

Hammersmith and Fulham Local Plan

Main Issues and Questions

The Examination Hearings will take place over 6 days across 2 weeks. Please see 'Guidance notes for people participating in the examination'.

Week 1 - 13th to 15th June 2017

Overview, Strategic and Housing Matters

1. Spatial Vision and Strategic Objectives. To incorporate legal compliance.
2. Regeneration Strategies – White City, Hammersmith, Fulham, South Fulham
3. Housing
4. (Unaccompanied site inspections within the Borough)

Week 2 - 20th to 22nd June 2017

All other Borough Wide Policies

1. Community Facilities, Leisure, Recreation, Green and Public Open Space, River Thames, Transport and Accessibility
2. Economy and Employment; Town Centres
3. Design, Conservation, Environmental Sustainability
4. Monitoring, Risk, Contingency and other matters

(A contingency Hearing day will exist on 22nd June to accommodate overruns)

Please note that it is the submitted Hammersmith and Fulham Local Plan which is subject to the Examination. This excludes the Council's proposed minor changes contained in Key Document 4, albeit the latter will be discussed at the Hearings as necessary.

LEGAL COMPLIANCE, SPATIAL VISION AND STRATEGIC OBJECTIVES (13th June am)

Is the Plan legally compliant? Does the Plan contain a robust spatial vision and justified strategic objectives consistent with national policy and in general conformity with the London Plan?

1.	Has the Plan been prepared in accordance with the statutory procedures of the 2004 Act (as amended) and the associated regulations ¹ , including in respect of the publication and availability of documents, advertisements and notification?
2.	Does the Plan acknowledge adequately cross border issues, particularly with regard to the Duty to Cooperate on strategic matters? Have there been timely, effective and conclusive discussions with key stakeholders and prescribed bodies on what the plan should contain? How does the Plan align with those of adjacent Boroughs?
3.	Has the production of the Plan followed the Local Development Scheme (is the LDS up to date in accordance with the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011)?
4.	Has the production of the Plan followed the Statement of Community Involvement? Has the consultation on the submitted plan (and its changes) been adequate?
5.	Is the Equalities Impact Assessment adequate and robust in terms of its methodology and conclusions?
6.	Has the Plan been prepared to be consistent with the National Planning Policy Framework (NPPF) and in general conformity with the London Plan? What review mechanisms are inbuilt? Is the Plan in general conformity with the London Plan?
7.	Has adequate consideration been given to the Habitat Regulations? Will the implementation of the Plan, alone or in combination, affect adversely any Natura 2000 sites? Is Natural England satisfied with the content of the Plan, particularly with regard to potential effects on Richmond Park SAC?
8.	Does the Plan contain a positively prepared, clear and justified vision for the Borough? How have reasonable alternatives been considered and discounted? Is the spatial vision justified and robust with due regard to inclusive design?
9.	How have the Strategic Objectives been derived, are these adequate and linked to specific policy provision? Is inclusive design referenced adequately?

¹ Particularly, The Town and Country Planning (Local Planning) (England) Regulations 2012

10.	<p>To what extent has the Sustainability Appraisal (SA) informed the content of the Plan²?</p> <p>Is the Council satisfied that the SA adequately summarises or repeats the reasons that were given for rejecting the alternatives at the time when they were ruled out (and that those reasons are still valid)?</p>
11.	<p>Is Policy DEL 1 positively prepared and justified by the evidence? Is this policy consistent with the LDS?</p>
12.	<p>Are issues of development viability recognised adequately by the Plan and its evidence base? Has a viability assessment been undertaken for the content of the Plan as a whole?</p> <p>Is the Viability Protocol a suitable approach to the issue of viability which is consistent with national policy (eg NPPF para 173 et al)? Is the requirement for a 'viability assessment' justified in all cases?</p>
13.	<p>Does the Plan reference the role of Neighbourhood Planning adequately and in line with national policy?</p>
14.	<p>How are changes to the policies map³ intended to be collated and shown within the Plan? Are the changes proposed to the map currently sufficiently clear and comprehensive?</p>

² Discussion upon alternative approaches will be undertaken at subsequent and relevant hearing sessions as necessary.

³ To be discussed at the final Hearing session further.

REGENERATION STRATEGIES – WHITE CITY, HAMMERSMITH, FULHAM, SOUTH FULHAM (13th June pm)

Does the Plan contain robust and deliverable regeneration strategies that are consistent with the objectives and policies of the Plan and which are in general conformity with the London Plan?

1.	Is the Strategic Policy (– Regeneration Areas) justified, clearly worded and deliverable?
2.	Is the heritage approach to all Regeneration Areas consistent with the NPPF?
	White City
3.	<p>Is Strategic Policy WCRA justified, with due regard to reasonable alternatives and the duty to cooperate, and will it be effective? Is it clear whether the housing numbers are targets/minimums?</p> <p>Should the plan reference the Opportunity Area Planning Framework for WCRA?</p> <p>Are the White City East and Shepherds Bush Town Centre defined robustly in the LP and shown appropriately on the policies map?</p>
4.	Is WCRA 1 (White City East) justified and will it be effective?
5.	Is WCRA 2 (White City West) justified and will it be effective?
6.	Is WCRA 3 (Shepherd's Bush Market and adjacent land) justified and will it be effective? Is the approach towards Shepherds Bush Market robust and appropriate?
	Hammersmith
7.	Is Strategic Policy HRA justified, with due regard to reasonable alternatives, and will it be effective? Should Strategic Policy HRA refer to tourism?
8.	<p>Are Policies HRA 1 and 2 justified when considered against reasonable alternatives?</p> <p>Are they deliverable and clear on how each element may be delivered with regard to infrastructure?</p>
	Fulham
9.	Are Strategic Policies FRA and FRA 1 justified, with regard to reasonable alternatives, and will they be effective?
10.	Is the approach to retail provision in the FRA robust and justified?

	South Fulham
11.	Are Policies SFRRRA and SFRRRA 1 justified, with due regard to reasonable alternatives, and will they be effective?
12.	Is the SFRRRA approach to housing robust in terms of identified numbers?
13.	Is the SFRRRA justified in terms of redevelopment/renewal and the policy wording?
14.	Is the SFRRRA approach to building design and heights robust?

HOUSING (14th June all day (+ contingency for overrun on 15th June))

Is the Local Plan's approach to housing provision sufficiently justified and consistent with national planning policy and in general conformity with the London Plan? With particular regard to deliverability, has the Plan been positively prepared and will it be effective in meeting the varied housing needs applicable to the Borough over the plan period?

	HO1 – Housing Supply
1.	<p>Is Policy HO1 justified and how will it be implemented effectively?</p> <p>How has the Plan been informed by, and is it consistent with, the Council's (and London's) Housing Strategy?</p> <p>Is Policy HO1 consistent with National Planning Policy Framework and aligned adequately with the London Plan?</p> <p>Is the evidence in support of the planned level of housing provision robust (with due regard to data relating to population projections and alternative methodologies and the Council's 2016 SHMA)?</p> <p>Is the SHMAA robust, has it used the most up to date housing projections and how does it inform the Plan housing requirement with due regard to the housing market area?</p> <p>Are the population forecasts and assumptions relating to migration robust?</p>
2.	Should housing targets be referenced as minimums?
3.	What robust evidence underpins the approach of the Plan towards the housing needs of vulnerable and older people? Does this encompass the need for retirement properties adequately?
4.	Are the needs of single persons recognised adequately?
5.	<p>Is the level of proposed housing over the plan period deliverable? How has the housing trajectory been derived and is it robust? Does the Council have a five year supply of housing sites that is consistent with national policy?</p> <p>Is a 'non-implementation allowance' required?</p>
6.	Does the Plan recognise the issues around 'build to rent'? Does the plan acknowledge adequately the provision of private rented housing in the supply side?
	HO2 – Housing Conversion and Retention
7.	What evidence supports the content of Policy HO2 and is the policy justified?

	HO3 – Affordable Housing
8.	<p>Is Policy HO3 justified and effective and consistent with national policy?</p> <p>Does the LP reference 'starter homes' robustly? Should the Plan reference self-build opportunities for affordable housing? Are self-build and starter homes referenced adequately and in line with national policy?</p> <p>Is the Policy consistent with the Mayor's emerging SPG?</p> <p>Is the Council's proposed change, ref MC 70, minor?</p> <p>Does the plan acknowledge adequately the role of intermediate rent as an affordable housing tenure within private rented developments?</p>
9.	Is a 50% threshold for affordable housing deliverable and viable? Is the Policy consistent with the NPPF, with due regard to positive planning and considerations of viability?
10.	<p>Is the approach for viability assessments for each scheme justified, effective and consistent with national policy?</p> <p>To what extent has 'pepper potting' been considered in relation to its potential effect upon the viability of developments?</p>
	HO4 – HO9
11.	Is Policy HO4 (Housing Quality and Density) justified and aligned with the London Plan? Is it flexible?
12.	Is HO5 (Housing Mix) justified and deliverable? What is the evidence for the housing mix proposed by HO5 and how has this been considered against alternatives?
13.	Is HO6 (Accessible Housing) justified, deliverable with regard to viability and consistent with national policy?
14.	Should HO7 (Needs of people who need care and support) include a target for the provision of supported homes?
15.	Is HO8 (Hostels and Houses in Multiple Occupation) justified and is it clear how it would be implemented effectively?
16.	Should the plan confirm that student accommodation (Policy HO9) does not contribute to the housing target? Are the policy criteria sufficiently clear for effective implementation?
17.	Is HO11 (Detailed Residential Standards) justified and flexible?
	HO10 – Gypsy and Traveller Accommodation
18.	What evidence justifies the approach of the Plan towards gypsies and

	travellers and travelling showpeople and is this sufficiently up to date and consistent with national policy? What engagement with relevant communities has been undertaken outside of the Borough?
19.	Has the duty to cooperate been employed adequately (and sufficiently widely) to address the issue of gypsy and traveller accommodation effectively?
20.	How have alternatives been considered and discounted? Has consideration been given to accommodating needs elsewhere within the Borough?
21.	Is the needs assessment adequate for the entire plan period and how does it relate to Section 124 of the Housing and Planning Act 2016 (caravans and houseboats)? How will the issue of needs assessment and site supply be addressed into the future?

**COMMUNITY FACILITIES, LEISURE, RECREATION, GREEN AND PUBLIC OPEN SPACE, RIVER THAMES, TRANSPORT AND ACCESSIBILITY
(20th June am)**

Is the approach of the Plan to community facilities, leisure and recreation activities, the provision of green and public open space, the River Thames, transport and accessibility justified by the evidence base, consistent with national policy and will it be effective in operation?

1.	Is CF1 (Supporting Community Facilities and Services) based on a robust evidence of needs and existing provision? Is it flexible and will it be effective in delivery?
2.	Does the plan reference robustly and accurately the health care services of the Borough and its future infrastructure needs? Is the plan based on sufficient evidence of demand and supply over the Plan period?
3.	Is the approach to sport and recreation justified by a sufficiently robust evidence base?
4.	Should CF2 (Enhancement and Retention of Community Uses) reference the emergency services/fire stations? Is the plan underpinned by an awareness of the capacity and requirements of emergency services? How will local needs for new or expanded community uses be determined?
5.	Is the approach to QPR FC clear and consistent between Policy CF 4 (Professional Football Grounds) and WRCA 2?
6.	How have current open space provision and needs been assessed? What up to date evidence supports Policies OS1 (Parks and Open Space) and OS2 (Access to Parks and Open Spaces)? Is the approach consistent with national planning policy?
7.	Is Policy OS4 (Nature Conservation) justified by the evidence base and is Natural England content with its content? Does the Plan reference Areas of Deficiency in Access to Nature adequately?
8.	Is food growing referenced adequately and is the Plan aligned with the London Plan in this regard?
9.	Is Margravine Cemetery referenced adequately within the Plan?
10.	Are the River Thames policies (RTC1-4) justified by the evidence base with particular regard to the Tidal Foreshore/Management Plan and heritage related matters?
11.	Is Policy T1 (Transport) justified by the evidence base and in general conformity with the London Plan? Is the reference to Crossrail justified and deliverable?

	Is the proposed change, ref MC 121, minor (re river)?
12.	Are the requirements of Policy T2 (Transport Assessment and Travel Plans) justified and will they be effective in operation/capable of delivery?
13.	Is Policy T4 (Parking Standards) justified? How will parking standards (including cycling) be set and managed?
14.	Are the Council's proposed changes to Policies T3 and T4 (ref MC 198 and MC 199) minor?

ECONOMY AND EMPLOYMENT; TOWN CENTRES (20th June pm)

Does the local plan provide the most appropriate and robust strategy towards the economy with due regard to cross border issues? Is the approach evidenced adequately and consistent with national policy and in general conformity with the London Plan? Will the approach be effective?

1.	<p>What robust evidence justifies Policy E1 (Providing for a Range of Employment Uses) and how will it be implemented effectively, with due regard to viability?</p> <p>Does the policy provide clarity for sui generis uses?</p> <p>Does the plan contain flexibility in Policy E1 by recognising that affordable workspace could be provided by design or rent?</p>
2.	<p>What evidence supports Policy E2 (Land and Premises for Employment Uses) and how will it be implemented effectively? Is E2 justified and sufficiently flexible to be effective in operation?</p> <p>To what extent has the Royal Mail concerns on infrastructure been considered? Should E2 reference the Royal Mail estate?</p>
3.	<p>Is Policy E4 (Local Development, Training and Skills Development Initiatives) justified and will it be clearly effective in delivery?</p>
4.	<p>What evidence supports Policy TLC1 (Hierarchy of Town and Local Centres) and how will it be implemented effectively?</p> <p>Is the approach to retail provision over the plan period robust (capacity/needs)?</p> <p>Is the proposed threshold at TLC 1(g) justified by the evidence base with due regard to national policy?</p>
5.	<p>Does the Plan take an evidence based approach to the identification of primary and secondary retail frontages which is robust? Are these recognised in the Policies Map?</p> <p>Is the Parsons Green Lane Parade accurately identified?</p>
6.	<p>Is the quota approach in TLC 2 (Town Centres) justified by the evidence base? Is it clear how the policy will be implemented effectively?</p>
7.	<p>Is TLC 3 (Local Centres) and its proportions of A1 uses justified by the evidence base and consistent with national policy?</p>
8.	<p>Is TLC 4 (Parades et al) and its approach to A1 uses justified by the evidence base and consistent with national policy?</p>

9.	Is TLC 5 (Impact of Food and Drink) justified, positively prepared and capable of effective implementation? Is it too prescriptive in terms of opening hours?
10.	Is TLC 6 (Betting Shops, Pawnbrokers and Payday Loan Shops and Hot Food Takeaways) justified by the evidence base and consistent with national policy?
11.	Is TLC 7 (Public Houses) justified by the evidence base with particular regard to the viability requirements of 1.a?

DESIGN, CONSERVATION, ENVIRONMENTAL SUSTAINABILITY

(21st June am)

Does the Plan take a justified and suitably evidenced based approach towards design, conservation and environmental sustainability? Is the Plan consistent with national policy in such regards and will it be effective in implementation?

1.	Is Policy DC1 (Built Environment) justified by the evidence and how will it be effective in operation?
2.	Is Policy DC2 (Design of New Build) clear in its use of the word and meaning of 'respect'?
3.	Will DC3 (Tall Buildings) and DC7 (Views and Landmarks) be effective and are they consistent with national policy and aligned with the London Plan? Should the criteria for DC3 include a reference to public benefits?
4.	Is Policy DC5 (Shopfronts) clear, why does it include reference to the SPD in the policy and will it be effective in operation?
5.	Is Policy DC6 (Replacement windows) justified and will it be clearly effective in operation?
6.	Is the approach of the Plan and wording of Policy DC8 (Heritage and Conservation) consistent with national policy and guidance in relation to heritage matters?
7.	Is DC9 (Advertisements) necessary, justified and will it be effective?
8.	Is DC10 (Telecommunications) consistent with national policy?
9.	Is DC11 (Basements and Lightwells) justified and clearly worded to ensure effective delivery?
10.	Is CC1 (Reducing Carbon Dioxide Emissions) robust and viable? Does the LP reference and plan for issues surrounding 'clean air' and the energy hierarchy robustly and adequately? Is it consistent with national policy?
11.	Should CC2 (Ensuring Sustainable Design and Construction) refer to renewable energy technologies? Is CC2 (b) justified and viable?
12.	Is the approach of the Local Plan towards flood risk supported by an adequate evidence base and consistent with national policy? Is the approach to flooding robust? Is a reference to the sequential test required? Is the Environment Agency in agreement with the approach of the Local Plan to such matters?

	Do Policy CC3 (Flood Risk et al) and its supporting text refer adequately to Groundwater Source Protection Zones?
13.	Are the greenfield run off rates within Policy CC4 (surface water et al) deliverable and viable? Is the policy adequately aligned with the London Plan?
14.	Should there be reference to the Water Framework Directive within the Plan?
15.	Are matters relating to waste management and hazardous substances dealt with adequately within the LP? Is Policy CC6 (Strategic Waste Management) justified and will it be effective in implementation? Should Policy CC8 (Hazardous Substances) include a reference to the Fulham Holder Stations?
16.	Is Policy CC10 (Air Quality) justified and viable in implementation?
17.	Is Policy CC13 (Control of Polluting Uses) justified and deliverable in terms of its applicability to 'all proposed developments'?
18.	Are issues of land contamination, remediation and water/air quality acknowledged sufficiently by the Plan?

INFRASTRUCTURE, MONITORING AND OTHER MATTERS (21st June pm)

Does the Plan address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives and the vision? Are the Plan's monitoring targets justified adequately and of a level of detail that is appropriate to a Local Plan? How will the effectiveness of the Plan be managed?

1.	With due regard to all infrastructure (transport, resources, services etc) is the Infrastructure Delivery Plan up to date? Does it specify clearly what is required, where, when and how it may be funded and delivered?
2.	How have risks and contingency been robustly addressed in the production of the Plan? Where is the supporting evidence?
3.	<p>How will the effectiveness of the Plan and its individual policies be measured/assessed? Should there be monitoring indicators for each policy/objective? Is Appendix 6 sufficiently related to the policy content and objectives?</p> <p>Are the arrangements for managing and monitoring the delivery of the Plan clear and will they be effective?</p> <p>Should the Plan include clearer timescales to assist monitoring, thereby providing milestones to assess policy effectiveness?</p>
4.	<p>Do the changes to the policies map reflect the Plan adequately? Are the changes proposed to the Policies Map sufficiently clear and comprehensive?</p> <p>Is the Policies Map informed by the evidence adequately?</p> <p>Should the MoL boundary remain extant, eg at Fulham Palace?</p> <p>Is the policies map accurate and clear with regard to OAPRDC and overground stations?</p>
5.	Is the approach of the Plan towards S106 obligations consistent with national policy? Is the reference to 'monitoring expenses' justified?
	<p>Other Matters to include:</p> <ul style="list-style-type: none"> • Matters arising • Schedule of changes/modifications • Timescale of next steps