

Examination into the Hammersmith and Fulham Proposed Submission Local Plan

SCHEDULE OF FURTHER SUGGESTED MINOR CHANGES

5th July 2017

The further suggested changes below are expressed by ~~strikethrough~~ for deletions and underlining for additions of text.

Each change has its own reference number (eg FMC1) and the policy and paragraph numbering refer to the text included in the submission Local Plan. A reason for the suggested change is also provided.

These changes are additional to the minor changes in the Minor changes schedule (KD4). However, where updates to the minor changes in KD4 have taken place, red underlining has been included in this schedule for reference in order to distinguish between the previous change and the further changes.

Ref No	Policy/ Para	Suggested Change	Reason for change
Introduction			
FMC1	Intro Paragraph 1.4	Amend para 1.4 as follows: "When adopted, the Local Plan will be used, together with the London Plan (2016) <u>and any made (adopted) neighbourhood Plans</u> , to help shape the future of the borough and to determine individual planning applications and deliver development"	To add clarification regarding neighbourhood plans.
FMC2	Intro Neighbourhood Planning	<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 <u>general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance.</u></u> <u>The Neighbourhood Planning Regulations set out the procedures 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>	Based on submission hearing statements and further clarification on neighbourhood planning. This amends minor change MC4.

Ref No	Policy/ Para	Suggested Change	Reason for change
Spatial vision and objectives			
FMC3	Key diagram Map 4	Show OPDC area more clearly on map 4 and show where other Local authority boundaries are eg. Kensington and Chelsea.	For clarity
FMC4	Spatial Vision	Amend first sentence of para 3 as follows: “At least 22,200 22,000 additional homes...”	To take account of changes to the housing trajectory.
Delivery and Implementation			
FMC5	Policy DEL1	Amend second bullet as follows: preparing other Local Plan documents, supplementary planning documents, joint Opportunity Area Planning Frameworks (OAPFs) development briefs, master plans and best practice guidance where necessary;	For clarification and to accord with the Local Development Scheme.
FMC6	Policy DEL1	Additional wording to the proposed policy, as follows: 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"> ○ Plan-making; ○ CIL charge-setting; and ○ Negotiating Section 106 agreements ('106s'), including for affordable housing, ○ applying the principles set out in the Viability Protocol in Appendix 9; ○ Site specific circumstances including site specific infrastructure; ○ Site size, constraints and characteristics. 	The Council has agreed to include the proposed wording, so that the balance is made clear for the purposes of decision making. The proposed wording seeks to ensure the delivery of development and outlining the flexibility the Council will accept in relation to the site specific circumstances.
Regeneration Area Strategies			
FMC7	Strategic Policy Regenerat ion Areas	Amend first bullet as follows: provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability, social inclusion, and respecting	To emphasise heritage conservation.

Ref No	Policy/ Para	Suggested Change	Reason for change
		local context ;	
FMC8	Policy WCRA1	Amend bullet point 4 as follows: “demonstrate how the proposal fits within the context of a detailed masterplan, and how it integrates and connects with the surrounding context including land adjacent to the boundary with RBKC ”.	To improve cross boundary referencing.
FMC9	Strategic Site Policy WCRA2- White City West	Amend last para of Policy WCRA2- White City West as follows:- “If either Loftus Road Stadium or Territorial Army (TA) Centre come forward for redevelopment, the council will seek residential led development. On the In relation to the Loftus Road site, in particular, there should be re-provision of community facilities and open space in the borough, in accordance with the other policies in the Local Plan .”	To clarify position on re-provision
FMC10	Strategic Site Policy WCRA2- White City West	Amend para 5.37 of Policy WCRA2 White City West as follows:- Therefore any redevelopment of this site would need to include reprovide a sport/community/leisure facility that could achieve substantial benefits for the community as well as open space, onsite or within the borough, in accordance with the other policies within the Local Plan .	To clarify position on re-provision
FMC11	Policy HRA Para 5.42	Amend last sentence as follows: “The council has also set up a Hammersmith Residents Working Party to assist the council in producing a Supplementary Planning Document (SPD) which will provide a development strategy for how Hammersmith could change over the next 20 years. ”	To reference emerging SPD.
FMC12	Policy HRA	Add new bullet point (as bullet 10) to the policy follows: “be based on a thorough assessment of the heritage significance of the area and respond	To emphasise heritage conservation and to link with Policy DC8.

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		<u>positively to local character and history, conserving and taking opportunities to enhance the significance of heritage assets”</u>	
FMC13	Para 5.55	Amend para 5.55 as follows: “ <u>The heritage assets of Hammersmith are a key attribute to consider in bringing development forward, to positively promote a sense of place and provide a basis for place-making.</u> It is important that any new schemes in the town centre are of high quality architecture and design which improve the appearance and quality of buildings <u>and respect the local townscape, heritage assets and their settings”</u>	To emphasise heritage conservation.
FMC14	Policy HRA2	Amend bullet 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>	To emphasise heritage conservation. This adds to minor change MC52.
FMC15	Policy FRA, Para 5.82	Amend part of para 5.82 as follows: “There will be opportunities for higher density development <u>in the opportunity area</u> , including the potential for tall buildings, subject to <u>detailed design and analysis.”</u>	To emphasise heritage conservation.
FMC16	Policy FRA	Amend final bullet of Policy FRA as follows: “preserve or enhance the character <u>or</u> appearance, and <u>the</u> setting of heritage assets including the Grade II* listed Fulham Town Hall <u>and the Grade I Historic Park and Garden at Brompton Cemetery.</u>	To align with the NPPF. This adds to minor change MC53 in KD4.

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Housing																																																											
FMC17	Policy H01 Table 2	<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>4,000 2,200</td><td>2,500 3,500</td><td>3,500 5,700</td><td>4,500 100</td><td>4,000 200</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>4,000 1,050</td><td>4,000 1,050</td><td>2,800</td></tr><tr><td>Fulham Regeneration Area **</td><td>4,500 1,100</td><td>2,500 600</td><td>4,000 1,700</td><td>4,500 5,300</td><td>4,500 0</td><td>7,000</td></tr><tr><td>South Fulham Riverside</td><td>4,500 2,700</td><td>4,500 800</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>4,000 2,000</td><td>700 200</td><td>4,700 2,200</td><td>700 0*</td><td>0*</td><td>2,400 2,200</td></tr><tr><td>Total</td><td>6,200 8,700</td><td>7,800 5,100</td><td>13,000 13,800</td><td>6,200 6,650</td><td>4,000 1,550</td><td>22,200 22,000</td></tr><tr><td>Average/year</td><td>4,040 1,740</td><td>4,560 1,020</td><td>2,600 1,380</td><td>4,040 1,330</td><td>800 310</td><td>4,110 820</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 **	4,000 2,200	2,500 3,500	3,500 5,700	4,500 100	4,000 200	6,000	Hammersmith Town Centre	200 700	600 0	800 700	4,000 1,050	4,000 1,050	2,800	Fulham Regeneration Area **	4,500 1,100	2,500 600	4,000 1,700	4,500 5,300	4,500 0	7,000	South Fulham Riverside	4,500 2,700	4,500 800	3,000 3,500	500 200	500 300	4,000	Rest of the borough	4,000 2,000	700 200	4,700 2,200	700 0*	0*	2,400 2,200	Total	6,200 8,700	7,800 5,100	13,000 13,800	6,200 6,650	4,000 1,550	22,200 22,000	Average/year	4,040 1,740	4,560 1,020	2,600 1,380	4,040 1,330	800 310	4,110 820	Table 2 has been amended to take account of changes to the Housing Trajectory. This supercedes minor change MC67 in the minor changes schedule (KD4).
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FMC18	Policy H01	Amend last sentence of para 6.3: <u>“The 1,031 additional homes does not include student housing and is monitored separately.</u> However, It should be noted that the figure of 1,031 pre-dates the establishment of the Old Oak and Park Royal Development Corporation and that a new housing target for the borough will need to be set by the Mayor in the proposed review of the London Plan due to begin in 2016.’	For clarification.																																																								
FMC19	Policy HO1 Para 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 in mind, Build to Rent may offer a greater range and choice to private renters.</u> <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</u>	To explain build to rent and private rent. This adds to minor change MC69 of KD4.																																																								

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		<p><u>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 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></p>	
FMC20	HO3 Affordable Housing	<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> <p><u>For developments of 11 or more self-contained dwellings,</u> on sites with the capacity for 101 or more such self-contained dwellings, affordable housing should be</p>	The additional wording seeks to clarify the key considerations when negotiating affordable housing.

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		<p>provided having regard to <u>in line with</u> the following:</p> <ul style="list-style-type: none"> 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. <p>e) 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); • <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</u></p>	

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		<p><u>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> <p>In addition, there should be no net loss of social/affordable rented housing on any <u>as part of any</u> development sites proposals.</p>	
FMC21	Para 6.18	<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</u> negotiate 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. <u>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.</u></p>	To be in accordance with national policy.
FMC22	Policy H03 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</u> its assessment of the housing market, including housing need and how this can be met. <u>In considering</u></p>	The additional wording seeks to clarify the key considerations when negotiating affordable housing.

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		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.	
FMC23	Policy H03 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 pre-application early discussions with applicants which should include information on 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. 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.</p>	The additional wording seeks to clarify the key considerations when negotiating affordable housing.
FMC24	Policy H03 Para 6.31	<p>Amend final two sentences in para 6.31 as follows:</p> <p>The council favours traditional intermediate housing products such as shared ownership which can provide properties that remain affordable over a longer period of time. 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>	The additional wording seeks to clarify the key considerations when negotiating affordable housing.
FMC25	HO4 Housing Quality and Density	6.39 The London Plan and the Mayor's Housing SPG... Therefore the higher density ranges of the London Plan (2016) 'Central' setting will only be appropriate in those parts of the regeneration areas and strategic sites	Clarification of the use of policy HO4 in relation to the London Plan policy 3.4 and the Regeneration Areas.

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	6.39	identified in the Local Plan as being suitable for higher density development.	
FMC26	HO10 – Gypsy and Traveller Accommodation	<p>The Council has proposed changes to HO10 at KD4 MC81. In addition to this, the council proposes further amendments to the policy, 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....’</p>	To clarify the Council’s position in meeting Gypsy and Traveller need.
FMC27	Paragraph 6.63 (Gypsy and Travellers)	<p>The Council proposes this clarification:</p> <p>6.63 The council and the Royal Borough of Kensington and Chelsea (RBKC) jointly provide a site for <u>20</u> travellers’ pitches on land in RBKC to the east of the White City Opportunity Area (19 authorised and 1 unauthorised pitch) <u>(1 is taken up by a community centre).</u></p>	The Council needed to correct a mistake in the Schedule (KD4) as identified in RBKC’s Hearing Statement.
FMC28	Para. 6.63 (Gypsy and Travellers)	<p>The Council proposes the additional clarifications to para 6.33:</p> <p>‘6.63 ... Both authorities are working together to determine how best to meet this identified need where possible, in accordance with further Site Appraisal work. <u>The Council will seek to address the findings from the GTANA and to meet its needs by undertaking a Site Appraisal Study. 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>’</p>	The Council proposes to amend this wording to clarify how the Council will be seeking to address its housing need following RBKC’s Hearing Statements.
Local Economy and Employment			
FMC29	Policy E1	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	The Council agrees that this should be added to the policy wording and proposes

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		enterprises in large new business developments, unless justified by the type and nature of the proposal and subject to viability .	this as an additional amendment to policy E1.
FMC30	Policy E1 Para 6.67	Amend para 6.67 as follows: In addition, the council will use its economic strength to encourage local business when procuring and hiring contractors. The Council's Economic Growth Development Plan and economic strategies for 2016-2019 provides further details of these and other economic development initiatives.	To correct references.
FMC31	Policy E1 Para 6.68	The Council made a Minor Amendment in Schedule (KD4), as an additional paragraph to follow 6.68. In response to written hearing statements the Council proposes further amendments, as follows: Applications for new business development schemes will be expected to provide affordable workspace. For example, flexible leasing arrangements, cross subsidised rent through S106 agreements, reduced rent arrangements, provide co-hubs or start up space. The council will consider the requirement for affordable workspace in regard to viability and the impact it could have upon delivery.	A further amendment to MC87 in KD4 to be consistent with text change at policy E1 and with the NPPF.
FMC32	Policy E2 Para 6.73	The Council made a minor amendment in Schedule (KD4). Further changes have been made: When determining applications for an alternative or change of use, the council will give consideration to any extensive, on-going issues with neighbouring uses, and the existing and future impact upon neighbouring amenity. Where there is a long-standing history between the current use and established residential areas, evidence will be required to identify whether any measures have been taken by either party to manage the particular concern and how well they have performed.	To provide further clarification of the use of the policy, following EiP hearings.
FMC33	Policy E3	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	Delete repetitions of policy criteria

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		<p>Kensington and White City Opportunity Areas subject to:</p> <ul style="list-style-type: none"> 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 and pick up points for the type of facility proposed; 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; and all new hotel applications should demonstrate that the site can provide appropriate servicing and pick up points for the type of facility proposed. 	
FMC34	Policy E4 Para 6.80	<p>The borough currently faces real socio-economic difficulties, including acute affordable housing need and high levels of deprivation. 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 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</p>	For clarity

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		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.	
Town and Local Centres			
FMC35	Policy TLC2 Para 6.96	Add the following text to the end of para 6.96 as follows: The council will use retail survey data, the lawful use and unimplemented extant permissions to help calculate the length of frontage and the proportion of frontage in A1 use. The council's retail survey data is available on the council website.	For clarity.
FMC36	Policy TLC3 Para 6.103	Add the following text to the end of para 6.103as follows: The council will use retail survey data, the lawful use and unimplemented extant permissions to help calculate the length of frontage and the proportion of frontage in A1 use. The council's retail survey data is available on the council website.	For clarity.
FMC37	Policy TLC4	Amend point c) as follows: The number of uses that may adversely impact on the quality of the parade or cluster, such as betting shops and amusement centres.	To remove reference to specific uses.
FMC38	Policy TLC6	Amend part of Policy TLC6 as follows: “.....Planning permission for new betting shops, pawnbrokers 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, pawnbrokers or payday loan shop. Outside of these areas, planning permission and will only be granted planning permission outside of these areas for a betting shop, pawnbrokers or payday loan shop in accordance with the quotas that apply and where it can be demonstrated that the proposal: <ul style="list-style-type: none"> will not impact on residential the amenity, character and function of an area; 	To improve policy by removing the 400 metre exclusion zone requirement and introducing criteria to assess applications on a case by case basis.

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		<ul style="list-style-type: none"> will add to the vitality of the existing shopping parade or cluster; <u>and</u> <u>will not result in negative cumulative impacts due to an unacceptable concentration of such uses in one area."</u> 	
FMC39	Policy TLC6 Para 6.177	<p>Amend para 6.177 as follows:</p> <p><u>The council will resist applications for such uses where they would cause unacceptable harm to the character, function and amenity of an area or negatively impact on the health and well being of the borough's residents.</u></p> <p>The betting shop exclusion zone of 400 metres enables the council to manage the amount of new betting shops within walking distance of existing premises, thereby reducing the clustering and concentration of such uses. Applying a criteria to be met with regard to residential amenity will enable the council to only allow such uses in locations where they will not impact upon the local community.</p> <p><u>In assessing the likely impacts of a proposal, regard will be had to the type of use, proposed opening hours, size of premises and operation and servicing. The council will also consider whether the proposal is likely to increase or create a negative cumulative impact in the surrounding area (generally within a radius of 400 metres of the site). 400 metres is considered to be a standard benchmark for walking distance equating to approximately 5 minutes walk. <u>Proposals will be resisted that would result in unreasonable negative cumulative impacts that cannot be adequately mitigated. The council's licensing policy will be a key consideration in assessing potential impacts of proposals.</u></u></p>	To improve policy
FMC40	Policy TLC6 Para 6.118	<p>Delete last line of para as follows:</p> <p>.The council's Planning Guidance SPD provides further supplementary policy related to hot food takeaways.</p>	To remove reference to SPD.
Community Facilities			
FMC41	Policy CF2	Add reference to "enhancement" in para 3 of Policy CF2:	To clarify position on enhancement of

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		"In any redevelopment proposal, existing community uses should be retained, enhanced or replaced, unless..."	facilities
FMC42	Policy CF3	Amend point (c) of policy CF3 as follows: - (c) "seeking retention, or replacement or enhancement of existing arts, culture, entertainment, leisure, recreation and sport uses....."	To clarify position on enhancement of facilities
FMC43	Policy CF3	Amend point c) as follows: (c) In these circumstances, A a viability report will be required that demonstrates to the council's satisfaction that the facility.....of at least 12 months, will be required .	For clarity.
FMC44	Policy CF3	Amend point d) as follows: - (d) Supporting Encouraging the temporary use of vacant buildings for community uses, including for performance and creative work.	To improve wording.
FMC45	Policy CF4	Amend policy CF4 as follows: - "In considering any redevelopment proposal for all or part of an existing football ground, the council will require the re-provision of suitable facilities to enable the continuation of professional football or other field- based spectator sports in the borough ".	To clarify position on re-provision of facilities in the borough.
Open Spaces and river			
FMC46	Policy OS1 Para 6.147	Amend para 6.147 as follows; "In a densely built up area like Hammersmith and Fulham, the local environment and public spaces are very important. In Hammersmith and Fulham there are a variety of types and sizes of open spaces including parks, playing fields, sports pitches, outdoor sporting facilities, cemeteries and church yards, amenity space, allotments, nature conservation areas and play areas. "	To improve wording.
FMC47	Policy OS1 Para 6.148	Insert para after 6.148 (Policy OS1) to include Local Green Space "The NPPF allows for local communities to	To be consistent with the NPPF.

Ref No	Policy/ Para	Suggested Change	Reason for change
		<u>identify green areas of particular local significance and value for designation as Local Green Space. The council will support local communities seeking the designation of Local Green Space that meets the relevant criteria</u>	
FMC48	Policy OS2	Amend point a) as follows: “...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”.	To improve wording.
FMC49	Policy OS2 Para 6.153	Delete the following sentence: In order to improve access to the boroughs parks and open spaces for local residents, the council will restrict their use for private events and use by out of borough schools.	This has been removed as it is considered un-enforceable.
FMC50	Policy OS5	(f) <u>“making Tree Preservation Orders where justified in the interests of amenity”</u>	For clarity. This supersedes minor change MC113 in KD4
FMC51	Policy OS5 Para 6.161	“Green and brown roofs and walls are also an essential sustainable design consideration and provide many of the benefits of more conventional urban greening. <u>Community gardens and allotments can play an important role in enabling small scale local food production, community engagement as well as enhancing biodiversity.</u> Where opportunities arise, space for local food growing should also be encouraged, for example through creative use of green roofs, walls and balconies. <u>This could be for individual gardeners or organisations including schools that want to grow food for themselves and/or for the local community.</u> ”	To improve wording. This amends minor change MC120 in KD4.

Ref No	Policy/ Para	Suggested Change	Reason for change
FMC52	Policy RTC4 Para 6.177	The River Thames can and should be used in ways that reflect its special character, for example as a base for many water-related recreational, <u>leisure</u> and commercial activities, a transport route that can relieve congestion on road and rail, a feature of the landscape and a habitat for many varieties of flora and fauna. <u>The river also provides a home for a number of boat dwellers. A range of temporary and permanently moored vessels can add diversity and vibrancy to the river. However, these need to be carefully located and appropriate management plans secured through planning conditions or Section 106 agreements to ensure the character and amenity value of the river is protected. Where developments include provision for new permanent-moorings, the Thames Strategy Kew-Chelsea (2000) should be considered.</u>	For clarity. This amends minor change MC126
Design and Conservation			
FMC53	Policy DC2 Para 6.191	In its consideration of proposed new development, the council will seek to ensure that developments are sustainable, durable and adaptable. Designs should deliver safe and inclusive environments. All development should be sited, designed and laid out to offer ease of entry, <u>egress</u> and use by disabled people, and for <u>by</u> parents of small children and others with needs for an environment which is accessible and inclusive. <u>Approval may be required under the Building Regulations to make sure that buildings are constructed or adapted in the right way, and with suitable materials. In this context, compliance with Fire Regulations must be checked both from a structural aspect and also with a view to ensuring fast and easy escape from a building. Building regulations are completely separate from planning control and approval under them does not mean that planning permission has been given, nor does a planning permission imply approval under the Building Regulations. Applicants are advised to contact Building Control for guidance and advice early in the design stages of a scheme.</u>	To provide reference to fire safety.

Ref No	Policy/ Para	Suggested Change	Reason for change
FMC54	Policy DC3	Amend 2 nd para as follows: “In these <u>se</u> areas identified as <u>potentially</u> appropriate for tall buildings, any proposal...”	For consistency with 2 nd sentence of policy.
FMC55	Policy DC3	Amend bullet d) as follows: has no harmful impact in terms of <u>had full regard to the significance of heritage assets, including the</u> setting of and views to and from heritage assets, <u>has no unacceptable harmful impacts and should comply with Historic England guidance on tall Buildings</u>	To be consistent with NPPF wording. This is an update to minor change MC134.
FMC56	Policy DC4	Amend 2 nd and 3 rd bullets as follows: <ul style="list-style-type: none"> “ subservient and successfully integrated into the...” <u>subservient and</u> should never dominate...” 	To remove duplication with 3 rd bullet.
FMC57	Policy DC5	Amend first sentence of Policy DC5 as follows: “...high quality shopfronts that are designed <u>to respect</u> in sympathy with the age and architectural style...”	To be consistent with other wording in Local Plan.
FMC58	Policy DC5	Amend second para as follows: “Where <u>a commercial premises with</u> an original shopfront is converted to another use..”	To improve sentence.
FMC59	Policy DC5	“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)”	To improve wording and remove SPD reference.
FMC60	Policy 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 will be important that the design <u>and material</u> of the	To improve wording.

Ref No	Policy/ Para	Suggested Change	Reason for change
		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.	
FMC61	Policy DC6 Para 6.212	<p>Amend para 6.212 as follows:</p> <p>In most buildings, the detailed design of the windows is a fundamental component of the elevation <u>and can contribute greatly to the visual character of the building. Windows are particularly vulnerable elements in that they are relatively easily replaced or altered. Where this work is not carried out sensitively, it can have a profound effect on the building, diluting its character, and detrimentally impacting upon the appearance of the general street scene.</u> The character of the façade and its contribution to the street scene can be eroded considerably by inappropriate replacement windows.</p>	For clarity on the council approach to replacement windows.
FMC62	Policy DC6 Para 6.213	<p>Amend para 6.213 and new para after as follows:</p> <p>The policy encourages the retention of the uniformity and consistency of the original design of each building, block or terrace in the borough <u>the selection of a design appropriate to the architectural character and age of the building and includes the design attributes that would be important to consider in order to achieve a successful design of replacement window. In most cases, this would mean a design which replicates the design and material of the windows that formed part of the original composition. It may be possible to base the design of the replacement windows on those that may survive elsewhere in the building or it may be necessary to look for examples in other buildings of the same period and style close by.</u></p> <p><u>The aim of the policy is to retain the uniformity and consistency of the original design of each building, block or terrace in the borough thereby protecting the quality and architectural integrity of the building and character of the street scene from harmful</u></p>	For clarity on the council approach to replacement windows.

Ref No	Policy/ Para	Suggested Change	Reason for change
		incremental alterations.	
FMC63	Policy DC7	Amend 4 th sentence of Policy DC7 as follows: “The council will refuse consent permission 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.”	For clarity.
FMC64	Policy DC7	Amend points 1 and 2 as follows: 1. Development Applications within the Thames Policy Area will not be permitted if it would cause demonstrable unacceptable harm to the view from the following points: 2. Development Applications will also not be permitted if it would cause demonstrable unacceptable	To improve wording.
FMC65	Policy DC8	Amend bullet point H as follows: Proposals which involve harm to or loss of substantial harm or less than substantial harm of any designated to the significance of a heritage asset will be refused unless it can be demonstrated that they meet the criteria specified in paragraphs 133 and 134 of the National Planning Policy Framework”	To emphasise heritage conservation. This updates minor change MC157.
FMC66	Policy DC8	Amend first para of DC8 as follows: “These assets include: listed buildings, conservation areas , historic parks and gardens, the scheduled monument of Fulham Palace Moated Site, unscheduled archaeological remains and buildings and features of local interest”	To include Conservation Areas.
FMC67	Policy DC8	Amend bullet d) as follows: “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	To reference NPPF.

Ref No	Policy/ Para	Suggested Change	Reason for change
		significance of the heritage asset in accordance with paragraph 135 of the National Planning Policy Framework	
FMC68	Policy DC8	Amend bullet f) as follows: “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 the conservation of the asset’s character and significance”	To be consistent with NPPF.
FMC69	Policy DC8	Amend bullet i) as follows: “...the developer should ensure that a suitably qualified person carries out an analysis (including photographic surveys) of its design and significance before it is lost , in order to record..”	To improve wording.
FMC70	Policy DC8, Para 6.222	Amend para 6.222 as follows: “Heritage assets are a non renewable resource. Proposals should therefore actively avoid harm and promote developments that reconcile heritage significance with economic and social aspirations to achieve sustainable development ”	To emphasise heritage conservation.
FMC71	Policy DC9	Delete last sentence of para 2 of Policy DC9 as follows: Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.	To remove SPD reference from policy.
FMC72	Policy DC10	Amend second sentence of Policy DC10 as follows: “...telecommunications development should meet the following criteria where applicable .”	For clarity.

Ref No	Policy/ Para	Suggested Change	Reason for change
FMC73	Policy DC11	Amend bullet e) as follows: “do not result in <u>an unacceptable</u> any adverse impact on the amenity of adjoining properties or on the local, natural and historic environment <u>during and post construction...</u> ”	To improve wording.
FMC74	Policy DC11	Amend last bullet as follows: I. <u>provide a construction traffic management plan as part of the CMS to</u> ensure that traffic and construction activity does not cause unacceptable harm to pedestrian, cycle, vehicular and road safety.	For clarity.
Environmental Sustainability			
FMC75	Policy CC2	Addition of the following bullet point to the existing list in the policy: • <u>“using prefabrication construction methods where appropriate”.</u>	To promote the use of prefabricated materials to reduce environmental impacts.
FMC76	Policy CC3	Delete the last sentence of Para 6.259 and replace with the following text as follows: - “The council considers that from a borough-wide perspective, the Sequential Test permits the consideration of all sites for development, subject to individual sites satisfying the requirements of the Exception Test (as outlined in the council's Planning Guidance SPD). <u>Given the large range and extent of flood risks in the borough, the council has applied the Sequential Test and concluded that, subject to proposals satisfying the requirements of the Exception Test and the provision of an adequate Flood Risk Assessment, all parts of the borough are considered as potentially suitable for development”.</u>	To clarify the application of the Sequential Test by the council with regards to flood risk.
FMC77	Policy CC4	Add the following text to the end of Paragraph 6.274 as follows: - <u>“For smaller developments, Thames Water (Developer Services) should be contacted to ensure that any potable water supply and waste water connection requirements are adequate to meet the needs of the proposal”.</u>	To clarify how bullet point 8 of the policy can be complied with by smaller developments.
FMC78	Policy CC6	Add additional text to Para 6.285 as follows: - <u>“Any potential surplus capacity identified at</u>	To clarify who is responsible for decision making on any potential

Ref No	Policy/ Para	Suggested Change	Reason for change
		<u>Powerday (Old Oak Sidings), beyond that required to meet LBHF's apportionment target, will be the joint responsibility of the OPDC and LBHF. LBHF will work with the WPAs within the WRWA area and the GLA to consider relevant waste matters, including apportionments"</u>	surplus capacity at the Powerday site.
FMC79	Policy CC6	Add additional sentence to para 6.285 as follows: - <u>"The council is committed to working with the WPAs within the WRWA area, including OPDC, and will work with them to help ensure that, where appropriate, as much apportioned waste as possible is managed within the WRWA area.</u> The council is <u>also</u> investigating ways forward with the OPDC as well —as the potential for pooling apportionment requirements with the WPAs within the WRWA area."	To improve effectiveness and to reflect email commitment to continue joint working.
FMC80	Policy CC6	Amend point (b) of Policy CC6 as follows:- (b) promoting sustainable waste behaviour and maximum <u>continued</u> use of the WRWA Smugglers Way facility.	To improve clarity on reference to Smugglers Way facility.
FMC81	Policy CC8	Amend Policy DC8 as follows: The council will ensure that development takes account of major hazards identified by the Health and Safety Executive, namely: <ul style="list-style-type: none"> • Fulham North Holder Station, Imperial Road; • Fulham South Holder Station, Imperial Road; and • Swedish Wharf, Townmead Road. 	To update notifiable installations.
FMC82	Policy DC8 Para 6.291	Amend para 6.291 as follows: Within the borough there are a number of <u>is</u> one <u>one</u> facility ies (gas fuel holders and pipelines) which handles and transports hazardous substances. Although the facility ies are <u>is</u> strictly controlled by health and safety regulations, it is necessary to control	To update notifiable installations.

Ref No	Policy/ Para	Suggested Change	Reason for change
		the type of development around this these sites and to resist new development which might pose a risk to people occupying sites and buildings in the vicinity.	
FMC83	Policy DC8 Para 6.293	<p>Amend Para 6.293 as follows:</p> <p>In Fulham there is one are three installations handling notifiable substances, including pipelines. Whilst it is they are subject to stringent controls under existing health and safety legislation, it is important to control the kinds of development permitted in the vicinity of this these installations. The council will consult the Health and Safety Executive on appropriate applications s prior to the granting of planning permission about the risks to the proposed development from the notifiable installation and this could lead to refusal of permission, or restrictions on the proximity of development to the notifiable installation. The notifiable sites are is shown on the Proposals Policies Map, together with the distance from the notifiable site for which consultation with the Health and Safety Executive will be required. The distance from the sites in which buildings will not normally be permitted is also listed.</p>	To update notifiable installations.
FMC84	Policy CC10	<p>Add text to the justification section as follows:</p> <p>- Air quality assessments should include 'air quality neutral' assessments carried out with reference to the GLA's emission benchmarks for buildings, transport and combustion based energy plant. Developments that do not exceed these benchmarks will be considered to be 'air quality neutral'.</p>	To provide further details on how the 'air quality neutral' requirement of the Policy should be complied with.
FMC85	CC13	<p>Amend the 1st sentence of the 2nd paragraph as follows: - "The council will, where appropriate, require precautionary and/or remedial action mitigation measures 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".</p>	To align wording with other Policies which include requirements for mitigation measures to be integrated to manage environmental impacts.

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Transport			
FMC86	Policy T1	<p>Correct spelling in minor change MC193 (second bullet) as follows:</p> <p>“supporting the implementation of a HS2 Crossrail/Great Western interchange at Old Oak with Interchanges with the West London Line and underground services, <u>a new and enhanced station at Willesden Junction and connect development in the north of the borough with the stations at Old Oak</u>”</p>	To correct spelling of 'Willsden'. This amends minor change MC193 in KD4.
FMC87	Policy T4	<p>“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 <u>and where on-street blue badge parking may be required as set out in Policy T5.</u></p>	Minor change MC199 in KD4 is not required. Blue badge holders can park anywhere on-street.
Glossary			
FMC88	Glossary	<p>Amend Glossary entry as follows:</p> <p>Community facilities/uses Community Facilities include the following uses:</p> <p>Community Uses</p>	For clarification.
FMC89	Glossary	<p>Proposed addition to the glossary to provide a definition for build to rent:</p> <p><u>“Build to rent: Build to rent involves the construction of dwellings specifically for the rental market, rather than the more traditional route in which developers build dwellings which they then sell, either to householders or to landlords. Build to rent schemes require long-term professional management to deal with the maintenance of the building and day-to-day issues.”</u></p>	For clarity.
FMC90	Glossary	<p>Amend glossary definition of Green corridors as follows:</p> <p>“....However these have been designated as nature conservation areas because of their greater nature conservation importance and are not shown as green corridors <u>open</u></p>	For clarity.

Ref No	Policy/ Para	Suggested Change	Reason for change
		space .	
FMC91	Glossary	Amend glossary entry for Open Space as follows: “Open space refers to land laid out as a public garden or used for the purposes of public recreation or land which is used as a burial ground. It excludes individual private gardens which do not serve a wider open space function, yards roads and carparks all land that is predominantly undeveloped other than by buildings or structures that are ancillary to open space. The definition covers a broad range of types of open spaces whether in public or private ownership and whether public access is unrestricted, limited or restricted. “	Amended to reflect London Plan definition.
Mapping			
FMC92	Map 5 Page 94	Amend Shopping hierarchy map in Local Plan to reflect proposed revised boundary to Shepherds Bush Town centre.	For consistency with proposals map changes.
FMC93	Policy OS4	Add map to Local Plan under Policy OS4 to show areas of nature conservation area deficiency	For clarity.
FMC94	Proposals Map	Fulham Gasholder (north and south holder stations) – remove designation on proposals map as a Notifiable installation.	To update current status.
FMC95	Local Plan	Change references to “Proposals Map” to “Policies Map” throughout the Plan	To update in accordance with regulations.
Appendices			
FMC96	Strategic Policies table	Add a table to show which policies are strategic and which are not within the Local Plan.	For clarity and in response to Neighbourhood planning comments.
FM97	Appendix 6 Indicator HO1	Delete indicative borough target with: Indicative borough target: 1,410 per year average.	Not considered necessary as a target.
FM98	Appendix 6 Indicator HO3	1. Add text under Monitoring Indicator to read, “ Total sum of commuted payments approved for affordable housing ”. 2. Change text under the target and direction to read the following: “ At least 50% of all additional dwellings ”	To improve indicator.

Ref No	Policy/ Para	Suggested Change	Reason for change
		built between 2015–25”.	
FM99	Appendix 6 Indicator E2	Change to the text under monitoring indicator to read: “ Employment Land Supply ” as opposed to Employment Land Available.	To improve indicator.
FM100	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: “ Reduce the number of buildings at risk as a percentage of the total number of listed buildings in the borough. ”	To improve indicator.
FMC101	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”.	To correct erroneous reference to Policy CC3 when the indicator relates to CC4.
FMC102	Appendix 6 Indicator CC10	Add Indicators for Policy CC10 as follows: - “ Monitoring Indicator: How many permitted developments integrated emissions reduction measures ”; Target: No Target; Data Source: LBHF ”. “ Monitoring Indicator: How many permitted developments integrated exposure reduction measures ”; Target: No Target; Data Source: LBHF ”.	Indicator added for CC10 as air quality is considered to be an important issue that should have an associated indicator.