

LONDON BOROUGH OF HAMMERSMITH & FULHAM

LOCAL PLAN EXAMINATION

WRITTEN STATEMENT

**ISSUE 2: REGENERATION STRATEGIES – WHITE CITY, HAMMERSMITH,
FULHAM, SOUTH FULHAM**

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?

Date: 22 May 2017

1. Is the Strategic Policy (– Regeneration Areas) justified, clearly worded and deliverable?

The Strategic Policy for the Regeneration Areas is considered to be justified, clearly worded and deliverable. The Regeneration Areas play an integral role in delivering the borough's expected growth and the Council considers that this Strategic Policy sets out a suitable framework for their development consistent with national and London-wide policy.

This Strategic Policy identifies the scale of growth needed in Hammersmith and Fulham over the plan period, based on robust and up-to-date evidence, including the council's housing trajectory (SD14) and sets out where this growth is expected to be delivered through the identification of the Regeneration Areas. The identified Regeneration Areas are consistent with the London Plan Opportunity Areas and the Local Plan sets out housing and jobs targets for these areas which are consistent with the London Plan (SD68).

The Strategic Policy sets out objectives and priorities for each Regeneration Area aimed at maximising site opportunities and the opportunities and benefits for the borough and the local area. These provide clear guidance to developers as to what the Council expects the areas to deliver. This Strategic Policy is supported by individual Regeneration Area policies and Strategic site policies which add further clarity and detail.

Proposed amendments (MC30 and MC31) as outlined in the council's minor changes schedule (KD4) are proposed in response to representations against this policy. These minor changes are considered to further enhance the policy and address the concerns raised by respondents.

2. Is the heritage approach to all Regeneration Areas consistent with the NPPF?

The heritage approach to all regeneration areas is considered to be consistent with the NPPF, including the promotion of heritage led regeneration. The London Plan, in its consideration of the built heritage refers to historic conservation-led regeneration. This point has been raised by Historic England, the Hammersmith Society and Hammersmith and Fulham Historic Buildings Group in their representations. The Council supports the preservation and reuse of heritage assets in schemes and is active in securing the repair and reuse of heritage assets at reflecting the London Plan.

Within the regeneration areas, a detailed analysis of the existing townscape character including the built heritage has been undertaken and has been instrumental in preparing the SPDs for White City (SD55), Earls Court and West Kensington (SD54), and South Fulham Riverside (SD56). The townscape character of the regeneration areas is varied. White City, for example, is composed of vacant and under-utilised land, whereas in South Fulham Riverside,

the vacant and under used sites are dispersed amongst developed sites. In each case, however, the objective is the same: the borough's heritage assets will be retained and reused wherever possible thereby continuing an approach the Council has adopted for many years.

Notwithstanding this, the council have proposed Minor changes (MC30, MC40, MC51, MC52, MC53) to further enhance the policies and address the concerns raised by respondents. The council are also preparing a statement of common ground with Historic England to further improve the wording of the regeneration area policies in relation to heritage. The Statement of Common ground is to be agreed between the Council and Historic England and will be issued to the Inspector prior to the public hearings.

White City

3. 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?

Should the plan reference the Opportunity Area Planning Framework for WCRA?

Are the White City East and Shepherd's Bush Town Centre defined robustly in the LP and shown appropriately on the policies map?

Strategic Policy WCRA is considered to be justified having considered reasonable alternatives and the duty to co-operate. The policies and proposals for growth in the WCRA are based on national and London Plan requirements and also on evidence gathered through local studies, with particular requirements for new housing and new jobs to meet local needs. The council has also undertaken sustainability appraisals (KD8 and KD13) to assess the sustainability of the policies and proposals in the WCRA, within which alternatives were assessed and dismissed. The council's duty to co-operate statement (KD6) provides detail on how the council has co-operated with other bodies with regard to the White City Regeneration Area.

The WCRA is part of the Council's strategy for meeting London Plan targets for housing and employment growth. The Local Plan policy for WCRA is in general conformity with the policy for the Opportunity Area set out in the London Plan 2016 (SD68), in particular the delivery of 6,000 homes and 10,000 jobs. The Council and GLA have prepared the White City Opportunity Area Planning Framework (WCOAPF) (SD55) in order to consider more explicitly the potential regeneration benefits for the White City housing estates. The WCOAPF has also investigated development capacity in terms of land use, urban design and transportation. The council have produced a Development Infrastructure Funding Study (DIFS) (SD60) which examines the cost and funding of necessary

infrastructure for the area and determines a basis for, and viability of, development contributions.

The council consider that it is clear that the housing target for the WCRA of 6,000 homes over the plan period is 'indicative' and not a minimum target, however this does not preclude the delivery of a greater number of dwellings in the WCRA. This is reinforced by Policy HO1 of the Local Plan (KD1) which states that the council will work to exceed the London Plan target of 1031 additional dwellings per year. Minor change MC61 in the minor changes schedule (KD4) has been proposed to further emphasise the council's commitment to delivering a minimum of 1,031 homes per year. Insert Core Strategy inspector approval of this approach.

The White City Opportunity Area Framework (WCOAPF) (SD55) provides evidence to support the Local Plan policies, however the council are not intending to readopt the WCOAPF as SPD to the Local Plan. It currently supplements the Core Strategy and is SPG to the London Plan. On this basis, it is considered that reference to it as SPD in the Local Plan would be inappropriate. However, a carefully worded reference to it as SPG to the London Plan could be considered and we would welcome a discussion on this point at the public hearings.

The council consider that the boundary of White City East is clearly defined in the proposals map changes document (KD2) (Map AM7). The map of White City East in the Local Plan (Policy WCRA1) also clearly defines the boundary of the strategic site.

Shepherd's Bush Town centre boundary is proposed to be extended northwards as shown clearly in the proposals map changes document (KD2) (Map AM35). The council note that this change is not depicted accurately on map 5 of the Local Plan (KD1). A further minor amendment, which is not currently shown in the minor changes schedule (KD4), will be required.

4. Is WCRA 1 (White City East) justified and will it be effective?

Policy WCRA1 (White City East) is considered to be justified. The proposals for growth in WCRA1 are based on national and London Plan requirements and also on evidence gathered through local studies associated with the production of the White City Opportunity Area Framework (SD55), with particular requirements for new housing and new jobs to meet local needs. The local studies which help to justify this policy include a Townscape and views analysis for White City Opportunity Area SPD (SD58) and the White City Opportunity Area Development Infrastructure Funding Study (DIF) (SD60).

This area contains the principal opportunity for growth and change comprising of largely underused or vacant land east of Wood Lane together with the BBC TV Centre. It has potential for relatively higher density development while

respecting local heritage and listed buildings. The fact that there is a large quantity of underused land and the history of collaboration by landowners in terms of masterplanning and support for the preparation of the WCOAPF (SD55), together with emerging development proposals and planning applications in the pipeline, demonstrates the deliverability of development in White City East over the next 15-20 years.

It is considered that policy WCRA1 will be effective because it sets out objectives and priorities for the site aimed at optimising site opportunities and the opportunities and benefits for the borough and the local area. It provides clear guidance to developers as to what the Council expects the site to deliver. The effective operation of Policy WCRA1 will also be achieved in tandem with other Local Plan policies to enable a thorough assessment of development on the site and a holistic approach that considers housing, employment, tall buildings, environmental sustainability and design and conservation.

Proposed amendments (MC43, MC44 and MC45) as outlined in the council's minor changes schedule (KD4) are proposed in response to representations against Policy WCRA1. These minor changes are considered to further enhance the policy and address the concerns raised by respondents.

5. Is WCRA 2 (White City West) justified and will it be effective?

Policy WCRA2 (White City West) is considered to be justified. The proposals for growth in WCRA2 are based on national and London Plan requirements and also on evidence gathered through local studies associated with the production of the White City Opportunity Area Framework (SD55), with particular requirements for new housing and new jobs to meet local needs. The local studies which help to justify this policy include a Townscape and views analysis for White City Opportunity Area SPD (SD58) and the White City Opportunity Area Development Infrastructure Funding Study (DIF) (SD60).

Policy WCRA2 sets out principles that should apply to any estate regeneration proposals (whether including partial redevelopment or refurbishment). The QPR football ground is included in Policy WCRA2 as a potential site in view of the Club's aspirations for a much larger stadium. The TA Centre is also identified as a potential site in view of its low intensity use and the scope for development to contribute to the opportunity area's objectives.

It is considered that policy WCRA2 will be effective because it sets out objectives and priorities for the site aimed at optimising site opportunities and the opportunities and benefits for the borough and the local area. This policy provides clear guidance to developers as to what the Council expects the site to deliver. The effective operation of Policy WCRA2 will also be achieved in tandem with other Local Plan policies to enable a thorough assessment of development on the site and a holistic approach that considers housing, employment, tall buildings, environmental sustainability and design and conservation.

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?

Policy WCRA3 (Shepherds Bush Market and adjacent land) is considered to be justified and effective. The proposal for the retention and improvement of the Market is consistent with advice in the NPPF (para.23) that plan policies should be positive and promote competitive town centres providing customer choice and a diverse retail offer. The London Plan policy 4.8 echoes these objectives and criteria B(e) makes specific reference to the importance of London markets. Shepherds Bush Market is an historic London market and provides a distinctive retail offer very different to the established High Street retail within Westfield and W12 shopping centres within Shepherds Bush Town Centre.

It is considered the policy will be effective as the objectives set out seek to work with the existing traders to maintain the historical character and existing businesses while also identifying the potential to include adjoining vacant land and businesses to provide a more sustainable and vibrant mix of uses.

The approach to the Market is considered robust and appropriate. Policy WCRA3 is clear on the support needed to the existing traders while acknowledging the need for improvement and a mix of uses to enhance the vitality of the market. Given the cramped site characteristics of the existing Market, the policy also identifies the potential benefits of including adjoining land to maximise the opportunities while requiring the re-provision of existing businesses within their current locations.

Proposed amendments (MC47, MC48 and MC49) as outlined in the council's minor changes schedule (KD4) are proposed in response to representations against Policy WCRA3. These minor changes are considered to further enhance the policy and address the concerns raised by respondents.

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?

Strategic Policy HRA is considered to be justified having considered reasonable alternatives. The policies and proposals for growth in the HRA are based on national and London Plan requirements, but also on evidence gathered through local studies, with particular requirements for new housing and new jobs to meet local needs. The council has also undertaken sustainability appraisals (KD8 and KD13) to assess the sustainability of the policies and proposals in the HRA, within which alternatives were assessed and dismissed. The council are currently preparing an SPD for Hammersmith Town Centre which will, once adopted, supplement Policy HRA.

Policy HRA emphasises the importance of continuing to build on the centre's role as a strategic office location, but the policy is clear that this is in the context of provision of a range of town centre uses and will also allow for a number of other council objectives to be achieved through redevelopment proposals including improvements to infrastructure and the public realm. This approach is in accordance with Policy 2.15 of the London Plan (SD68) which designates Hammersmith as a major centre.

Within the Local Plan the indicative number of additional homes within the Hammersmith Regeneration Area over the plan period is 2,800 new homes. This indicative figure is based on the Strategic Housing Land Availability Assessment (SHLAA) (SD70), the Flyunder Feasibility Study (SD62) and the council's housing trajectory (SD14).

In respect of tourism, the strategic site proposals identified will provide the council with the opportunity to promote leisure and hotel uses, where appropriate, in accordance with Policy E3 of the Local Plan (KD1). It is not considered necessary to make this explicit in the Strategic policy and this would not preclude such uses coming forward.

8. Are Policies HRA 1 and 2 justified when considered against reasonable alternatives?

Are they deliverable and clear on how each element may be delivered with regard to infrastructure?

Strategic Policies HRA1 and HRA2 are considered to be justified having considered reasonable alternatives. The council has undertaken sustainability appraisals (KD8 and KD13) to assess the sustainability of the proposals in the HRA1 and HRA2, within which alternatives were assessed and dismissed, including a do nothing scenario. The alternative options were also consulted upon in the Regulation 18 Draft Local Plan (SD1).

Policy HRA1 is appropriate and justifiable, in terms of planning and regeneration of the area as it will provide a focus for activity and add to the role of the town hall as an attractor, increasing footfall along King Street. It should also greatly improve the setting of the listed town hall and the local townscape and should also help improve pedestrian and cycle access to the riverside. Policy HRA1 seeks a comprehensive approach to development of the strategic site which is currently in a number of land ownerships.

Policy HRA2 has two main elements, the flyunder and the West Island site (Hammersmith Gyrratory). The flyunder element of the policy is considered to be deliverable, is supported by the GLA and TfL, and is justified by supporting studies which include a Flyunder Feasibility Study (SD62) and the A4 Masterplan and Development Value Study (SD63). In 2015, TfL also conducted a feasibility study for tunnel options to replace Hammersmith Flyover, and a business case

was submitted to the Government where such a project could support growth and regeneration in London. As a component of the 2016 Budget, the former Chancellor invited TfL to investigate proposals for financing transport infrastructure schemes in order to support projects such as the tunnel for Hammersmith. This investigation is ongoing.

The gyratory element of the policy is supported by TfL's work programme to make the gyratory safer. TfL has removed similar gyratory schemes over the last few years to the benefit of road and pedestrian users. TfL support both elements of policy HRA2 and the respective improvements to infrastructure and understand the desire to bring forward a comprehensive redevelopment of the wider context. The council acknowledge TfL's concerns (rep 388 – KD3) about intrinsically linking the two elements and consider that both elements are deliverable and that the wording of Policy HR2 is sufficiently flexible to allow each element to come forward separately, if required.

Proposed amendments (MC51 and MC52) as outlined in the council's minor changes schedule (KD4) are proposed in response to representations against Policy HRA2. These minor changes are considered to further enhance the policy and address the concerns raised by respondents.

Fulham

9. Are Strategic Policies FRA and FRA 1 justified, with regard to reasonable alternatives, and will they be effective?

Are Strategic Policies FRA and FRA1 justified in terms of redevelopment/renewal, housing numbers and the policy wording?

Strategic Policies FRA and FRA1 are considered to be justified having considered reasonable alternatives and will be effective.

The Fulham Regeneration Area includes the Earl's Court and West Kensington Opportunity Area and Fulham town centre. The Opportunity Area is identified within the London Plan 2016 (SD68). Policies FRA and FRA1 are consistent with the London Plan in its approach to seeking comprehensive mixed use regeneration in the area.

The Mayor of London, LBHF and RBKC have produced a joint Supplementary Planning Document (SPD) for the Opportunity Area (SD54) which provides supplementary detail to policies within LBHF's Core Strategy, RBKC's Local Plan and the Mayor of London's London Plan. This SPD, which has helped inform Policies FRA and FRA1, includes a detailed Urban Design Strategy, townscape analysis (SD57) and a viability assessment (SD59).

The council has also undertaken sustainability appraisals (KD8 and KD13) to assess the sustainability of the policies and proposals in the FRA, within which alternatives were assessed and dismissed. The SPD (SD5) has also been subject

to a comprehensive sustainability appraisal. Both sustainability appraisals show overwhelming benefits in relation to the council's policy for regenerating the area. The principal benefits are in terms of the provision of new homes (including affordable homes) and jobs. These will be of particular benefit to local people and help to tackle locally high levels of deprivation.

It is considered that policies FRA and FRA1 will be effective because they set out objectives and priorities for the sites aimed at optimising site opportunities and the opportunities and benefits for the borough and the local area. They provide clear guidance to developers as to what the council expects the site to deliver. Policies FRA and FRA1 expects redevelopment to provide a variety of uses, including housing, employment, hotels, leisure, offices and associated facilities, including retail to cater for day to day needs and cultural facilities. It is envisaged that this mixed use approach to redevelopment of the area will ensure that the widest benefits are offered to residents in the borough. The effective operation of Policies FRA and FRA1 will be achieved in tandem with other Local Plan policies to enable a thorough assessment of development on the site and a holistic approach that considers housing, employment, tall buildings, environmental sustainability and design and conservation.

In the London Plan (2016), the Earls Court and West Kensington Opportunity Area has a minimum target of 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. These figures are based on the London Plan (SD68), the Strategic Housing Land Availability Assessment (SHLAA) (SD70), the council's housing trajectory (SD14) and the Earls Court and West Kensington SPD (SD54).

Proposed amendments (MC53 – MC56) as outlined in the council's minor changes schedule (KD4) are proposed in response to representations against Policies FRA and FRA1, in particular MC55, MC56 and MC206 have been proposed with regard to estate renewal and redevelopment. These minor changes are considered to further enhance the policy and address the concerns raised by respondents.

10. Is the approach to retail provision in the FRA robust and justified?

The council consider that the approach to retail provision in the FRA is robust and justified. The council's Retail Needs Study 2016 (SD19) projects the retail need in the borough during the plan period and provides the evidence for retail need in the Local Plan. It is based on an established and robust methodology

using London Plan population projections. The retail needs for Fulham Town centre as set out in SD19 up to 2031 are 4,300 sqm of comparison retail and 3,600 sqm of convenience retail. The council's Retail Needs Study 2016 recommends that no site allocations are necessary for retail in the Local Plan.

South Fulham

11. Are Policies SFRRRA and SFRRRA 1 justified, with due regard to reasonable alternatives, and will they be effective?

The policies and proposals for growth in the SFRA are based on national and London Plan requirements and also on evidence gathered through local studies, with particular requirements for new housing and new jobs to meet local needs. The council has also undertaken sustainability appraisal (KD8 and KD13) to assess the sustainability of the policies and proposals in the SFRA, within which alternatives have been discussed and dismissed.

The SFRA is characterised by vacant and underutilised sites in relatively fragmented ownership and there is a need for coordinated action to get the greatest benefits from regeneration. A South Fulham Riverside Supplementary Planning Document (SPD) (SD56) has been produced. This has investigated development capacity in terms of land use, urban design and transportation which has helped to inform the Local Plan policy (KD1).

An important part of the preparation of the South Fulham Riverside SPD was a Development Infrastructure Funding Study (DIF) (SD61) which examined the cost and funding of necessary physical and social infrastructure and determined a basis for, and viability of, development contributions, involving a S106 tariff. The DIF will help deliver the proposals for the South Fulham Riverside Area.

Proposed amendments (MC58 and MC59) as outlined in the council's minor changes schedule (KD4) are proposed in response to representations against Policy SFRRRA. These minor changes are considered to further enhance the policy and address the concerns raised by respondents.

12. Is the SFRRRA approach to housing robust in terms of identified numbers?

Within the Local Plan the indicative number of additional homes within the South Fulham Regeneration Area over the plan period is 4,000 new homes. This indicative figure is based on the Strategic Housing Land Availability Assessment (SHLAA) (SD70), the council's housing trajectory (SD14) and the South Fulham Riverside SPD (SD56). A Transport Study produced for the SPD concluded that at 550 habitable rooms per hectare, 4,000 new homes was the maximum level of growth achievable based on the modelling undertaken as part of the transport study. This level of growth is also dependent on a number of highway improvements being implemented, including the widening of the Wandsworth Bridge Road/Townmead Road/Carnwath Road junction and a new road through

the National Grid site, Imperial Road. Negotiations have already commenced with affected landowners in order to ensure these improvements can be delivered in time to support the growth in new homes.

A Development Capacity Study was also produced to inform the South Fulham Riverside SPD and details regarding the outcome from the study are included in the South Fulham Riverside SPD (SD56). A 3D block model was developed using medium density (550 habs per hectare, 4,000 new homes) based around the sites identified for potential development within the next 20 years. The model demonstrated in spatial terms an example of the type of layout, scale and massing that could be developed for the regeneration area in line with urban design principles set in the SPD around building heights, scale and massing and open space whilst also accommodating the required housing mix and typologies.

13. Is the SFRRA justified in terms of redevelopment/renewal and the policy wording?

Policy SFRRA is justified in terms of redevelopment as detailed at questions 11 and 12 above. The council consider that the policy wording is clear that the housing target for the SFRRA of 4,000 homes over the plan period is 'indicative' and not a minimum target, however this does not preclude the delivery of a greater number of dwellings in the SFRRA. This is reinforced by Policy HO1 of the Local Plan (KD1) which states that the council will work to exceed the London Plan target of 1031 additional dwellings per year. Minor change MC61 in the minor changes schedule (KD4) has been proposed to further emphasise the council's commitment to delivering a minimum of 1,031 homes per year.

14. Is the SFRRA approach to building design and heights robust?

The South Fulham Riverside SPD (SD56), thoroughly considers the local context regarding building height, mass and scale in order to inform the Local Plan Policy for regeneration in South Fulham. The Council's Tall Buildings Background Paper (SD38) also provides supporting evidence with regard to building height in this area.

Currently within the regeneration area building heights to the west of Wandsworth Bridge Road are significantly lower than those found on the east side. To the east of Wandsworth Bridge Road, the residential development Regent on the River is fairly substantial in height rising to nine storeys; also Imperial Wharf rises to twelve storeys in places. Beyond the railway embankment outside of the regeneration area Chelsea Harbour consists of a number of blocks up to twelve storeys in height and the Belvedere Tower is twenty storeys. It is considered that proposals for tall buildings in these locations would provide a positive statement in the regeneration area and are unlikely to cause harm to the heritage assets of their setting.

In terms of the assessment of tall buildings, it will be necessary for Policy SFRRA to be read alongside Policy DC3 'Tall Buildings' which provides further detail and assessment criteria to determine the appropriateness of tall buildings in the regeneration areas. It is considered that there is sufficient flexibility in the Local Plan to consider tall buildings in the SFRRA, including outside of those areas detailed.