. The SEA Directive requires that consideration is given to alternative options to addressing key issues within the Local Plan, with a view to informing the selection and development of the preferred strategy. The assessment of alternative policy options for the Local Plan was presented in the draft [SA Report \(January 2015\)](#) and is not replicated in this SA. Instead, an appraisal of the proposed policies in the Proposed Submission Local Plan are set out in Appendix 1 of this document.
- 9.2 As part of the preparation of the draft Local Plan, the preferred policies and alternative options were appraised and any issues that arose through the assessment process were identified. Where a preferred policy option was found to generally be the most sustainable but could be improved, recommendations were put forward and included in the Local Plan.
- 9.3 Throughout the sustainability appraisal process, many detailed discussions took place during the development of the Local Plan policy 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.
- 9.4 The Local Plan consists of policy options arising from:
- Existing policies in the Core Strategy (2011) and Development Management Local Plan (2013)
 - Policies in the Core Strategy and Development Management Local Plan which have been amended to reflect changes in wider planning context.
 - New regeneration and strategic site policies which will focus on guiding development in specific parts of the borough

- new borough-wide development management policies, including TLC6 Addressing the concentration and clustering of betting shops and payday loan shops, TLC7 Public houses, CF4 Professional football grounds, DC10 Telecommunications and T7 Construction and Demolition Logistics.
 - a new policy on planning contributions and infrastructure.
- 9.5 As a consequence of the background of the Local Plan policies, some of these policies have already been subject to a number of separate SA reports. The development of the Local Plan policies has drawn upon the previous sustainability appraisals where appropriate and refreshed these appraisals if needed.
- 9.6 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 (2011)*
https://www.lbhf.gov.uk/sites/default/files/Sustainability_Appraisal.pdf
 - *Sustainability Appraisal for the Submission Development Management Local Plan (2013)*
https://www.lbhf.gov.uk/sites/default/files/section_attachments/dm_4_sustainability_appraisal_for_submission_dm_dpd_tcm21-173805.pdf
- 9.7 The SA of the appraised Local Plan reveals that 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.
- 9.8 All of the preferred and alternative policy options in the draft Local Plan (2015) and proposed policies within the Proposed Submission Local Plan (2016) have been appraised using the matrix displayed in Table 10. The Secondary, cumulative and synergistic effects for each policy chapter have also been identified.
- 9.9 Table 10: Local Plan sustainability matrix:-

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

- 9.10 Section 7 of the draft SA Report (2015) provides an appraisal of the preferred and alternative policy options within the draft Local Plan, whilst Appendix 1 of this Submission SA Report (2016) provides an appraisal of the proposed policies within the Proposed Submission Local Plan (2016).

10 STAGE B (B4)-MITIGATING ADVERSE EFFECTS AND MAXIMISING BENEFICIAL EFFECTS

Mitigation measures to minimise adverse effects and maximise beneficial effects

- 10.1 The 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 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.
- 10.2 Furthermore, a number of the 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 policies within the Proposed Submission Local Plan will result in significant adverse environmental effects.
- 10.3 Notwithstanding the above circumstances, the policy context as well as the issues facing the borough is subject to continuing change. The SA for the Local Plan has revisited previous SA's for the Core Strategy and Development management Local Plan 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 process to improve the overall sustainability of the Local Plan in accordance with the iterative nature of the SA and as part of the need to mitigate any negative effects that the SA considered might arise on implementation of the policy. In most instances, planning officers accepted the recommended changes and these have been incorporated into the Local Plan. Recommendations included the following:
- The White City Opportunity Area Planning Framework SPD may 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 may also need 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- The council will need to continue to work closely with RBKC and the local traveller community to determine how best to meet the identified needs.
 - Policy TLC6 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.

- Policy C6 Strategic Waste Management – Now that our waste sites lie within OPDC, the council will need to continue to work closely with OPDC and other WRWA's to ensure London Plan waste apportionments are met. This may involve the preparation of a joint waste study with the WRWA's and OPDC.

11 STAGE B (B5) - LOCAL PLAN PROPOSED MONITORING OF SIGNIFICANT EFFECTS

- 11.1 The council is legally required to monitor the significant environmental effects of the implementation of the Local Plan, with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.
- 11.2 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 appendix 2. 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.
- 11.3 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.

12 Stage C: Preparation of SA Report and Stage D: Consultation

Draft SA and Draft Local Plan

- 12.1 Following assessment of the Local Plan policy options and alternatives during stage B, a draft SA report was prepared to accompany the draft Local Plan. This outlined the SA process undertaken to date and presented the findings of the individual assessment of the policy options and alternatives in the draft Local Plan. Reasons for selecting the preferred options and rejecting the alternatives were also given, with recommendations provided where improvements could be made to the sustainability of the policy. The draft SA and draft Local Plan were published for a 6-week consultation in January 2015.
- 12.2 Comments were received specifically to the draft SA from the Environment Agency in relation to a number of environmental policies in the draft Local Plan. In addition, a number of comments were made directly on the draft Local Plan which provided support for some of the alternative policy options, most notably the alternative policy option of not actively promoting the regeneration areas and strategic sites within the borough. However, as shown in the draft SA, the alternative options for the regeneration areas and strategic sites were found to be less sustainable than the

preferred options and therefore dismissed and the council have not been convinced otherwise.

Submission SA and Proposed Submission Local Plan

- 12.3 Following consultation on the draft Local Plan, a number of changes were made to the Local Plan policies. These changes resulted from consideration of consultation responses, updated national and regional planning policy and new evidence gathered by the council.
- 12.4 Appendix 1 of this Submission SA Report provides an updated assessment of the proposed policies within the proposed Submission Local Plan, which includes consideration of any amendments made following the previous stage of consultation. This has involved revisiting stage B of the SA process to consider and assess the impact, if any, on the sustainability objectives. Amendments have also been made to the Local Plan in relation to changes to national legislation and London Plan policies and where updated evidence has pointed to a need for redrafting.
- 12.5 A number of key changes to the Local Plan are highlighted below. Further commentary is then provided as part of the individual assessments of all Proposed Submission Local Plan policies in Appendix 1 of this document:-
- **Policy H03 Affordable Housing** - Increase in affordable housing requirement from 40% to 50%.
 - **Strategic Policy OORA Old Oak Regeneration Area**- policy removed from Proposed Submission Local Plan
 - **Strategic Policy HRA2: King Street East**- policy removed from Proposed Submission Local Plan
 - **Policy DC11 Basements**- additions and amendments made to the criteria in the policy
 - **Policy HO6 Accessible Housing**- Amendments made to the policy in accordance with changes to national planning policy
 - **Policy CC4 Minimising Surface Water Run Off and SUDS**- new policy to address surface water run-off
 - **Policy CC3 Minimising Flood Risk and Reducing Water Use**- changes to the criteria in the policy
 - **Policy T5 Housing with Reduced Parking**- policy removed from Proposed Submission Local Plan.
 - **Policy TLC4 Local Centres** -changes to the use class quotas for Key Local Centres, Neighbourhood Parades and Satellite Parades to allow greater flexibility for changes of use to non A class uses where appropriate.
 - **Policy TLC3 Town Centres**- policy removed from Proposed Submission Local Plan (moved justification of TLC3 into justification of TLC2)
 - **Policy TLC2: Town Centres**- changes to the use class quotas and policy criteria to allow greater flexibility for changes of use from A class use where appropriate
- 12.6 This submission SA Report will be published alongside the Proposed Submission Local Plan for a further stage of consultation in September 2016 (Regulation 19).

13 Stage E: Monitoring

- 13.1 The council is legally required to monitor the significant environmental effects of the

implementation of the Local Plan with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

- 13.2 The results of the monitoring will be included in the council's Monitoring Report's. Among other topics, the monitoring reports will identify and assess a number of indicators linked to the SA objectives. This will assist in measuring how well the Local Plan contributes towards sustainable development and will also help to inform any future review of policies and plans in the Local Plan.
- 13.3 As part of the SA, a monitoring framework has been developed (Appendix 2) with a series of key performance indicators to measure against the SA objectives.

14 Conclusions

Summary of Key Findings and Effects

- 14.1 The assessment of Local Plan policy options has informed the preparation of the Proposed Submission Local Plan which outlines the council's strategy and policies for development in the borough over the next 15-20 years.
- 14.2 This SA Report is the latest in a series of SA's to be published on Council planning documents, with previous reports being made in June 2007 (Core Strategy Preferred Options), June 2009 (Core Strategy Options), October 2011 (Core Strategy), July 2013 (Development Management Local Plan) and January 2015 (draft Local Plan).
- 14.3 The strategic objectives of the Local Plan set out the many and varied aims of the council in relation to land use and future development in the borough. Overall, the SA has revealed that the Local Plan policies exhibit a broad commitment to the principles of sustainable development and are largely compatible with the assessment objectives of the SA process.
- 14.4 It is the Local Plan's objective to regenerate the most deprived parts of the borough and increase housing where there is most tension with the SA objectives. Nonetheless, the SA has considered that through appropriate mitigation measures, any in-compatibilities can be reduced and in some cases eliminated, provided that the policies in the Local Plan are implemented in a sustainable manner. For example by incorporating energy and resource efficiency measures, making space for biodiversity, ensuring public transport accessibility and avoiding inappropriate development in flood risk areas.
- 14.5 The Local Plan's proposed approach is to focus major growth in four key regeneration areas to promote new housing and employment activities throughout these areas and to deliver supporting infrastructure. In addition, the Local Plan sets out a designated town and local centre hierarchy, which overlaps with the regeneration areas.
- 14.6 The SA has found the council's approach to regeneration is sustainable. For each of the four regeneration areas identified, the Local Plan sets out policies for the overall strategy and vision for the area and the proposals for sites of strategic importance. In relation to the policies for the key regeneration areas and strategic sites, the SA has found no wholly unsustainable policies have been put forward. In general, the policies meet social and economic criteria but there is less certainty as to whether

they will meet the environmental objectives as this will depend on implementation of the policies through development management.

- 14.7 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 has also recommended that more in depth SA's 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.
- 14.8 In addition to the overarching spatial strategy and regeneration area policies, the Local Plan includes a number of boroughwide 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 proposed boroughwide development management policies in the Local Plan are generally sustainable, and in addition are accompanied by viability assessment criteria where appropriate.
- 14.9 Overall, therefore the strategic objectives, spatial policies, regeneration areas and strategic sites and boroughwide development management policies are generally sustainable. This is expected given the iterative nature of the Local Plan process and the fact that the sustainability appraisal has run side by side with the development of policy options.
- 14.10 It should also be borne in mind that, in general, growth in London is supported by national and London wide policy and can be more sustainable in highly accessible areas like Hammersmith and Fulham. Achieving the council's vision, including regenerating deprived areas of the borough and delivering affordable housing 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, (e.g. minimising carbon emissions and resource use) through development management and environmental standards.
- 14.11 The sustainability effects of the Local Plan will largely depend upon the implementation of its policies through the development management process and therefore it will be important to ensure that the policies in the Local Plan are monitored closely and at an early stage in order to identify any unforeseen negative effects, which may occur.
- 14.12 Some policies may require further SA assessments as part of the preparation of more detailed regeneration area SPD's for the borough or when planning applications are submitted. Therefore, despite this SA appraisal, the difficult target of achieving sustainable development will remain and it will be necessary for future development, particularly major schemes to be assessed on an individual basis in terms of its impact on sustainability.

15 Next Steps

- 15.1 The next stage of the SA process is to consult on this Submission SA Report alongside the Proposed Submission Local Plan for 6-weeks (Regulation 19). The Proposed Submission Local Plan along with any representations received will be submitted to the Secretary of State for independent examination. The appointed inspector will consider whether the Local Plan is found sound and legally compliant.

Appendices

Appendix 1: Appraisal of Individual Proposed Submission Local Plan Policies

Appendix 2: The SA Framework- Objectives & Monitoring Indicators

Appendix 3: List of Policies, Plans & Programmes

Appendix 4: Representations to the SA- Draft Local Plan Consultation (Regulation 18)

Appendix 1: Proposed Submission Local Plan Individual Policy Assessments

Policy DEL1-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 resident working groups and designated neighbourhood forums;**
- **preparing other Local Plan documents, supplementary planning documents, joint Opportunity Area Planning Frameworks (OAPFs) development briefs, master plans and best practice guidance where necessary;**
- **maintaining an Infrastructure Schedule (part of the Infrastructure Delivery Plan) that identifies the infrastructure projects and programmes that seeks to create the most benefits from development;**
- **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; and**
 - **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.**

This policy on delivery and implementation of the policies and proposals in the Local Plan should have a positive impact on all of the SA objectives. It emphasises that the council will work with partner organisations, resident working groups and designated neighbourhood forums when implementing the policies and proposals in the Local Plan. The introduction of resident working groups and the designation of neighbourhood forums in the borough will enable local communities to have more involvement in planning decisions that affect their local areas and will enable resident's views to be considered at an early stage of a scheme's development.

The policy refers to negotiating section 106 agreements for affordable housing as well as using funding for other projects. In accordance with the principles of the Local Plan Viability Protocol (Appendix 9) the policy will seek to ensure that the maximum reasonable level of affordable housing is provided on sites and that other plan requirements are met.

Continual monitoring of the policies and proposals in the Local Plan will ensure that those which are not effective will be reviewed and updated which should help to ensure that the SA objectives continue to be achieved.

Section 106 agreements will be levied at a rate that does not threaten viability of development in the borough.

POLICY	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
Proposed Policy: <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Assessing secondary, cumulative and synergistic effect

The delivery and implementation policy, with its identification of viability as a factor to be taken into account, is anticipated to contribute positively towards the Local Plan's strategic objectives including: objective 5 – which seeks to increase supply of housing, particularly affordable housing for local residents, 4 – which seeks to provide a range of high quality facilities and services and other community infrastructure, and 2 – 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 resident working groups, as well as neighbourhood forums 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.

Regeneration Area Strategies

Strategic Policy- Regeneration Areas

The Council supports major regeneration and growth in the borough's four regeneration areas and will work with the local community and 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 19,800 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 29,500 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.**

The proposed policy will have numerous positive effects for the majority of the sustainability appraisal objectives. The overriding objective of the proposed 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.

Around 19,800 new homes are proposed to be delivered over the plan period in the four regeneration areas across the borough. The proposed policy 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.

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.

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.

The proposed policy seeks to deliver 29,500 new jobs over the plan period across the four 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 proposed 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.

The policy encourages major regeneration and this could 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 proposed policy will help in having a positive effect on reducing climate change and its impact on the borough.

It is important to note that the former Old Oak Regeneration Area, now lies within the boundary of the Old Oak and Park Royal Development Corporation (OPDC) and is subject to the Local Plan being prepared by the OPDC. The OPDC was established in April 2015 and, as a consequence, unlike the Core Strategy and Development Management Local Plan, the Proposed Submission Local Plan (2016) includes no policies for the part of the borough now situated within the OPDC boundary. This change is not considered to impact on the sustainability of the Local Plan.

The council will continue to work with the OPDC on the development of their Local Plan to ensure that the needs of the borough, including affordable housing and job opportunities for local people are appropriately met.

POLICY	SA OBJECTIVES											
Strategic Policy-Regeneration Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: The Council supports major regeneration and growth in the borough's four regeneration areas and will work with key stakeholders to ensure that within these areas,	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓

POLICY	SA OBJECTIVES											
Strategic Policy-Regeneration Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
proposals will:												
Proposed policy: Provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion;	✓	✓	0	0	✓	0	✓	✓	✓	✓	✓	✓
Proposed policy: Deliver 19,800 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	✓	✓	✓	✓	✓
Proposed policy: Deliver 29,500 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	0	0	✓	0	0	✓	0	0	✓	0	0	✓
Proposed policy: Deliver new physical, social and environmental infrastructure that meets the needs of new residents as well delivering tangible benefits for surrounding communities.	✓	✓	✓	0	✓	0	✓	✓	✓	✓	✓	✓

Assessing secondary, cumulative and synergistic effects

The Strategic Regeneration Area Policy is anticipated to contribute towards a number of the Local Plan's strategic objectives including: 1 - which seeks to encourage regeneration in the most deprived areas of the borough, 5 - which seeks to increase supply and choice of housing to meet local needs, 3 - which seeks to create employment and training opportunities, 7 - which seeks to encourage investment and job growth, 8 - which seeks to support maintain local people in employment, 4 - which seeks to provide residents with social and physical infrastructure and 2 - which seeks to ensure that regeneration benefits and involves the whole community.

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 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 WCRA- White City Regeneration Area

Indicative additional homes	Indicative new jobs
6,000	10,000

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 academic and research facilities as well as the 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 open space and encourage the creation of new open 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;**
- **ensure that new development recognises the substantial scope offered by the scale and location of the White City Regeneration Area to create a new sense of place and range of densities. There may be scope for tall buildings, however any tall buildings would need to be justified by a full urban design analysis; and**
- **provide further enhancements across the area to ensure high public transport use, along with provision for more pedestrian and cycle infrastructure, including an enhanced Wood Lane, a bridge across the A3220 adjacent to the Hammersmith & City and Circle Line and the provision of an east-west underpass from the Imperial College former Woodlands site to land to the west in RBKC.**

The proposed 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 seeks to provide new affordable homes for local residents to buy or rent.

The proposed 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.

The proposed 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 50% 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 Local Plan's objective is to protect social housing and provide new affordable homes for local residents to buy or rent.

The proposed 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.

The proposed 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 as well as its academic and research facilities

The proposed 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 boundary. Those retail activities that cannot be located within the boundary may be appropriate for location on the edge of the existing town centre.

The proposed policy requires development proposals to provide appropriate transport infrastructure to support the needs arising from the development as a whole. The justification for this 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.

The proposed 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.

The policy does make reference to tall buildings which may be acceptable at this location. However, on implementation of the policy, it must be demonstrated that they enhance and do not have a negative impact on the character and setting of Listed Buildings, Conservation Areas and the local area in general to ensure no negative effects on the heritage objectives.

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.

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
Strategic Policy WCRA- White City Regeneration Area												
Proposed policy: <i>See policy wording above.</i>	✓	0	✓ / ?	✓	✓	✓	✓	0	✓	0	✓	✓

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, including creative and academic based industries, community uses, 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;
- 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 including opening up arches underneath the

- Hammersmith and City Line railway viaduct, where appropriate;**
- provide a network of green corridors and public open spaces including a local park located centrally of approximately 2ha;**
 - 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 remaining parts of the former 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.**

The proposed policy 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.

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.

The proposed 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.

It is predicted that there will be a positive effect on 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 50% affordable housing for new developments with 60% of additional affordable housing for social or affordable renting.

The proposed 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.

The proposed policy 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 carefully located in areas which are suitable to minimise adverse effects on conservation areas and important views.

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.

The effect of the proposed policy on the pollution, transport, resources and climate change sustainability objectives are dependent on implementation of the policy.

POLICY	SA OBJECTIVES											
Strategic Site Policy WCRA1 - White City East	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: See policy wording above.	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	✓

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.

The proposed 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.

The proposed 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.

The proposed 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.

The proposed 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.

POLICY	SA OBJECTIVES											
Strategic Site Policy WCRA2 - White City West	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓	0	✓ / ?	✓	✓ / ?	✓	0	0	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.**
- **Provide the opportunity for the re-provision of Goldhawk Road businesses within new high quality retail premises within the proposed frontage.**
- **Provide affordable housing in accordance with Policy H03.**

The proposed policy aims to regenerate the Shepherd's Bush Market by providing a mix of town centre uses including leisure uses, offices and residential development whilst also maintaining existing market traders. This will increase and improve employment opportunities and should also contribute to reducing unemployment in the borough.

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.

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.

Good quality housing, including affordable housing to meet local needs will also be provided in line with policy HO3.

The policy is likely to have a positive effect on the social justice and social cohesion objectives, but this will depend on the implementation of the policy which seeks to ensure that existing market traders and local businesses are retained as part of the redevelopment.

POLICY	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
Proposed policy: <i>See policy wording above.</i>	✓ I/?	0	0	✓	✓/ ?	✓	x/?	0	0	0	0	✓

Assessing secondary, cumulative and synergistic effects

Strategic Policy WCRA – White City Regeneration Area is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 3, 4, 5, 6, 9, 15 and 19. It is predicted that the effects of Strategic Policy WCRA in terms of a 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.

Strategic Site Policy WCRA1 – White City East is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 3, 4, 5, 9, 15, 16 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.

Strategic Site Policy WCRA2 – White City West is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 4, 5 and 6. 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.

Strategic Site Policy WCRA3 – Shepherd's Bush Market and adjacent land is anticipated to positively contribute towards the Local Plan strategic objectives 1, 5, 6, 7, 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 proposed policy will have both a permanent and direct effect on the satisfying work, heritage and sustainable economy sustainability objectives.

Strategic Policy Hammersmith Regeneration Area

Strategic Policy HRA – Hammersmith Regeneration Area

Indicative additional homes	Indicative new jobs
6,000	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 vicinity of 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 infrastructure, including 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.

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 boroughwide policy HO3: Affordable Housing, which requires 50% affordable housing for residential developments over 10 dwellings. The justification text 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.

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, is also provided to meet the needs of the local community. The proposed policy 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.

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.

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.

Hammersmith Town Centre has a number of existing tall buildings and further tall buildings of a similar height could be appropriate in some parts of the centre. Any proposals for tall buildings will need to be assessed against the criteria in policy DC3 which will include consideration of heritage assets.

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 2800 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.

Most of this area is at risk from tidal flooding and lies within Flood Zone 3a. As such a site specific Flood Risk Assessment will be required for any planning application, with more vulnerable uses needing to pass the Exception Test in accordance with the NPPF and PPG.

The proposed policy also 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.

It is also important to note that former policy Strategic Site HRA2- King Street East no longer forms part of the Hammersmith Regeneration Area and the specific policy relating to this area has been removed from the Local Plan. This policy change is likely to have no significant impact on the sustainability objectives as the site remains in the regeneration area for which an area based supplementary planning document is to be produced.

POLICY	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
Proposed Option: <i>See policy wording above.</i>	0	✓/!	0	✓	✓	✓	?/ ✓	0	0	0	0	✓

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.

The proposed policy 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.

This site has the potential to deliver affordable housing. The amount of affordable housing will be delivered in line with Local Plan policy HO3: Affordable Housing.

The proposed policy aims to either replace or refurbish the existing Town Hall extension building in order to “open up” 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.

The proposed policy 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.

POLICY	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
Proposed Option: See policy wording above.	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 and sections of the 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; and**
- **minimise disruption during construction.**

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.**

In respect of the Hammersmith Centre West Island Site, the Council will work with Transport for London and other stakeholders to assess and bring forward the redevelopment of this site as well as return the Hammersmith Gyratory to two way working and improve the capacity of Hammersmith bus station. Development proposals for this site will be required to:

- **provide a state of the art inter-modal interchange that facilitates the safe and efficient movement of passengers from buses, taxis and trains,**

- including cycles, into and out of the station;
- **provide for mixed-use redevelopment , including office, retail, arts, cultural and leisure facilities and supporting infrastructure to help retain a strong commercial role for the Town Centre and increase its vitality and viability;**
- **include the provision of housing for local people across a range of tenures and affordabilities;**
- **ensure that there will be no detrimental impact on cyclists or pedestrians or 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;**
- **ensure that feeder roads to the gyratory are not widened or residential properties demolished as part of these plans;**
- **ensure that building height is generally consistent with the prevailing height in the townscape, whilst recognising the scope offered by the scale and location of the Regeneration Area to create a range of densities. Any tall buildings would need to be justified by a full urban design analysis; and**
- **be designed to help facilitate any future proposals to replace the flyover and A4 with a tunnel**

The proposed policy 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.

The proposed policy 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.

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.

The proposed policy 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.

The proposed 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.

The policy proposes to provide employment on the flyover site. This will increase the opportunities for relatively well paid service sector employment.

Although the proposed policy 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, including consideration of tall buildings 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.

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 proposed 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.

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.

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.

Development of the Hammersmith West Island site presents an opportunity to improve the gyratory system and capacity of Hammersmith Bus Station to provide a state of the art inter modal interchange, which will have further positive effects on the transport objectives.

POLICY	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
Proposed policy: <i>See policy wording above.</i>	✓	✓	?/✓	✓	✓	✓	?	?	✓	0	0	✓

Assessing secondary, cumulative and synergistic effects

Strategic Policy HRA – Hammersmith Regeneration Area is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 3, 5, 6, 7, 8, 17 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 proposed 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.

Strategic Site Policy HRA1 – Town Hall Extension and adjacent land, Nigel Playfair Avenue is anticipated to positively contribute towards the Local Plan strategic objectives 1, 3, 5, 6, 8, 10, 11, and 12. It is predicted that the timeframe of the effect of Strategic Site Policy HRA1 will be medium to long terms. It is expected that the effects of this proposed policy will have both a permanent and direct effect on the heritage and sustainable economy 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.

Strategic Policy HRA3-A4, Hammersmith Flyover and adjoining land is anticipated to positively contribute towards the Local Plan strategic objectives 1, 3, 5, 6, 8, 10, 11, 12 and 14. It is predicted that the timeframe of the effect of Strategic Site Policy HRA4 will be long term. It is considered that the proposed policy will have positive, permanent, cumulative and synergistic effects in respect of many of the social, environmental and economic sustainability objectives. The replacement of Hammersmith flyover with a tunnel provides a significant opportunity to release land for redevelopment and provide mixed use development and improve access to the riverside from the town centre and quality of life for existing residents.

Strategic Policy FRA – Fulham Regeneration Area

Strategic Policy FRA – Fulham Regeneration Area

Indicative additional homes	Indicative new jobs
7,000	9,000

There is a substantial opportunity for regeneration within the Fulham 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; and**
- 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 9,000 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 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;**
- 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.**

The proposed policy has the potential to increase equity and social justice for the deprived communities living in the area. The proposed 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.

There is likely to be a positive effect on the affordable homes sustainability objective as the proposed policy seeks the renewal of and additions to all or part of the estates in order to provide improved housing, including affordable housing opportunities for local residents.

The proposed 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 proposed 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.

The proposed 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.

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.

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.

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 proposed 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.

POLICY	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Strategic Policy FRA – Fulham Regeneration Area												
Proposed policy: <i>See policy wording above.</i>	✓	0	0	✓	?/ ✓	✓	0	0	✓	0	✓	✓

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 and cultural facilities. Cultural facilities should include a major arts, leisure or entertainment activity;
- 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; and
- 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, however any tall buildings would need to be justified by a full urban design analysis.

The proposed policy includes initiatives that are likely to increase levels of equity and social justice in the regeneration area. The proposed policy 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.

The provision of new public open space and local park has the potential to positively contribute towards health outcomes.

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.

The proposed 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 policy 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 proposed 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.

The proposed 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.

The proposed policy aims to ensure that new development will take account of, and respect the local context and setting, including local conservation areas and local/long distance views, particularly when considering the suitability of tall buildings. The policy seeks to ensure that a full urban design analysis will be undertaken when considering tall buildings in this location in order to minimise adverse impacts on heritage assets and the surrounding area.

This proposed policy 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.

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 proposed policy recognises that additional infrastructure may be required. It also seeks to improve pedestrian connections.

The proposed 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 proposed 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.

The proposed policy 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.

POLICY	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
Proposed policy: <i>See policy wording above.</i>	✓	✓/ ?	✓/ ?	✓/ ?	✓/ ?	✓	✓/ ?	0	?	0	0	✓

Assessing secondary, cumulative and synergistic effects

Strategic Policy FRA - Fulham Regeneration Area is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 3, 4, 5, 6, 8 and 10. 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 proposed policy 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.

Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area is anticipated to positively contribute towards the Local Plan strategic objectives 1, 4, 5, 6, 9, 10, and 11. It is predicted that the timeframe of the effect of Strategic Site Policy FRA1 will be medium to long term. This proposed policy 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:

- predominantly be for 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, including 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 no substantially harmful impact on heritage assets, and respect for the scale of the surrounding residential buildings Building height can be gently stepped up toward the riverside, to provide a presence and give definition to the river frontage. The council will work with Transport for London and other Stakeholders to seek a new Crossrail 2 station at Imperial Wharf.**

The proposed policy which seeks residential uses will increase the range and affordability of housing. 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.

The proposed policy 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.

The proposed 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'.

Although largely residential development led, the proposed policy 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.

The proposed 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 may be appropriate, but will only be permitted in those locations that minimise any adverse impacts on local heritage assets and 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.

Re-developing 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.

The proposed policy proposes a number of measures to encourage the development of better transport connections, given the poor accessibility at present. Sustainable transport measures and enhanced public transport infrastructure and services, including promotion of a Crossrail 2 station at Imperial Wharf are proposed in the policy. The proposed policy also aims to reduce the need for travel, particularly for some 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.

Although development in this regeneration area will principally be residential in nature, the proposed policy 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.

POLICY	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Strategic Policy SFRRRA – South Fulham Riverside Regeneration Area												
Proposed policy: <i>See policy wording above.</i>	0	✓/ ?	✓/ ?	✓ /?	✓	✓	✓/ ?	?	✓/ ?	0	0	✓

Strategic Site SFRRRA1 - Imperial Gasworks National Grid

Strategic Site SFRRRA1 - 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 to support the needs of the development and contribute to reducing open space deficiency in the area;
- 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 its setting and other heritage assets in the surrounding townscape;

- ensure building heights and massing has an acceptable impact on the skyline and views from and to the riverside and waterways and heritage assets in the area, and contributes positively to the surrounding townscape context; 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.

The proposed policy 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 50% affordable housing on residential developments of 10 or more dwellings.

The proposed policy 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 limited and suitable locations. Additionally, the proposed 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.

POLICY	SA OBJECTIVES											
Strategic Site SFRA1 – Imperial Gasworks National Grid	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	0	0	0	✓/?	0	0	✓	✓	✓	0	0	✓

Assessing secondary, cumulative and synergistic effects

Strategic Policy SFFRA – South Fulham Riverside Regeneration Area is anticipated to positively contribute towards the Local Plan's strategic objectives 1, 2, 3, 5, 10, 11, 12 and 14. It is predicted that the timeframe of the effect of Strategic Policy SFFRA will be medium to long term. This proposed policy will have a positive, direct and permanent impact on the number of the sustainability objectives. In particular, the proposed policy is likely to have an indirect effect of increasing 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.

Strategic Site Policy SFRA1 – Imperial Gasworks National Grid is anticipated to positively contribute towards the Local Plan's strategic objectives 1, 5, 10, 11 and 14. It is considered that the effects of Strategic Site Policy SFRA1 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

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:

- a. the development of strategic sites identified within the Local Plan;**
- b. the development of sites identified in the council's Strategic Housing Land Availability Assessment;**
- c. the development of windfall sites and the change of use of buildings where there is no reasonable prospect of that site and/or premises being used for that purpose;**
- d. the provision of new homes through conversions;**
- e. ensuring that new dwellings meet local needs and are available for occupation by people living in London;**
- f. the retention of existing residential accommodation and improvement in the quality of private rented housing; and**
- g. working to return vacant homes to use and ensure that new homes are occupied.**

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

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 disadvantaged sections of the community.

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 boroughs town centre's 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.

The policy further seeks to return vacant homes back into use and ensure new homes are occupied, whilst also encouraging new dwellings to be marketed and occupied by local and UK residents in line with the Mayor's New Homes for Londoners Concordat. This is likely to have a positive impact on the social and housing objectives.

Increasing the number of homes in the borough will, however 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.

The proposed policy 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.

Increasing the number of homes in the three town centre areas 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 the 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.

The implementation of the proposed policy will inevitably have some impact on heritage and conservation. The sustainability issues concerning these issues are addressed in other policies in the Local Plan.

Increasing the intensity of development in the borough will almost inevitably add to pollution levels in terms of air, 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.

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 the use of sustainable modes of transport including walking and cycling. Increasing residential density will also result in greater efficiencies in terms of land and resource use, including water and energy by incorporating sustainable urban design principles and higher building design standards.

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.

POLICY	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Policy HO1 Housing supply												
Proposed policy: <i>See policy wording above.</i>	✓	✓	0	0	✓	0	0	?	✓	✓	✓	✓

Borough-wide Policy HO2 Housing conversion and retention

Policy HO2 -Housing Conversion and Retention

The council will:

- a. **Permit conversions of existing dwellings into two or more dwellings where:**
 - the net floor area of the original dwelling is more than 120sqm;
 - at least 50% of the proposed units consist of two or more bedrooms;
 - housing appropriate for families has access to any garden or amenity space; and
 - there is no adverse impact on on-street parking stress.
- b. **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.**
- c. **In streets where there is less than 10% night-time free space the number of additional dwellings may be restricted or conditioned to allow no additional on-street parking.**

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.

The proposed policy 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.

The proposed policy 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 its retention may not be so beneficial to climate change.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed policy: a) Permit conversions of existing dwellings into two or more dwellings where:	✓	0	0	✓	✓	0	0	?	✓	0	?	0

POLICY	SUSTAINABILITY OBJECTIVES											
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
<ul style="list-style-type: none"> the net floor area of the original dwelling is more than 120sqm; at least 50% of the proposed units consist of two or more bedrooms; housing appropriate for families has access to any garden or amenity. there is no adverse impact on on-street parking stress. 												
Proposed policy: b) Resist proposals that 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
Proposed policy: c) In streets where there is less than 10% night-time free space the number of additional dwellings may be restricted or conditioned to allow no additional on-street parking	0	0	0	0	0	0	0	?	✓	0	?	0
Proposed policy: 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.	✓	0	0	✓	✓	0	0	✓	0	0	0	0

Borough-wide Policy HO3 Affordable Housing

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 50% of all 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 provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership.**
- e. In negotiating for affordable housing a proposed development, the council will seek the maximum reasonable amount of affordable housing and take into account:**
 - o site size and site constraints; and**
 - o 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 any development sites.

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

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.

As affordability is a key issue in the borough, the council have increased the affordable housing target in the Local Plan from 40% to 50% in order to maximise the

amount of affordable housing to meet local needs. This change is likely to result in a further positive effect on the affordable homes and social sustainability objectives, but will be dependent on implementation of the policy taking into account viability. An updated viability assessment has been undertaken by consultants to support the affordable housing target in policy H03.

It will be important to monitor this policy closely as the level of affordable provision at 50% could also affect the viability of some developments and potentially reduce the number of homes coming forward in the future.

Through the Housing and Planning Act (2016) the Government has introduced Starter Homes as an alternative to more traditional forms of affordable housing. Starter Homes are aimed at first time buyers, under 40 to enable them to buy their own home which will be offered at a discount of at least 20% below market value and in London will cost no more than £450,000. A supply of Starter Homes in the borough may have some potential to retain middle income households that would otherwise have to move elsewhere to satisfy aspirations for owner occupation, but will do little to meet the aspirations of lower income households in housing need. However, until the exact details of Starter Homes are known, there is a great deal of uncertainty on how this initiative may affect the sustainability objectives.

The provision of intermediate housing recognises the particular need in London to cater for people that are above social rent income levels, but are able 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 into 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.

The proposed policy 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.

Affordable housing located near to 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	SUSTAINABILITY OBJECTIVES											
Policy H03- Affordable Housing	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: a) a borough wide target that at least 50% of all dwellings built between 2015-25 should be affordable.	✓	0	0	✓	✓	0	0	0	0	0	0	0

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO3- Affordable Housing	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: 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
Proposed policy: In addition, there should be no net loss of social/affordable rented housing on any development sites.	✓	0	0	✓	✓	0	0	0	0	0	0	0

Borough-wide Policy HO4 Housing quality and density

Policy HO4 Housing quality and density

Housing Quality

The council will expect all housing development to respect the local setting and context, provide a high quality residential environment, be well designed internally and externally and energy efficient 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.

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/or children's playspace.

Housing Density

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 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

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.

The proposed policy seeks to ensure that all housing developments are provided to a satisfactory quality and well related to their 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.

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.

The proposed policy 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.

The proposed policy 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed policy: The council will expect all housing development to respect the local setting and context, provide a high quality residential environment, be well designed internally and externally and energy efficient, and (subject to the size of scheme) provide a good range of housing types and sizes.	✓	✓	0	✓	0	0	✓	✓	0	✓	✓	0
Proposed policy: 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
Proposed policy: 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/or children's playspace.	✓	✓	0	✓	✓	0	0	0	0	0	0	0
Proposed policy: In existing residential areas, and in substantial parts of regeneration areas, new housing will be expected to be	✓	✓	0	✓	✓	0	✓	✓	0	0	0	0

POLICY	SUSTAINABILITY OBJECTIVES											
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
predominantly low to medium rise consisting of 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)												
Proposed policy: 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

Borough-wide Policy HO5 Housing mix

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**
c. for market housing, a mix of unit sizes including larger family accommodation.

The proposed policy 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.

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

POLICY	SUSTAINABILITY OBJECTIVES											
Policy H05: Housing mix	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: 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 <i>policy wording above</i> .	✓	✓	0	✓	✓	0	0	0	0	0	0	0

Borough-wide Policy HO6 Accessible housing

Policy HO6 - Accessible housing

The council will seek to secure high quality accessible homes in all developments that include housing, in particular we will require that:-

- a. 90% percent of new housing should meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and where feasible, additional dwellings resulting from conversions, changes of use and dwellings formed from extensions or floors added to existing blocks of flats should also meet this requirement.
- b. 10% percent of new housing should meet Building Regulation requirement M4(3) 'wheelchair user dwellings' designed to be wheelchair accessible users. 'Wheelchair user dwellings should be provided in proportion to the tenure mix of the development.

Accessible width car parking spaces should be provided to meet the needs of blue badge holders in accordance with Policy T6 and British Standards.

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

The policy formerly referred to Lifetime Homes, but in response to the Government introducing new national technical standards, this policy has been modified to include reference to part M4 of the Building Regulations rather than Lifetime Homes. These regulations are considered to be broadly equivalent to be broadly equivalent to satisfy lifetime homes criteria and will continue to have a impact on the social justice, social cohesion, housing and health objectives. The regulations are also referred to in the London Plan 2016.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Option: <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	0	0	✓	0	0	0

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

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 or that the currently facility is unfit for purpose or that it will be replaced elsewhere. Proposals for the loss of existing accommodation should demonstrate that there is no longer a need for that particular type of accommodation or that the current facility is unfit for purpose or that it will be replaced elsewhere.

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.

Where relevant, it will be necessary for evidence of lack of need to consider the full range of special needs, including the frail elderly, people with physical and learning difficulties and people needing short term support.

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

The proposed policy will require applications for special needs housing to show that they are considering the impact on the local area 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed policy: Applications for development that would	✓	✓	0	✓	✓	0	0	0	0	0	0	0

POLICY	SUSTAINABILITY OBJECTIVES											
Policy H07 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
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 or that the current facility is unfit for purpose or that it will be replaced elsewhere. Proposals for the loss of existing accommodation should demonstrate that there is no longer a need for that particular type of accommodation or that the current facility is unfit for purpose or that it will be replaced elsewhere.												
Proposed policy: 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</i>	✓	✓	0	✓	✓	0	0	0	✓	0	0	0

Borough-wide Policy HO8 Hostels and houses in multiple occupation

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.

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

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO8 Hostels and houses in multiple occupation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	?	0	✓	✓	0	0	0	0	0	0	0

Borough-wide Policy HO9 Student accommodation

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 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, however the council will resist proposals which are likely to have adverse local impacts.

An application for student accommodation will need to show that:

- a. 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;**
- b. there would be no loss of existing housing;**
 - c. the development does not have a detrimental impact on the local area, and 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;**
 - d. the accommodation is of high quality, including size of units, daylight and sunlight standards;**
 - e. wheelchair accessible accommodation is provided to meet the needs of disabled students in accordance with relevant British Standards; and**
 - f. the student accommodation should be secured for occupation by members of specified London-based educational institutions or an element of affordable accommodation in accordance with the relevant London Plan (2016) policies.**

The proposed policy considers that student accommodation will be best delivered in the two main Opportunity Areas where it can be planned and integrated as part of major 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.

The proposed policy 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed policy: 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	✓	0	?	?	?	0	✓	?	✓	?	?	✓

POLICY	SUSTAINABILITY OBJECTIVES											
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
within the 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, however the council will resist proposals which are likely to have adverse local impacts.												
Proposed policy: An application for student accommodation will need to show that [...]. <i>See policy wording above.</i>	✓	?	?	?	?	0	✓	?	✓	?	?	✓

Borough-wide Policy HO10 Gypsy and traveller accommodation

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.

Following the completion of a Gypsy and Traveller Accommodation Needs Assessment in 2015 with the Royal Borough of Kensington and Chelsea, the study suggested a need for extra pitches for an additional five families by 2020.

The council will work with the Royal Borough of Kensington and Chelsea to accommodate this need if necessary. The provision of pitches to meet the full accommodation needs of the traveller community would provide a small number of affordable dwellings to meet a particular housing need. The effects on a number of the sustainability objectives are currently uncertain and so this policy will need to

be reviewed and monitored in liaison with Royal Borough of Kensington and Chelsea.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed policy: <i>See policy wording above.</i>	?	?	0	?	✓	0	0	0	0	0	0	0

Borough-wide Policy HO11 Detailed residential standards

Policy HO11 - 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:

- a. floor areas and room sizes in new build dwellings, conversions and changes of use, including meeting 'Nationally Described Space Standards;
- b. accessibility for disabled people;
- c. amenity and garden space provision;
- d. a safe and secure environment;
- e. car parking and cycle parking;
- f. flood protection measures and attenuation of surface water run off;
- g. sustainable energy measures that provide resilience to climate change impacts
- h. use of durable construction materials to construct low maintenance dwellings with low environmental impacts;
- i. provision of waste and recycling storage facilities;
- j. noise insulation and layout to minimise noise nuisance between dwellings; and
- k. 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 a Planning Guidance SPD that provides further guidance on these and other residential amenity issues referred to in the Local Plan.

The proposed 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 standards of design and sustainable developments in the borough.

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

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO11- 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
Proposed policy: <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	✓	✓	✓	✓	✓	✓

Assessing secondary, cumulative and synergistic effects

Proposed policy HO1 Housing Supply is anticipated to positively contribute to the Local Plan's strategic objective 5, 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.

Proposed policy HO2 Housing Conversion and Retention is anticipated to positively contribute towards the Local Plan's strategic objective 5, which seeks to increase the supply and choice of high quality housing in the borough. The effect of proposed policy HO2 is medium to long term. Overall, the proposed 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.

Proposed policy HO3 Affordable housing is anticipated to positively contribute towards the Local Plan's strategic objective 5 to increase the supply and choice of housing, particularly the need for affordable housing and strategic objective 6 to protect social housing and provide more new affordable homes for local residents to buy or rent. 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, particularly in relation to Starter Homes regulations to ensure that appropriate tenure mixes are being secured and that social and economic polarisation in the borough is being reduced.

Proposed policy HO4 Housing quality and density is anticipated to positively contribute towards the Local Plan's strategic objectives 5, 10, 13, and 16. The effect of proposed 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

Proposed policy HO5 Housing mix is anticipated to positively contribute towards the Local Plan's strategic objectives 5 which seeks to provide more housing in the borough and 6 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 effects 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.

Proposed policy HO6 Accessible housing is anticipated to positively contribute towards the Local Plan's strategic objective 5 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. Overall, the proposed policy has been found sustainable and no uncertain or negative effects have been identified.

Proposed policy HO7 Meeting needs of people who need care and support is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objective 5 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.

Proposed policy HO8 Hostels and houses in multiple occupation is anticipated that it will positively contribute towards the Proposed Submission Local Plan's strategic objective 5 by seeking to increase the supply and choice of high quality housing. Proposed Policy HO8 recognises the role that hostels and HMOs play in providing accommodation for single people who cannot afford self-contained accommodation.

Proposed Policy HO8 is likely to have a medium to long-term effect. Overall, the proposed policy has been found sustainable.

Proposed policy HO9 Student accommodation is anticipated to positively contributing towards the 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 proposed policy HO9 on some sustainability objectives means that individual schemes will need to be looked at carefully as and when they come forward.

Proposed policy HO10 Gypsy and traveller accommodation may contribute towards the Proposed Submission Local Plan's strategic objective 5 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 and the policy reviewed in liaison with Royal Borough of Kensington and Chelsea.

Proposed policy HO11 Detailed residential standards is anticipated to positively contribute towards the Local Plan strategic objective 5 which seeks to increase the supply and choice of high quality housing. Overall, proposed policy HO11 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

Policy E1- Providing for a range of employment uses

The council will support proposals including mixed use schemes for new employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services, bio-medical and other research based industries such as those at Imperial College in Shepherd's Bush.

The council will also support 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, unless justified by the type and nature of the proposal. When considering new employment floorspace or the extension of existing floorspace the council will also take into account:

- a. whether the scale and nature of the development is appropriate, having regard in particular to local impact, the nature of the surrounding area, and public transport accessibility;**
- b. impact upon small and medium sized businesses that support the local community;**
- c. scale and nature of employment opportunities generated in the new development;**
- d. whether there will be displacement of other uses such as community facilities or housing; and**
- e. the Hammersmith and Fulham Economic Growth Plan and the council economic strategies.**

The borough's three town centres and the White City and Earl's Court and West Kensington Opportunity Areas will be the preferred locations for new office development above 2500 sq m. Proposals outside of these areas for large new office development (above 2,500 sq.m.) will generally be discouraged unless it can be demonstrated that provision cannot be provided within the town centres or the White City and Earl's Court and West Kensington Opportunity Areas.

By enhancing opportunities for the development of a range of different employment uses the proposed 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.

Identifying the town centres and regeneration areas as preferred locations for major office developments is in accordance with national and London wide policy. It is these locations which have identified development sites, good transport accessibly and/or opportunities and supportive infrastructure that will enable the achievement of sustainable development.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy E1 Providing for a range of employment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy : The council will support proposals including mixed use schemes for new employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services, bio-medical and other research based industries. The council will also support 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, unless justified by the type and nature of the proposal. When considering new employment floorspace or the extension of existing floorspace the council will also take into account: [...]. See <i>policy wording above</i> .	✓	0	0	0	0	✓	0	?	0	?	?	✓

POLICY	SUSTAINABILITY OBJECTIVES											
Policy E1 Providing for a range of employment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Option: The borough's three town centres and the White City and Earl's Court and West Kensington Opportunity Areas will be the preferred locations for new office development above 2500 sq m. Proposals outside of these areas for large new office development (above 2,500 sq.m.) will generally be discouraged unless it can be demonstrated that provision cannot be provided within the town centres or the White City and Earl's Court and West Kensington Opportunity Areas.	0	0	✓	0	0	✓	0	?	0	?	?	✓

Borough-wide Policy E2 Land and premises for employment uses

Policy E2 - Land and premises for employment uses

The council will require the retention of land and premises capable of providing continued accommodation for employment or local services. Permission will only be granted for a change where:

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 evidenced that the property is no longer required for employment purposes.

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 over a period of at least 12 months;
- 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.

A shortage of land and premises for employment activities and competition from other uses, as well as permitted development rights allowing change of use from office to residential is likely to reduce the possibility of maintaining a sustainable economy and business diversity in the borough.

Therefore, it is appropriate to protect this local resource, although 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 proposed policy will allow the mixed use enhancement of sites to be sustainable where uses do not impact detrimentally on their neighbours.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed policy: <i>See policy wording above.</i>	0	0	✓	0	0	✓	0	0	0	0	0	✓

Borough-wide Policy E3 Provision for visitor accommodation and facilities

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 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;**
- **the scheme adding to the variety and quality of visitor accommodation available locally; and**
- **all new hotel applications should demonstrate that the site can provide appropriate servicing and pick up points for the type of facility proposed.**

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.**

The proposed 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed policy: <i>See policy wording above.</i>	✓	0	0	✓	?	✓	✓	✓	✓	0	✓	✓

Borough-wide Policy E4 Local employment, training and skills development initiatives

Policy E4 - Local employment, training and skills development initiatives

The council will require the provision of 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.

The proposed policy will seek employment and training initiatives as part of major developments and will help support sustainable economic growth in the borough by creating a skilled local work force. The proposed 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed policy: <i>See policy wording above.</i>	✓	0	✓	0	✓	✓	0	0	✓	0	0	✓

Assessing secondary, cumulative and synergistic effects

Proposed policy E1 Providing for a range of employment uses is anticipated to contribute positively towards the Proposed Submission Local Plan's strategic objective 3 seeking to reduce polarisation and worklessness, and objective 7 and objective 8 that look to support the local economy, inward investment and businesses by maximising job opportunities. Overall, proposed policy E1 has been found sustainable, but uncertain environmental effects on the SA objectives will have to be monitored.

Proposed policy E2 Land and premises for employment uses is anticipated to contribute positively towards the Proposed Submission Local Plan's strategic objectives 7 and 8 that look to support the local economy, inward investment and businesses. Overall, proposed 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.

Proposed policy E3 Provision for visitor accommodation and facilities is anticipated to contribute positively towards the Proposed Submission Local Plan's strategic objectives 7 and 8 that look to support the local economy, inward investment and businesses. Overall, proposed policy E3 has been found sustainable however it 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.

Proposed policy E4 Local employment, training and skills development initiatives is anticipated to contribute positively towards the Proposed Submission Local Plan's strategic objectives 3, 7 and 8 that look to create opportunities for training and employment and support the local economy, inward investment and businesses. Overall, proposed policy E4 has been found sustainable and will also contribute to other social appraisal objectives.

Taken as a whole, the 4 policies are considered to provide a balanced and coordinated approach to the issue of employment policy that will not impact detrimentally on the achievement of sustainable development throughout the borough.

Town and Local Centres

Borough-wide Policy TLC1 Hierarchy of town and local centres

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 enhance the vitality and viability of the borough's hierarchy of three town centres, 5 key local centres, 15 neighbourhood parades and 6 satellite parades (see Appendix 2 and Map 5 for details). In particular the council will:

- a. support the regeneration of the town centres for a mix of town centre uses, including residential development on appropriate sites;**
- b. maintain the predominant retail function of primary shopping areas;**
- c. support the night time economy in town centres;**
- d. support the conversion of unused or underused space above ground floor units for new residential accommodation (subject to the requirements of other relevant policies);**
- e. seek a mix of shop sizes and types, with independent as well as national traders, that are accessible to local residents, workers and visitors;**
- f. ensure that new developments for town centre uses are appropriately located, are of an acceptable scale, and do not negatively impact on the existing hierarchy, in accordance with national and regional policy and local need;**
- g. require a retail impact assessment for out of centre retail proposals which are in excess of 300 sqm (gross);**
- h. require a sequential test for out of centre retail development proposals in accordance with the NPPF;**
- i. promote the provision of shopmobility schemes;**
- j. safeguard local shops and other local services within local centres to meet local need;**
- k. support and protect local markets and clusters of specialist shopping;**
- l. 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 proposed policy 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 proposed policy seeks to support the regeneration of the town centres for a mix of town centre uses and to minimise adverse impacts on surrounding residential properties, which will have a positive effect on the social sustainability objectives.

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.

POLICY	SA OBJECTIVES											
Policy TLC1: Hierarchy of Town and Local Centres	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy See Policy wording above	✓	0	0	0	✓	✓	0	0	✓	0	0	✓

Boroughwide Policy TLC2- Town Centres

Policy TLC2 –Town Centres

In the designated town centres (as shown on the Proposals Map and defined in Table 4 below), changes from A class use at street level will 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 and do not have an adverse impact on the local area. In particular, permission for changes of use will be considered on the following basis:

1. no more than 40% of the length of the prime retail frontage as a whole will be permitted to change to non-class A1 uses;
2. 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.

- 3. the nature and characteristics of the proposed use are complementary to the shopping frontage;**
- 4. the proposed use contributes to the function of the centre in terms of the size of the unit, the length of its frontage and the location of the unit within the centre;**
- 5. 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; and**
- 6. consent will not be granted for residential use within the ground floor frontage**

In non prime retail frontages criteria 3-6 above will apply. In all calculations of the proportion of the frontage in class A1, the lawful use and unimplemented extant permissions for changes of use will be taken into account.

The proposed 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.

Over recent years the nature of the high street and consumer shopping habits have changed with a greater variety of non-retail uses seeking to locate within the boroughs town centres. This coupled with vacant units suggests a more flexible policy approach to non-retail uses is required and there is a risk that a too prescriptive approach may stifle economic development.

This policy has therefore been modified to ensure there is greater flexibility to allow for a wider variety of uses within the prime retail frontage of town centres where appropriate, but still seeks to protect the predominance of retail (A1 uses). Those units within the designated non-prime retail frontage of town centres have less restrictions for changes of use from class A1 retail, with no requirement to meet a set quota figure. This will contribute positively to the sustainable economy objective. Having greater flexibility built into the policy to allow for a wider variety of uses will enhance the vitality and viability of the three town centres by offering a greater choice of uses and adding diversity. However, in order to have a positive impact on the health and social behaviour objectives, on implementation of the policy the concentration and location of takeaways as well as betting shops and pay day loan shops will need to be managed.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy TLC2-town centres	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓/!	0	0	✓/!	0	0	0	✓	0	0	✓

Borough-wide Policy TLC3 Local centres

Policy TLC3 - Local centres

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, changes of use will be permitted subject to 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 and where it meets the quotas set out below:

Neighbourhood Parades:

a. no more than 40% of the neighbourhood parade frontage as a whole will be permitted to change to non-class A1 uses; and

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

Satellite Parades:

a. no more than 60% of the satellite parade frontage as a whole will be permitted to change to non-class A1 uses; and

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 however residential may be appropriate at the rear of premises, subject to satisfactory evidence that neither shopping policy nor the long term viability of the retail unit will be prejudiced.

The quota policies, although more flexible and less restrictive than previously will contribute to maintaining the viability and vitality of the centres and protect the more local retail base of those centres. The flexibility that is built into the policy will allow a considered approach to the issue of vacancy. The proposed policy will have a positive impact on the economy, social justice (by improving the range and quality of shops and meeting residents' needs), and sustainable transport objectives (by reducing the need to travel).

On implementation of the policy the location and concentration of takeaways as well as pay day loan and betting shops will need to be monitored carefully to ensure there is no negative impact on health and social behaviour.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy TLC3 Local centres	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓/?	0	0	?/✓	0	0	0	✓	0	✓	✓

Borough-wide Policy TLC4 Small non designated parades, clusters and corner shops

Policy TLC4 - 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:

- a. the proximity and the range of shops in the locality to meet local needs (where town centres, key local centres, protected parades and satellite parades are not within 400 metres);
- b. the length of time that the application premises may have been vacant and the marketing of the premises; and
- c. 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 of corner shops 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 3400 metres).

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.

Outside of the Local Plan retail hierarchy this policy is more flexible and allows for changes of use to residential and other uses where appropriate, with no quotas to be applied. Rather than setting a maximum threshold of non-retail uses that would be permitted, flexibility is applied to enable the council to consider the impacts of the proposal on a case by case basis having regard to local circumstances. This will contribute positively to the sustainable economy objective. However, the policy still seeks to protect local 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).

POLICY	SUSTAINABILITY OBJECTIVES											
TLC4 Small non designated parades, clusters and corner shops	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	✓	✓	0	0	✓	0	0	✓

Borough-wide Policy TLC5 Managing the impact of food, drink and entertainment uses

Policy TLC5 - 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:

- 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**
- There will not be any increase in the cumulative impact from these or similar activities, on an adjacent residential area; and**
- There is a high level of public transport accessibility to and from the premises at appropriate times; and**
- 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.

Proposed policy TLC5 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.

POLICY	SUSTAINABILITY OBJECTIVES											
TLC5 Managing the impact of food, drink and entertainment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: 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: [...]	0	✓	0	0	✓	0	0	✓	✓	0	0	✓
See policy wording above.												

Town and Local Centre policy TLC6- Betting Shops, Pawnbrokers and Payday Loan Shops and Food Takeaways

Policy TLC6 – Betting shops, Pawnbrokers and Payday Loan Shops and Hot Food Takeaways

To ensure that shopping areas remain diverse and balanced, the council will seek to limit the amount and concentration of betting shops, pawnbrokers and payday loan shops in areas of high concentration.

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 in accordance with the quotas that apply and 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.

When considering proposals for hot food takeaways (class A5), and 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.

This is a new policy in the 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.

The proposed policy 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 proposed policy 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 proposed policy 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.

POLICY	SA OBJECTIVES											
Policy TLC6 Betting shops, pawnbrokers, payday loan shops and hot food takeaways	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓ /?	0	0	✓	0	0	0	0	0	0	✓

Town and Local Centre policy TLC 7 Public houses

Policy TLC7 - 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 to meet 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 residential standards.**

4. The applicant will be required to carry out an assessment of the needs of the community for community facilities to show that the existing or former public house is no longer needed and that alternative provision is available in the area.

The proposed policy scores positively on a number of sustainability objectives. This proposed policy 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.

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.

There would be a positive impact on heritage objective 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.

POLICY	SA OBJECTIVES											
Policy TLC7 Public houses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: 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	✓	0	0	0	✓	0	✓	?	✓	✓	?	✓

POLICY	SA OBJECTIVES											
Policy TLC7 Public houses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<p>in the provision of space for community groups to meet 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>Proposed Policy</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</p>	0	0	0	0	0	0	✓	?	0	0	?	0

POLICY	SA OBJECTIVES											
Policy TLC7 Public houses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
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.												
Proposed Policy 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

Assessing secondary, cumulative and synergistic effects

Proposed policy TLC1 Hierarchy of town and local centres is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objectives 1 and 8, seeking to regenerate Hammersmith and 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.

Proposed policy TLC2 Town Centres is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objectives 1 and 8 which seek 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 likely that the policy will have a positive effect on the sustainability appraisal objectives, especially in the medium to long term. Proposed 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.

Proposed policy TLC3 Local Centres is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objective 1 which seeks to promote a network of supporting key local centres providing local services. It also contributes to achieving strategic objective 4 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 expected 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 proposed Policies TLC5-8 to strengthen the local economy across the whole borough and help protect residential amenity and create sustainable communities.

Proposed policy TLC4 Small non-designated parades, clusters and corner shops is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objective 1 which seeks to promote a network of supporting key local centres providing local services. It also contributes to achieving strategic objective 4 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 proposed policies TLC3, TLC5-7 to strengthen the local economy across the whole of the borough and help protect residential amenity, contributing towards sustainable communities.

Proposed policy TLC5 Managing the impact of food, drink and entertainment uses is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objective 16 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. Proposed policy TLC6 could combine cumulatively and synergistically with the other shopping policies, in particular proposed Policies TLC6 and TLC7 to contribute towards sustainable communities.

Proposed policy TLC6 Addressing the concentration and clustering of betting shops and payday loan shops is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objectives 1 and 8, which seek to improve the vitality and vibrancy of high streets and key local centres as well as strategic objective 16 which aims to protect the amenity and quality of life of residents.

Effects of this proposed 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 proposed policy will provide a greater level of certainty over its effect.

Proposed policy TLC7 Public houses is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objective 4 which seeks to ensure that residents have access to a range of community infrastructure. It is predicted that the effects of this proposed 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 proposed 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

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

- 1. 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**
 - a. 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**
 - b. supporting renewal of existing GP premises and other healthcare facilities where this is required.**
- 2. Seeking the improvement of school provision, including:**
 - a. improvement and/or expansion of secondary schools;**
 - b. improvement and/or expansion of primary schools through the primary school capital programme;**
 - c. supporting the creation of new free schools;**
 - d. 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 Fulham Regeneration Area (including Earls Court and West Kensington Opportunity Area);**
 - e. working with and supporting the Old Oak and Park Royal Development Corporation in the provision of school facilities to meet the need arising from proposed development in the OPDC area;**
 - f. supporting the provision of schools and facilities for those with special needs; and**
 - g. supporting provision of childcare nurseries.**
- 3. Improving the range of leisure, recreation, sports, arts, cultural and entertainment facilities by:**
 - a. protecting existing premises that remain satisfactory for these purposes;**
 - b. supporting re-provision of facilities for existing users in outworn premises where opportunities arise; and**
 - c. 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

-water related sports and educational facilities in riverside developments.

- 4. 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;**
- 5. Enhancing sport, leisure and cultural provision for schools and public use in suitable local parks;**
- 6. Protecting all existing community facilities and services throughout the borough unless there is clear evidence that there is no longer an identified need for a particular facility or service, or where that facility or service can be appropriately replaced or provided elsewhere in the locality;**
- 7. 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**
- 8. Requiring developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities.**

By working with strategic partners, the council should ensure that needs and requirements of residents, including health and wellbeing and education, are identified in a holistic and comprehensive manner. The proposed policy is aimed at safeguarding and providing for community facilities to assist in meeting the needs of borough residents and visitors to the borough which, 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 contribute to the night-time economy and 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 appropriate social infrastructure and should not give rise to unsustainable pressure on existing facilities elsewhere in the borough.

The policy will also result in positive effects on the social and health objectives, through protecting and improving social infrastructure such as health care, as well as improving leisure sport and recreational facilities. There will also be benefits to the community by seeking to reduce incidents of crime and antisocial behaviour.

By seeking to provide and protect schools and childcare facilities to meet local needs, the policy is likely to have a positive effect on the education objective.

POLICY	SA OBJECTIVES											
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
Proposed Policy: 1) 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, and; [...] <i>See policy wording above.</i>	✓	✓	✓	0	✓	?	?	?	✓	✓	?	✓
Proposed Policy: 2) Seeking the improvement of primary and secondary school provision, including [...] <i>See policy wording above.</i>	✓	0	✓	0	✓	?	?	?	?	?	?	✓
Proposed Policy: 3) Improving the range of leisure, recreation, sports, arts and cultural facilities by: [...] <i>See policy wording above.</i>	✓	✓	✓	0	✓	✓	?	?	?	?	?	✓
Proposed Policy: 4) 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	✓	✓	✓	0	✓	✓	✓	?	?	?	?	✓
Proposed Policy: 5) Enhancing sport, leisure and cultural provision for schools and public use in suitable local parks.	✓	✓	✓	0	✓	?	?	?	?	?	?	✓

Proposed Policy: 6) Protecting all existing community facilities and services throughout the borough unless there is clear evidence that there is no longer an identified need for a particular facility or service, or where that facility or service can be appropriately replaced elsewhere in the locality.	✓	✓	✓	0	✓	✓	?	?	?	?	?	✓
Proposed Policy: 7) 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;	✓	✓	0	0	✓	0	0	0	0	0	0	0
Proposed Policy: 8) Requiring developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities.	✓	✓	✓	0	✓	?	0	?	?	?	?	✓

Borough-wide Policy CF2 Enhancement and Retention of community uses

Policy CF2 – Enhancement and Retention of community uses

Proposals for new or expanded community uses should meet local needs, be compatible with and minimise impact on the local environment and be accessible and inclusive 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 short or long-term need for a particular facility or service, or where the existing facility or service can be appropriately replaced or provided elsewhere in the locality. 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; and**
- require 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**

The proposed 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, including education. It will also help reduce the need to travel if community uses are available locally and provided on site as part of a new development. It should also contribute to achieving a sustainable economy by providing an opportunity for local jobs.

The loss of existing community facilities could potentially have a significant negative effect on the social sustainability objectives, particularly if it is not replaced. The proposed policy will help to ensure that existing community facilities are not lost if local needs exist. However, by including a criteria against which proposed loss of uses will be assessed, the policy will allow for alternative uses where this is justified by evidence. This is considered to be a flexible approach that should mean that premises do not lie vacant for long periods.

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

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CF2 Enhancement and Retention 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
Proposed Policy : Proposals for new or expanded community uses should meet local need, be compatible with and minimise impact on the local environment and be accessible and inclusive to all in the community they serve.	✓	✓	✓	0	✓	0	✓	?	✓	0	✓	✓
Proposed Policy: 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	✓
Proposed Policy : In any development proposal, existing community facilities should be retained or replaced, unless there is clear evidence that there is no longer an	✓	✓	0	0	✓	0	0	✓	✓	✓	0	✓

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CF2 Enhancement and Retention 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
<p>identified short or long term need for a particular facility or service, or where the existing facility or service can be appropriately replaced or provided elsewhere in the locality. In assessing need, the council will take into account the role the facility plays in the provision of space for community groups [...]</p> <p><i>See policy wording above.</i></p>												

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

Policy CF3 – Enhancement and Retention 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:

- a. **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;**
- b. **requiring proposals for new and expanded venues to be accessible and inclusive and to be supported by evidence of how impacts such as noise, traffic, parking and opening hours have been assessed, minimised and mitigated;**
- c. **seeking retention or replacement of existing 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; and

- d. encouraging the temporary use of vacant buildings for community uses, including for performance and creative work.**

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 aspects of the borough. These uses are often part of the boroughs 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 and also could have a potential negative effect on the local economy, particularly if no replacement is delivered in the area.

The proposed 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 by evidence. This is considered to be a flexible approach that should mean that premises do not lie vacant for long periods.

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CF3 Enhancement and retention 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	Uustainable economy
Proposed Policy : <i>See policy wording above.</i>	✓	✓	✓	0	✓	?	✓	✓	?	0	0	✓

Borough-wide Policy CF4 Professional football grounds

Policy CF4 - Professional football grounds

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

The three football clubs in this borough are an important part of the borough's fabric and the council wishes to retain these in the borough. They provide jobs and entertainment and contribute to education and skills and social cohesion objectives. However, redevelopment of these venues for alternative 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 proposed policy is considered to have a neutral impact on sustainability appraisal objectives.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	0	0	0	0	0	0

Assessing secondary, cumulative and synergistic effects

Proposed policies CF1 to CF3 have been found sustainable. These community facilities policies will work well together and positively contribute to a number of the Local Plan's strategic objectives, including objective 4 seeking to ensure that residents and visitors to the borough have access to a range of high quality facilities and services. Taken as a whole, the policies should contribute to the creation of a sustainable community.

Proposed policy CF1 Supporting community facilities and services is also anticipated to contribute towards the Local Plan's strategic objective 19 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 15 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.

Proposed policy CF3 Enhancement and retention of arts, culture, entertainment, leisure, recreation and sport uses is also anticipated to contribute towards the Local Plan's strategic objective 9 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. Proposed 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.

Proposed 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 Parks and open spaces

Policy OS1 - Parks and open spaces

The council will protect, enhance and increase provision of parks, open spaces and biodiversity in the borough by:

- a. 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);**
- b. requiring a mix of new public and private open space in the White City and Earls Court and West Kensington Opportunity Areas and the South Fulham Riverside Regeneration Area and in any new major development; and**
- c. improving existing parks, open spaces and recreational facilities throughout the borough.**

The protection of open space has a number of benefits. The majority of the borough's open spaces are long established and form an important part of the borough's cultural and environmental heritage. Whether old or new, the open spaces form a focal point for communities and provide opportunities for exercise, social interaction and relaxation, which will have a positive effect on the social and health sustainability objectives. 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 objectives, offering opportunities to contribute positively to biodiversity and flood risk management.

The provision of new open spaces as part of the development of the borough's regeneration areas will help contribute to the creation of 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, play spaces and nature conservation areas will contribute to the creation of sustainable communities throughout the borough.

POLICY	SUSTAINABILITY OBJECTIVES											
OS1 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
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	✓	0	✓	✓	?	✓	✓	0

Borough-wide Policy OS2 Access to parks and open spaces

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:

- a. 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;
- 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:
 - o 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;
- c. requiring accessible and inclusive new open space in any new major new development, and
- d. 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.

Larger developments are likely to place additional strain on existing open spaces. The proposed 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 by improving their quality of life and making better places to live. Seeking improvements to existing open spaces and facilities will have similar sustainability benefits.

The proposed policy proposes to resist development on existing open space unless it leads to a qualitative improvement to the open space. The policy 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, as well as offering opportunities to contribute positively to biodiversity and flood risk management. 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above</i>	✓	✓	0	0	✓	0	✓	✓	?	0	✓	✓

Borough-wide Policy OS3 Playspace for children and young people

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, safe and secure 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.

Protection of existing playspace and associated facilities is important because these are an important part of the social infrastructure of an area, particularly for those that do not have access to a private garden or amenity space. Residential developments will lead to an increase in population and are likely to place additional strain on existing children and young peoples' playspace. The proposed 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 "Shaping Neighbourhoods Play and Informal Recreation (2012)" the policy will provide additional guidance. The Proposed policy is likely to have positive effects on social equity, social cohesion and health objectives by seeking to improve the quality of life of residents and making better places to live.

POLICY	SUSTAINABILITY OBJECTIVES											
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	ustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	?	0	✓	0	0	0	?	0	0	✓

Borough-wide Policy OS4 Nature conservation

Policy OS4 - Nature conservation

The nature conservation areas and green corridors identified on the Proposals Map (and shown on Map 7 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:

- a. 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**
- b. provision is made for replacement nature conservation interest of equal or greater value elsewhere in the locality.**

Outside of the areas identified on the Proposals Map, 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.

With a significant amount of growth and development planned in the borough, it will be important to protect the existing nature conservation areas and green corridors from harmful negative impacts. The policy seeks to ensure the protection of nature conservation areas and green corridors and 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 also, help in minimising flood risk by reducing run off.

The proposed policy aims to resist developments in nature conservation areas unless these 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.

Seeking green infrastructure on development sites, for example in the regeneration areas, will add to the biodiversity stock of the borough and help reduce and mitigate local causes of climate changes and will assist in reducing flood risk. By placing 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 and enhance this valuable resource.

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy OS4 Nature conservation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : The nature conservation areas and green corridors identified on the Proposals Map (and shown on Map 7 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
Proposed Policy : In these areas, development will not be permitted unless: [...] See <i>policy wording above</i> .	✓	0	0	0	✓	✓	✓	✓	✓	0	✓	0
Proposed Policy : 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

Borough-wide Policy OS5 Greening the borough

Policy OS5 - Greening the borough

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

- a. maximising the provision of gardens, garden space and soft landscaping and seeking green or brown roofs and other planting as part of new development;
- b. protecting back, front and side gardens from new development and encouraging planting in both back and front gardens;
- c. seeking to prevent removal or mutilation of protected trees;
- d. seeking retention of existing trees and provision of new trees on development sites; and
- e. adding to the greening of streets and the public realm.

Enhancing biodiversity and improving green infrastructure in the borough will have a number of benefits, including enhanced environmental quality. Biodiversity improvements can, for example, help to reduce the impact of high summer temperatures and reduce rainfall run-off rates, helping to reduce the risk of surface water flooding. As well as improving the boroughs health through improved local air quality. This policy will therefore have significant positive effects on the environmental and health objectives and on the quality of life of the communities.

It should be possible for the proposed policy to be applied in such a way that it does not constrain new housing development or, for example, the aspirations of home owners, but this will need to be monitored. It is understood that there will be additional planning guidance in supporting SPD on a number of the requirements set out in the policy. The London Mayor's SPG on Green Infrastructure and Open Environments should also provide further guidance. Both documents 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy : <i>See policy wording above.</i>	✓	✓	0	?	✓	0	✓	✓	0	0	✓	0

Assessing secondary, cumulative and synergistic effects

The policies provide comprehensive coverage of open space and green infrastructure matters. There is no indication that they cannot work well with each other as well as with other policies within the Local Plan.

Proposed policy OS1 Parks and open spaces is anticipated to positively contribute towards the Local Plan's strategic objective 11 which seeks to protect and enhance the borough's open green spaces and create new parks where there is major regeneration. Proposed 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.

Proposed policy OS2 Access to parks and open spaces is anticipated to positively contribute to the Local Plan's strategic objective 11 that seeks to protect and enhance the borough's open green spaces, strategic objective 4 which ensures that residents have access to recreation and strategic objective 15 which seeks to encourage and promote healthier lifestyles through better sports facilities to reduce health inequalities. Overall, proposed policy OS2 has been found sustainable and will have a positive short to long-term impact on the health and welfare of the community.

Proposed policy OS3 Playspace for children and young people is anticipated to positively contribute towards the Local Plan strategic objective 11 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. Proposed 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 proposed policy also links to the principles of accessible and inclusive design as promoted in proposed policy DC2 Design of new build.

Proposed policy OS4 Nature conservation will contribute towards the Local Plan's strategic objective 11 which seeks to protect and enhance the borough's open green spaces and strategic objective 13 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, proposed policy OS4 has been found sustainable.

Proposed policy OS5 Greening the borough will contribute towards the Local Plan's strategic objective 11 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, proposed policy OS5 has been found sustainable.

RIVER THAMES

Borough-wide Policy RTC1 River Thames

Policy RTC1 - River Thames

The council will work with its partner organisations, including the Environment Agency, Port of London Authority, 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 improve waterside environments by:

- a. 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;**
- b. encouraging the development of vacant or underused land along the waterways, namely the River Thames, Chelsea Creek and taking into account their local context and character;**
- c. 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**
- d. ensuring the provision, or improvement and greening, of the Thames Path National Trail (the riverside walk) in all riverside developments.**

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 should allow through consideration of sustainability objectives as and when matters arise.

Encouraging the development of vacant and underused land along the Thames and Chelsea Creek will help to improve the local environment of these waterways and reduce the amount of underused land. It is understood that such development will be in accordance with other policies of the Local Plan and if this is mixed use it should allow the achievement of a number of sustainability objectives, including provision of affordable housing and jobs.

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 the South Fulham Riverside Regeneration Area.

Requiring new development to provide water based activities and enhance river related biodiversity and public access to the riverside will have social, health 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 adjoining the river will improve accessibility and offer opportunities for healthy lifestyles.

Safeguarding and enhancing flood defences will assist in reducing the risk of flooding.

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
Policy RTC1 River Thames												
Proposed Policy: a)Identifying the Thames Policy Area 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	0	0	0	0	✓	0	✓	0	0	?	✓	0
Proposed Policy : b) Encouraging the development of vacant or underused land along the waterways, namely the River Thames, Chelsea Creek and taking into account their local context and character	✓	✓	0	✓	✓	✓	✓	0	✓	?	✓	✓
Proposed Policy: c)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	✓	✓	0	0	✓	✓	✓	✓	✓	✓	✓	✓

defences, etc												
Proposed Policy: d)Ensuring the provision and greening of the Thames Path National Trail in all riverside developments	✓	✓	0	0	✓	0	✓	0	✓	?	✓	0

Borough-wide Policy RTC2 Access to the Thames riverside and foreshore

Policy RTC2 - Access to the Thames riverside and foreshore

The council will seek accessible and inclusive public access to the riverside, including through-site links when riparian development takes place and the provision and enhancement of the Thames Path National Trail (the riverside walk). It will also seek the retention and enhancement of access to and from the foreshore in development schemes where it is appropriate and safe to do so, 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.

The proposed 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 and encouraging walking and cycling.

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 over the top of the river walls, which is likely to increase with climate change. The proposed policy will positively contribute to the climate change objective by seeking to safeguard and enhance flood defences, thereby minimising the risk of flooding from storm events and overflow of the river.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy RTC2 Access to the Thames riverside and foreshore	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: The council will seek accessible and inclusive public access to the riverside, including through-site links when riparian development takes place and the provision and enhancement of the Thames Path National Path (the riverside walk). It will also seek the retention and, enhancement of access to and from the foreshore in development schemes where it is appropriate and safe to do so, and will promote enjoyment of riverside heritage assets and open spaces.	✓	✓	0	0	✓	0	✓	✓	✓	0	✓	0
Proposed Policy : 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
Proposed Policy: All proposals will need to ensure that flood defences are not adversely affected.	0	✓	0	0	0	0	0	0	0	0	✓	0

Borough-wide Policy RTC3 Design and appearance of development within the Thames Policy Area

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.

The council will encourage the greening and naturalising of the river bank and/or flood defences with reference to the Thames Estuary 2100 Plan to create habitats for wildlife and improve the visual attractiveness of the area. Schemes that meet these requirements, and, by their design, contribute to creating an attractive, safe and interesting riparian environment will be welcomed. The council will require the submission of a design and access statement as part of a planning application within the Thames Policy Area.

The policy seeks to permit riverside development, which respects the unique character of the river and is of a suitable height, massing and bulk. Implementing the proposed 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 DC3 on tall buildings and the South Fulham Riverside Regeneration Area Policy-SFRRRA) which provides further guidance.

Achievement of the policy objectives will depend upon the application of a number of related policies within the Local Plan, and different development scenarios and different land uses will exert varying impacts on sustainability.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy RTC3 Design and appearance of development within the Thames Policy Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : <i>See policy wording above.</i>	0	✓	0	0	0	0	✓	0	?	0	✓	0

Borough-wide Policy RTC4 Water-based activity on the Thames

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 new permanent moorings, passenger services, and for facilities associated therewith, particularly where these would be publicly accessible, will be welcomed, provided:

- a. they are compatible with the character of the river, the riverside, and the importance of the river as a wildlife habitat;**
- b. they do not impede or give rise to hazards to navigation, water flow, the integrity of flood defences or public safety; and**
- c. they accord with other objectives and policies of the Plan.**

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).

By encouraging developments that include the provision of water based and river related activities, the proposed policy will promote the sustainability objectives outlined above. Also by listing a number of identified criteria that developments have to meet, the proposed policy will ensure consideration of environmental sustainability objectives.

However, although the policy promotes the increased use of the river and the provision of new facilities as part of any riverside development, a balance must be struck with regard to other issues that may be affected negatively if not managed, such as ecological and navigational interest, heritage assets and amenity of residential neighbours.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy RTC4 Water-based activity on the Thames	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : 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	✓	✓
Proposed Policy : Developments that include provision in the river for water-based and river-related activities and uses, including new permanent moorings, passenger services, and for facilities associated therewith, particularly where these would be publicly accessible, will be welcomed, provided: [...] See policy wording.	✓	✓	0	✓	✓	0	✓	✓	✓	0	✓	✓

Assessing secondary, cumulative and synergistic effects

The riverside policies RTC1 to 4 have been found to be generally sustainable. In the South Fulham Riverside 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.

All the policies have a slant towards protection and enhancement of heritage assets and careful design and conservation. As 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.

Proposed policy RTC1 River Thames is anticipated to positively contribute towards the Local Plan's strategic objective 12, which seeks to increase public access and use of Hammersmith and Fulham's waterways as well as enhance their environment, quality and character. It also contributes to strategic objective 10, which seeks to preserve and enhance the quality, character and identity of the borough's natural environment. Proposed policy RTC1 is likely to have positive cumulative and secondary effects 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 proposed 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.

Proposed policy RTC2 Access to the Thames riverside and foreshore is anticipated to contribute positively towards Local Plan strategic objective 15 which encourages and promotes healthier lifestyles and strategic objective 12 which seeks to increase public access and use of the waterways. It will also contribute positively towards strategic objective 14, which seeks the development of a sustainable transport network. Proposed policy RTC2 seeks provision of the riverside walk which will increase opportunities for healthy lifestyles. This is likely to have a positive short to long term effect, in particular on the sustainability objective for health 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.

Proposed policy RTC3 Design and appearance of development within the Thames Policy Area is anticipated to contribute positively towards the Local Plan strategic objective 10, which seeks to preserve and enhance the quality, character and identity of the borough's natural and built environment, and strategic objective 12, which seeks to increase public access and use of the borough's waterways. This proposed 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.

Policy RTC4 Water-based activity on the Thames is anticipated to contribute positively towards the Local Plan strategic objective 15, which encourages and promotes healthier lifestyles, strategic objective 12 which seeks to increase public access and use of the borough's waterways and strategic objective 13, which seeks to mitigate flood risk. Proposed 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. The use of the safeguarded wharves for cargo handling uses could have positive transport impacts, but only if serviced by the river.

DESIGN AND CONSERVATION

Borough-wide Policy DC1 Built environment

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 demonstrates how good design, quality public realm, landscaping, heritage assets and land use can be integrated to help regenerate places.

The proposed policy focuses in ensuring that development should be of a high quality and that the 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.

The proposed policy will make a positive contribution towards 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.

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.

The proposed policy places significant emphasis on helping to ensure that new development will respect and enhance natural assets.

In addition, high quality design (together with other attributes of the borough should continue to make the borough a destination where businesses will wish to settle and grow, thereby helping to sustain the local economy.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: See policy wording above.	✓	✓	0	0	✓	0	✓	0	0	0	0	✓

Borough-wide Policy DC2 Design of new build

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:

- a. the historical context and townscape setting of the site, and its sense of place;
- b. the scale, mass, form and grain of surrounding development and connections to it;
- c. the relationship of the proposed development to the existing townscape, including the local street pattern, local landmarks and the skyline;
- d. 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;
- e. the principles of residential amenity;
- f. the local landscape context and where appropriate should provide high quality landscaping and public realm with good permeability;
- g. sustainability objectives; including adaptation to, and mitigation of, the effects of climate change;
- h. the principles of accessible and inclusive design; and
- i. principles of Secured by Design

The proposed policy will have benefits in relation to the heritage, the responsible consumption of resources and climate change objectives. Applying the principles of inclusive design will have positive effects on the community, social justice and cohesion objectives, 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 crime and anti-social behaviour through good design.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: New build development will be permitted if it is of a high standard of design and compatible with the	✓	✓	0	✓	✓	0	✓	?	?	✓	✓	?

<p>scale and character of existing development and its setting.</p> <p>All proposals must be designed to respect: [...]</p> <p>See <i>policy wording above</i>.</p>												
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Borough-wide Policy DC3 Tall buildings

Policy DC3 - Tall buildings

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. However, areas where tall buildings may be appropriate are as follows:

- White City Regeneration Area
- Earls Court & West Kensington Opportunity Area
- South Fulham Riverside Regeneration Area
- Hammersmith Town Centre

In the areas identified as appropriate for tall buildings, any proposal will need to demonstrate that it:

- a. **Has positive relationship to the surrounding townscape context in terms of scale, streetscape and built form;**
- b. **Is of the highest quality of architectural design and materials with an appropriate form and silhouette which contributes positively to the built heritage and image of the borough;**
- c. **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;**
- d. **Has no harmful impact in terms of the setting of, and views to and from, heritage assets;**
- e. **Is supported by appropriate transport infrastructure;**
- 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, including minimising energy use and the risk of overheating through passive design measures, and the design allows for adaption 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.**

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 resisted by the council. This policy although dependent on implementation is likely to have a positive impact on the heritage objective by seeking to ensure that tall buildings are only permitted in suitable locations and there is no harmful impact in terms of the setting of and views to and from heritage assets.

The criteria in the policy, to be used when considering planning applications should ensure benefits in relation to most of the sustainability objectives if applied appropriately and consistently.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above.</i>	✓	0	0	0	0	✓	✓/ ?	✓	✓	✓	✓	0

Borough-wide Policy DC4 Alterations and extensions (including outbuildings)

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;
- subservient and successfully integrated into the architectural design of the existing building; and
- should never dominate the parent building in bulk, scale, materials or design.

In considering applications for alterations and extensions the council will 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. **impact on skyline silhouette (for roof top additions);**
- g. **relationship to existing building, spaces between buildings and gardens;**
- h. **good neighbourliness in particular the amenities of the neighbouring properties, and other properties most directly affected by the proposal; and**
- i. **the principles of accessible and inclusive design.**

The proposed 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 and possibly the health objective. Good neighbourliness can also help foster social cohesion.

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
Policy DC4 Alterations and extensions (including outbuildings)												
Proposed Policy: The council will require a high standard of design in all alterations and extensions to existing buildings. These should be: [...] <i>See policy wording above.</i>	0	?	0	0	0	0	✓	0	0	0	✓	0
Proposed Policy: In considering applications for alterations and extensions the council will take into account the following: [...] <i>See policy wording above.</i>	✓	?	0	0	✓	0	✓	0	0	0	✓	0

Borough-wide Policy DC5 Shopfronts

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 is converted to another use 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 shopfront of a suitable scale can be inserted.

Fascia signs and projecting signs should not be overly large and should be designed to be appropriate to the styles of the shopfront (see section on Shopfront Guidance in the Planning Guidance Supplementary Planning Document).

New shopfronts should be designed to meet the principles of accessible and inclusive design.

The proposed policy seeks to improve the appearance of the borough's street by encouraging high quality shopfronts. This is likely to have a positive effect on the heritage, social and sustainable economy objectives. Accessible and inclusive design of shopfronts will particularly benefit disabled people and those with push chairs.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above.</i>	✓	0	0	0	0	0	✓	0	0	0	0	✓

Borough-wide Policy DC6 Replacement windows

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.

The proposed policy will seek a high standard of design that is compatible with the local environment. It will have significant positive impacts on the heritage objective. New windows could also have benefits in respect of consumption of resources and climate change objectives.

POLICY	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
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	✓	✓	0

Borough-wide Policy DC7 Views and landmarks

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 harm to the significance of a designated heritage asset and townscape generally, unless it can be demonstrated that the harm is necessary to achieve public benefits that outweigh the harm caused. Opportunities for enhancement of strategic and local views will be pursued where they arise.

1. Development within the Thames Policy Area will not be permitted if it would cause demonstrable harm to the view from the following points:
 - a. 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.
- b. 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.

The implementation of the proposed policy will have a significant positive impact on preserving and enhancing the character and identity of the boroughs natural and built environment including its heritage assets.

The proposed 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	0

Borough-wide Policy DC8 Heritage and Conservation

Policy DC8 - Heritage and Conservation

The council will conserve the significance of the borough's historic environment by protecting, restoring and enhancing its heritage assets. These assets include: listed buildings, historic parks and gardens, the scheduled monument of Fulham Palace Moated site, unscheduled archaeological remains and buildings and features of local interest. 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, restoration and enhancement 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. development affecting designated heritage assets, including alterations and extensions to buildings will only be permitted if the significance of the heritage asset is conserved or enhanced or where there is less than substantial harm and the harm is outweighed by the public benefits of the proposal. Where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered the significance of the heritage asset and tailored their proposals accordingly;**
- c. development should conserve 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;**
- 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. particular regard will be given to matters of scale, height, massing, alignment, materials and use;**
- f. where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use should be consistent with the aims of conservation of the asset's character and significance;**
- g. 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.**
- h. proposals which involve 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.**
- 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;

- j. the proposal respects the principles of accessible and inclusive design;
- k. expert advice will be required to address the need to evaluate and conserve archaeological remains, and to advise on the appropriate mitigation measures in cases where excavation is justified; and
- l. securing the future of heritage assets at risk identified on English Heritage's national register, as part of a positive strategy for the historic environment.

The proposed policy aims to conserve the significance of the borough's historic environment by protecting, restoring and enhancing its heritage assets. The policy will therefore have positive benefits on the heritage objective. 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.

The 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.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	0

Borough-wide Policy DC9 Advertisements

Policy DC9 - Advertisements

The council will require a high standard of design of advertisements, which should be in scale and in keeping with the character of their location and should not impact adversely on public safety. The council will resist excessive or obtrusive advertising and inappropriate illuminated signs which adversely affect the character and appearances of the neighbourhood or the site/building, residential amenity or public safety. 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 should normally be located at ground floor level and related to commercial zone of the street frontage and the architectural design of the facade. All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for Shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.

Hoardings and other large advertisements, such as digital screens will be acceptable where they are of an appropriate scale with their surroundings and where they do not have a detrimental impact on 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.

Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds. Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried out. This will not be permitted where the advertisement would impose a detrimental impact on the building or street scene in terms of the size, illumination and/or content; or where the advertisement would be harmful to residential amenity or public safety. Where advertisement shrouds are considered to be acceptable, they should be accompanied by a 1:1 depiction of the building and only be displayed for a limited period related to the reasonable duration of the building works. Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once planning permissions has been granted and all pre-commencement conditions have been discharged.

The display of estate agents boards within Regulation 7 areas will not be permitted.

The proposed policy will seek a high standard of design for advertisements in keeping with their location and setting. The proposed policy will have a positive effect in conserving areas of cultural and historical value and protecting their characteristics.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	✓	0	✓	0	0	0	0	0

Borough-wide Policy DC10 Telecommunications

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;**
- the siting and appearance of the apparatus and associated structures should not have an unacceptable impact on conservation areas, listed buildings, buildings of merit or areas of open space; and**
- where appropriate, proposed apparatus and associated structures should share locations where there is an existing facility.**

The proposed policy will help to ensure that new telecommunication structures will respect local built character and will not adversely impact upon the borough's heritage assets. Design should minimise the impact of telecommunications equipment on the environment.

Better telecommunications, subject to safeguarding against environmental impact, should benefit the borough as a whole, including having a potentially positive impact on the sustainable economy objective by providing better communications for businesses and home workers.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	?/ ✓

Borough-wide Policy DC11-Basement Accommodation and Lightwells

Policy DC11 – Basement Accommodation and Lightwells

New basements and extensions to existing basements will only be permitted where they:

- do not extend into or underneath the garden further than 50% of the depth of the host building measured from the principal rear elevation;
- do not extend into or underneath the garden further than 50% of the depth of the garden;
- are set back from neighbouring property boundaries where it extends beyond the footprint of the host building;
- do not comprise more than one storey. Exceptions may be made on large sites;
- do not result in any adverse impact on the amenity of adjoining properties or on the local, natural and historic environment;
- are designed to minimise the risk of flooding to the property and nearby properties from all sources of flooding.
- include a minimum of one metre of soil above any part of the basement beneath a garden;
- ensure that the basement helps reduce the volume and flow of surface water run-off through appropriate use of SuDS and will provide active drainage devices to minimise the risk of sewer flooding;

- i. ensure that lightwells and railings at the front or side of the property are as discreet as possible and allow the scale, character and appearance of the property, street or terrace to remain largely unchanged;
- j. are designed to safeguard the structural stability of the existing building, nearby buildings and other infrastructure;
- k. provide a Construction Method Statement (CMS) (carried out by a qualified structural or civil engineer) to be submitted with planning applications for all basement projects;
- l. ensure that traffic and construction activity does not cause unacceptable harm to pedestrian, cycle, vehicular and road safety.

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.

The effects of proposed policy DC11 are primarily related to environmental and residential amenity objectives.

The proposed policy states that basements should not exceed 50% of the garden area and not exceed 50% of the depth of the host building. This will restrict the extent of the basement excavations and does not allow basements deeper than a single storey. Because of 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 policy will assist in meeting a number of environmental sustainability objectives.

The approach will also be compatible with reducing the transport impacts 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 creation of construction waste and reduction in traffic. Where structural stability is maintained, this will have a positive impact on the heritage sustainability objective.

The proposed policy also makes a specific reference to the need to minimise the risk of surface water runoff and 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.

Basement construction can also cause nuisance and disturbance for neighbours and others in the vicinity, through construction traffic, parking suspensions and the noise, dust and vibration of construction itself. The policy will help to ensure that disruption to neighbouring properties is minimised by requiring a construction management statement to be submitted alongside any planning application for basement development. Although only for the short term, this may have a positive effect on the health objective by seeking to ensure disturbance to neighbours is considered and minimised where possible.

The council is preparing a non-immediate Article 4 Direction to remove permitted development rights for basements. When in place, all future basement developments will be subject to a planning application and will need to be assessed against the council's adopted Local Plan. Proposed policy DC11 is considered to be sound, reasonable and consistent with the emerging Article 4 Direction.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC11 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
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	✓	0	0	✓	0	0	✓	✓	0

Assessing secondary, cumulative and synergistic effects

Proposed policy DC1 Built Environment will contribute towards the Proposed Submission Local Plan strategic objective 10 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.

Proposed policy DC2 Design of New Build will contribute towards the Proposed Submission Local Plan strategic objective 17 which seeks to promote the safety and security of those who live and work in the borough and strategic objective 16 which seeks to protect and enhance the amenity and quality of life of residents as well as strategic objective 10 which seeks to preserve and enhance the quality and character of the borough's built environment. Overall proposed policy DC2 has been found sustainable, but the few uncertain effects will need to be monitored. The effects of the proposed 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.

Proposed policy DC3 Tall Buildings will contribute towards the Local Plan's strategic objective 10, 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 proposed policy DC3 has been found sustainable, but the impact of tall buildings on heritage objective will need to be monitored. It is likely that the timeframe for the effects of this policy will be medium to long term. It is anticipated that proposed policy DC3 will positively contribute towards a number of the sustainability objectives.

Proposed Policy DC4 Alterations and Extensions (including outbuildings) will contribute towards the Proposed Submission Local Plan strategic objective strategic objective 16 which seeks to protect and enhance the amenity and quality of life of residents and strategic objective 10 which seeks to preserve and enhance the quality, character of the borough's built environment with inclusive and sustainable design. Overall, proposed policy DC4 has been found sustainable. It is likely to have a short to long-term effect of permanent and direct nature. Proposed policy DC4 is anticipated to positively contribute towards the heritage and climate change sustainability objectives.

Proposed Policy DC5 Shopfronts will contribute towards the Proposed Submission Local Plan strategic objective 10 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, proposed policy DC5 has been found sustainable. Proposed policy DC5 is anticipated to positively contribute towards the sustainability objectives for social justice, heritage and sustainable economy.

Proposed Policy DC6 Replacement Windows will contribute towards the Local Plan strategic objective 10, which seeks to preserve and enhance the quality and character of the borough's built environment. Overall, proposed policy DC6 has been found sustainable.

Proposed Policy DC7 Views and Landmarks will contribute towards the Proposed Submission Local Plan strategic objective 10 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, proposed policy DC7 has been found sustainable. Proposed policy DC7 is likely to have a long-term effect on the heritage sustainability objective.

Proposed Policy DC8 Heritage and Conservation will contribute significantly towards the achievement of the Proposed Submission Local Plan's strategic objective 10 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, proposed policy DC8 has been found sustainable.

Proposed Policy DC9 Advertisements will contribute towards the achievement of strategic objective 10 (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 proposed policy DC9 has been found sustainable.

Proposed Policy DC10 Telecommunications will contribute towards the achievement of strategic objective 10. 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.

Proposed Policy DC11 Basement Accommodation and Lightwells will contribute towards the Local Plan's strategic objectives 5, 10, 13, 14, 16, and 17. The policy aims to reduce the short and long-term impacts of basements, particularly any potential negative impacts on neighbours during both the construction and operational phases of the development.

The design and conservation policies have been found to support environmental objectives and contribute positively to the broad commitment to sustainable development. However, when developments are proposed and the land uses are considered acceptable in principle, the policies will need to be carefully balanced against social and economic objectives in this intensively developed borough where there are many competing needs.

ENVIRONMENTAL SUSTAINABILITY

Borough-wide Policy CC1 Reducing Carbon Dioxide Emissions

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 (CO₂) reduction targets to ensure developments are designed to make the most effective use of passive design measures, minimise energy use and reduce CO₂ emissions;**
- **Ensuring developments are designed to make the most effective use of passive design measures, and where an assessment such as BREEAM (or equivalent) is used to determine a development's environmental performance, this must be supplemented with a more detailed Energy Assessment in order to show compliance with the London Plan's CO₂ reduction targets;**
- **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 CO₂ emissions;**
- **Requiring major developments to demonstrate that their heating and/or cooling systems have been selected to minimise CO₂ 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 CO₂ emissions from major developments, where feasible;**

Where it is not feasible to make the required CO₂ 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 CO₂ reduction measures in the borough or elsewhere in London; and

Encouraging energy efficiency and other low carbon measures in all other (i.e. non-major) developments, where feasible. The council will also encourage developers to use energy performance standards such as PassivHaus to guide development of their Energy Strategies.

The proposed policy will support the London Plan's policies by tackling climate change in relation to the built environment. It will have significant positive effects on mitigating climate change, reducing pollution, encouraging careful consumption of resources and ultimately on promoting the health and quality of life of communities.

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 an essential part of the development process. Renewable energy generation on major sites will also be encouraged and will provide further reduction of CO₂ emissions.

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.

The proposed 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 by promoting the demand for and therefore supply of related goods and services.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: Implementing the London Plan sustainable energy policies and meeting the associated carbon dioxide (CO ₂) reduction targets;	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?
Proposed Policy: Ensuring developments are designed to make the most effective use of passive design measures, and where an assessment such as BREEAM (or equivalent) is used to determine a development's environmental performance, this must be supplemented with a more detailed Energy Assessment in order to	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?

POLICY	SUSTAINABILITY OBJECTIVES											
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
show compliance with the London Plan's CO2 reduction targets.												
Proposed Policy: 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 ₂ emissions.	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?
Proposed Policy: Requiring major developments to demonstrate that their heating and/or cooling systems have been selected to minimise CO2 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;	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?
Proposed Policy: Using on-site renewable energy generation to further reduce CO2 emissions from major developments, where feasible;	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?
Proposed Policy: Where it is not feasible to make the required CO ₂ reductions by	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?

POLICY	SUSTAINABILITY OBJECTIVES											
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
implementing these 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 or elsewhere in London and;												
Proposed Policy: Encouraging energy efficiency and other low carbon measures in all other (i.e. non-major) developments where feasible. The council will also encourage developers to use energy performance standards such as PassivHaus to guide development of their Energy Strategies.	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?

Borough-wide Policy CC2 Ensuring Sustainable Design and Construction

Policy CC2 - Ensuring Sustainable Design and Construction

The council will require the implementation of sustainable design and construction measures in all major developments by:

a. Implementing the London Plan sustainable design and construction policies to ensure developments incorporate sustainability measures, including:

- **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 and promoting biodiversity and the natural environment,**
- **ensuring developments are comfortable and secure for users and avoiding impact from natural hazards (including flooding); and**

b. Requiring Sustainability Statements (or equivalent assessments such as BREEAM) for all major developments to ensure the full range of sustainability issues has been taken into account during the design stage; and

The integration of sustainable design and construction measures will be encouraged in all other (i.e. non-major) developments, where feasible.

The proposed policy will support the London Plan policies on sustainable design and construction, which look to achieve the highest standards of sustainable design.

The proposed policy will help to ensure that the impacts of development on the environment, health and wellbeing of residents are properly managed and mitigated where possible. Through this policy, the design and construction of developments will be considered against these impacts, whilst also helping to reduce consumption of scarce resources, reduce pollution, enhance open spaces and contribute to the health and wellbeing of residents. The proposed policy will therefore, have positive effects on the environment and heritage objectives by implementing sustainable measures. It will also contribute to improving the quality of life and health of residents.

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.

The proposed policy 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 proposed policy, but it is expected that positive economic impacts would be created by promoting the demand for and therefore supply of related goods and services. Also, the social cohesion benefits are expected through the provision and conservation of the natural environment and biodiversity and the promotion of measures such as recycling.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC2 Ensuring Sustainable Design and Construction	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Carer support	Climate change	Sustainable economy
Proposed Policy: See policy wording above.	?	✓	0	0	✓/ ?	0	✓	✓	0	✓	✓	✓/ ?

Borough-wide Policy CC3 Minimising Flood Risk and Reducing Water Use

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:

A site specific Flood Risk Assessment (FRA) will be required for the following development proposals:

- All proposals for developments in the Environment Agency's Flood Zones 2 and 3
- Proposals for new developments over 1 hectare in size in Flood Zone 1
- All proposals for new development in areas identified in the council's SWMP as being susceptible to surface water flooding – i.e. those located in a flooding hotspot
- All proposals for new development which includes a subterranean element in areas identified in the council's SWMP as being at risk from elevated groundwater levels
- As part of the FRA, the requirements of the National Planning Policy Framework must be addressed and, where applicable, an Exception Test must also be carried out and included in the FRA;
- The FRA must assess the risk of flooding from all relevant sources, in particular tidal, surface and ground water, as well as sewer flooding and

where there is a risk of flooding, appropriate flood proofing measures must be integrated, in accordance with the guidance in the H&F SFRA;

- 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 or in surface water flooding hotspots where the flood hazard rating is defined a significant or higher in the SWMP, unless a satisfactory means of escape can be provided;
- Where development is proposed in the Environment Agency's Groundwater Source Protection Zones 1 or 2, measures must be taken to ensure the protection of groundwater supplies;
- All developments that include a subterranean element must provide details of the structural waterproofing measures to be integrated to prevent any increase in on or off-site groundwater flood risk;
- All developments that are classified as 'more' or 'highly' vulnerable to flooding that include proposals at basement or lower ground floor level must install a non-return valve or equivalent to protect against sewer flooding;

All 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;

In line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the river Thames must maintain and where necessary enhance or raise flood defences (or show how they could be raised in the future), demonstrating that they will continue to provide adequate flood protection for the lifetime of the development.

All developments must include water efficient fittings and appliances, where provided, in line with London Plan water consumption targets. In addition, major developments and high water use developments must include other measures such as rainwater harvesting and grey water re-use.

Hammersmith and Fulham suffers from risk of flooding, with over 60% of the borough in the Environment Agency's Flood Zone 2 and 3. With an increase in housing development planned for the borough, this will have an impact on flooding if it is not managed appropriately. This policy will help to mitigate the risk of flooding by requiring development to submit a site-specific flood risk assessment and incorporate specific design measures.

The requirement for a site-specific flood risk assessment will help to assess the risk inappropriate and unfit developments. This will have a positive impact on the health and climate change sustainability objectives.

The proposed policy is in conformity with the sustainability objective on reducing climate change impact by seeking to minimise the risk of flooding from storm events and breach of the River Thames flood defences. 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.

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 proposed policy is therefore important as it requires development to make provision for 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.

The policy also seeks to ensure that sufficient water and wastewater infrastructure capacity is in place. This will have a positive impact on the pollution, careful consumption and climate change objectives.

Implementing the proposed policy will increase the overall efficiency of water use, reducing per person daily consumption.

POLICY	SUSTAINABILITY OBJECTIVES											
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
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	✓	✓	0

Borough-wide policy CC4- Minimising Surface Water Run-off with Sustainable Drainage Systems

Policy CC4- Minimising Surface Water Run-off with Sustainable Drainage Systems

All proposals for new development must manage surface water run-off as close to its source as possible and on the surface where practicable, in line with the London Plan drainage hierarchy. Other requirements include:

- **All major developments must implement Sustainable Drainage Systems(SuDS) to enable a reduction in peak run-off to greenfield run off rates for storms up to the 1 in 100 year event (plus climate change allowance);**
- **Major developments will be required to provide a sustainable drainage strategy that demonstrates how SuDS will be integrated to reduce peak flow volumes and rates in line with the requirements of this policy;**
- **All other developments must maximise attenuation levels, achieving greenfield run off rates where possible, particularly where they are located in surface water flooding hotspots, or increase a site's impermeable area,**
- **As well as being designed to minimise flood risk, surface water drainage measures must be designed and implemented where possible to help deliver other Local Plan policies such as those on biodiversity, amenity and recreation, water efficiency and quality;**
- **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;**
- **All flat roofs in new developments should be green or brown roofs to help contribute to reducing surface water run-off**
- **Where installed, SuDS measures must be retained and maintained for the lifetime of the development and details of their planned maintenance must be provided to the council.**

The inclusion of a locally specific policy on surface water and implementation of SuDS has been incorporated into the Local Plan in order to reduce the impact of surface water run-off and will help to reduce the risk of flooding by ensuring that surface water run-off is managed on site where possible through the use of SuDS where appropriate. This will positively contribute to the environmental and health sustainability objectives. SuDS includes measures such as rainwater harvesting which involves the collection of rainwater for re-use. This promotes the careful consumption of water.

SuDS can also provide an array of amenity, recreational and biodiversity benefits.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC4 Minimising Surface Water Run-off with Sustainable Drainage Systems	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	✓	✓	0

Borough-wide Policy CC5 Water Quality

Policy CC5- 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.

The proposed policy 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 will contribute positively towards the pollution and health objectives by reducing the level of water pollution and improving water quality.

The use of private water supplies also reduces demands on the mains water supply and are better able to cope with climate change impacts such as drought.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC5 Water Quality	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	✓	0

Borough-wide Policy CC6 Strategic Waste Management

Policy CC6- Strategic Waste Management

The council will pursue sustainable waste management, including:

- a. Planning to manage 247,000 tonnes per annum of waste in LBHF by 2036**
- b. Promoting sustainable waste behaviour and maximum use of the WRWA Smuggler's Way facility; and**
- c. Seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport.**

The boroughs municipal waste is managed through a riverside site (Smugglers Way) close to Wandsworth Bridge in the London Borough of Wandsworth. Currently most of the non-recyclable municipal waste is transported by river to an energy waste facility in Bexley.

In addition to the site at Smugglers Way, two large sites (Powerday at Old Oak Sidings and EMR site) exist within the Old Oak Common Opportunity Area. Since April 2015, this Opportunity Area and the waste sites have fallen within the boundary of the Old Oak and Park Royal Development Corporation (OPDC).

The council considers that the Old Oak Sidings (Powerday) site could meet the borough's waste apportionment target set out in the London Plan and will continue to work with them by encouraging them to retain the site.

The health sustainability objective will be influenced by the implementation of the policy. 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.

The proposed 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.

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

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC6 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
Proposed Policy: The council will pursue sustainable waste management, including: planning to manage 247,000 tonnes per annum of waste in LBHF by 2036;	0	0	0	0	0	✓	0	?	?	✓	?	✓
Proposed Policy: Promoting sustainable waste behaviour, and maximum use of the WRWA Smuggler's Way facility; and	0	0	0	0	0	0	0	✓	✓	✓	✓	0
Proposed Policy: Seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport.	0	✓	0	0	0	0	✓	✓	✓	✓	✓	0

Borough-wide Policy CC7 On-site Waste Management

Policy CC7- On-site Waste Management

All new developments must 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.

- a. **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;**
- b. **In major development proposals on-site waste management should be provided, particularly for commercial and industrial waste streams;**
- c. **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.

Encouraging efficient resource use and recycling during all stages of the development process will reduce the amounts of waste that is transported for disposal, reducing greenhouse gas emissions.

The implementation of the proposed policy 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 proposed policy will also contribute positively to increasing the overall efficiency of resource use and the responsible consumption of resources.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC7 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
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	0	✓	✓	✓	✓	0

Borough-wide Policy CC8 Hazardous Substances

Policy CC8- 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**

The proposed policy seeks to ensure the protection of new and existing residents by resisting the expansion of or new developments which may cause unacceptable safety risks. This policy will therefore 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 proposed policy.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC8 Hazardous Substances	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0

Borough-wide Policy CC9 Contaminated Land

Policy CC9- 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:

- 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;
- Threaten the structural integrity of any building built, or to be built, on or adjoining the site;
- Lead to the contamination of any watercourse, water body or aquifer; and
- 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.

Through this policy, developers must ensure that any development proposed on or near a site which is considered to be contaminated must carry out the necessary site assessments and if necessary, effective measures to treat, contain or control any contamination will need to be provided. This will have positive impacts on the overall health of the population and on reducing the level of pollution in the borough.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC9 Contaminated Land	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0

Borough-wide Policy CC10 Air Quality

Policy CC10- 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 exceedances 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.

The proposed policy will have a number of positive effects on environmental amenity and social equity objectives by helping to address the adverse health impacts of poor air quality, particularly on more vulnerable groups. The requirement for all major developments to consider air quality issues at an early stage and if necessary provide an air quality assessment which will encourage better and more sustainable planning by ensuring that developers consider the wider implications of the development and design led mitigation measures can be established.

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.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC10 Air Quality	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	✓	✓	✓	0

Borough-wide Policy CC11 Noise

Policy CC11- Noise

Noise (including vibration) impacts of development will be controlled by implementing the following measures:

- a. 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;
- b. 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
- c. 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.

Where necessary, applicants will be expected to carry out noise assessments and provide details of the noise levels on the site. Where noise mitigation measures will be required to enable development to take place, an outline application will not normally be acceptable.

The proposed 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 proposed 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 proposed 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.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC11 Noise	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	0	0	0	?

Borough-wide Policy CC12 Light Pollution

Policy CC12- 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.**

The proposed policy aims to ensure that external lighting provided as part of a new development is provided in the most efficient manner in terms of maximising safety and amenity objectives as well as minimising energy use and any environmental impact. As it also encourages the most efficient provision of external lighting in terms of design, energy efficiency and seeks to manage any negative impacts on the environmental and amenity of neighbours, which will have positive effects on the

environmental objectives, namely reducing pollution, the careful consumption of resources, reducing climate change impacts.

The proposed policy will also have positive effects on the health sustainability objective by facilitating the extended use of outdoor sports facilities and also maximising amenity.

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
Policy CC12 Light Pollution												
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	✓	✓	0

Borough-wide Policy CC13 Control of Potentially Polluting Uses

Policy CC13- 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.

The proposed policy seeks to ensure that new developments are not detrimental to the amenity of surrounding occupiers. By preventing pollution and other nuisances from occurring, the proposed policy will have a positive effect on the social justice and health objectives. There is some uncertainty associated with the costs of mitigation that would need to be provided on the economic development objectives in the borough, but these are considered to be relatively minor when set against the benefits they will confer.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC13 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
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	0	0	0	?

Assessing secondary, cumulative and synergistic effects

Proposed policy CC1 Reducing Carbon Dioxide Emissions is anticipated to positively contribute to the Proposed Submission Local Plan's strategic objective 15, which seeks to encourage healthier lifestyles and strategic objective 13 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.

Proposed policy CC2 Ensuring Sustainable Design and Construction is anticipated to positively contribute to the Proposed Submission Local Plan's strategic objective 10 which seeks to ensure that the built environment complies with the principles of sustainable design and strategic objective 13 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.

Proposed policy CC3 Reducing Water Use and the Risk of Flooding is anticipated to positively contribute towards the strategic objective 13, which seeks to reduce and mitigate the local causes of climate change and mitigate flood risk. The effects of proposed policy CC3 are likely to be short to long term and will have a direct effect.

Proposed policy CC4 Minimising Surface Water Run-off with Sustainable Drainage Systems is anticipated to positively contribute to Local Plan Strategic Objective 13 which seeks to reduce and mitigate the local causes of climate change and mitigate flood risk.

Proposed policy CC5 Water Quality is anticipated to positively contribute towards the strategic objective 13 which seeks to reduce and mitigate the local causes of climate 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.

Proposed policy CC6 Strategic Waste Management is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objective 12 which seeks to increase the use of Hammersmith & Fulham's waterways and objective 13 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.

Proposed policy CC7 On-site Waste Management is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objectives 11 and 13 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. Proposed policy CC6 will have a positive short to long-term effect on the environmental sustainability objectives.

Both proposed policy CC8 Hazardous Substances and Policy CC9 Contaminated Land are anticipated to positively contribute to the Proposed Submission Local Plan's strategic objective 15 which seeks to encourage healthier lifestyles and 13 which seeks to reduce and mitigate of climate change. Both of these proposed policies will have a short to long term positive impact on the health objective and reducing the level of potential pollution in the borough.

Proposed policy CC10 Air quality is anticipated to positively contribute to Proposed Submission Local Plan's strategic objectives 13, 15, 16, 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. Proposed policy CC10 will have a positive short to long-term impact on the social, health and reduction of pollution sustainability objectives.

Proposed policy CC11 Noise is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objectives 15 to reduce health inequalities and strategic objective 16, 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 proposed policy will have a short to long-term effect on the social, health and reduction of pollution sustainability objectives.

Proposed policy CC12 Light Pollution is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objectives 13, 15 and 16 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, proposed policy CC12 has been found sustainable.

Proposed policy CC13 Control of Potentially Polluting Uses is anticipated to positively contribute to Strategic objectives 13, 15, 16 and 17. By preventing pollution and other nuisances from occurring, the proposed policy will have a positive short to medium term effect on the social justice and health objectives.

TRANSPORT AND ACCESSIBILITY

Borough-wide Policy T1Transport

Policy T1 - Transport

To work with strategic partners to improve transportation provision, accessibility, and air quality in the borough, by improving and increasing the opportunities for cycling and walking, and by improving connections for bus services, underground, national and regional rail by:

Major Scheme Targets

- seeking and promoting the routing of Crossrail 2 via South Fulham, with an interchange to the Overground line at Imperial Wharf;
- supporting the implementation of a HS2 Crossrail/Great Western interchange at Old Oak with interchanges with the West London Line and underground services;
- 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;
- seeking the increased capacity and reliability of the Piccadilly and District Lines;
- seeking increased use of the Thames -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; and
- seeking localised improvements to the highway network to reduce congestion on north-south routes in the borough.

Borough wide Targets:

- promoting and supporting the continued development of initiatives designed to encourage modal shift away from private vehicles, in order to improve congestion and air quality within the borough;
- developing and promoting safe environments for cyclist and pedestrians to encourage residents and businesses to consider these modes;
- extending the Mayor's Bike Hire scheme throughout the borough;
- working with Transport for London and bus operators to develop zero exhaust emission bus services and routes across the borough;
- securing access improvements for all, particularly people with disabilities, as part of planning permissions for new developments in

the borough;

- **ensuring that there are adequate levels of provision of electric charging infrastructure to support local residents and visitors;**
- **working towards changing the behaviour patterns and vehicle types of private hire vehicles and taxis;**
- **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.**

Implementing the proposed policy will bring 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.

The proposed 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.

The replacement of Hammersmith Flyover with a tunnel will enable major housing led development to be constructed on this space. The replacement of the Hammersmith Flyover will also bring 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.

The policy's 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 policy will also result in lower levels of air, water and noise pollution and aims to manage car dependency and use by controlling parking provision to avoid negative impacts on the quality of the urban environment, this is likely to have a positive impact on the health objective. It also aims to increase the opportunities for sustainable transport modes of transport such as walking and cycling which will serve to reduce greenhouse gas emissions and will contribute to reducing climate change impacts.

The policy supports greater use of the River Thames for both passenger services and freight movements which will further encourage the use of more sustainable modes of transport.

By aiming to sustainably address the transport needs associated with the planned intensification of development in the borough, the policy will ensure that the drivers

of economic growth are provided with essential transport infrastructure, thereby improving the movement of people and resources.

The proposed policy promotes the responsible consumption of resources in the borough and will result in reduced levels of consumption of non-renewable fossil fuels.

It is important to note that former policy T5-Housing with Reduced Parking has been removed from the Proposed Submission Local Plan. It was not considered necessary to retain this policy as the assessment of parking on housing schemes will be considered against the other relevant Local Plan policies, in particular Policy T4 and the London Plan (2016).

POLICY	SUSTAINABILITY OBJECTIVES											
Policy T1 Transport	Social justice justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption consumption	Climate change	Sustainable economy economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	0	✓	✓	✓	✓	✓

Borough-wide Policy T2 Transport assessments and travel plans

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. The existing and potential availability of public transport, and its capacity to meet increased demand will also be assessed for any development.

The council will require a Transport Assessment (TA), together with a Travel Plan where a development is anticipated to generate a level of trips that impacts on the local network or have an impact on any strategic routes. Delivery and Servicing Plans should be secured in line with TfL's London Freight Plan and should be co-ordinated with Travel Plans.

The proposed policy will require all developments to be assessed in terms of their impact on traffic generation and where necessary a Transport Assessment and Travel Plan may be required. It will have a significant positive effect on the transport and environmental objectives as well as the health of residents.

The policy will also require appropriate mitigation to be provided by developers for any impacts on the public highway or local network as well as financial contributions for associated infrastructure and improvements to public transport capacity.

POLICY	SA OBJECTIVES											
Borough-wide Policy T2 Transport assessments and travel plans	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	✓	0	✓	0

Borough-wide Policy T3 Increasing and Promoting Opportunities for Cycling and Walking

Policy T3 – Increasing and Promoting Opportunities for Cycling and Walking

The Council will encourage and support the increasing use of bicycles by requiring:

- new developments to include the provision of convenient accessible and safe secure cycle parking within the boundary of the site (see appendix 8);
- the provision of suitable changing and showering facilities, following the guidance outlined in the Hammersmith and Fulham Cycling Strategy 2015; 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, inclusive and safe pedestrian routes within and through the larger developments;
- accessible and inclusive pedestrian access to the river and canal, where appropriate; and
- contributing to improvements in the local highway infrastructure and walking environment.

The proposed policy will encourage more sustainable modes of transport, namely walking and cycling, 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.

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
Policy T3 Increasing Opportunities for Cycling and Walking												
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	✓	0	✓	✓	✓	0	✓	0

Borough-wide Policy T4 Vehicle Parking Standards

Policy T4 – Vehicle Parking Standards

The council will require any proposed development (new build, conversion or change of use) to conform to its car parking standards (appendix 7). The council will also require car parking permit free measures on all new development unless evidence is provided to show that there is a significant lack of public transport available.

This policy seeks to provide adequate parking provision, in accordance with London Plan (2016) parking standards, that does not result in over reliance on the use of the car and will assist in reducing carbon emissions, thereby improving air quality.

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 the provision of designated parking spaces for disabled people which will have a positive effect on the social objectives. 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 improving the local economy. It is also likely to contribute positively to the social objectives.

Through this policy, the council will also require 5% of parking spaces to be equipped with electric car charging points and a further 25% passive provision. This is likely to have a positive impact on the climate change and transport sustainability objectives.

POLICY	SA OBJECTIVES											
Borough-wide Policy T4 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
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	✓	✓	0	✓	✓	0	✓	✓

Borough-wide Policy T5 Parking for blue badge holders

Policy T5 - Parking for blue badge holders

New developments that include vehicular access must provide accessible, off street car parking bay for Blue Badge holders even if no other general parking is provided as part of the development.

The proposed policy will contribute towards increasing equity and social justice, including a 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.

POLICY	SA OBJECTIVES											
Borough-wide Policy T5 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
Proposed Policy: <i>See policy wording above.</i>	✓	0	0	0	✓	0	0	?	?	0	0	0

Borough-wide Policy T6 Borough road network - hierarchy of roads

Policy T6 - Borough road network - hierarchy of roads

Developments, construction and other operations that affect 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.

There are some uncertainties around the impacts of the proposed 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.

POLICY	SA OBJECTIVES											
Borough-wide Policy T7 Borough Road- Network Hierarchy of Roads	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	0	?	?	✓	?	✓

Boroughwide Policy T7 Construction and Demolition Logistics

Policy T7 Construction and Demolition Logistics

All construction, demolition, utilities and major logistics activities within the borough will be required to work with the council in developing the scope and impact of their operations. In order to mitigate the impact of any additional traffic or potential disruption to the network, careful planning and co-ordination with the council is required to ensure the smooth operation of the highway network.

This policy seeks to ensure that any additional traffic or disruption that may have a negative impact on the road network in association with the construction and demolition of development is managed and mitigated effectively. This is likely to have a positive effect on the transport objective by encouraging the use of more sustainable modes of delivery and could possibly lead to more use of rail and river.

Limiting additional traffic will also reduce pollution and have health benefits.

POLICY	SA OBJECTIVES											
Borough-wide Policy T7 Construction and Demolition Logistics	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0/?	?/✓	✓	0	0	0

Assessing secondary, cumulative and synergistic effects

Policy T1 Transport is anticipated to contribute positively to the proposed Submission Local Plan's strategic objective 14 which seeks to ensure the development of a safe, sustainable transport network. It 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 considered 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.

Policy T2 Transport Assessments and Travel Plans is anticipated to contribute positively to strategic objective 14 seeking to ensure there is a high quality transport infrastructure. It is considered 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.

Policy T3 Increasing Opportunities for Cycling and Walking is anticipated to contribute positively to strategic objective 14 seeking to ensure the development of a safe, sustainable transport network that includes improvements to public transport, cycling and walking infrastructure. It is considered 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

Policy T4 Vehicle Parking Standards is anticipated to positively contribute to strategic objective 14 seeking to ensure there is a high quality transport infrastructure. It is considered 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 lead to strengthened and improved 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.

Policy T5 Parking for Blue Badge Holders is anticipated to positively contribute to strategic objective 14 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 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

Policy T6 Borough Road Network-Hierarchy of Roads is anticipated to positively contribute to strategic objectives 7, 8, 4 and 14. 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.

Policy T7 Construction and Demolition Logistics is anticipated to positively contribute to strategic objective 19 14 by seeking to ensure a safe, sustainable transport network. It will help to reduce traffic congestion and will have a positive effect on the sustainability objectives, especially concerning pollution and health. This policy could combine cumulatively and synergistically with the other transport policies to reduce pollution and have positive benefits for the environment and climate change.

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 LBHF CIL Charging Schedule

The council will spend CIL on:

- Infrastructure in accordance with the H&F Regulation 123 (R123) List
- 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 affordable housing (see policy H03) and S106 monitoring expenses.

CIL and S106 contributions collected in the borough will be used to fund the provision of infrastructure required to support development in the borough.

The council's CIL rates were tested through an examination in public and have been set at a rate which would not threaten the viability of development in the borough. The CIL rates were tested through an examination in public and have been set at a rate which would not threaten the viability of development coming forward in the borough. The CIL Charging Schedule was adopted in May 2015 and took effect on 1st September 2015. Alongside CIL, the council will negotiate for planning obligations that meet the necessary tests and these must also not threaten the viability of development coming forward.

Development contributions in the form of CIL and section 106 agreement payments will help to 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.

Contributions for necessary infrastructure could include health 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.

Development contributions may be used to provide necessary education infrastructure in line with projected needs in the borough, thereby contributing positively to the education and skills sustainability objective.

Section 106 contributions will be used to provide affordable homes in the borough and this will have a positive effect on the affordable homes sustainability objective.

Provision of infrastructure, particularly social infrastructure, as part of development schemes is also likely to impact positively upon local resident's sense of community and their sense of social cohesion.

POLICY	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
Proposed Policy : <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	0	0	✓	0	✓	0

Assessing secondary, cumulative and synergistic effects

The Planning Contributions and Infrastructure Planning policy is anticipated to contribute positively towards the Local Plan's strategic objectives including: objective 5– which seeks to increase supply of housing, particularly affordable housing for local residents, and 4 – 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, physical or green 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.

Conclusion of Individual Local Plan Proposed Submission Policy Assessments- Cumulative Effects

Whilst for any one single development management or regeneration area or site policy, the proposed policy might elicit a favourable sustainability comment, when policies are considered together the overall assessment of significant impacts may be different because of tension between specific policy objectives. In this context, the provision of housing, schools, workplaces, health centres, recreation centres and new shopping 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 also have wider and deeper environmental impacts, both locally and further afield.

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 also 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 the environment, with short-term environmental impacts versus the long-term gain. However, the provision of new development in sustainable locations such as town centres with good transport accessibility, or in regeneration areas where there is the opportunity for master planning, can reduce environmental impact and result in the likelihood of a more sustainable development.

The Hammersmith and Fulham Local Plan particularly promotes new housing with a target of 1031 dwellings a year up to 2025. Although the provision of housing and supporting infrastructure scores positively against the majority of sustainability objectives, the impact on the environmental objectives will be dependent on the location of the new housing and the manner of implementation of associated policies, such as those dealing with green infrastructure, energy or flood risk.

In general, the locational policies and the development management policies of the Local Plan offer the opportunity to ensure that the environmental impact of housing provision (and other major development) is minimised by ensuring development is in the right place as well as meeting high standards of efficiency and sustainability. The council's Planning Guidance SPD (July 2013) also provides detailed guidance on sustainable construction and design and should be updated and renewed to support the Local Plan.

Appendix 2: 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"> • Make essential services affordable to all • Reduce differences in standards between different communities • Improve support to groups that are vulnerable and have special needs including those with disabilities 	<ul style="list-style-type: none"> • Index of Multiple Deprivation (IMD)
Health	2.Improve health of population overall	<ul style="list-style-type: none"> • Increase expected years of health life • Enable healthy lifestyles including mode of travel 	<ul style="list-style-type: none"> • All age, all causes mortality rate (SMRs) • Obesity among primary school age children in year 6 • Adult participation in sport
Education and skills	3.Improve the education and skills of young people and adults	<ul style="list-style-type: none"> • Raise the standard of achievement at all ages 	<ul style="list-style-type: none"> • Achievement of 5 or more A* - C grades at GCSE or equivalent including English and Mathematics
Affordable homes	4.Provide decent and affordable homes	<ul style="list-style-type: none"> • Reduce homelessness • Increase the range and affordability of housing • Reduce the number of unfit homes 	<ul style="list-style-type: none"> • 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. • 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

			<ul style="list-style-type: none"> • Number and % of homes granted permission that are wheelchair accessible in developments providing ten or more residential units • % of homes granted permission achieving Lifetime Homes standards • % of homes permitted meeting the Code for Sustainable Homes Levels 3,4,5 and 6
Social cohesion	5.Increase local residents' sense of community and social cohesion	<ul style="list-style-type: none"> • Increase participation and voluntary activity • Reduce levels of crime and non-criminal anti-social disturbances • Increase sense of security and safety at home and in the street 	<ul style="list-style-type: none"> • Net change in D2 use class floorspace • Number of total offences in the borough
Satisfying work	6.Increase the opportunities for satisfying and well paid work	<ul style="list-style-type: none"> • Reduce unemployment, especially long term unemployment • Improve earnings and reduce work related stress to improve health 	<ul style="list-style-type: none"> • Overall employment rate • Working age people on out of work benefits • Working age people claiming out of work benefits in the most deprived areas of the borough
Heritage	7.Improve the local environment and preserve and enhance the setting of heritage assets	<ul style="list-style-type: none"> • Conserve and enhance the setting of heritage assets including sites, features and areas of cultural, historical and archaeological value • Maintain and enhance sites and species of nature conservation interest • Retain and enhance the character and use of the river 	<ul style="list-style-type: none"> • % of conservation areas with up to date conservation area statements/management plans • Proportion of designated Heritage assets (including building at risk, conservation areas and scheduled monuments) • Length of riverside walk • Net change in total area of public open space • Net change to areas of nature conservation interest • Number of planning applications that include

			<p>any of the following measures to protect and/or enhance biodiversity:</p> <ul style="list-style-type: none"> - Green or Brown roofs - Living walls - Native planting schemes - Bird and/or bat boxes
Reduce pollution	8.Reduce the level of pollution	<ul style="list-style-type: none"> • Improve local air and water quality and reduce noise levels • Reduce the amount of litter, derelict, degraded and underused land 	<ul style="list-style-type: none"> • Number of times the level of pollution exceeds the guide limits for PM10 and NO2 • Number of planning permissions granted where Health and Safety Executive (HSE) objected
Reduce transport impacts	9.Reduce the effect of transport on the environment	<ul style="list-style-type: none"> • Reduce the need for travel and therefore reduce traffic volume • Encourage use of more sustainable modes of transport 	<ul style="list-style-type: none"> • Method of children's travel to school (5-16 year olds) • Number of planning permissions involving Transport Impact Assessments • Cycle parking provision in permitted development schemes
Careful consumption	10. Responsible consumption of resources in the borough	<ul style="list-style-type: none"> • Increase efficiency in use of resources in future plans • Reuse, recover and/or recycle waste 	<ul style="list-style-type: none"> • % of household waste sent to recycling
Climate change	11.Reduce climate change and its impact on the borough	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gases and ozone depleting substances • Reduce energy and water use and increase use of renewable sources • Minimise the risk of flooding from storm events and overflow of watercourses • 	<ul style="list-style-type: none"> • Per capita CO₂ emissions in the borough • Number of developments permitted where on-site renewable energy generation is integrated • Number of properties permitted connected to decentralised energy networks • Types and number of SuDS measures approved for installation

Sustainable economy	12. Improve the sustainability of the local economy	<ul style="list-style-type: none"> • Improve the level of investment in community services and shopping facilities • Improve access to key local services, shopping and other local facilities • Encourage indigenous investment and training of local workers 	<ul style="list-style-type: none"> • Percentage of frontage in A1, A2 and other use classes in frontages identified in policy C2 • Percentage of frontage in A1, A2 and other use classes in the non-prime frontage areas • Percentage of frontages in non-A1 use; percentage in A3, A4 and A5 uses in frontages identified in policy C4 • Percentage of frontage in non-A1 use; percentage in A3, A4 and A5 uses non-designated parades and clusters and corner shops • Proportion of vacant shopping frontages in retail designations • Employment land available by type • Amount of permitted/completed employment floorspace (by type, regeneration areas and rest of the borough) • The business stock
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Appendix 3: Policies, Plans & Programmes

International
Conservation of Natural Habitats of Wild Fauna and Flora Directive 92/43/EEC
The Wild Birds Directive 2009/147/EC
The Convention on Biological Diversity 93/626/EEC
The EU Water Framework Directive 2000/60/EC
Ambient air quality assessment and management Directive 1996/62/EC
Limit values for sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air Directive 1999/30/EC
Air Quality Directive 2008/50/EC
Environmental Noise Directive 2002/49/EC
Approval of the Kyoto Protocol on Climate Change Decision 2002/358/EC
Allocation of emission levels under the Kyoto Protocol Decision 2010/778/EU
Landfill Directive 1999/31/EC
EU Renewable Energy Directive 2001/77/EC
EU Energy Efficiency Directive 2012/27/EU
EU Floods Directive 2007/60/EC
Pan-European Biological and Landscape Diversity Strategy 2003
Mainstreaming sustainable development into EU policies: Review of the European Union Strategy for Sustainable Development 2009
European Spatial Development Perspective 1999
Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system, White Paper 2011
European Landscape Convention 2000
Proposal for a new EU Environment Action Programme to 2020 - "Living well, within the limits of our planet" 2012
The Johannesburg Declaration on Sustainable Development 2002
Living Planet Report 2012 – Biodiversity, bio-capacity and better choices

National
National Planning Policy Framework (2012)
National Planning Practice Guidance
Housing and Planning Bill (2016)
National Infrastructure Plan (2014)
National Planning Policy for Waste (2014)
The Community Infrastructure Levy Regulations 2010 and amendments 2014
Planning policy for traveller sites 2012
Planning for Town Centres: Practice guidance on need, impact and the sequential approach 2009
Historic Environment Planning Practice Guide to PPS5 2010
Planning for climate change – guidance for local authorities 2012
Good Practice Guide on Planning for Tourism 2006
Localism Act 2011
Public Services (Social Value) Act 2012
'Reuniting health with planning: healthier homes, healthier communities' 2012
UK Sustainable Development Strategy "Securing the Future" 2005
Conservation of Habitats and Species Regulations 2010

Biodiversity 2020: A strategy for England's wildlife and ecosystem services 2011
UK Biodiversity Action Plan (UK BAP) 1994
UK Post-2010 Biodiversity Framework 2012
Transport White Paper – "Creating Growth, Cutting Carbon: making sustainable local transport happen" 2011
Draft aviation policy framework 2012
The Wildlife and Countryside Act (as amended) 1981
Sustainable Communities Act 2007 (as amended)
Building a Greener Future- Towards Zero Carbon Development (2006)
UK Energy Efficiency Strategy 2012
Climate Change Act 2008
UK Climate Projections 2009
The Air Quality Strategy (Volume 1, 2007; Volume 2; 2011 2)
Air Pollution: Action in a Changing Climate 2010
National Flood and Coastal Erosion Risk Management Strategy for England
Natural England Corporate Plan 2012-2015
The Code for Sustainable Homes: Setting the Sustainability Standards for new homes 2008
The Code for Sustainable Homes: Technical Guide 2012
English Heritage's Conservation Principles: Policies and Guidance (2008)
English Heritage Corporate Plan 2011 - 2015
The Changing Face of the High Street: Decline & Revival (2013) English Heritage
By Design: Urban Design in the Planning System- Towards Better Practice (OPDM & CABE 2000)
Suburbs and the Historic Environment 2007
Guidance on Tall Buildings (CABE and English Heritage) 2007
Historic Environment Good Practice Advice in Planning (Historic England, 2015)
The Water Resources Act 1991
The Water Act 2003
Flood Risk Regulations 2009
Flood and Water Management Act 2010
Sustainable Drainage Systems- An Introduction (Environment Agency, 2003)
Non-statutory technical standards for sustainable drainage systems, DEFRA 2015
Healthy Lives, Healthy People: Our Strategy for Public Health in England
CLAIRE Definition of Waste: Development Industry Code of Practice 2011
Waste Management Plan for England (2013)
The Plan for Growth 2011
A Practical Guide to the SEA Directive 2006
"The Natural Choice: Securing the value of nature" White Paper (2011)
Planning Policy for Traveller Sites (2012 & 2015)
Circular 01/2006- Planning for Gypsies and Traveller Caravan Sites
Planning Practice Guidance for Renewable and Low Carbon Energy (July 2013)
Laying the Foundations- A Housing Strategy for England (CLG 2011)

Regional- London
The London Plan: Spatial Development Strategy for Greater London 2016
The Mayor's Housing SPG (2016)
The Mayor's Town Centre SPG (2014)
Land Industry and Transport SPG 2012
The Mayor's Green Infrastructure & Open Environments: preparing borough tree and woodland strategies SPG 2013
London Strategic Housing Land Availability Assessment (2013)
London Infrastructure Plan (2015)
The Mayor's Housing Strategy (draft) 2012

The Mayor's Transport Strategy (draft) 2010
The Mayor's Ambient Noise Strategy (2004)
The Mayor's Air Quality Strategy (2010)
The Mayor's Biodiversity Strategy (2002)
The Mayor's Cultural Strategy (2010)
The Mayor's Economic Development Strategy (2010)
The Mayor's Climate Change Mitigation and Energy Strategy (2011)
The Mayor's Climate Change Adaptation Strategy (draft) 2010
The Mayors Sustainable Design and Construction SPG (2014)
Crossrail Mayoral CIL (2012)
Sustainable Design and Construction- April 2014 and the control of dust and emissions during construction and demolition-July 2014
Accessible London: Achieving an inclusive environment (2014)
London Boroughs Gypsy and Traveller Accommodation Needs Assessment (2008)
Shaping Neighbourhoods: Play and Informal Recreation (2014)
London's wasted resource: waste management strategy
London Biodiversity Action Plan 2001
Sub Regional Development Framework for the south sub region (2006)
Thames Waterway Plan (2006-2011)
Thames Corridor Catchment Abstraction Management Strategy (2004)
Thames River Basin Management Plan (2009)
Thames Catchment Flood Management Plan (2009)
The Thames Estuary 2100 Plan (2012)
The Lower Thames Flood Risk Management Strategy (draft) 2010
London Strategic Parks Project (2006)
Transport Assessment Best Practice Guidance (2010)
A New Way to Plan – Travel planning for new development in London (2010)
Managing Freight Effectively: Delivery and Servicing Plans (2010)
The Mayor's Equality Framework (2009)
West London Retail Needs Study Update (2010)
OPDC Draft Local Plan (2016)
Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, Experian (2013)
Local and Regional CO2 Emissions Estimates for 2005-2006 DEFRA

Local
Core Strategy (2011) LBHF
Development Management Local Plan (2013) LBHF
Planning Guidance Supplementary Planning Document (2013) LBHF
Community Infrastructure Levy (CIL) Charging Schedule (2015) LBHF
Affordable Housing Viability Assessment (2016) BNP
CIL Viability Assessment (2015) Peter Brett Associates
Infrastructure Delivery Plan (2016) LBHF
Annual Monitoring Report (2014/15) LBHF
Strategic Housing Market Assessment (2014, 2015 & 2016) LBHF
Retail Needs Study (2016)
Strategic Flood Risk Assessment (2015)
Employment Study (2015 & 2016)
Economic Development Plan (2016-2019) LBHF

Housing Background Paper (2016) LBHF
Five Year Housing Land Supply (2016) LBHF
Open Space Background Paper (2016) LBHF
Tall Buildings Background Paper (2016) LBHF
Strategic Flood Risk Assessment
Surface Water Management Plan (2014)
Leisure Needs Assessment (2009)
Borough Profile (2014)
Earls Court & West Kensington Opportunity Area Joint SPD (2012)
White City Opportunity Area Planning Framework (2013)
South Fulham Riverside Regeneration Area SPD (2013)
Revised Statement of Community Involvement (2013)
Old Oak: A Vision for the Future (June 2013)
Park Royal Opportunity Area Planning Framework (January 2011)
Home Energy Conservation Act (2013)
Thames Strategy Kew to Chelsea.(2002)
Air Quality Progress Report (2014)
Updating & Screening Assessment for Hammersmith & Fulham (2015)
Single Equity Scheme (2009-2012)
Health Joint Strategic Needs Assessment (2013-2014)
Health & Wellbeing Strategy (2013-2015)
Independent Healthcare Commission for North West London (2015) Michael Mansfield QC
Hammersmith & Fulham CCG's out of hospital strategy: 2014/15 progress and plans for 2015/16
NHS Hammersmith & Fulham Strategic Plan (2009-2014) NHS
Alcohol Licensing Strategy 2012-2015
Community Strategy 2007-14
Housing Strategy (2012)
Housing Allocation Scheme (2012)
Homelessness Strategy (2012)
Contaminated Land Strategy 2001
A Transport Plan for H & F (LIP 2) 2011-2031
Air Quality Progress Report and Air Quality Action Plan Review (April 2011)
Biodiversity Action Plan (2004)
Parks and Open Spaces Strategy 2008-2018 (May 2008)
Parks Capital Programme 2013/16 (April 2013)
Open Spaces and Outdoor Recreation Facilities in H&F 2006
Sport and Physical Strategy 2006 to 2012
Hammersmith and Fulham CSPAN Physical Activity Strategy 2011-2016 (November 2011)
A Water Management Policy for Hammersmith and Fulham (September 2013)
Housing Strategy: Building a Housing Ladder of Opportunity (October 2012)
Third Sector Strategy (2009)
Children and Young People's Plan 2009 Review (March 2010)
Schools Organisational Strategy 2012/13 (January 2013)
Community Safety Strategy (2005)
Hammersmith and Fulham Crime Reduction Partnership Plan 2008-2011 (June 2008)
Hammersmith and Fulham Community Safety Partnership Strategic Assessment 2012-1 (April 2012)
NHS Hammersmith and Fulham Strategic Plan 2009-2014 (November 2009)
Better Care Closer to Home. Our Strategy for Coordinated, High Quality Out of Hospital Care. Hammersmith and Fulham. 2012-2015. (October 2012)
Secretary of State for Health Decision on Shaping a Healthier Future (October 2013)
Joint Health and Wellbeing Strategy (Consultation Draft 2013-2015)

Appendix 4: Representations to the SA- draft Local Plan consultation (January 2015)

Environment Agency

creating a better place



**Environment
Agency**

Development Plans Team
London Borough of Hammersmith &
Fulham

Localplan@lbhf.gov.uk

Our ref: NE/2007/103171/CS-
03/IS1-L01
Your ref:

Date: 20 February 2015

Dear Sirs

**Draft Local Plan
Regulation 18 consultation, January 2015**

Thank you for consulting the Environment Agency on your Draft Local Plan, January 2015. We hope that you find these comments useful as you progress with the final document.

This letter sets out what we believe are the key issues impacting on your borough and the policy approaches to take. The advice is suitable for strategic and development management policies. We suggest you use these comments to help ensure you have identified and addressed all the potential impacts of your plan in the associated Sustainability Appraisal (SA). We have referenced useful strategies, plans and evidence to support our advice and have provided links to these at the end of the letter. Please consider this our formal response to your consultation and a checklist to ensure you have covered the key environmental issues at each developing stage of your plan. If you require further advice or feedback about a specific issue or policy please contact me on the number below.

Flood Risk
Hammersmith & Fulham has areas of tidal flood risk from the River Thames in the south of the borough. We are pleased to see that your proposed policy (CC3) builds on the principles outlined in the NPPF (and Planning Practice Guidance) and implements recommendations made within your Strategic Flood Risk Assessment (SFRA).

Developments within areas of flood risk should only be allocated/permitted if the Sequential and, where necessary, the Exception Tests have been passed (see paragraphs 100-102 of the NPPF and Technical Guide). It's essential you consult us on any sequential tests carried out for your plan and we would be happy to provide bespoke advice to assist with this process. Basement dwellings, for example, are classed as highly vulnerable and not appropriate in areas at risk of flooding. Policies and guidance on basement developments will help applicants understand the potential risks, locations to avoid and measures to make developments safe and resilient to any potential flood risks.

As a Lead Local Flood Authority (LLFA) it will benefit you if your policies are informed by your boroughs Surface Water Management Plan (SWMP) and SFRA. We are therefore pleased to see that your policies require developments to adhere to recommendations made within these plans. Sustainable Drainage Systems (SuDS) should be encouraged

Cont/d..



by your policies in line with London Plan Policy 5.13 and Supplementary Planning Guidance: Sustainable Design and Construction. SuDS will help to reduce surface water run-off and reduce the risk of surface water flooding within your borough.

Thames Estuary 2100

As your borough has some frontage of the River Thames your policies should also be informed by the Thames Estuary 2100 plan ([TE2100](#)). You may need to safeguard sites to ensure that necessary flood defence improvement works can be undertaken in the future.

Many communities within London and the Thames Estuary currently benefit from a robust and well organised system of tidal flood risk management but increasing pressures, including climate change mean flood risk is increasing. With climate change we predict that by 2060 we will be closing the Thames Barrier around 50 times a year.

The TE2100 Plan was written and published by the Environment Agency in November 2012. It sets out our recommendations for flood risk management for London and the Thames estuary through to the end of the century and beyond. Policy units (grouped together into Action Zones) describe the existing vulnerability and flood risk management current measures and future options for a specific geographic area along the Thames estuary.

Hammersmith and Fulham is located within the Hammersmith Policy Unit of Action Zone 1 (West London) in the TE2100 Plan. For Hammersmith the TE2100 policy is P5 which is to take further action now or in the future to reduce flood risk beyond that required to keep pace with climate change. This policy recognises the commercial, economic and historic value of West London and justifies an increased standard of protection from the current 1:1000 year level to 1:10,000.

Borough-wide Policy RTC2, access to the Thames riverside and foreshore, states that 'the riverside walk should generally be at least 6 meters wide.... all proposals will need to ensure that flood defences are not adversely affected'. Whilst we support the intentions of the policy, consideration should be given to the future raising of flood defences as this may impact on the path and current access.

Riverside developments should be seen as an opportunity to soften and naturalise river banks at the same time as improve flood defences. We would therefore encourage you to include policies within your plan which makes this a requirement/consideration of any riverside development.

The TE2100 selected policy for the Hammersmith policy unit is P5 'to take further action to reduce flood risk beyond that required to keep pace with climate change.' Although the Thames Barrier will continue to provide tidal flood protection to the same high standard as the rest of London, within 25 years it will no longer be sustainable to use the Thames Barrier to assist with lower order (i.e. more frequent) flood events, particularly for the protection of undefended areas. A higher standard of protection is needed in the form of flood defence raising or realignment with floodplain management. As there is a potentially high risk of pluvial (rainfall) and urban drainage flooding, mitigation measures should be developed in detail which could include improvement of drainage outfalls and flood resilience in affected areas. The requirements of TE2100 need to be reflected in your policies. For further information please refer to the Hammersmith policy unit (page 88) of the TE2100 plan.

Land will be needed to implement the TE2100 Plan, e.g. for flood defence repair, realignment or raising. In many cases land will not be needed for many years into the future so therefore there is a need to safeguard land so it is available when required. We can provide further information about this on request.

Works to defences need to be aligned with other objectives such as recreational use and public access, landscape design, intertidal habitat enhancements and other riverside developments. We encourage all Local Authorities to prepare a planning vision (riverside strategy) which can then be used to inform the design of flood defence improvements; this could be done in partnership with us and neighbouring Local Authorities.

Policy recommendations

The following are the policy messages that need to be included in your Local Plan and/or supplementary guidance so that the recommendations of TE2100 are implemented in strategic planning and new developments.

The Council will work in partnership with the Environment Agency and others to ensure the recommendations of the TE2100 plan are implemented in new and existing developments aiming to keep communities safe from flooding in a changing climate and improving the local environment.

The Council will require developments to reduce flood risk now and in the future and act on the recommendations of Hammersmith Policy Unit of the TE2100 plan. These actions include:

- Safeguarding land beside flood defences where it is expected that defence raising and improvements will be required in the future;
- Maintaining, enhancing or replacing flood defences so they provide adequate protection for the lifetime of development whilst improving the river frontage to provide amenity space, habitat, access and environmental enhancement;
- Safeguarding land and access routes where defence realigning is required and maintaining and improving flood storage areas whilst offering benefits for wildlife and people;
- Ensuring land for secondary defences at vulnerable locations including tube station entrances and critical infrastructure
- The NPPF principles are applied to development to ensure vulnerable developments are appropriately located;
- Flood resilience and resistance is built in where developments are at risk from flooding.

In order to comply with the recommendations of the Thames Estuary 2100 plan, where appropriate, proposed developments will be required to:

- Demonstrate how the tidal flood defences protecting their site can be raised to the required TE2100 levels in the future through submission of plans and cross-sections of the proposed raising;
- Demonstrate provision of improved access to existing flood defences and incorporate anticipated land requirements for future flood defence raising or realignment including access; and
- Raise existing flood defences or realign flood defences to the required TE2100 levels in preparation for future climate change impacts;

- Incorporate landscape, amenity and habitat improvements within any flood defence raising and/or realignment.
- Demonstrate how the risks of pluvial flooding have been taken into account in the design of the development using the recommendations of the Surface Water Management Plan.

Climate Change

Climate change will present significant challenges to the people and environment of your borough. You should therefore consider evidence bases, plans and policies that ensure your borough is resilient to current and future climate change risks.

Planning for Climate Change: Guidance for Local Authorities produced in April 2012 contains helpful guidance and examples of how to incorporate climate change in plan-making. Our Climate Ready service is also a potential source of information as it provides tools and practical information to help businesses and other organisations live with the changing climate.

Water Framework Directive

The Water Framework Directive (WFD) is European legislation designed to protect and enhance the quality of our rivers, lakes, streams, groundwater, estuaries and coastal waters, with a particular focus on ecology. The Environment Agency is the lead authority on the WFD in England and Wales. We are required to plan and deliver actions that will improve our water environment. We have prepared the Thames River Basin Management plan which includes waterbodies within your local authority. For a specific summary of the status of the waterbodies in your borough please refer to the London Borough Environmental Fact Sheet that we have produced on our website.

You are required to help deliver the objectives of the River Basin Management plan and aims to improve the status of waterbodies in your borough. Therefore you should consider recommendations from the Thames River Basin Management Plan and work these into your planning policies as you draft and develop them.

This topic is particularly relevant to your borough because urban diffuse pollution is an issue and measures to address this in line with WFD outcomes should be a consideration.

Biodiversity

Protecting and enhancing biodiversity should be considered throughout any policy document, with native species planting a priority. Green Infrastructure delivers biodiversity benefits and climate change adaptation. Open spaces can be designed to serve as flood storage areas with high biodiversity value if they are located in areas of high risk of flooding or functional floodplain. Buffer zones along rivers in your borough can provide valuable green networks for wildlife, and rivers should be protected and restored to a more natural state to enhance biodiversity. Green spaces and buffer zones can bring about benefits of amenity, biological enhancements, sustainable drainage and reduction in surface/storm water flooding. Green roofs are beneficial for a wide range of wildlife and can also be a valuable amenity space and would ensure policy 5.11 of the London Plan is being met.

You should consider policies that promote opportunities for river restoration through new development as these would also make a significant contribution to meeting the actions in the RBMP.

The natural environment should feature in policies to ensure it is recognised as a priority. Even if the development site would have very minimal impact on the

environment, it should aim to improve the natural environment where it can. This would go towards ensuring policy 2.18 on Green Infrastructure of the London Plan, including planning green infrastructure needs and managing them to realise the value of green and open space to communities is addressed, in addition to Policy 5.10 of the London Plan on Urban Greening.

Water Resources

Hammersmith and Fulham is within Thames Water's London Water Resource Zone – this is classified as 'seriously water stressed.' This means there is a high population with high water demands and limited water availability – it does not reflect water companies ability to supply water. Average water use in Hammersmith and Fulham in 2010-11 was 166.5 litres per head per day (l/h/d) which is above the England and Wales average of 148 l/h/d. Improving the water efficiency of new development should be a priority and as a minimum new development should comply with London Plan policy 5.15 which requires residential development to meet water consumption targets of 105 l/h/d.

Inefficient use of water can lead to unnecessary carbon emissions. Currently water use accounts for 27 percent of all carbon emissions from our homes. Building a house to 105 l/h/d will save 79 kilograms of CO₂ and 15 cubic meters of water per year, per house, over and above building regulations (125l/h/d).

Non-households consume significant amounts of water. In London non-households accounts for 29 percent of water consumption and is therefore an area where further water and carbon savings can be made. The Mayor's Water Strategy (October 2011) notes that 'commercial water efficiency has a significant potential to save water'. We therefore recommend that you consider that new non-household development, including refurbishments, achieve a water efficiency standard, such as BREEAM (BRE Environmental Assessment Method) 'Excellent' with maximum number of 'water credits'. BREEAM credits are awarded for water where water efficient appliances (e.g. low flush toilets), water metering, leak detection systems and water butts are in place. Alternatively buildings could meet the 'best practice' level of the AECB (Association for Environment Conscious Building) Water Standards.

Groundwater Protection & Contaminated Land

Parts of your borough are defined as being sensitive locations for groundwater because they are located within Source Protection Zones 1 or 2 for public water supplies and also secondary aquifers which form an important source of base flow to rivers.

Your policies and site allocations should therefore ensure that groundwater will be protected. You should ensure that only appropriate land uses are located within source protection zones as outlined within our groundwater protection guidance GP3. In addition that any proposed piling methods and sub-water table development do not pose an unacceptable risk to groundwater.

Your policies should encourage redevelopment of sites affected by land contamination. Sites with unacceptable contaminant concentrations should be remediated through redevelopment. For this reason, planning applications for potentially contaminated or contaminated sites within groundwater sensitive areas should be accompanied by a Preliminary Risk Assessment and if necessary a Site Investigation. Including these measures within your policies will contribute to your compliance with the Water Framework Directive.

Ground source heat is a technology that can help achieve the UK's targets for generating energy from renewable source. Your policies should encourage GSHC

schemes to follow our Environmental good practice guide for ground source heating and cooling ([EGPG](#)). This includes assessing and understanding the environmental risks of a proposed scheme and taking steps to reduce the environmental risks. E.g. changes in groundwater availability, flow and quality, mobilisation of contaminants, undesirable temperature changes and localised mounding.

Waste Planning

When developing policies on waste we emphasise the importance of the 'Waste Hierarchy' as set out in Article 4 of the revised EU Waste Framework Directive to maximise the reduction and re-use of waste. Local Authorities should also have regard to the guidance on making waste plans in accordance with the EU Directive, the emerging National Waste Management Plan and National Waste Prevention Plan (see references). The London Plan policies, e.g. 5.16 and 5.17 encourage greater self sufficiency for waste management in London and sustainable transportation of waste which should be considered when developing policies and allocating sites. Our Groundwater Protection Policy (GP3) recommends where waste activities are appropriate and avoiding areas that are groundwater sensitive, e.g. Source Protection Zone 1. The risks of flooding and adapting to climate change should be taken into account when allocating sites for waste facilities and developing policy criteria.

Air Quality

We regulate certain processes under the Environmental Permitting Regulations and support and work closely with local authorities in improving air quality through the UK Air Quality Strategy, Local Air Quality Management and Air Quality Action Plans, especially where these processes may have an impact on local air quality. Your Director of Public Health has to report on air quality (deaths attributable to particulate pollution) under the Public Health Framework. For these reasons, and given that main source of air pollution is frequently transport, we expect relevant local plan policies to reference and link with your Borough Air Quality Action Plan and the Mayor's Air Quality and Transport Strategies.

Hammersmith & Fulham Local Plan Examination Main Modifications Consultation

Sustainability Appraisal of the Main Modifications

28th July 2017

1. Introduction & Methodology

- 1.1 The council is legally required under both European and UK law to prepare a Sustainability Appraisal (SA) of the Local Plan in order to help ensure that sustainability objectives including social, environmental and economic considerations are taken into account during all stages of the Local Plans preparation.
- 1.2 The process of the SA has been integral to the development of the Council's Local Plan, with findings published and consulted upon alongside the Local Plan at each stage of its preparation. This has included the preparation of a series of SA documents including the SA Scoping Report (KD9), the Draft Local Plan SA (KD13) and the Submission Local Plan SA (KD8). The SA is an iterative process and has been used to assess policy options and site selection to ensure that the plan contributes to the achievement of sustainable development and any potential negative impacts on sustainability are minimised or effectively mitigated.
- 1.3 This note is an addendum to the SA submitted as part of the Local Plan examination. During the Local Plan examination hearings which took place in June 2017, a number of main modifications to the Local Plan have been proposed by the Inspector. These main modifications are likely to be required to make the Local Plan "sound". This addendum to the SA provides an assessment as to whether the proposed main modifications to the Local Plan are likely to have significant effects on the sustainability objectives.
- 1.4 Each of the proposed main modifications have been assessed against the SA objectives to identify any new or altered impacts to the sustainability objectives listed in Table 1. A summary of the SA implications for each modification are provided in Appendix 1 of this note, with an assessment of each modification provided in Appendix 2.
- 1.5 This addendum to the SA is being published for consultation alongside the main modifications proposed to the Local Plan following the examination hearings. This should be read alongside the other SA documents submitted as part of the Local Plan examination, including the SA Scoping Report (KD9), the draft Local Plan SA (KD13) and the Submission Local Plan SA (KD8).

2. Conclusion

2.1 Overall, the assessment of the proposed main modifications found that there would be no significant effects against the sustainability objectives in the SA, with mostly neutral or positive effects being identified. The modifications therefore do not significantly alter the overall findings of the Submission SA Report (KD8) in terms of delivering positive sustainability outcomes, with greater clarity and improvements provided.

Table 1: Sustainability Appraisal Objectives

Topic	Sustainability Objective	Sustainability sub-objective
Social justice	1. Increase equity and social justice	<ul style="list-style-type: none">• Make essential services affordable to all• Reduce differences in standards between different communities• Improve support to groups that are vulnerable and have special needs including those with disabilities
Health	2. Improve health of population overall	<ul style="list-style-type: none">• Increase expected years of health life• Enable healthy lifestyles including mode of travel
Education and skills	3. Improve the education and skills of young people and adults	<ul style="list-style-type: none">• Raise the standard of achievement at all ages
Affordable homes	4. Provide decent and affordable homes	<ul style="list-style-type: none">• Reduce homelessness• Increase the range and affordability of housing• Reduce the number of unfit homes

Social cohesion	5. Increase local residents' sense of community and social cohesion	<ul style="list-style-type: none"> • Increase participation and voluntary activity • Reduce levels of crime and non-criminal anti-social disturbances • Increase sense of security and safety at home and in the street
Satisfying work	6. Increase the opportunities for satisfying and well paid work	<ul style="list-style-type: none"> • Reduce unemployment, especially long term unemployment • Improve earnings and reduce work related stress to improve health
Heritage	7. Improve the local environment and heritage	<ul style="list-style-type: none"> • Conserve and enhance sites, features and areas of cultural, historical and archaeological value • Maintain and enhance sites and species of nature conservation interest • Retain and enhance the character and use of the river
Reduce pollution	8. Reduce the level of pollution	<ul style="list-style-type: none"> • Improve local air and water quality and reduce noise levels • Reduce the amount of litter, derelict, degraded and underused land
Reduce transport impacts	9. Reduce the effect of transport on the environment	<ul style="list-style-type: none"> • Reduce the need for travel and therefore reduce traffic volume • Encourage use of more sustainable modes of transport
Careful consumption	10. Responsible consumption of resources in the borough	<ul style="list-style-type: none"> • Increase efficiency in use of resources in future plans • Reuse, recover and/or recycle waste
Climate change		

	11. Reduce climate change and its impact on the borough	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gases and ozone depleting substances • Reduce energy and water use and increase use of renewable sources • Minimise the risk of flooding from storm events and overflow of watercourses
Sustainable economy	12. Improve the sustainability of the local economy	<ul style="list-style-type: none"> • Improve the level of investment in community services and shopping facilities • Improve access to key local services, shopping and other local facilities • Encourage indigenous investment and training of local workers

Appendix 1: Table of Main Modifications and Summary of SA Implications

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM1	20	Amend Spatial Vision 3 rd paragraph	...New development will have created a high quality, <u>accessible</u> , safe and inclusive environment that respects local context and the borough's natural, built and <u>historic</u> environment...	Positive impact on objectives 1 (social justice) and 7 (heritage) because of the inclusion of the additional text referencing to accessible and inclusive environment and the historic environment. All other objectives are neutral.
MM1	20	Amend Strategic Objective 10	To 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 high quality, intelligent developments and design , and ensuring compliance with the principles of inclusive, <u>accessible</u> and sustainable design...	Positive impact on Objective 1 (social justice) in terms of improving support to groups that are vulnerable and have special needs including those with disabilities, given the additional text now refers directly to accessible design. All other objectives are neutral.
MM2	25	DEL1	Amend bullets: ... The Council will implement the policies and proposals of the Local Plan by: ... <ul style="list-style-type: none"> • having regard to the financial viability of development in the following ways: <ul style="list-style-type: none"> o Plan-making; 	Neutral. All changes to the Local Plan resulting from alterations to text in MM2 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<ul style="list-style-type: none"> o CIL charge-setting; and o Negotiating Section 106 agreements ('106s'), including for affordable housing, applying the principles set out in the Viability Protocol in Appendix 9; o <u>Site specific circumstances including site specific infrastructure;</u> o <u>Site size, constraints and characteristics.</u> <p>...</p>	
MM3	2	After para 1.9	<p>Add new wording after para 1.9 as follows</p> <p><u>Neighbourhood Planning</u> <u>Neighbourhood Planning was introduced as part of the Localism Act 2011. Neighbourhood plans are development and land use documents led by members of the community. Neighbourhood plans must be developed in general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance.</u> <u>The Neighbourhood Planning Regulations sets out the procedure and key milestones in developing a neighbourhood plan. In order for a neighbourhood plan to be adopted and form part of the Development Plan Framework, they must be voted on and agreed by a majority vote, in a local Referendum.</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM3 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM4	29	Strategic Policy – Regeneration Areas	Amend Strategic Policy – regeneration Areas (Bullet 1) as follows:	Positive. The changes to the text include reference to respect for the historic environment and respecting local context which is positive in

Ref.	Page	Policy/Para	Main Modification	SA Implications
			...delivered to the highest standards of urban design, <u>respect for the historic environment, environmental sustainability, and social inclusion and respecting local context...</u> "	terms of Objective 7 (heritage). All other objectives are neutral.
MM4	29	Table 1	Amend text at bottom of Table 1 as follows: ...In the London plan (2016, the Earls Court and West Kensington Opportunity Area has a minimum target of 6,500 dwellings <u>7,500 homes and 9,500 jobs across both LBHF and RBKC. It is anticipated that 6,500 homes and 8,500 jobs could be accommodated in LBHF. In addition to this capacity in the Earls Court and West Kenington opportunity Area, the FRA is considered to have the capacity to deliver an additional 500 homes and 500 jobs making an overall total of 7,000 homes and 9,000 jobs. In the figures above, 7,000 dwellings have been allocated to that part of ECWK Opportunity Area that is within LBHF and 1000 to the area that is within RBKC.</u>	Neutral. All changes to the Local Plan resulting from alterations to text at the bottom of Table 1 are considered to have a neutral impact on all sustainability objectives.
MM4	45	HRA	Add new bullet point (as bullet 10) to the policy follows: <u>...be based on a thorough assessment of the heritage significance of the area and respond positively to local character and history, conserving and taking opportunities to enhance the significance of heritage assets...</u>	Positive. The new bullet point results in a positive assessment for Objective 7 (heritage). All other objectives are neutral.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM4	51	HRA2	<p>Amend bullet point 5 as follows: ...Ensure that the tunnel entrances and exits <u>avoid, or where this is not possible</u>, have minimal impact on the amenity of residents <u>and the local environment, including the significance and setting of heritage assets...</u></p> <p>Amend bullet point 10 as follows: ...be of a coherent urban design that has regard to the setting and context of the regeneration area, <u>including its scale and character, heritage assets and archaeology and should take opportunities to re-unify areas of severed townscape sensitively...</u></p>	Positive. The amended bullet point results in a positive assessment for Objective 7 (heritage). All other objectives are neutral.
MM5	43	WCRA3	<p>Amend 4th bullet point as follows: “Provide affordable housing <u>and affordable workspace</u> in accordance with Policy H03 <u>and Policy E1</u>”</p>	Positive. The amended bullet point includes reference to affordable workspace and is therefore positive for Objective 12 (sustainable economy).
MM6	56	FRA	<p>Amend fifth bullet point of Policy FRA as follows:</p> <ul style="list-style-type: none"> provide for the improvement of the West Kensington, Gibbs Green and Registered Provider estates, <u>including the potential for</u> 	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM6 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>renewal of and additions to all or parts of the estates</u>	
MM6	59	FRA1	<p>Amend third bullet point of Policy FRA1 as follows:</p> <ul style="list-style-type: none"> provide for improvement to the West Kensington, Gibbs Green and Registered Provider estates, <u>including the potential for renewal of and additions to all or parts of the estates,</u> as part of the comprehensive approach to the regeneration of the Opportunity Area;... 	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM6 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM7	69	HO1	<p>Amend HO1 policy as follows:</p> <p>"The council will work with partner organisations and landowners to exceed the London Plan (2016) <u>minimum</u> target of 1,031 additional dwellings a year up to 2025..."</p> <p>....</p> <p>e) Ensuring that new dwellings meet local needs and are available for occupation by people living in London....</p> <p>...</p> <p>g) working to return vacant homes to use and ensure that <u>all</u> new homes are occupied <u>and vacant homes are returned to use to meet local and London needs;</u></p> <p>...</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM7 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>Insert additional sentence to follow 'g' at Policy H01 – Housing Supply:</p> <p>h) <u>where possible, support applications for self and custom builds that are in accordance with the relevant Local Plan policies.</u></p>	
MM7	69	H01	Amend Table 2 'Indicative Housing Targets' as follows:	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM7 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification							SA Implications																																																		
			<table><tr><th>Area</th><th>2015/20 2016/20</th><th>2020/25 2021/26</th><th>Total 10 years</th><th>2025/30 2026/31</th><th>2030/35 2031/35</th><th>Total 20 years for Plan Period (up to 2035)</th></tr><tr><td>White City Regeneration Area/Opportunity Area **</td><td>1,000 2,200</td><td>2,500 3,500</td><td>3,500 5,700</td><td>1,500 100</td><td>1,000 200</td><td>6,000</td></tr><tr><td>Hammersmith Town Centre</td><td>200 700</td><td>600 0</td><td>800 700</td><td>1,000 1,050</td><td>1,000 1,050</td><td>2,800</td></tr><tr><td>Fulham Regeneration Area **</td><td>1,500 1,100</td><td>2,500 600</td><td>4,000 1,700</td><td>1,500 5,300</td><td>1,500 0</td><td>7,000</td></tr><tr><td>South Fulham Riverside</td><td>1,500 2,700</td><td>1,500 800</td><td>3,000 3,500</td><td>500 200</td><td>500 300</td><td>4,000</td></tr><tr><td>Rest of the borough</td><td>1,000 2,000</td><td>700 200</td><td>1,700 2,200</td><td>700 0*</td><td>0*</td><td>2,400 2,200</td></tr><tr><td>Total</td><td>5,200 8,700</td><td>7,800 5,100</td><td>13,000 13,800</td><td>5,200 6,650</td><td>4,000 1,550</td><td>22,200 22,000</td></tr><tr><td>Average/year</td><td>1,040 1,740</td><td>1,560 1,020</td><td>2,600 1,380</td><td>1,040 1,330</td><td>800 310</td><td>1,110 820</td></tr></table>	Area	2015/20 2016/20	2020/25 2021/26	Total 10 years	2025/30 2026/31	2030/35 2031/35	Total 20 years for Plan Period (up to 2035)	White City Regeneration Area/Opportunity Area **	1,000 2,200	2,500 3,500	3,500 5,700	1,500 100	1,000 200	6,000	Hammersmith Town Centre	200 700	600 0	800 700	1,000 1,050	1,000 1,050	2,800	Fulham Regeneration Area **	1,500 1,100	2,500 600	4,000 1,700	1,500 5,300	1,500 0	7,000	South Fulham Riverside	1,500 2,700	1,500 800	3,000 3,500	500 200	500 300	4,000	Rest of the borough	1,000 2,000	700 200	1,700 2,200	700 0*	0*	2,400 2,200	Total	5,200 8,700	7,800 5,100	13,000 13,800	5,200 6,650	4,000 1,550	22,200 22,000	Average/year	1,040 1,740	1,560 1,020	2,600 1,380	1,040 1,330	800 310	1,110 820	
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MM7	69	HO1	Add the following new text after paragraph 6.9: <u>The Build to Rent or Private Rent sector has the potential to boost the supply of private rental accommodation across the borough. The SHMA identifies that private renting is high and is increasing in the borough; between 2001 and 2011 the private rented sector increased from 23% to 33%. Bearing this</u>							Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM7 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.																																																		

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>in mind, Build to Rent may offer a greater range and choice to private renters.</u></p> <p><u>The council recognises that the financial model of Build to Rent is different to traditional, private market housing and there will be separate viability concerns when considering Build to Rent schemes. Nevertheless, a range of tenures will be expected to provide accessible housing for all, subject to viability. On such schemes, affordable housing may be delivered by discount market rent using the London Living Rent (or lower) as the Council's preferred benchmark. The Council's Housing Strategy may also be used in setting appropriate rent levels to ensure schemes are affordable locally. The quantum of affordable housing units will be subject to the specifics on a scheme. Long-term covenants will be required on any scheme to ensure developments are rental for at least 15 years with a 'clawback' mechanism in place where units are sold out of the Build to Rent sector during the covenant period. Importantly, affordable housing should be maintained in perpetuity and managed by the Build to Rent provider.</u></p> <p><u>An integral part that makes Build to Rent development different is the management of the site. The council will expect that any developers will identify a suitable, long term, experienced management team in place when coming forward with any applications that will deliver high-quality housing for its residents.</u></p> <p><u>When considering Build to Rent schemes, it will be important to consider the nature of build to rent development. Higher turnover is anticipated in Build to</u></p>	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>Rent schemes which may have a wider impact in terms of the sense of community in the area and other high-street parking issues and impacts. Evidence of mitigating these issues and/or ways of managing these issues may be required by the council.</u>	
MM7	69	HO1	<p>Insert new text on Self Build and Custom Housebuilding as follows:</p> <p><u>The Self-build and Custom Housebuilding Act 2015 requires local authorities to keep a register of individuals and associations of individuals seeking to acquire serviced plots of land to build houses for those individuals to occupy as homes. Self-build typically refers to individuals seeking to build their own home and to occupy them. The council has produced a self-build register, where individuals may register their interest.</u></p> <p><u>Self build and custom housebuilding refers to individuals or groups of individuals interested in buying land and building a home to occupy. The London SHMA found that self-build provides 4% of all new homes in England. In London, the figures indicate that self-build accounts for 1.9% and 3.5% of annual housing output in London.</u></p> <p><u>The London SHMA has found from a survey conducted in 2013 that 13% of adults in London were actively researching self-build, in line with the national average. Results from the same survey found that 2% of adults in London were doing something about this in terms of acquiring land, submitting a planning application, or</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM7 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>starting construction. Those likely to complete a self-build project within a year was 1%.</u></p> <p><u>There are a number of broad barriers to delivering or undertaking such a project which indicates why there are such low output levels in London and nationally: the high cost of land, access to finance – self-build is considered as relatively risky, which in turn favour high-density development and builders able to capitalise on economies of scale. Self-build typically takes place in small infill sites, end of terrace spaces, backland sites, gardens, garages, and small industrial sites. In parts of London where land values are lower, sites which would not have interest from developers, such as on the fringe of industrial sites, there are greater opportunities to take place.</u></p> <p><u>In Hammersmith and Fulham, where land prices are high and the supply of available land for development is so competitive, these factors do not provide the best conditions for self-build or custom housebuilding to take place. Whilst the council is supportive in principle, this will continue to be monitored and assessed through the AMR and self-build register.</u></p>	
MM8	73	HO3 and supporting text	<p>Amended wording to the proposed policy, as follows:</p> <p>Housing development should increase the supply and improve the mix of affordable housing to help achieve more sustainable communities in the borough.</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>For developments of 11 or more self-contained dwellings, and on sites with the capacity for 1011 or more such self-contained dwellings, affordable housing should be provided having regard to <u>in line with the following:</u></p> <ol style="list-style-type: none"> a borough wide target that at least 50% of all dwellings built between 2015-25 should be affordable; 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing; affordable dwellings should be located throughout a new development and not concentrated on one part of the site; the provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership7. <p>In negotiating for affordable housing in a proposed development, the council will seek the maximum reasonable amount of affordable housing and take into account:</p> <ul style="list-style-type: none"> • site size and site constraints; and • financial viability, applying the principles set out in the Viability Protocol (Appendix 9) and having regard to the the individual circumstances of the site and the availability of public subsidy; 	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<ul style="list-style-type: none"> • <u>individual circumstances and characteristics of the site;</u> • <u>site specific infrastructure;</u> • <u>availability of public subsidy; and</u> • <u>CIL charge.</u> <p><u>Planning applications for developments of 11 or more self-contained dwellings, and on sites with the capacity for 110 or more such dwellings, will not be required to provide viability information, where they:</u></p> <ul style="list-style-type: none"> • <u>deliver 50% or more affordable housing on site;</u> • <u>are consistent with the relevant tenure split within this policy (see also paragraph 6.29); and</u> • <u>meet all of the other relevant Local Plan policy requirements and obligations.</u> <p><u>For the avoidance of doubt, in circumstances where the three requirements set out immediately above are satisfied, the council will regard that affordable housing provision as "the maximum reasonable amount of affordable housing.</u></p> <p>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.</p>	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			In addition, there should be no net loss of social/affordable rented housing on any development sites <u>as part of any development proposals.</u>	
MM8	74	Para 6.18	<p>Amend para 6.18 as follows:</p> <p><u>In order to maximise affordable housing supply, the council will seek affordable housing contributions on schemes of 11 or more dwellings. In addition, on schemes of 10 or less dwellings that have a maximum combined gross floorspace of more than 1,000 square metres (gia), the council will also seek negotiate</u> affordable housing where there is considered to be capacity for more units. In determining capacity, the council will take into account the guidance included in London Plan (2016) policy 3.13 and supporting supplementary planning guidance. for example in schemes where dwellings are large in floorspace terms but below 11 units and could yield a larger number of average sized homes the application of affordable housing policy will apply. In order to meet the target for affordable housing, the council will negotiate for affordable housing to be provided on all larger sites in accordance with the London Plan (2016) threshold for sites with the capacity for 10 or more self-contained dwellings. The affordable housing proportion should be calculated in relation to gross rather than net provision i.e, it should be based on the total number of units proposed in the final development.</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM8	75	Para 6.28	<p>Add further paragraph following 6.28:</p> <p><u>'The council will seek the maximum reasonable amount of affordable housing on any development. Vacant Building Credit (VBC) was introduced by Central Government in 2014 to incentivise the redevelopment of disused and vacant buildings on brownfield sites by offering developers a financial credit equivalent to the existing gross floor space when calculating the affordable housing contribution. Any increase in floorspace, affordable housing contributions will be required. When assessing applications, it is important to apply the Government's intended purpose for VBC.</u></p> <p><u>In an area of high affordable housing need, VBC has the potential to decrease the affordable housing supply across the borough. In order to mitigate against this potential loss, VBC will not be applicable where there is evidence of the following:</u></p> <ul style="list-style-type: none"> <u>-The building is not covered by an extant planning permission or recently expired planning permission for the same or substantially the same development;</u> <u>-The building has been left vacant for the sole purpose of redevelopment; and,</u> <p><u>The building, at the time of application, is not in any legal use</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM8	75	Para 6.29	<p>Amend paragraph 6.29 as follows:</p> <p>In considering the mix of tenure that is appropriate for additional dwellings to be built in the borough, the council has had regard to the London Plan (2016) affordable housing policies and to <u>our own its</u> assessment of the housing market, including housing need and how this can be met. <u>In considering appropriate rent levels for the various tenures, the council will be led by our Housing Strategy to ensure that all new affordable homes are affordable to people who live or work in the Borough.</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM8	75	Para 6.30	<p>Amend para 6.30 as follows:</p> <p>It is recognised that in negotiating for affordable housing, specific site constraints and financial viability may affect the amount of affordable housing that can be achieved on that site. The council encourages <u>pre-application</u> early discussions with applicants <u>which should include information on</u> during the pre-application stage when financial viability appraisals are required with planning applications. The council will apply the principles and requirements set out in the Viability Protocol (Appendix 9) when receiving and assessing financial viability appraisals submitted with planning applications and in negotiating Section 106 Agreements, to ensure the maximum reasonable level of affordable housing is provided and that other plan requirements are met. <u>Financial viability appraisals will not be required where a proposal will deliver 50% or more affordable housing on site, has a tenure split in</u></p>	<p>Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.</p> <p>The additional wording seeks to clarify the key considerations when negotiating affordable housing.</p>

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>line with our policy and meets all other relevant Local Plan policy requirements and obligations.</u>	
MM8	76	Para 6.31	<p>Amend final two sentences in para 6.31 as follows:</p> <p><u>The council favours traditional intermediate housing products such as shared ownership which can provide properties that remain affordable over a longer period of time.</u> The council will, therefore, need to weigh the needs of different groups when considering development proposals. Where Starter Homes are substituted for affordable housing in development proposals, the council will expect them to replace affordable home ownership products (primarily shared ownership) rather than affordable rented housing.</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM8	77	Para 6.33	<p>Add additional text to paragraph 6.33 as follows:</p> <p><u>"Mixed tenure housing developments should be tenure blind, meaning that it should be difficult to spot the difference in the architectural quality of market and affordable properties. It is important for the council to ensure that housing developments are inclusive for all residents. The council recognises that spreading of affordable housing units may not be practical in all schemes. For example, separate service cores may be necessary between private and all affordable housing units to maintain affordable service charges and to aid good housing management when locating affordable tenures."</u></p>	<p>Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.</p> <p>This has been added for clarity in response to consultation comment</p>

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM9	84	HO10	<p>Amend HO10 as follows:</p> <p><u>The council will seek to address the joint Gypsy and Traveller accommodation needs over the Plan period, as identified in the Gypsy and Traveller Accommodation Needs Assessment (2016).</u></p> <p>The council will work closely with the Royal Borough of Kensington and Chelsea, and any other relevant partners to protect, improve and, if necessary, increase the capacity of the existing gypsy and traveller site at Westway <u>Stable Way</u>.</p> <p><u>Applications for additional sites should meet the requirements set out in the Planning Policy for Traveller Sites (2015).</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM9 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM9	84	6.63	<p>6.63 ... Following engagement with the local traveller community an assessment of the need for traveller pitches was carried out in accordance with the Gypsy and Traveller Accommodation Needs Assessments (DCLG 2007). This study suggested a need for extra pitches for an additional five families by 2020(38). The assessment identified that 3 additional pitches are required in the first five years, 9 in total over the plan period. The council is currently working with RBKC and the local traveller community to determine how best to meet the identified needs. Both authorities are working together to determine how best to meet this identified need where possible, in accordance with further Site Appraisal work. The Council will seek to address the</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM9 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

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			<p>findings from the GTANA its assessment and to meet its needs by undertaking a Site Appraisal Study in 2017 and producing an Options Paper thereafter. The Council and RBKC will explore all available options in meeting the objectives of national policy in order to identify a National Planning Policy Framework compliant supply of sites during the course of 2018, if not earlier. This will be reported upon in the Council's annual monitoring report. Sites identified will be assessed against the agreed methodology with RBKC, in accordance with the NPPF and the PPTS. Any subsequent planning applications should be considered against the criteria set out in the PPTS along with relevant planning policies and guidance.</p>	
MM10	120	OS2	<p>Amend Policy OS2 as follows:</p> <p>The council will seek to reduce open space deficiency and to improve <u>will protect and enhance</u> the quality of, and access to, existing open space by:</p> <p>refusing development on public open space and other green open space <u>of strategic</u> and borough-wide importance <u>as identified in the council's Open Space Hierarchy</u> (see Appendix 3 and Proposals Policies Map) unless it can be demonstrated that such development <u>will not harm</u> would preserve or enhance its open character, <u>and</u> its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity;</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM10 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

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MM11	125	RTC1	<p>Add bullet point (e) and (f) to Policy RTC1 as follows:</p> <ul style="list-style-type: none"> e. <u>promoting use of the River Thames for transport uses, including passengers and freight</u> f. <u>seeking improvements to the tidal foreshore in line with the requirements of the Thames River Basin Management Plan and the Thames Estuary 2100 Plan.</u> 	<p>Positive. The changes to include promoting the River Thames for transport uses is positive in terms of Objective 9 (transport effects), as this is considered a more sustainable form of transport.</p> <p>All other objectives are neutral.</p>
MM12	91	6.80	<p>Amend para 6.80 as follows:</p> <p><u>The borough currently faces real socio-economic difficulties, including acute affordable housing need and high levels of deprivation.</u> Continued economic growth in the borough will require a growing work force. These jobs will not go to workless unemployed residents in the borough unless they have the necessary qualifications and skills. If local workless people are not moving into the local labour market, the growth in jobs will have to be met by workers from outside the local area. This will increase pressure on the already overstretched supply of housing and local transport infrastructure. This is also important in addressing social inequalities across the borough. Where major developments come forward that do not employ and/or train local people in their construction/operation, they will aggravate this situation. This is because local unemployed people will not be moving into the local labour market, and the growth in jobs related to those developments will have to be met by workers from</p>	<p>Positive. The changes to the text is positive in terms of Objective 12 (sustainable economy).</p> <p>All other objectives are neutral.</p>

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			<u>outside the local area. This will aggravate existing circumstances by increasing pressure on the already overstretched supply of housing, and on local transport infrastructure. It will also fail to address the social inequalities across the borough. Accordingly, in order for major developments to be sustainable, particularly having regard to the social and economic strands of sustainability, they must comply with the policy.</u>	
MM13	102	TLC4	Amend point c) as follows: ... The number of <u>existing non-A1</u> uses that may adversely impact on the quality of the parade or cluster, such as betting shops and amusement centres...	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM13 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM14	105	TLC6	Amend Policy and text as follows: Policy TL6 To ensure that shopping areas remain diverse and balanced, the council will seek to limit the amount <u>manage</u> the and concentration of betting shops, pawnbrokers <u>and</u> payday loan shops in areas of high concentration. Planning permission for Any proposal for a new betting shops, pawnbrokers or payday loan shops will be <u>considered against the provisions of Policies TLC2 and TLC3 not be permitted in the prime retail frontage of</u>	Neutral. This has a neutral impact overall. The modification will reduce control of betting shops, pawnbrokers and pay day loan, which will mean the council has marginally less ability to control the concentration of such uses within a certain catchment area which may have a negative impact on the vitality/viability of town and local centres (objective 12). However, the modification provides additional criteria to consider the impact/concentration of such uses on

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			<p>town centres or within 400 metres of the boundary of an existing or permitted betting shop, pawnbrokers or payday loan shop.</p> <p>Outside of these areas, planning permission and will only be granted for a betting shop, pawnbrokers or payday loan shop may be granted permission, in accordance with the quotas that apply, and where it can be demonstrated that the proposal:</p> <ul style="list-style-type: none"> • will not impact adversely on residential the amenity, character and function of an area; • and will add to the vitality of the existing shopping parade or cluster; and • will not result in negative cumulative impacts due to an unacceptable concentration of such uses in one area. <p>When considering proposals for hot food takeaways (class A5) and 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 the location and nature of the proposal with regard to the proximity of existing hot food takeaways, its compatibility with surrounding uses and, as applicable, available evidence relating to potential health impacts.</p>	<p>a case by case basis which would have a neutral impact overall.</p> <p>In relation to hot food takeaways, It will reduce the council's ability to restrict this type of development which could result in a negative impact on the health objectives. However, the modification provides criteria to policy to directly consider the impact of such uses on health and so this would have a neutral impact overall.</p>

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MM14	106	6.118	<p>6.118 Although hot food takeaways provide a service for the community, the council is concerned about the potential health impacts of hot food takeaways, <u>particularly</u> on children and young people. Therefore, <u>In the case of proposals for class A5 uses (hot food takeaways), consideration will be given to the proximity of schools and similar facilities, as well as the prevalence and clustering of takeaways and relevant evidence relating to potential health impacts arising from the type of use proposed. when assessing the acceptability of these uses.</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM14 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM15	134	DC3	<p>Amend DC3 as follows:</p> <p>In these <u>areas</u> identified as <u>potentially</u> appropriate for tall buildings, any proposal will need to demonstrate that it:</p> <p>...</p> <p>d) has no harmful impact in terms of <u>had full regard to the significance of heritage assets including the setting of, and views to and from, such heritage assets, has no unacceptable harmful impacts, and should have due regard to Historic England's guidance on tall buildings...</u></p>	Positive. This modification will have a positive impact on Objective 7 (heritage) because of the inclusion of the additional text referencing historic assets. All other objectives would be neutral.

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MM16	137	DC5	<p>Amend DC5 as follows:</p> <p>...</p> <p>Fascia signs and projecting signs should not be overly large and should be designed to be appropriate to the <u>styles scale and design</u> of the shopfront (see section on shopfront guidance in the Planning Guidance Supplementary Planning document)...</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM16 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM17	138	DC6	<p>Amend policy wording in DC6 as follows:</p> <p>...</p> <p>Replacement windows should respect the architectural character of the building and its surroundings. In this respect, <u>It will be important that the design and material</u> of the replacement windows matches the original windows <u>as closely as possible</u>, in terms of material, type and size, method of opening, profile and section and sub-division. ...</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM17 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM18	142	DC8	<p>Amend Policy DC8 as follows:</p> <p>The council will conserve the significance of the borough's historic environment by protecting, restoring and enhancing it's <u>its</u> heritage assets. These assets include: listed buildings, <u>conservation areas</u>, historic parks and gardens, the scheduled monument of Fulham Palace Moated site, unscheduled archaeological remains and buildings and features of local interest. When determining applications for development</p>	Positive. Positive impact on Objective (heritage) because of the inclusion of the additional text. All other objectives would be neutral.

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			<p>affecting heritage assets, the council will apply the following principles:</p> <p>a. the presumption will be in favour of the conservation, restoration and enhancement 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;</p> <p>b. development applications affecting designated heritage assets, including alterations and extensions to buildings will <u>normally</u> only be permitted if the significance of the heritage asset is conserved or enhanced or where there is less than substantial harm and the harm is outweighed by the public benefits of the proposal.</p> <p>c. development <u>applications</u> should conserve 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 <u>their</u> setting;</p> <p>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 <u>in accordance with paragraph 135 of the National Planning Policy Framework</u>;</p> <p>e. particular regard will be given to matters of scale, height, massing, alignment, materials and use;</p>	

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			<p>f. where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use should be consistent with the aims of conservation of the asset's character and significance, <u>including securing its optimum viable use</u>;</p> <p>g. applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposed development proposal 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. <u>Where archaeological remains of national significance may be affected applications should also be supported by an archaeological field evaluation</u>;</p> <p>h. proposals which involve harm to, or loss of, substantial harm, or less than substantial harm any designated to the significance of a heritage asset will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 133 and 134 of the National Planning Policy Framework;</p> <p>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 <u>and significance</u> before it is lost, in order to record and advance the understanding of heritage in the borough. The extent of the requirement</p>	

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			<p>should be proportionate to the nature and level of the asset's significance;</p> <p>j. the proposal respects the principles of accessible and inclusive design;</p> <p>k. <u>where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered the significance of the heritage asset and tailored their proposals accordingly;</u></p> <p>l. expert advice will be required to address the need to evaluate and conserve archaeological remains, and to advise on the appropriate mitigation measures in cases where excavation is justified; and</p> <p>m. securing the future of heritage assets at risk identified on English Heritage's national register, as part of a positive strategy for the historic environment.</p>	
MM19	146	DC9	<p>Amend DC9 as follows:</p> <p>The council will require a high standard of design of advertisements, which should be in scale and in keeping with the character of their location and should not <u>have an unacceptable impact on public, including road, impact adversely on public safety.</u> The council will resist excessive or obtrusive advertising and illuminated signs which adversely affect the character and appearances of the neighbourhood or the site/building, residential amenity or public safety. The design of advertisements should be appropriate to their context and should generally be restrained in quantity</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM19 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

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			<p>and form. Advertisements should normally be located at ground floor level and relate to the commercial zone of the street frontage and the architectural design of the facade.</p> <p>All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.</p> <p><u>Hoardings</u></p> <p>Hoardings and other large advertisements, such as digital screens, will be acceptable where they are of an appropriate scale with their surroundings and where they do not have a detrimental impact on 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.</p> <p><u>Advertisement Shrouds</u></p> <p>Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds. Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried out. This will not be permitted where the advertisement would not impose a</p>	

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			<p>detrimental impact on the building or street scene in terms of the size, illumination and/or content; and where the advertisement would <u>not</u> be harmful to residential amenity or public safety. Where advertisement shrouds are considered to be acceptable, they should be accompanied by a 1:1 depiction of the building and only be displayed for a limited period related to the reasonable duration of the building works.</p> <p>Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once planning permissions has been granted and all pre-commencement conditions have been discharged. The display of estate agents boards within Regulation 7 areas will not be permitted.</p>	
MM19	147	Para 6.233	Amend the supporting text to include the following information deleted from the policy.	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM19 are considered to have a neutral impact on the plans

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.</u></p> <p><u>Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried out. Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds.</u></p> <p><u>Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once</u></p>	<p>approach in terms of all sustainability objectives.</p>

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>planning permissions has been granted and all pre-commencement conditions have been discharged.</u></p> <p><u>The display of estate agents boards within Regulation 7 areas will not be permitted.</u></p>	
MM20	148	DC11	<p>Amend Policy DC11 as follows:</p> <p>Amend bullet e) as follows:</p> <p>...</p> <p>e) do not result in an unacceptable any adverse impact on the amenity of adjoining properties or on the local, natural and historic environment <u>during and post construction...</u></p> <p>Amend last bullet as follows:</p> <p>...</p> <p>I. <u>provide a construction traffic management plan as part of the CMS to ensure that traffic and construction activity does not cause unacceptable harm to pedestrian, cycle, vehicular and road safety...</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM20 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM21	153	CC1	<p>Amend Policy CC1 as follows:</p> <p>Amend bullet point (d) to add text as follows:</p> <p><u>... including heat networks if this can be done without having an unacceptable impact on air quality;</u> and ...</p>	Positive. This modification will reinforce the expected positive impacts on the sustainability objectives by ensuring the impacts of air quality are considered.

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MM22	162/163	Para 6.280-6.285	Amend the justification for Policy CC6 in paragraphs 6.280 to 6.285 inclusive in line with the changes shown in KD4 and EX15.	Neutral. This modification will not have a significant effect on the sustainability of the Local Plan.
MM22	165	Policy CC8	<p>Amend Policy CC8 as follows:</p> <p>...The council will ensure that development takes account of major hazards identified by the Health and Safety Executive, namely:</p> <ul style="list-style-type: none"> • Fulham North Holder Station, Imperial Road; • Fulham South Holder Station, Imperial Road; and • Swedish Wharf, Townmead Road. 	Neutral. This modification will not have a significant effect on the sustainability of the Local Plan.
MM23	167	CC10	<p>Amend Policy CC10 as follows:</p> <p>The council will seek to reduce the potential adverse air quality impacts of new developments by:</p> <p>a. requiring all major developments <u>which may be impacted by local sources of poor air quality or may adversely contribute to local air quality to provide an air quality</u> 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. <u>The assessment should include separate consideration of the impacts of (i) the construction/demolition phase of development and (ii)</u></p>	Positive. This modification would reinforce the expected positive impacts on the SA objectives and would not result in any negative outcomes.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>the operational phase of development with appropriate mitigation measures highlighted for each phase;</u></p> <p>b. 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 exceedances of the Government's air quality objectives;</p> <p>c. 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;</p> <p>d. <u>requiring developments to be 'air quality neutral' and resist development proposals which would materially increase exceedances of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Council's Local Air Quality Management Plan; and</u></p> <p>e. <u>requiring all decentralised energy schemes to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be prioritised over other air quality neutral technologies.</u></p>	
MM24	184	Para 7.11	Add additional text as follows:	Neutral. This modification will not substantially change the plans approach and therefore will not have

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>....In limited circumstances, such as in the case of particularly large developments, where the Council concludes that the costs of administering and monitoring the development would satisfy the relevant tests in regulation 122 CIL Regulations (as amended), it will secure the payment of those costs by the developer via the Section 106 agreement.</u>	a significant effect on the sustainability of the plan.
MM25	220	Appendix 6 Indicator HO1	Delete indicative borough target with: Indicative borough target: 1,410 per year average.	Neutral. The modification to the monitoring indicators will have no significant effect on the sustainability of the plan.
MM25	221	Appendix 6: Monitoring Indicators Housing Policy HO6	The monitoring indicator for Policy HO6 to be updated to delete reference to lifetime homes and include reference to building regulations part M4(2) and M4(3). Amend Appendix 6 as follows: Housing policy HO6: Accessible housing <u>Monitoring Indicator</u> - Number and percentage of homes granted permission that meet achieving the Lifetime Homes standards <u>Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.</u> - Number and % of homes granted permission that meet Building Regulation requirement M4(3) 'wheelchair user dwellings' Building that are wheelchair accessible in developments providing ten or more residential units <u>Target and Direction</u> All new dwellings to be built to 'life homes' standards with 10% to be wheelchair accessible.	Neutral. The modification to the monitoring indicators will have no significant effect on the sustainability of the plan.

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			<p>90% of new housing should meet Building regulation requirement M4(2) 'accessible and adaptable dwellings'.</p> <p>10% of new housing should meet Building Regulation requirement M4(3) 'wheelchair user dwellings' designed to be wheelchair accessible.</p>	
MM25	222	Appendix 6 Indicator E2	Change to the text under monitoring indicator to read: " <u>Employment Land Supply</u> " as opposed to Employment Land Available.	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.
MM25	222	Appendix 6: Monitoring Indicators Policy E3	Employment Policy E3: provision for visitor accommodation and facilities- in "Target and Direction" column amend as follows: "London Plan: 40,000 additional hotel bedrooms by 2021 <u>2036</u> "	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.
MM25	225	Appendix 6 Indicator DC8	Change the text under monitoring indicator for DC8 to read: " <u>The number of listed buildings at risk.</u> " Change the Target and Direction text to the following: " <u>Reduce the number of buildings at risk as a percentage of the total number of listed buildings in the borough.</u> "	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.
MM25	224	Appendix 6: Monitoring Indicators Policy OS1	Open Space Policy OS1: protecting parks and open spaces- amend monitoring indicator as follows: "Net change in total area of public open space"	Neutral. The modification to the monitoring indicators will have no significant effect on the sustainability of the plan.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM25	225	Appendix 6 Indicator CC3	Amend as follows: "Policy: CC3 CC4: Minimising flood risk and reducing water use surface water run off with Sustainable Drainage Systems; Monitoring indicator: Average % reduction in surface water flows for major developments; Target: Minimum reduction of 50% in peak flows compared to pre-development. Maximise reductions in peak surface water discharges compared to pre-development; Data Source: LBHF (Flood Risk Assessment or SuDS Strategy) Report".	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.
MM25	226	Appendix 6 Indicator CC10	Add Indicators for Policy CC10 as follows: - " <u>Monitoring Indicator: How many permitted developments integrated emissions reduction measures</u> "; Target: No Target; Data Source: LBHF". " <u>Monitoring Indicator: How many permitted developments integrated exposure reduction measures</u> "; Target: No Target; Data Source: LBHF".	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.

Appendix 2: Assessment of the Main Modifications against the Sustainability Objectives

Key

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

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
MM1	20	Amend Spatial Vision 3 rd paragraph	...New development will have created a high quality, <u>accessible</u> , safe and <u>inclusive</u> environment that respects local context and the borough's natural, built and <u>historic</u> environment...	✓	0	0	0	0	0	✓	0	0	0	0	0
MM1	20	Amend Strategic Objective 10	To preserve and enhance the quality, character and identity of the borough's	✓	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			natural and built environment (including its heritage assets) by respecting the local context, seeking high quality, intelligent developments and design , and ensuring compliance with the principles of inclusive, <u>accessible</u> and sustainable design...												
MM2	25	DEL1	<p>Amend bullets:</p> <p>...</p> <p>The Council will implement the policies and proposals of the Local Plan by: ...</p> <ul style="list-style-type: none"> • having regard to the financial viability of development in the following ways: <ul style="list-style-type: none"> o Plan-making; o CIL charge-setting; and o Negotiating Section 106 agreements ('106s'), including for affordable housing, 	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<ul style="list-style-type: none"> o applying the principles set out in the Viability Protocol in Appendix 9; o <u>Site specific circumstances including site specific infrastructure;</u> o <u>Site size, constraints and characteristics.</u> 												
MM3	2	After para 1.9	<p>...</p> <p>Add new wording after para 1.9 as follows</p> <p><u>Neighbourhood Planning</u> <u>Neighbourhood Planning was introduced as part of the Localism Act 2011.</u> <u>Neighbourhood plans are development and land use documents led by members of the community. Neighbourhood plans must be developed in general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance.</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>The Neighbourhood Planning Regulations sets out the procedure and key milestones in developing a neighbourhood plan. In order for a neighbourhood plan to be adopted and form part of the Development Plan Framework, they must be voted on and agreed by a majority vote, in a local Referendum.</u>												
MM4	29	Strategic Policy – Regeneration Areas	Amend Strategic Policy – regeneration Areas (Bullet 1) as follows: ...delivered to the highest standards of urban design, <u>respect for the historic environment</u> , environmental sustainability, and social inclusion <u>and respecting local context...</u>	0	0	0	0	0	0	✓	0	0	0	0	0
MM4	29	Table 1	Amend text at bottom of Table 1 as follows:	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			...In the London plan (2016, the Earls Court and West Kensington Opportunity Area has a minimum target of 6,500 dwellings 7,500 homes and 9,500 jobs across both LBHF and RBKC. It is anticipated that 6,500 homes and 8,500 jobs could be accommodated in LBHF. In addition to this capacity in the Earls Court and West Kensington opportunity Area, the FRA is considered to have the capacity to deliver an additional 500 homes and 500 jobs making an overall total of 7,000 homes and 9,000 jobs. In the figures above, 7,000 dwellings have been allocated to that part of ECWK Opportunity Area that is within LBHF and 1000 to the area that is within RBKC.												
MM4	45	HRA	Add new bullet point (as bullet 10) to the policy follows: <u>...be based on a thorough assessment of the heritage significance of the area and respond positively to local character and</u>	0	0	0	0	0	0	✓	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>history, conserving and taking opportunities to enhance the significance of heritage assets...</u>												
MM4	51	HRA2	<p>Amend bullet point 5 as follows: ...Ensure that the tunnel entrances and exits <u>avoid, or where this is not possible, have minimal impact on the amenity of residents and the local environment, including the significance and setting of heritage assets...</u></p> <p>Amend bullet point 10 as follows: ...be of a coherent urban design that has regard to the setting and context of the regeneration area, <u>including its scale and character, heritage assets and archaeology and should take opportunities to re-unify areas of severed townscape sensitively...</u></p>	0	0	0	0	0	0	✓	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
MM5	43	WCRA3	Amend 4 th bullet point as follows: "Provide affordable housing <u>and affordable workspace</u> in accordance with Policy H03 <u>and Policy E1</u> "	0	0	0	0	0	0	0	0	0	0	0	✓
MM6	56	FRA	Amend fifth bullet point of Policy FRA as follows: <ul style="list-style-type: none"> provide for the improvement of the West Kensington, Gibbs Green and Registered Provider estates, <u>including the potential for renewal of and additions to all or parts of the estates</u> 	0	0	0	0	0	0	0	0	0	0	0	0
MM6	59	FRA1	Amend third bullet point of Policy FRA1 as follows: <ul style="list-style-type: none"> provide for improvement to the West Kensington, Gibbs Green 	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			and Registered Provider estates, <u>including the potential for renewal of and additions to all or parts of the estates</u> , as part of the comprehensive approach to the regeneration of the Opportunity Area;...												
MM7	69	HO1	<p>Amend HO1 policy as follows:</p> <p>"The council will work with partner organisations and landowners to exceed the London Plan (2016) <u>minimum</u> target of 1,031 additional dwellings a year up to 2025..."</p> <p>....</p> <p>e) Ensuring that new dwellings meet local needs and are available for occupation by people living in London....</p> <p>...</p> <p>g) working to return vacant homes to use and ensure that all new homes are occupied and vacant homes are returned to use to meet local and London needs;</p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			... Insert additional sentence to follow 'g' at Policy H01 – Housing Supply: h) <u>where possible, support applications for self and custom builds that are in accordance with the relevant Local Plan policies.</u>												
MM7	69	H01	Amend Table 2 'Indicative Housing Targets' as follows:	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy																																																							
			<table><tr><th>Area</th><th>2015/20 2015/20</th><th>2020/25 2021/25</th><th>Total 10 years</th><th>2025/30 2025/31</th><th>2030/35 2031/35</th><th>Total 20 years for Plan Period 2015- 2035</th></tr><tr><td>White City Regeneration Area/Opportunity Area **</td><td>1,000 2,200</td><td>2,500 3,500</td><td>3,500 5,700</td><td>1,500 100</td><td>1,000 200</td><td>6,000</td></tr><tr><td>Hammersmith Town Centre</td><td>200 700</td><td>600 0</td><td>800 700</td><td>1,000 1,050</td><td>1,000 1,050</td><td>2,800</td></tr><tr><td>Fulham Regeneration Area **</td><td>1,500 1,100</td><td>2,500 500</td><td>4,000 1,700</td><td>1,500 5,300</td><td>1,500 0</td><td>7,000</td></tr><tr><td>South Fulham Riverside</td><td>1,500 2,700</td><td>1,500 800</td><td>3,000 3,500</td><td>500 200</td><td>500 300</td><td>4,000</td></tr><tr><td>Rest of the borough</td><td>1,000 2,000</td><td>700 200</td><td>1,700 2,200</td><td>700 0*</td><td>0*</td><td>2,400 2,200</td></tr><tr><td>Total</td><td>5,200 8,700</td><td>7,800 5,100</td><td>13,000 13,800</td><td>5,200 6,650</td><td>4,000 1,550</td><td>22,200 22,000</td></tr><tr><td>Average/year</td><td>1,040 1,740</td><td>1,560 1,020</td><td>2,600 1,380</td><td>1,040 1,330</td><td>800 310</td><td>4,440 820</td></tr></table>	Area	2015/20 2015/20	2020/25 2021/25	Total 10 years	2025/30 2025/31	2030/35 2031/35	Total 20 years for Plan Period 2015- 2035	White City Regeneration Area/Opportunity Area **	1,000 2,200	2,500 3,500	3,500 5,700	1,500 100	1,000 200	6,000	Hammersmith Town Centre	200 700	600 0	800 700	1,000 1,050	1,000 1,050	2,800	Fulham Regeneration Area **	1,500 1,100	2,500 500	4,000 1,700	1,500 5,300	1,500 0	7,000	South Fulham Riverside	1,500 2,700	1,500 800	3,000 3,500	500 200	500 300	4,000	Rest of the borough	1,000 2,000	700 200	1,700 2,200	700 0*	0*	2,400 2,200	Total	5,200 8,700	7,800 5,100	13,000 13,800	5,200 6,650	4,000 1,550	22,200 22,000	Average/year	1,040 1,740	1,560 1,020	2,600 1,380	1,040 1,330	800 310	4,440 820											
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MM7	69	HO1	<p>Add the following new text after paragraph 6.9:</p> <p><u>The Build to Rent or Private Rent sector has the potential to boost the supply of private rental accommodation across the borough. The SHMA identifies that private renting is high and is increasing in the borough; between 2001 and 2011</u></p>	0	0	0	0	0	0	0	0	0	0	0	0																																																							

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p><u>the private rented sector increased from 23% to 33%. Bearing this in mind, Build to Rent may offer a greater range and choice to private renters.</u></p> <p><u>The council recognises that the financial model of Build to Rent is different to traditional, private market housing and there will be separate viability concerns when considering Build to Rent schemes. Nevertheless, a range of tenures will be expected to provide accessible housing for all, subject to viability. On such schemes, affordable housing may be delivered by discount market rent using the London Living Rent (or lower) as the Council's preferred benchmark. The Council's Housing Strategy may also be used in setting appropriate rent levels to ensure schemes are affordable locally. The quantum of affordable housing units will be subject to the specifics on a scheme. Long-term covenants will be required on any scheme to ensure developments are rental for at least 15</u></p>												

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			<p><u>years with a 'clawback' mechanism in place where units are sold out of the Build to Rent sector during the covenant period. Importantly, affordable housing should be maintained in perpetuity and managed by the Build to Rent provider.</u></p> <p><u>An integral part that makes Build to Rent development different is the management of the site. The council will expect that any developers will identify a suitable, long term, experienced management team in place when coming forward with any applications that will deliver high-quality housing for its residents.</u></p> <p><u>When considering Build to Rent schemes, it will be important to consider the nature of build to rent development. Higher turnover is anticipated in Build to Rent schemes which may have a wider impact in terms of the sense of community in the area and other high-street parking issues and impacts. Evidence of mitigating these issues</u></p>												

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			<u>and/or ways of managing these issues may be required by the council.</u>												
MM7	69	HO1	<p>Insert new text on Self Build and Custom Housebuilding as follows:</p> <p><u>The Self-build and Custom Housebuilding Act 2015 requires local authorities to keep a register of individuals and associations of individuals seeking to acquire serviced plots of land to build houses for those individuals to occupy as homes. Self-build typically refers to individuals seeking to build their own home and to occupy them. The council has produced a self-build register, where individuals may register their interest. Self build and custom housebuilding refers to individuals or groups of individuals interested in buying land and building a home to occupy. The London SHMA found that self-build provides 4% of all new homes in England. In London, the figures indicate that self-build</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p><u>accounts for 1.9% and 3.5% of annual housing output in London.</u></p> <p><u>The London SHMA has found from a survey conducted in 2013 that 13% of adults in London were actively researching self-build, in line with the national average. Results from the same survey found that 2% of adults in London were doing something about this in terms of acquiring land, submitting a planning application, or starting construction. Those likely to complete a self-build project within a year was 1%.</u></p> <p><u>There are a number of broad barriers to delivering or undertaking such a project which indicates why there are such low output levels in London and nationally: the high cost of land, access to finance – self-build is considered as relatively risky, which in turn favour high-density development and builders able to capitalise on economies of scale. Self-build typically takes place in small infill sites, end of terrace spaces, backland</u></p>												

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			<p><u>sites, gardens, garages, and small industrial sites. In parts of London where land values are lower, sites which would not have interest from developers, such as on the fringe of industrial sites, there are greater opportunities to take place.</u></p> <p><u>In Hammersmith and Fulham, where land prices are high and the supply of available land for development is so competitive, these factors do not provide the best conditions for self-build or custom housebuilding to take place.</u></p> <p><u>Whilst the council is supportive in principle, this will continue to be monitored and assessed through the AMR and self-build register.</u></p>												
MM8	73	HO3 and supporting text	<p>Amended wording to the proposed policy, as follows:</p> <p>Housing development should increase the supply and improve the mix of</p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p>affordable housing to help achieve more sustainable communities in the borough.</p> <p><u>For developments of 11 or more self-contained dwellings, and on sites with the capacity for 1011 or more such self-contained dwellings, affordable housing should be provided having regard to in line with the following:</u></p> <ul style="list-style-type: none"> g. a borough wide target that at least 50% of all dwellings built between 2015-25 should be affordable; h. 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing; i. affordable dwellings should be located throughout a new development and not concentrated on one part of the site; j. the provision of affordable rented and social rented housing in ways that 												

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			<p>enable tenants to move into home ownership.</p> <p>In negotiating for affordable housing in a proposed development, the council will seek the maximum reasonable amount of affordable housing and take into account:</p> <ul style="list-style-type: none"> • site size and site constraints; and • financial viability, applying the principles set out in the Viability Protocol (Appendix 9) and having regard to the the individual circumstances of the site and the availability of public subsidy; • <u>individual circumstances and characteristics of the site;</u> • <u>site specific infrastructure;</u> • <u>availability of public subsidy; and</u> • <u>CIL charge.</u> 												

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p><u>Planning applications for developments of 11 or more self-contained dwellings, and on sites with the capacity for 110 or more such dwellings, will not be required to provide viability information, where they:</u></p> <ul style="list-style-type: none"> • <u>deliver 50% or more affordable housing on site;</u> • <u>are consistent with the relevant tenure split within this policy (see also paragraph 6.29); and</u> • <u>meet all of the other relevant Local Plan policy requirements and obligations.</u> <p><u>For the avoidance of doubt, in circumstances where the three requirements set out immediately above are satisfied, the council will regard that affordable housing provision as “the maximum reasonable amount of affordable housing.</u></p>												

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p>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.</p> <p>In addition, there should be no net loss of social/affordable rented housing on any development sites as part of any development proposals.</p>												
MM8	74	Para 6.18	<p>Amend para 6.18 as follows:</p> <p><u>In order to maximise affordable housing supply, the council will seek affordable housing contributions on schemes of 11 or more dwellings. In addition, on schemes of 10 or less dwellings that</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p>have a maximum combined gross floorspace of more than 1,000 square metres (gia), the council will <u>also seek negotiate</u> affordable housing where there is considered to be capacity for more units. In determining capacity, the council will take into account the guidance included in London Plan (2016) policy 3.13 and supporting supplementary planning guidance. for example in schemes where dwellings are large in floorspace terms but below 11 units and could yield a larger number of average sized homes the application of affordable housing policy will apply. In order to meet the target for affordable housing, the council will negotiate for affordable housing to be provided on all larger sites in accordance with the London Plan (2016) threshold for sites with the capacity for 10 or more self-contained dwellings. The affordable housing proportion should be calculated in relation to gross rather than net</p>												

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>provision i.e, it should be based on the total number of units proposed in the</u>												
MM8	75	Para 6.28	<p>Add further paragraph following 6.28:</p> <p><u>'The council will seek the maximum reasonable amount of affordable housing on any development. Vacant Building Credit (VBC) was introduced by Central Government in 2014 to incentivise the redevelopment of disused and vacant buildings on brownfield sites by offering developers a financial credit equivalent to the existing gross floor space when calculating the affordable housing contribution. Any increase in floorspace, affordable housing contributions will be required. When assessing applications, it is important to apply the Government's intended purpose for VBC.</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p><u>In an area of high affordable housing need, VBC has the potential to decrease the affordable housing supply across the borough. In order to mitigate against this potential loss, VBC will not be applicable where there is evidence of the following:</u></p> <p><u>-The building is not covered by an extant planning permission or recently expired planning permission for the same or substantially the same development;</u></p> <p><u>-The building has been left vacant for the sole purpose of redevelopment; and,</u></p> <p><u>The building, at the time of application, is not in any legal use</u></p>												
MM8	75	Para 6.29	<p>Amend paragraph 6.29 as follows:</p> <p>In considering the mix of tenure that is appropriate for additional dwellings to be built in the borough, the council has had</p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			regard to the London Plan (2016) affordable housing policies and to <u>our own</u> its assessment of the housing market, including housing need and how this can be met. <u>In considering appropriate rent levels for the various tenures, the council will be led by our Housing Strategy to ensure that all new affordable homes are affordable to people who live or work in the Borough.</u>												
MM8	75	Para 6.30	Amend para 6.30 as follows: It is recognised that in negotiating for affordable housing, specific site constraints and financial viability may affect the amount of affordable housing that can be achieved on that site. The council encourages <u>pre-application</u> early discussions with applicants <u>which should include information on</u> during the pre-application stage when financial viability appraisals are required with planning applications . The council will apply the principles and requirements set out in	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			the Viability Protocol (Appendix 9) when receiving and assessing financial viability appraisals submitted with planning applications and in negotiating Section 106 Agreements, to ensure the maximum reasonable level of affordable housing is provided and that other plan requirements are met. <u>Financial viability appraisals will not be required where a proposal will deliver 50% or more affordable housing on site, has a tenure split in line with our policy and meets all other relevant Local Plan policy requirements and obligations.</u>												
MM8	76	Para 6.31	Amend final two sentences in para 6.31 as follows: <u>The council favours traditional intermediate housing products such as shared ownership which can provide properties that remain affordable over a longer period of time.</u> The council will, therefore, <u>need to</u> weigh the needs of different groups when considering	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			development proposals. Where Starter Homes are substituted for affordable housing in development proposals, the council will expect them to replace affordable home ownership products (primarily shared ownership) rather than affordable rented housing.												
MM8	77	Para 6.33	<p>Add additional text to paragraph 6.33 as follows:</p> <p>"Mixed tenure housing developments should be tenure blind, meaning that it should be difficult to spot the difference in the architectural quality of market and affordable properties. <u>It is important for the council to ensure that housing developments are inclusive for all residents. The council recognises that spreading of affordable housing units may not be practical in all schemes. For example, separate service cores may be necessary between private and all</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>affordable housing units to maintain affordable service charges and to aid good housing management when locating affordable tenures."</u>												
MM9	84	HO10	<p>Amend HO10 as follows:</p> <p><u>The council will seek to address the joint Gypsy and Traveller accommodation needs over the Plan period, as identified in the Gypsy and Traveller Accommodation Needs Assessment (2016).</u></p> <p>The council will work closely with the Royal Borough of Kensington and Chelsea, and any other relevant partners to protect, improve and, if necessary, increase the capacity of the existing gypsy and traveller site at Westway <u>Stable Way</u>.</p> <p><u>Applications for additional sites should meet the requirements set out in the</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<u>Planning Policy for Traveller Sites (2015).</u>												
MM9	84	6.63	6.63 ... Following engagement with the local traveller community an assessment of the need for traveller pitches was carried out in accordance with the Gypsy and Traveller Accommodation Needs Assessments (DCLG 2007). This study suggested a need for extra pitches for an additional five families by 2020(38). <u>The assessment identified that 3 additional pitches are required in the first five years, 9 in total over the plan period. The council is currently working with RBKC and the local traveller community to determine how best to meet the identified needs. Both authorities are working together to determine how best to meet this identified need where possible, in accordance with further Site Appraisal work. The Council will seek to address the findings from the GTANA its</u>	0	0	0	0	0	0	0	0	0	0	0	0

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			<u>assessment and to meet its needs by undertaking a Site Appraisal Study in 2017 and producing an Options Paper thereafter. The Council and RBKC will explore all available options in meeting the objectives of national policy in order to identify a National Planning Policy Framework compliant supply of sites during the course of 2018, if not earlier. This will be reported upon in the Council's annual monitoring report. Sites identified will be assessed against the agreed methodology with RBKC, in accordance with the NPPF and the PPTS. Any subsequent planning applications should be considered against the criteria set out in the PPTS along with relevant planning policies and guidance.</u>												
MM10	120	OS2	Amend Policy OS2 as follows: The council will seek to reduce open space deficiency and to improve will	0	0	0	0	0	0	0	0	0	0	0	0

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			<p><u>protect and enhance</u> the quality of, and access to, existing open space by:</p> <p>refusing development on public open space and other green open space <u>of strategic</u> and borough-wide importance <u>as identified in the council's Open Space Hierarchy</u> (see Appendix 3 and Proposals Policies Map) unless it can be demonstrated that such development <u>will not harm</u> would preserve or enhance its open character, <u>and</u> its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity;</p>												
MM11	125	RTC1	<p>Add bullet point (e) and (f) to Policy RTC1 as follows:</p> <p>k. <u>promoting use of the River Thames for transport uses, including passengers and freight</u></p> <p>l. <u>seeking improvements to the tidal foreshore in line with the</u></p>	0	0	0	0	0	0	0	0	✓	0	0	0

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			<u>requirements of the Thames River Basin Management Plan and the Thames Estuary 2100 Plan.</u>												
MM12	91	6.80	Amend para 6.80 as follows: <u>The borough currently faces real socio-economic difficulties, including acute affordable housing need and high levels of deprivation.</u> Continued economic growth in the borough will require a growing work force. These jobs will not go to workless-unemployed residents in the borough unless they have the necessary qualifications and skills. If local workless people are not moving into the local labour market, the growth in jobs will have to be met by workers from outside the local area. This will increase pressure on the already overstretched supply of housing and local transport infrastructure. This is also important in addressing social inequalities across the borough. Where	0	0	0	0	0	0	0	0	0	0	0	✓

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			<p><u>major developments come forward that do not employ and/or train local people in their construction/operation, they will aggravate this situation. This is because local unemployed people will not be moving into the local labour market, and the growth in jobs related to those developments will have to be met by workers from outside the local area. This will aggravate existing circumstances by increasing pressure on the already overstretched supply of housing, and on local transport infrastructure. It will also fail to address the social inequalities across the borough. Accordingly, in order for major developments to be sustainable, particularly having regard to the social and economic strands of sustainability, they must comply with the policy.</u></p>												
MM13	102	TLC4	Amend point c) as follows:	0	0	0	0	0	0	0	0	0	0	0	0

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			... The number of <u>existing non-A1</u> uses that may adversely impact on the quality of the parade or cluster, such as betting shops and amusement centres...												
MM14	105	TLC6	<p>Amend Policy and text as follows:</p> <p>Policy TL6</p> <p>To ensure that shopping areas remain diverse and balanced, the council will seek to limit the amount <u>manage</u> the and concentration of betting shops, pawnbrokers <u>and</u> payday loan shops in areas of high concentration.</p> <p>Planning permission for Any proposal for a new betting shops, pawnbrokers or payday loan shops will be considered against the provisions of Policyies TLC2 and TLC3 not be permitted in the prime retail frontage of town centres or within 400 metres of the boundary of an</p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>existing or permitted betting shop, pawnbrokers or payday loan shop.</p> <p>Outside of these areas, planning permission <u>and will only be granted for a betting shop, pawnbrokers or payday loan shop may be granted permission, in accordance with the quotas that apply, and where it can be demonstrated that the proposal:</u></p> <ul style="list-style-type: none"> • <u>will not impact adversely on residential the amenity, character and function of an area;</u> • <u>and will add to the vitality of the existing shopping parade or cluster; and</u> • <u>will not result in negative cumulative impacts due to an unacceptable concentration of such uses in one area.</u> 												

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			When considering proposals for hot food takeaways (class A5) and 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 <u>the location and nature of the proposal with regard to the proximity of existing hot food takeaways, its compatibility with surrounding uses and, as applicable, available evidence relating to potential health impacts.</u>												
MM14	106	6.118	6.118 Although hot food takeaways provide a service for the community, the council is concerned about the potential health impacts of hot food takeaways, <u>particularly</u> on children and young people. Therefore, In the case of proposals for class A5 uses (hot food takeaways), consideration will be given	0	0	0	0	0	0	0	0	0	0	0	0

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			to the proximity of schools and similar facilities, as well as the prevalence and clustering of takeaways and relevant evidence relating to potential health impacts arising from the type of use proposed. when assessing the acceptability of these uses.												
MM15	134	DC3	<p>Amend DC3 as follows:</p> <p>In <u>these</u> areas identified as <u>potentially</u> appropriate for tall buildings, any proposal will need to demonstrate that it:</p> <p>...</p> <p>d) has no harmful impact in terms of had <u>full regard to the significance of heritage assets including the setting of, and views to and from, such heritage assets, has no unacceptable harmful impacts, and</u></p>	0	0	0	0	0	0	✓	0	0	0	0	0

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			<u>should have due regard to Historic England's guidance on tall buildings...</u>												
MM16	137	DC5	Amend DC5 as follows: ... Fascia signs and projecting signs should not be overly large and should be designed to be appropriate to the styles <u>scale and design</u> of the shopfront (see section on shopfront guidance in the Planning Guidance Supplementary Planning document)...	0	0	0	0	0	0	0	0	0	0	0	0
MM17	138	DC6	Amend policy wording in DC6 as follows: ... Replacement windows should respect the architectural character of the building and its surroundings. In this respect, It <u>It</u> will be important that the design <u>and material</u> of the replacement windows matches the original windows <u>as closely as possible</u> , in terms of material , type	0	0	0	0	0	0	0	0	0	0	0	0

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			and size, method of opening, profile and section and sub-division. ...												
MM18	142	DC8	<p>Amend Policy DC8 as follows:</p> <p>The council will conserve the significance of the borough's historic environment by protecting, restoring and enhancing it's <u>its</u> heritage assets. These assets include: listed buildings, <u>conservation areas</u>, historic parks and gardens, the scheduled monument of Fulham Palace Moated site, unscheduled archaeological remains and buildings and features of local interest. When determining applications for development affecting heritage assets, the council will apply the following principles:</p> <p>a. the presumption will be in favour of the conservation, restoration and enhancement of heritage assets, and</p>	0	0	0	0	0	0	✓	0	0	0	0	0

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			<p>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;</p> <p>b. development applications affecting designated heritage assets, including alterations and extensions to buildings will <u>normally</u> only be permitted if the significance of the heritage asset is conserved or enhanced or where there is less than substantial harm and the harm is outweighed by the public benefits of the proposal.</p> <p>c. development applications should conserve 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 <u>their</u> setting;</p> <p>d. applications for development affecting non-designated heritage assets (buildings and artefacts of local</p>												

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			<p>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 <u>in accordance with paragraph 135 of the National Planning Policy Framework</u>;</p> <p>e. particular regard will be given to matters of scale, height, massing, alignment, materials and use;</p> <p>f. where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use should be consistent with the aims of conservation of the asset's character and significance, <u>including securing its optimum viable use</u>;</p> <p>g. applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposed development <u>proposal</u> upon it or its setting which should be carried out with the assistance</p>												

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			<p>of a suitably qualified person. The extent of the requirement should be proportionate to the nature and level of the asset's significance.</p> <p><u>Where archaeological remains of national significance may be affected applications should also be supported by an archaeological field evaluation;</u></p> <p>h. proposals which involve harm to, or loss of, substantial harm, or less than substantial harm any designated to the <u>significance of a heritage asset</u> will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 133 <u>and 134</u> of the National Planning Policy Framework;</p> <p>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 <u>and significance</u> before it is lost, in order to</p>												

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			<p>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;</p> <p>j. the proposal respects the principles of accessible and inclusive design;</p> <p>k. <u>where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered the significance of the heritage asset and tailored their proposals accordingly;</u></p> <p>l. expert advice will be required to address the need to evaluate and conserve archaeological remains, and to advise on the appropriate mitigation measures in cases where excavation is justified; and</p> <p>m. securing the future of heritage assets at risk identified on English Heritage's national register, as part of a</p>												

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			positive strategy for the historic environment.												
MM19	146	DC9	<p>Amend DC9 as follows:</p> <p>The council will require a high standard of design of advertisements, which should be in scale and in keeping with the character of their location and should not <u>have an unacceptable impact on public, including road, impact adversely on public safety.</u> The council will resist excessive or obtrusive advertising and illuminated signs which adversely affect the character and appearances of the neighbourhood or the site/building, residential amenity or public safety. The design of advertisements should be appropriate to their context and should generally be restrained in quantity and</p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>form. Advertisements should normally be located at ground floor level and relate to the commercial zone of the street frontage and the architectural design of the facade.</p> <p>All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.</p> <p><u>Hoardings</u></p> <p>Hoardings and other large advertisements, such as digital screens, will be acceptable where they are of an appropriate scale with their surroundings and where they do not have a detrimental impact on areas sensitive to</p>												

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			<p>the visual impact of hoardings such as conservation areas, listed buildings and other heritage assets, residential areas, open spaces or waterside land.</p> <p><u>Advertisement Shrouds</u></p> <p>Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds.</p> <p>Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried out. This will not be permitted where the advertisement would <u>not</u> impose a detrimental impact on the building or street scene in terms of the size, illumination and/or content; and where the advertisement would <u>not</u> be harmful to residential amenity or public safety. Where advertisement shrouds are considered to be acceptable, they should be accompanied by a 1:1 depiction of</p>												

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			<p>the building and only be displayed for a limited period related to the reasonable duration of the building works.</p> <p>Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once planning permissions has been granted and all pre-commencement conditions have been discharged.</p> <p>The display of estate agents boards within Regulation 7 areas will not be permitted.</p>												

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	147	Para 6.233	<p>Amend the supporting text to include the following information deleted from the policy.</p> <p><u>All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.</u></p> <p><u>Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>out. Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds.</p> <p>Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once planning</p>												

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			<p><u>permissions has been granted and all pre-commencement conditions have been discharged.</u></p> <p><u>The display of estate agents boards within Regulation 7 areas will not be permitted.</u></p>												
MM20	148	DC11	<p>Amend Policy DC11 as follows:</p> <p>Amend bullet e) as follows:</p> <p>...</p> <p>e) do not result in <u>an unacceptable any</u> adverse impact on the amenity of adjoining properties or on the local, natural and historic environment <u>during and post construction...</u></p> <p>Amend last bullet as follows:</p> <p>...</p>	0	0	0	0	0	0	0	0	0	0	0	0

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			I. <u>provide a construction traffic management plan as part of the CMS to ensure that traffic and construction activity does not cause unacceptable harm to pedestrian, cycle, vehicular and road safety....</u>												
MM21	153	CC1	Amend Policy CC1 as follows: Amend bullet point (d) to add text as follows: <u>... including heat networks if this can be done without having an unacceptable impact on air quality; and ...</u>		✓						✓			✓	
MM22	162/ 163	Para 6.280- 6.285	Amend the justification for Policy CC6 in paragraphs 6.280 to 6.285 inclusive in line with the changes shown in KD4 and EX15.	0	0	0	0	0	0	0	0	0	0	0	0
MM22	165	Policy CC8	Amend Policy CC8 as follows: ...The council will ensure that development takes account of major	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>hazards identified by the Health and Safety Executive, namely:</p> <ul style="list-style-type: none"> • Fulham North Holder Station, Imperial Road; • Fulham South Holder Station, Imperial Road; and • Swedish Wharf, Townmead Road. 												
MM23	167	CC10	<p>Amend Policy CC10 as follows:</p> <p>The council will seek to reduce the potential adverse air quality impacts of new developments by:</p> <p>a. requiring all major developments <u>which may be impacted by local sources of poor air quality or may adversely contribute to local air quality to provide an air quality</u> 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</p>		✓						✓			✓	

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			<p>levels above the Government's air quality objective concentration targets. <u>The assessment should include separate consideration of the impacts of (i) the construction/demolition phase of development and (ii) the operational phase of development with appropriate mitigation measures highlighted for each phase;</u></p> <p>b. 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 exceedances of the Government's air quality objectives;</p> <p>c. 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;</p>												

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			<p>d. requiring developments to be 'air quality neutral' and resist development proposals which would materially increase exceedances of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Council's Local Air Quality Management Plan; and</p> <p>e. requiring all decentralised energy schemes to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be prioritised over other air quality neutral technologies.</p>												
MM24	184	Para 7.11	<p>Add additional text as follows:</p> <p><u>...In limited circumstances, such as in the case of particularly large</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<u>developments, where the Council concludes that the costs of administering and monitoring the development would satisfy the relevant tests in regulation 122 CIL Regulations (as amended), it will secure the payment of those costs by the developer via the Section 106 agreement.</u>												
MM25	220	Appendix 6 Indicator HO1	Delete indicative borough target with: Indicative borough target: 1,410 per year average.	0	0	0	0	0	0	0	0	0	0	0	0
MM25	221	Appendix 6: Monitoring Indicators Housing Policy HO6	The monitoring indicator for Policy HO6 to be updated to delete reference to lifetime homes and include reference to building regulations part M4(2) and M4(3). Amend Appendix 6 as follows: Housing policy HO6: Accessible housing <u>Monitoring Indicator</u> <u>-Number and percentage of homes granted permission that meet achieving</u>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>the Lifetime Homes standards <u>Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.</u></p> <p>- Number and % of homes granted permission that meet Building Regulation requirement M4(3) 'wheelchair user dwellings' Building that are wheelchair accessible in developments providing ten or more residential units</p> <p><u>Target and Direction</u></p> <p>All new dwellings to be built to 'life homes' standards with 10% to be wheelchair accessible.</p> <p>90% of new housing should meet <u>Building regulation requirement M4(2) 'accessible and adaptable dwellings'.</u></p> <p><u>10% of new housing should meet Building Regulation requirement M4(3) 'wheelchair user dwellings' designed to be wheelchair accessible.</u></p>												
MM25	222	Appendix 6 Indicator	Change to the text under monitoring indicator to read:	0	0	0	0	0	0	0	0	0	0	0	0

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		E2	" <u>Employment Land Supply</u> " as opposed to Employment Land Available.												
MM25	222	Appendix 6: Monitoring Indicators Policy E3	Employment Policy E3: provision for visitor accommodation and facilities- in "Target and Direction" column amend as follows: "London Plan: 40,000 additional hotel bedrooms by 2021 <u>2036</u> "	0	0	0	0	0	0	0	0	0	0	0	0
0	225	Appendix 6 Indicator DC8	Change the text under monitoring indicator for DC8 to read: "The number of listed buildings at risk." Change the Target and Direction text to the following: " <u>Reduce the number of buildings at risk as a percentage of the total number of listed buildings in the borough.</u> "	0	0	0	0	0	0	0	0	0	0	0	0
MM25	224	Appendix 6: Monitoring Indicators Policy OS1	Open Space Policy OS1: protecting parks and open spaces- amend monitoring indicator as follows: "Net change in total area of public open space"												

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MM25	225	Appendix 6 Indicator CC3	Amend as follows: "Policy: CC3 CC4: Minimising flood risk and reducing water use surface water run off with <u>Sustainable Drainage Systems</u> ; Monitoring indicator: Average % reduction in surface water flows for major developments; Target: Minimum reduction of 50% in peak flows compared to pre-development . Maximise reductions in peak surface water discharges compared to pre-development; Data Source: LBHF (Flood Risk Assessment or SuDS Strategy) Report".	0	0	0	0	0	0	0	0	0	0	0	0
MM25	226	Appendix 6 Indicator CC10	Add Indicators for Policy CC10 as follows: - " <u>Monitoring Indicator: How many permitted developments integrated emissions reduction measures</u> "; Target: No Target; Data Source: LBHF". " <u>Monitoring Indicator: How many permitted developments integrated</u>	0	0	0	0	0	0	0	0	0	0	0	0

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			<u>exposure reduction measures”; Target: No Target; Data Source: LBHF”.</u>												