

**LONDON BOROUGH OF HAMMERSMITH & FULHAM LOCAL PLAN
EXAMINATION**

WRITTEN STATEMENT

**ISSUE 4: 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 delivery?

Date: 22 May 2017

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?

Policy CF1 is an overarching policy which sets out the approach to community facilities and services in LBHF. It seeks to protect and enhance existing facilities and provide new community facilities and services. It provides a summary of the current situation regarding provision of key community services in the borough, including health, education and sport/leisure.

As referenced in the Local Plan Glossary, community facilities encompasses a number of uses including education, healthcare, emergency services, community services/third sector e.g. libraries, arts, cultural and entertainment and leisure recreation and sport.

The Policy is informed by a robust set of studies which provide evidence of current and future needs for community facilities and services in the borough. This includes, the council's Leisure Needs Assessment (SD32) Leisure Needs Update (SD31), Sports and Physical Activity Strategies for years 2011-16 and 2017-21 (SD29 & SD30) Open Space Audit (SD27) Open Space Background Paper (SD24), the Joint Strategic Needs Assessments (SD33, SD34, SD35 & SD36), Infrastructure Delivery Plan and Schedule (SD45) the ECWKOA SPD (SD54), the WCOA SPD (SD55) and the South Fulham Riverside SPD (SD56) as well as the Development Infrastructure funding Studies for the White City and South Fulham Riverside (SD60 & SD61).

The Infrastructure Delivery Plan (SD45) is a key document supporting Policy CF1. The Infrastructure Delivery Plan (SD45) provides details of the current provision and future needs for infrastructure which will be required to support further growth as set out in the Local Plan. This includes information on key community facilities and services in the borough, education, health, open space, sports and leisure, libraries, and emergency services. The studies listed above have helped to inform the Infrastructure Delivery Plan (SD45), with updated information on provision and needs identified through regular discussions with infrastructure providers. In some cases, the council is the infrastructure provider and so this reflects the council's existing priorities and strategies.

The strategic site policies for the council's regeneration area's, identify some of the infrastructure including community facilities that will be required to support future growth within that area. These policies have been informed by evidence undertaken as part of the development of a number of area based SPD's (SD54, SD55 & SD56) for the council's regeneration area's which also included preparation of Development

Infrastructure Funding Studies for White City and South Fulham Riverside (SD60 & SD61).

The council considers that much of the borough's current needs for community facilities can be met on existing sites through development and improvements. However, with additional growth set to take place within the borough, this will increase the demand for community facilities and services. The development taking place within the regeneration areas will provide opportunities to meet the needs arising from new development as well as contributing to meeting existing needs. New developments, which result in an increase in the demand for community facilities will therefore be required to make appropriate provision for new or enhanced community facilities in line with the Local Plan policies.

Although the policy aims to protect existing community facilities, circumstances may arise when existing provision may be lost where there is no longer a need or facilities can be appropriately replaced or re-provided elsewhere. Policy CF1 (6.) allows for these circumstances, with further requirements set out in Policy CF2. Policy CF1 is therefore considered to be flexible.

In terms of deliverability, this policy will be implemented alongside other policies in the Local Plan, notably policy INFRA1 which seeks to ensure that the necessary infrastructure is delivered to support development through planning contributions (CIL and S106). The council have and will continue to work with infrastructure providers and its strategic partners to keep aware of needs and assist with implementation of agreed programmes by allocating sites for specific uses and ensuring that future requirements as a result of new development are taken into account. The council's Infrastructure Delivery Plan and Schedule (SD45) provides a detailed list of proposals for community facilities that are likely to be needed, this includes new provision and improvements to existing facilities.

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?

The Local Plan is considered to reference robustly and accurately the health care services of the borough and its future infrastructure needs. Reference to health care provision is made in Section 2 of the Local Plan, this section outlines the challenges and opportunities of health care in the borough which the Local Plan seeks to address. Policy CF1 of the Local Plan provides more comprehensive information on health care services in the borough. Paragraphs 6.130 to 6.138 set out the current situation with

regards to health care provision in the borough, as well as future provision required. These paragraphs also provide details of the key health partners involved and explains their strategies and priorities for the provision of health care in the borough for the future. Further details on health care services and its future requirements are provided in the Infrastructure Delivery Plan (SD45) which is a key supporting document to the Local Plan.

In light of the representations by Imperial College Healthcare NHS Trust and the Hammersmith and Fulham Clinical Commissioning Group which state that there are no present plans to close Charing Cross Hospital, the council acknowledge that some amendments are necessary to the wording of the Local Plan in relation to Charring Cross Hospital. The council have therefore proposed a minor change to the Local Plan for consistency and in order to reflect the factual position with regard to the future of healthcare facilities in the borough. Please see minor change MC9 of the Schedule of Suggested Minor Changes (KD4).

Some further minor changes as requested by the Hammersmith and Fulham Disability Forum and Hammersmith and Fulham CCG have also been proposed to the health section in Policy CF1 to update the out of date references to the NHS Commissioning Board. Please see minor changes MC104 and MC105 of the Schedule of Suggested Minor Changes (KD4).

The council considers that the Local Plan is based on sufficient evidence of the demand and supply of health care over the plan period. Through working with health care partners, the council have identified the key priorities for health care services in the borough. They have also been involved in the preparation of a number of evidence documents which provide information on health care, including the Infrastructure Delivery Plan and Schedule (SD45) and the relevant Joint Strategic Needs Assessments on health (SD33, SD34, SD35 & SD36).

As the council is not the provider of health care facilities, a number of strategies for health care have been prepared by the health providers in the borough. The ambitions of the H&F CCG for primary care facilities are set out in its Out of Hospital Care Strategy 2012-2015, with priorities for secondary care outlined in Imperial College Healthcare NHS's Strategy and their Shaping a Healthier Future Strategy. The council will continue to work with both the H&F CCG and Imperial College Healthcare NHS Trust to plan for current and future health care needs in the borough.

The Infrastructure Delivery Plan (SD45) is a key document providing evidence of current and future health care needs and contains more detailed information on the strategy for the provision of health care services. It provides a section on existing health care provision which

includes details on the types of existing services, capacity and quality of these facilities. In LBHF there are a number of different types of health care provision including, primary care facilities, community services, learning disability centres, acute hospitals and specialist facilities and mental health services. In terms of future provision, this includes a section on improvements to existing health care services, as well as those areas where new facilities will be required to support future development planned. Some of the facilities identified for improvement are listed in paragraph 6.137, with further details on the proposals for specific new or enhanced health facilities are provided in the Infrastructure Delivery Plan and Schedule (SD45). Within the council's regeneration area's, it will be important for new health services to be provided, particularly within xx regeneration areas

The council has a Health and Wellbeing Board (HWB) which has statutory duties including promoting integrated working, as well as responsibility for preparing a Joint Strategic Needs Assessment (JSNA) for specific health needs identified in LBHF and a Joint Health and Wellbeing Strategy (SD37). A series of Joint Strategic Needs Assessments have been prepared on specific health related issues, including the JSNA Highlights Report (SD33), the Housing and Care JSNA (SD34), the Physical Activity JSNA (SD35) and the Young Adults JSNA (SD36). These documents outline some the key issues and priorities for health care provision in the borough that the Local Plan seeks to help address.

Through working with health care providers, sufficient and robust evidence has informed the approach to health care in the Local Plan. Policy CF1 seeks to ensure that high quality health care is provided and existing facilities are protected and enhanced. As well as helping to ensure new health services are provided in the regeneration areas as part of supporting social infrastructure. The council's strategic site policies and policy INFRA1 will also help to ensure that health care facilities needed to support future growth in the borough are delivered.

3. Is the approach to sport and recreation justified by a sufficiently robust evidence base?

Policies CF1, CF2 and CF3, together with the policies OS1 and OS2 seek to protect, enhance and provide sport and recreational facilities in the borough including both indoor and outdoor sporting and recreation facilities such as playing pitches, leisure centres, sports halls and tennis courts. These policies are considered to be informed by a sufficiently robust evidence base.

In 2009, a leisure needs study (SD32) was prepared by PMP which provided a comprehensive assessment of current provision and future needs for sport and leisure facilities in the borough to support the policies

in the Core Strategy and Development Management Local Plan. This included an assessment of current provision and future needs for leisure and sport facilities in the borough, including leisure centres, swimming pools, sports halls, health and fitness facilities, Although much of this information still remains valid, changes in participation levels in sport and increases in population growth have necessitated a review of the boroughs leisure needs and strategy for sport.

As a result, a number of evidence documents have since been published and collectively, these have informed the approach to sport and recreation in the Local Plan. This includes:-

- Physical Activity and Sport Borough profile 2016
- Sport & Physical Activity Strategy 2011-2016 and 2017-2022
- Strategic Assessment of the Needs for Sports Hall Provision (2014)
- Strategic Assessment of the Need for Swimming Pool Provision (2014)
- Open Space Audit (2006)
- Parks and Open Space Strategy 2008-2018
- Open Space Background Paper (2016)
- Infrastructure Delivery Plan (2016)
- Physical Activity Joint Strategic Needs Assessment (2014)
- Leisure Needs Assessment (2009)
- Leisure Needs Update (2017)

The Key evidence base documents which have informed the approach to sport and recreation are summarised in more detail below.

The Leisure Needs Update (SD31) provides an updated picture of the current provision and future needs for the main sport and recreation facilities in the borough including, swimming pools, sports halls, health and fitness centres, synthetic turf pitches and indoor tennis. This update found that overall there is a lack of provision of sport and recreation facilities in the north of the borough compared to the south, with the majority of the boroughs sport and recreation facilities in private use. There is also a significant deficit of sports hall provision across the borough, with gaps in synthetic turf pitches across the borough, but adequate supply of swimming pools, health and fitness facilities, indoor tennis and athletics provision.

Through discussions with the council's parks and leisure team, and evidence gathered in the studies above, this has helped to inform the council's Infrastructure Delivery Plan (SD45) which includes robust and accurate picture of current provision and future requirements for sport and recreation facilities in the borough. The Infrastructure Delivery Plan (SD45) includes a schedule of proposals which are likely to be required throughout the Local Plan period. This identifies a number of schemes for

sport and recreation, including improvements to existing provision as well as new facilities to be built. For open space, sport and recreation facilities, the regeneration area's provide an opportunity for new provision to be made as part of major development proposals. The Infrastructure Delivery Plan (SD45) identifies that substantial provision of new leisure facilities including a sports hall and all weather football facility can be provided in the WCOA, with Linford Christie Stadium identified for improvements to be made. Within the ECWKO, provision is also planned for a new gym and public leisure centre.

The council's Sport and Physical Activity Strategies (SD29 & SD30) are key evidence documents supporting the approach to sport and recreation in the Local Plan. These strategies have been prepared by CSPAN, a strategic partnership committed to the development and improvement of sport and physical activity in the borough. Its main priority is to increase participation in sport and physical activity and to encourage people to lead healthier lifestyles. The two strategies aim to support the vision to make LBHF the most physically active borough in London. The strategies include information on participation rates in sport, an outline of current and planned sports initiatives, a summary of existing facilities and some key recommendations on future needs for sports and leisure facilities.

The Open Space Audit (SD37) and Open Space Background Paper (SD24) provide further evidence to justify the approach to sport and recreation. The audit provides a comprehensive understanding of the supply of open spaces in the borough, including outdoor sporting facilities such as sports pitches and playing fields and children's play facilities. The 2006 audit is still considered to provide a generally robust picture of the supply of open space in the borough. However, there have been some changes in the quantity of existing open space since the audit was undertaken, these have been documented in the Open Space Background Papers in 2008, 2010, 2015 and 2016.

In addition, the council has a Parks and Open Spaces Strategy 2008-2018 (SD25) which includes all public and private open spaces across the borough including parks, open spaces, housing land and civic spaces. The strategy sets out a framework for the delivery of services and future improvement actions for the council and other partners involved in providing and managing open space. The parks team at the council have made a commitment to review and update this document in 2018.

As identified in the Local Plan, there are many important sport, leisure and recreation facilities in Hammersmith and Fulham, including internationally recognised clubs such as the Queens Tennis Club, Chelsea FC, Queens Park Rangers, Fulham FC and Thames Harriers Athletics as well as parks and open space of strategic and boroughwide importance. In a heavily

built up area like LBHF where space is limited, there are many uses competing for land. With new development planned, this will put additional pressure on existing community facilities. It is therefore important that the council protects and enhances existing sport and leisure facilities and seeks new facilities in the regeneration areas to support new development. Policy CF1, CF2 and CF3, together with Policy OS1 and OS2 reflect these aims which are justified by robust evidence base documents as summarised above.

In light of Sport England's representation, the council acknowledge that more detailed and accurate information on current provision and future requirements for sports and leisure facilities in the borough as identified in the evidence documents above could be added into the community policies. The council have therefore proposed that some additional wording is included to the justification text of Policy CF1. Please see minor changes MC101, MC102 and MC103 of the Schedule of Suggested Minor Changes (KD4).

The council's sports and leisure team have also started work on preparing a Playing Pitch Strategy, which Sport England are involved in. This will help to establish a clear strategy for playing pitches in the future and once adopted will provide a supporting document to the Local Plan. The council's parks team have also made a commitment to update the Parks and Open Space Strategy in 2018.

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?

Policy CF2 (Enhancement and Retention of Community Uses) applies to all such community uses as defined in the Glossary of the Local Plan. The Glossary defines community uses as those comprising of Emergency Services which includes the Police, Fire and Ambulance. It would be inappropriate to single out a particular community use within the policy wording itself. The Local Plan is considered to be underpinned by an awareness of the capacity and requirements for emergency services. Section 3.4 of the Infrastructure Delivery Plan (SD45) sets out the information on the capacity and requirements for emergency services infrastructure in the borough. This was prepared alongside discussions with infrastructure providers including the emergency services providers.

Local needs for new or expanded community uses will be determined in accordance with the evidence studies that have been prepared to support

the Local Plan, as well as through discussions with infrastructure providers, both internal and external. Key local needs have been identified and established through evidence gathering, as a result of ongoing discussions with infrastructure providers and through the consultation stages of the Local Plan. For some services, the council is the provider and so the council's strategies e.g. the Parks and Open Spaces Strategy (SD25) identify the priorities for meeting local needs.

Policy CF1 provides an overview of local needs for key community facilities in the borough, other policies in the plan e.g. Policy OS1 provide an overview of the local needs for open space. The Local Plan is supported by the Infrastructure Delivery Plan and Schedule (SD45) which includes more detailed information on local needs for community facilities in the borough and how this local need can be met through provision of new and expanded provision. The Infrastructure Delivery Plan and Schedule (SD45) provides a number of proposals for community facilities that will be required to meet local needs. This includes types of facilities that will be required and their locations.

With much development expected to take place within the council's regeneration areas, these areas provided the greatest opportunities for provision of new or expanded community facilities as part of development proposals. Local needs for community facilities in the regeneration areas have been established through evidence base work prepared to support the area based SPD's for ECWKOA (SD54), WCOA (SD55) and South Fulham Riverside (SD56). These SPD's contain a great deal of information on the types of infrastructure that will be required to meet local needs within these areas.

Therefore, when considering proposals for new or expanded community uses, local needs will be determined in accordance with the policies in the Local Plan which set out local needs for community facilities, notably policy CF1 and OS1, as well as supporting evidence on local needs contained within the Infrastructure Delivery Plan (SD45). Discussions with infrastructure providers will also be undertaken.

5. Is the approach to QPR FC clear and consistent between Policy CF 4 (Professional Football Grounds) and WRCA 2?

The Queens Park Rangers (QPR) football ground at Loftus Road is a professional football club which lies within the White City Opportunity Area and is designated as open space in the Local Plan. Although, Strategic Policy WRCA 2 identifies Loftus Road as a potential site for residential led redevelopment, if an application were to come forward for the redevelopment of Loftus Road, this would be assessed on its merits and

like any other application, it would need to be in accordance with the other policies in the Local Plan, including Policy CF4. It would therefore not be appropriate to make an exception for Loftus Road in Policy CF4 of the Local Plan.

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?

In 2006, the council undertook a comprehensive assessment of the supply of open space including play space and outdoor sporting facilities (SD27). The study identified the supply of different types of open space in the borough including outdoor sporting facilities and play areas. The study found that overall Hammersmith and Fulham has relatively little open space per person, with high levels of deficiencies in open space identified across the borough.

The Open Space Audit (SD27) is considered to still provide a sufficiently robust picture of supply of open space in the borough. However, there have been changes in quantity as well as quality of existing parks since the study, and further changes have been approved or are proposed within the council's existing development plan and emerging Local Plan. Where further changes, including improvements have occurred to the borough's open space stock, they have been published in a series of open space background papers, the most recent of which is the 2016 Open space Background Paper (SD24). Section 8 of the 2016 Open Space Background Paper outlines the results of a full review of all open spaces in the borough, taking into account all boundary changes that have taken place since the 2011 Core Strategy.

These additional updates are considered to supplement the Open Space Audit (SD27) and provide an up to date picture of open space provision in the borough. This has informed the approach taken in Policies OS1 and OS2 which seeks the protection, provision, and enhancement of open space. It has also enabled us to undertake a thorough review of the open space designations on the Local Plan Proposals Map which are shown in the Proposals Map Changes Document (KD2)

In addition, the council has a Parks and Open Spaces Strategy 2008-2018 (SD25) which includes all public and private open spaces across the borough including parks, open spaces, housing land and civic spaces. The strategy sets out a framework for the delivery of services and future improvement actions for the council and other partners involved in

providing and managing open space. The parks team at the council have made a commitment to review and update this document in 2018.

The findings of the evidence documents discussed above has informed the approach taken in policies OS1 and OS2 which seek to reduce open space deficiency by protecting and enhancing existing open spaces in the borough, including improving access and quality as well as seeking to provide new open space as part of major developments. The council therefore consider that the studies, collectively, provide up to date information to support the Local Plan with regard to open space provision in the borough and are consistent with paragraph 73 of the NPPF as they are based on robust and up to date evidence of the needs for open space and opportunities for new open space in the borough, with areas of deficiency in open space identified.

In terms of the protection of open space, paragraph 74 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless it can be demonstrated that the land or buildings is surplus to requirements, it would be replaced by an equivalent quantity and quality of open space, or alternative sports and recreational provision is proposed that would outweigh the loss.

The council have taken paragraph 74 of the NPPF into account when preparing policy OS2 which provides sufficient protection for open spaces whilst allowing for some flexibility for potential losses where justified and in line with the policy criteria. However, the approach taken reflects locally specific circumstances. With deficiencies in open space identified across the borough and with increases in population expected, this places further pressure on existing open spaces. In addition to this, given the lack of land available, there are also difficulties in providing new areas of public open space in the borough. Given the dense and built up nature of the borough, the council therefore considers that all of the borough's open spaces have value and none can be considered surplus to requirements. Therefore, the Local Plan seeks to protect all of the boroughs open spaces in, but also sets out the circumstances where certain types of development on open space may be considered acceptable. These circumstances are outlined in criteria a and b of Policy OS2 and are considered to be in line with exceptions in Paragraph 74 of the NPPF.

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?

There are nature conservation areas of metropolitan importance in the borough, namely the River Thames and its inlets, and the Kensal Green Cemetery. There are also a number of sites of borough-wide and local importance. These are identified on the Proposals Map and identified within Appendix 4 of the Local Plan. All of these areas provide habitats for species of flora and fauna, as well as a valuable resource for the local community for educational and recreational purposes.

Policy OS4 is supported by a robust set of evidence base documents including local and London-wide evidence including the council's Parks and Open Spaces Strategy (SD25), the Open Space Audit (SD27) as well as the Mayor's SPG on Green Infrastructure and Open Environments. The council's Parks and Open Spaces Strategy 2008-2018 (SD25) and the Open Space Audit (SD27) identify that there is an overall deficiency in access to nature conservation areas in the borough, with an area of deficiency running north/south through the borough from the River Thames to Brook Green.

In light of the built up nature of the borough and the overall deficiency in access to nature conservation areas, Policy OS4 seeks to protect and enhance the borough's nature conservation areas and green corridors. Through this policy, the nature conservation areas and green corridors identified in the Local Plan will be protected from development likely to cause demonstrable harm to their ecological value.

However, in line with the NPPF, the council considers it appropriate for the policy to allow for circumstances where certain types of development will be considered acceptable in nature conservation areas. Criteria a and b of the policy, provide details of the types of development that will be considered acceptable in nature conservation areas. This involves either the replacement of the nature conservation interest of equal or greater value elsewhere in the locality or mitigation measures are included as part of the development to protect and enhance the nature conservation interest so there is no net loss of native species and no net loss of habitat as a result of development.

Natural England provided comments to both the Local Plan Regulation 18 and 19 consultation, with supportive comments received in relation to the approach to biodiversity and green infrastructure in policies OS4 and OS5. The council therefore consider that Natural England are supportive of its content and approach.

In light of the representation from the Woodland Trust, it is acknowledged that further reference to areas of deficiency in access to nature in the borough could be included in Policy OS4 of the Local Plan. The council have therefore proposed some additional wording to the justification text of Policy OS4. Please see minor changes MC 115 and MC116 within the council's Schedule of Suggested Minor Changes (KD4). Further to this, the council also considers it necessary to include a map within Policy OS4 to show the areas of the borough which are identified as deficient in access to nature.

8. Is food growing referenced adequately and is the Plan aligned with the London Plan in this regard?

In response to the representation by the Hammersmith Community Gardens Association and in order to be in line with the London Plan, the council acknowledges that further reference to local food growing is needed within the Local Plan. The council have proposed some additional wording to Policy OS5 Greening the Borough. Please see MC120 of the Schedule of Suggested Minor Changes (KD4). With the inclusion of MC120, the Local Plan is considered to be in line with the London Plan Policy 7.22 on Land for Food.

9. Is Margravine Cemetery referenced adequately within the Plan?

The council acknowledges the representation by the Friends of Margravine Cemetery which requests for a number of changes to be made to the Local Plan in relation to the incorrect referencing of Margravine Cemetery (Hammersmith Cemetery) in Appendix 3, Appendix 4 and Map 7. In response to their representation, the council have proposed a number of minor changes to the Local Plan. Please see MC118, MC212 and MC213 within the Schedule of Suggested Minor Changes (KD4) which is considered to provide adequate and correct reference to Margravine Cemetery in the Local Plan.

Please also note that the council's proposed minor changes to Appendix 3: Open Space Hierarchy of the Local Plan in relation to the referencing of Margravine Cemetery (Hammersmith Cemetery) (MC212 and MC213) also apply to in Appendix 4: Nature Conservation Areas.

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?

The River Thames policies (RTC1-4) have been informed by a robust set of evidence base documents. A number of local studies have been undertaken which includes the Thames Strategy Kew to Chelsea (SD39), the Open Space Audit (SD27), Individual Conservation Area Appraisals, the Tall Buildings Background Paper (SD38) and the Strategic Flood Risk Assessment (SD56). The South Fulham Riverside SPD (SD56) also contains further supporting evidence.

The River Thames and Riverside is subject to Thames Policy Area status as shown on the Local Plan Proposals Map (a special policy area defined by boroughs as required by the London Plan). The River and much of the riverside is also subject to conservation area designation, whilst the river itself is a nature conservation area of metropolitan Importance.

The London Plan has a comprehensive set of policies for the Blue Ribbon Network which apply to the borough. In line with the aims of the London Plan, policies RTC1-4 seek to increase and improve access, as well as use of the River Thames. They also seek to protect and enhance the key features of the River Thames and riverside and aim to strike an appropriate balance between the many functions of the river. These policy objectives are consistent with those in the London Plan.

In terms of heritage matters, the River Thames policies are justified and supported by robust evidence as set out above. The Thames Strategy Kew to Chelsea (SD39) provides a key evidence base document which has informed the approach taken in policies RTC1-4. Some of the key principles of the Thames Strategy Kew to Chelsea are outlined in paragraph 6.175 of the Local Plan.

As the river and much of the riverside is also subject to conservation area status, the council's individual conservation area appraisals also provide further evidence which has informed the approach taken to heritage matters in policies RTC1-4.

Taking these evidence base documents into account, the River Thames and riverside has been identified as an important and unique heritage asset for Hammersmith and Fulham. Policies RTC1-4 therefore reflect this evidence by aiming to protect and enhance the river and riverside's historic character and heritage assets. Through Policy RTC3, the designation of the River Thames as Thames Policy Area status seeks to protect the River Thames and its riverside from inappropriate development, in terms of its design and appearance. As well as the general design and conservation policies in the Local Plan, Policy RTC3

sets out specific design criteria that development within the Thames Policy Area must meet in order to be considered acceptable. To assist in identifying the qualities of the Thames Policy Area when considering applications, the council will refer to the council's conservation area appraisals and the Thames Strategy Kew to Chelsea (SD39). In respect of proposals for tall buildings along the Thames, Policy DC3 provides further policy requirements for tall buildings, which is supported by the council's Tall Buildings Background Paper (SD38).

In their representation to the Local Plan, Historic England recommended a minor amendment was made to Policy RTC3 in order to ensure the policy wording includes specific reference to the 'historic' environment which would encompass archaeology or historic parks and gardens. The council agree with this change in order to ensure compliance with paras 61 and 157(8) of the NPPF. Please see minor change MC123 of the Schedule of Minor and Technical Change (KD4).

Not only is it important for development along the riverside to respect heritage assets and maintain and enhance the quality of the historic environment, it is also important that waterside developments respect the flood defences and enhance these where necessary.

The Environment Agency's Thames Estuary 2100 Plan (SD95) has been a key evidence base document used in preparation of the river policies in the Local Plan in relation to flooding and tidal foreshore matters. This sets out a number of priority actions specifically for Hammersmith and Fulham which will need to be taken during this century in order to protect the land adjacent to the tidal Thames from flood risk. Therefore, when guiding and promoting development in the Local Plan, it is necessary that the policies in the Local Plan reflect the actions and requirements set out in the Thames Estuary 2100 Plan (SD95).

In light of this evidence document, Policy RTC3 therefore requires development proposals to maintain or enhance the quality of the natural environment. As well as seeking to encourage the greening and naturalising of the river bank and flood defences with reference to the Thames Estuary 2100 Plan to create habitat for wildlife and improve the attractiveness of the area. Alongside this, Policy CC3 includes a requirement for developments adjoining the River Thames to maintain and where necessary enhance or raise flood defences (or show how they could be raised in the future), in line with the Thames Estuary Plan 2100.

In their representation to the Local Plan, the Environment Agency were broadly supportive of the river policies (RTC1-4) in the Local Plan. However, they have requested a number of minor amendments to the wording of Policy RTC1, Policy RTC2 and Policy RTC3 to ensure that the river policies guides development to take into account both the flood risk

and biodiversity aspects of the Thames Estuary 2100 Plan and the requirements of the Water Framework Directive set out in the Thames River Basin Management Plan.

The council notes their representation, but considers that Policy CC3 (Minimising Flood Risk and Reducing Water Uses) already covers the EA's comments about flood defences sufficiently (as outlined above). In terms of their comments regarding improvements to the tidal foreshore, the council acknowledge that it would be appropriate to add this suggested amendment to Policy RTC1 which would seek improvements to the tidal foreshore as required by the Thames Estuary 2100 Plan and Thames River Basin Management Plan. Please see Minor Change MC 122 of the Schedule of Suggested Minor Changes (KD4).

11. Is Policy T1 (Transport) justified by the evidence base and in general conformity with the London Plan?

Policy T1 is considered to be justified by the evidence base and in conformity with the London Plan. It is supported by a robust set of evidence base documents, including:-

- Air Quality Commission Plan – October 2016 (SD42)
- Transport Local Implementation Plan (LIP2) - 2011 (SD43)
- LBHF Infrastructure Delivery Plan - January 2017 (SD45)
- FlyUnder Feasibility Study – March 2014 (SD62)
- FlyUnder Masterplan and Development Value Study – March 2014 (SD63)
- London Land for Industry and Transport SPG – September 2012 (SD77)
- Old Oak and Park Royal Development Corporation Draft Local Plan - February 2016 (SD94)
- Mayor's Transport Strategy - May 2010 (SD86)
- Accessible London SPG –May 2014 (SD79)

This evidence underpins the overarching aim of this policy which seeks to work with our strategic partners to improve transportation provision, accessibility, and air quality in the borough by improving and increasing opportunities for cycling and walking, and by improving connections for bus services, underground, national, and regional rail by both Major Scheme Targets and Borough wide targets.

The council considers that Policy T1 is in accordance with national planning policy. The policy recognises that there is relatively poor connectivity to and between certain parts of the borough and the need to increase capacity, particularly on north-south routes. As well as various

passenger rail improvements, the policy seeks increased use of the River Thames for transport, including freight (subject to the local road network being able to cope with associated lorry movements). Also increasing opportunities for walking and cycling and improving access for disabled people. The localised highway improvements which will be sought are necessary for the efficient function of the road network on which the economy depends, and schemes will be designed to benefit all road users, including buses, pedestrians and cyclists. Parking will be provided for the essential needs of development and we do not intend to encourage additional car commuting.

The Policy is in general conformity with London Plan Policies 6.1 and 6.2 in terms of integrating transport and development to provide a strategic approach. The Transport Local Implementation Plan (SD43) shows how the council intends to implement the Mayor's Transport Strategy, which is a sister document to The London Plan.

In response to some of the representations, the council have proposed some minor changes to Policy T1. Please see minor changes MC193 and MC194 of the Schedule of Suggested Minor Changes (KD4).

Is the reference to Crossrail justified and deliverable?

The council is seeking to promote a Crossrail 2 station at Imperial Wharf via South Fulham, with reference to this made in the Local Plan (para's 1.5, 5.110, 6.309, 7.38 & Spatial Vision, Strategic Policy SFRRRA & Policy T1). Whilst the council acknowledge that TfL's current and preferred option for a Crossrail 2 station is at Kings Road in Chelsea, the council consider that a new Crossrail station at Imperial Wharf would bring greater regeneration benefits by improving transport links to South Fulham, as well as supporting the delivery of new homes and attracting businesses into the area over and above the current projected growth. The council have undertaken studies to demonstrate the additional housing and jobs that could be provided as a result of a Crossrail 2 station at Imperial Wharf, this evidence will be submitted to the Crossrail 2 planning team for consideration in the assessment of the business case for a Crossrail 2 Station via Imperial Wharf.

The policy wording is clear that 'the council will work with TfL and other stakeholders to seek a new Crossrail 2 station'. Given that the route for Crossrail 2 is not yet finalised and the fact that further consultation on the route is planned, the council consider that the promotion of a Crossrail 2 station at Imperial Wharf is consistent with the NPPF (para.154) that Local Plans should be aspirational but realistic and therefore acceptable as a statement to make in the Local Plan.

Is the proposed change, ref MC 121, minor (re river)?

The proposed change to Policy RTC1 (MC121) is considered to be minor as this was proposed in order for Policy RTC1 to be consistent with Policy T1 of the Local Plan. Policy T1 includes reference to a target for seeking increased use of the River Thames for passengers and freight. Policy T1, Bullet point 6, "*seeking increased use of the River Thames for passenger services and freight use where this is compatible with the capacity of the connecting road network and meets environmental concerns*".

12. Are the requirements of Policy T2 (Transport Assessment and Travel Plans) justified and will they be effective in operation/capable of delivery?

In terms of the requirements in Policy T2, the approach taken is considered to be the most appropriate strategy for LBHF and is justified and will be effective in operation. The policy requires Transport Assessments and Travel Plans to be submitted where a development is anticipated to generate a level of trips that impacts on the local network or has an impact on strategic routes. The approach to Transport Assessments and Travel Plans in Policy T2 is an established and effective method in LBHF (a similar policy is set out in the adopted Development Management Local Plan- SD6) for managing the potential impact of a development on traffic generation and congestion. The policy can also help to achieve the aims of the Local Plan's Vision and Strategic Objectives for delivering an environmentally sustainable borough.

The council expects Transport Assessments and Travel Plans to be produced in accordance with Transport for London's 'Transport Assessment Guidance' (2014). This approach is in accordance with Policy 6.3 of the London Plan.

Further detailed guidance on the requirements for Transport Assessments and Travel Plans will be included in the council's Planning Guidance SPD. This will be updated shortly.

13. Is Policy T4 (Parking Standards) justified? How will parking standards (including cycling) be set and managed?

Policy T3 (Appendix 8) and Policy T4 (Appendix 7) set out the standards for cycling and parking provision that will be required as part of developments in LBHF. These standards replicate those in the London Plan and are considered to be the most appropriate strategy for the Local Plan and therefore justified. The London Plan's approach to parking aligns with

the council's transport objectives set out in the Local Plan such as encouraging more sustainable modes of transport, including cycling, walking and public transport and avoiding excessive car provision.

These will be managed by the application of conditions to the planning permission to secure the approved parking/cycling spaces and through the powers of planning enforcement if these are not provided in accordance with the approved permission.

14. Are the Council's proposed changes to Policies T3 and T4 (ref MC 198 and MC 199) minor?

The council's proposed minor changes MC 198 and MC199 within the Schedule of Suggested Minor Changes (KD4) are considered to be minor. They have been added for the sake of clarity as requested by TfL. They do not materially alter the thrust of the Policy T3 and T4 and do not have an impact on the other policies in the plan.