

Hammersmith & Fulham Local Plan Examination: Minor Modifications Consultation Responses

Rep No.	Name/Organisation	Comment
(1)	St Quintin & Woodlands Neighbourhood Forum (Mr Henry Peterson)	<p>These are comments from the St Quintin and Woodlands Neighbourhood Forum. on the Main Modifications and the Minor Modifications as published on the LBHF website:</p> <p>Minor modifications</p> <p>We welcome the further change to FMC1 Para 1.4. This now reads “When adopted, the Local Plan will be used, together with the London Plan (2016) and any made (adopted) neighbourhood Plans, to help shape the future of the borough and to determine individual planning applications and deliver development” It seems to have taken LBHF a long time to recognise this basic principle on the status of neighbourhood plans and we feel that it should not have required a Planning Inspector to need to make this modification at this late stage.</p> <p>MC 41 This modification relating to Strategic Policy WCRA on White City currently reads <i>Add reference to the draft St Quintin and Woodlands Neighbourhood Plan at the end of para 5.23 as follows: “Where appropriate, the draft St Quintin and Woodlands Neighbourhood Plan will also be considered”.</i></p> <p>We have been notified by RBKC that the St Quintin and Woodlands Neighbourhood Plan is now 'made' as of the July 19th implementation of the relevant section of the 2107 Neighbourhood Planning Act. So the term 'draft' in this modification should be replaced by 'made (adopted)'. See RBKC email to councillors at the foot of this email.</p> <p>MC42 We welcome the modification to this policy which now reads <i>“However, parts of the area such as the A40 and A3220 are (deleted) may be less sensitive to the impact of building height due to large pieces of road and rail infrastructure that act to separate potential taller elements from nearby lower rise residential areas.”</i></p> <p>FMC 47 we welcome the additional modification reading <i>Insert para after 6.148 (Policy OS1) to include Local Green Space “The NPPF allows for local communities to identify green areas of particular local</i></p>

		<p><i>significance and value for designation as Local Green Space, The council will support local communities seeking the designation of Local Green Space that meets the relevant criteria” .</i></p> <p>MC204 we welcome the modification and explanation of the treatment of Neighbourhood CIL</p> <p>MC207 we welcome the fuller explanation of the status of Metropolitan Open Land, to be included in the glossary.</p>
(2)	Mr Anthony Williams	<p>I am responding to your e-mail of 28th July.</p> <p>I have reviewed the schedule of recommended modifications. They all appear to be of benefit to the Borough's residents. I therefore consider that the modifications be accepted and adopted.</p>
(3)	National Grid	<p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.</p>

(4)	<p>Port of London Authority</p> <p>(Mr Michael Atkins)</p>	<p>Thank you for your e-mail dated 28th July 2017, inviting the Port of London Authority (PLA) to comment on the Main and Minor Modifications as part of the Examination in Public on the Boroughs new Local Plan, setting out the vision, strategic priorities and a planning policy framework to guide and manage development in the borough over the next 20 years.</p> <p>The PLA provided comments in response to previous consultations for the Local Plan, most recently in October 2016 as part of the Regulation 19 consultation. Not all of these comments have been taken into account and a copy of the PLAs October 2016 representation is therefore attached above.</p> <p>The PLA have the following comments on both the Main Modifications schedule and the Minor Modifications schedule.</p> <p>EX27 Minor Modifications Schedule.</p> <ul style="list-style-type: none"> - MC58, page 69, Policy SFRRA. (South Fulham Riverside Regeneration Area) Although the new reference advising that the Council will protect the three safeguarded wharves in accordance with the London Plan 7.26 is welcomed, a number of the PLAs previous comments, particularly regarding the lack of evidence as to the extent of wharf capacity to be consolidated downstream of Wandsworth Bridge on Swedish and Comleys wharves is concerning. Please refer to PLAs comments as part of the Regulation 19 consultation for which details our previous comments on the safeguarded wharves. (Attached) - FMC46, page 130, Policy OS1 (Parks and Open Spaces) The PLA recommends that Rivers and waterways should be added to the paragraph 6.147 amendment, as these are included under table 7.2 of the 2016 London Plan, regarding public open space categorisation. - MC125, Page 142, Policy RTC4 (Water-based Activity on the Thames) The PLA supports the suggested clarity change to this policy. - FMC52, page 130, Policy RTC4 (Water-based Activity on the Thames) The PLA supports the changes to paragraph 6.177 regarding boat dwellers, moorings and the reference to the Thames Strategy Kew-Chelsea (2000) document. - MC175, Page 175, Policy CC6 (Strategic Waste Management)
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		<p>The PLA supports the direct reference to maximising the use of the River Thames within the Strategic Waste Management Policy.</p> <p>If you wish to discuss any issues raised within the response please do not hesitate to contact me via the details below</p>
(5)	<p>Canal & River Trust</p> <p>(Claire McLean)</p>	<p>Thank you for this recent consultation.</p> <p>I have reviewed the main and minor modifications to the draft Local Plan, and have no comments to make on behalf of the Canal & River Trust.</p>
(6)	<p>Environment Agency</p> <p>(Mr Edward Crome)</p>	<p>Thank you for consulting us with these modifications to the LBHF Local Plan. Having reviewed them we welcome the additional wording referencing the importance of the TE2100 Plan throughout the document. These modifications do not represent a material change to the content of the plan and we welcome them as strengthening the overall document. We will therefore not be making detailed comments on this consultation.</p>
(7)	<p>Hammersmith & Fulham Disability Forum</p> <p>(Jane Wilmot)</p>	<p>The inspector published for consultation:</p> <ul style="list-style-type: none"> • Major Modifications (MM) • Minor Changes (MC) <p>MC 195: Transport Assessments</p> <p>“The TA should consider accessibility from the perspective of disabled people or people with mobility impairments. Further guidance on this is contained within the Mayor of London’s Accessible London SPG”.</p> <p>We advise that the council ensures applicants consider accessibility from the perspective of disabled people or people with mobility impairments in Transport Assessments once the policy is formally adopted.</p>

(8)	U+I Group	<p>U+I is the part freeholder and part leaseholder of land at Shepherds Bush Market, included within the area covered by Strategic Site Policy WCRA3. The company has been discussing with the Council the prospect of bringing forward a suitable mixed-use development on its non-market land and on the Old Laundry Site – and which will assist the vitality and sustainability of the adjoining main market operations.</p> <p>We note that there are a number of proposed Modifications to the wording of Policy WCRA3 and to its written justification and comment as follows:</p> <p>MM5 and MC48</p> <p>Whilst the addition of inclusion of affordable workspace within the last bullet point would be acceptable, the overall range of identified uses remains less than satisfactory.</p> <p>As currently drafted through the proposed modification, the policy could imply that there is a need to provide affordable housing but without clarity that this can be supported financially by market housing. For example, this would mean that the Council-owned Old Laundry Site should potentially be limited to affordable housing (and workspaces), making development most likely unviable. It would then accord better with the content of the wider Policy WCRA and its Table 2 housing targets. Whilst the first bullet point includes ‘residential development’ within the wider mix of uses, greater clarity should be incorporated.</p> <p>We would therefore suggest that the wording of the last bullet point should read as: ‘provide housing, affordable housing and affordable workspace in accordance with Policies H01, Ho3 and E1’.</p> <p>MC48</p> <p>The addition of a third bullet point in Policy WCRA3 to identify the benefits of assisting market trading functions is welcomed as a statement of intent.</p> <p>It is in the interests of U+I to maximise the success of the market and the company has already been making investments to that effect.</p>
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(9)	Hammersmith Society (Mr Tom Ryland)	<p>The Hammersmith Society submits the following comments on the proposed modifications. In accordance with the Council's letter of 28 July 2017, we have split these comments under the following headings:</p> <ul style="list-style-type: none"> - Main Modifications - Minor and technical changes <p>We have also commented on some of the Map changes.</p> <p>The Society has been involved in consultations on the new Local Plan from the outset when the first consultation took place in January 2015, and this was followed up by the Proposed Plan Submission on which we commented in October 2016. The Society also attended several of the EIP hearings in June.</p> <p>The Society welcomed the changes made as a result of our comments in October 2016, but we were also disappointed at the number of suggestions which were either ignored or rejected. We would again refer you to our Comments submitted in October 2016, a copy of which is appended. We welcome the strengthening of policies in connection with heritage assets arising from the EIP. Overall the Society considers that with the exception of our concerns regarding housing targets, affordable housing targets and tall buildings as noted below, the Plan is for the most part justified, effective and sound.</p> <p>Particular concerns which we feel have not been addressed include:</p> <ul style="list-style-type: none"> - We have not seen an updated Map 4 but the original is deficient for the reasons stated in our October 2016 submission (See Page 1 of the appended copy) although we understand modifications are in hand. - Although Map AD2 has been modified, it still does not extend the A4 safeguarding zone far enough to the East and West Borough boundaries. (Refer to Page 4 of our appended copy). - WCRA and the Plan generally is still weak in its definition of tall buildings, maximum sizes and where these could occur. We asked whether the Council's Draft Paper on Tall Buildings could be firmed up and incorporated into the Plan as a DPD. - We appreciate the pressure from the Mayor of London/GLA to increase the housing targets (and we note that Table 2 has been revised to increase the numbers in early years), we still consider these to be unrealistic in the light of numbers achieved historically.
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	<p>- On the same basis, we question the achievability of the Council's target of 50% affordable homes, and there is no reference to the Mayor's advice that providing developments achieve 35% on private land there will be no requirement for viability justification.</p> <p>- We are disappointed that several of our suggestions (Page 6) in respect of Open Space policies have not been accepted.</p> <p>- We would like to see a stronger reference the StreetSmart and that it is clarified as a policy.</p> <p>Minor Modifications</p> <p>FMC2 – Neighbourhood Planning – see our comments above under MM3.</p> <p>MC29 – We believe the additional text should state Strategic Objective 13 not 12?</p> <p>FMC17 – See our comments above under MM7.</p> <p>FMC22 – Additional wording should probably read ' . . will be led by <u>its</u> Housing Strategy . . .' rather than '<u>our</u>'!</p> <p>MC79/MC80 – There appears to be a conflict between the conflicting demands in the new texts : They need to be prioritised.</p> <p>FMC29 – New states 'and subject to viability' but it is not explained how this viability will be evaluated.</p> <p>MC91 – There is reference here and elsewhere to the London Plan 2016 but there is no advise that the Plan is due to be updated during 2017/8. In any event, we believe in the particular context, the transfer of industrial and warehousing land in White City is fait accompli.</p> <p>MC94 – We have seen no explanation why the wording on Policy E4 has been amended from 'insist' (as in the Core Strategy) to 'require' in the current draft.</p> <p>FMC39 – We believe there is an error in the reference here to para 6.177?</p> <p>MC101 – There is repetition of the phrase 'certain type of facilities'.</p>
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		<p>MC102 – Please advise where we can find the Open Space Audit, also the Parks and Open Spaces Strategy 2008 -2018.</p> <p>MC109/MC116 – Are the references to the ‘Council’s 2008 Parks Survey’ and ‘2006 Open Spaces Audit’ one and the same? As these are potentially 10 years old, we query whether they should be updated?</p> <p>FMC47 – It is unclear how ‘local communities’ may propose additional designation of Open Space and in what way the Council will provide support.</p> <p>FMC51 – We can find no reference to ‘Allotments’ under Policy OS2 : We refer to our comments in our original submission under OS2 (See Appendix Page 6).</p> <p>FMC135 – We welcome the amended text to Policy DC4 but are concerned that there is no guidance on hard paving and hardstandings (to front garden areas in particular).</p> <p>MC164 – see our comments above in respect of MM19.</p> <p>MC197 – While it is good to see the Council’s support for the Mayor’s Cycle Super Highway, we feel that until such time as the final plans have been fully developed and consulted upon, the Council’s support should be qualified.</p> <p>MC204 – The alterations particularly in respect of the proposed 7.6 are unclear.</p> <p>MC207 – The additional wording on MoLs is welcome but particularly in the case of Wormwood Scrubs should state that they are created by statute via Act of Parliament and can altered only by reference back to Parliament.</p> <p>MC215 – Reference to the very specific date of ‘2020’ seems inadvisable.</p> <p>We look forward to receiving confirmation of receipt of these comments, and any subsequent responses.</p>
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(10)	Sport England (Mr Mark Furnish)	<p>Thank you for allowing Sport England to comment on the proposed Local Plan modifications.</p> <p>Sport England welcome that the modifications have resulted in playing field, playing pitches and other sports facility types being specifically mentioned as this makes it clear what infrastructure is being referred to in various policies. However, Sport England's main overriding objections in relation to the lack of evidence base and clear strategy for sport provision and infrastructure delivery and the content of policies relating to Community Facilities and Services and Infrastructure Delivery have not been addressed. These objections are explained on the consultation form for Proposed Submission Local Plan submitted by Sport England (attached for convenience).</p> <p>In light of the above, Sport England still objects as it still considers the Local Plan to be unsound.</p>
(12)	Royal Borough of Kensington & Chelsea	<p>Thank you for the opportunity for the Royal Borough to respond to the proposed "main and minor modifications" to the London Borough of Hammersmith and Fulham Local Plan. Please find our comments below.</p> <p><u>Chapter 3 Spatial Vision and Strategic Objectives</u></p> <p>Please note there was an error in our consultation response, MC22 alteration to Map 4. This should refer to "Kensal Canalside Opportunity" Area not "Gasworks".</p> <p><u>Chapter 5 Regeneration Area Strategies</u></p> <p>White City Regeneration Area Strategic Policy WCRA - White City Regeneration Area We note that a reference to the St Quintin and Woodlands Neighbourhood Plan has been added. This is welcomed.</p> <p><u>Strategic Site Policy WCRA1 – White City East</u></p> <p>We note that the requested change to WRCRA1 has been made.</p> <p>Environmental Sustainability</p> <p><u>Policy CC6 Strategic Waste Management</u></p>

		<p>Proposed modifications relating to Policy CC6 and associated supporting text are set out in:</p> <ul style="list-style-type: none"> • FMC78, FMC79 and FMC80 of Schedule of Further Suggested Minor Changes (EX15) • MM22 of Main Modifications Schedule (EX26) • MC176 to MC185 and FMC78 to FMC80 of Schedule of Proposed Minor Modifications Schedule (EX27) <p>In light of the number of different documents proposed changes are contained within, the Council has reviewed the consolidated changes in the Local Plan including Post Submission Amendments Arising During Examination (EX8). The proposed changes in EX8 appear to reflect the Statement of Common Ground.</p> <p>I trust you will find these comments useful. If you have any queries regarding the Council's response, please do not hesitate to contact me.</p>
(13)	<p>Power Leisure Bookmakers</p> <p>(Planning Potential)</p>	<p>Introduction</p> <p>I write on behalf of our client, Power Leisure Bookmakers Ltd, to make representations to the LB Hammersmith & Fulham Local Plan Main and Minor Modifications Public Consultation. We welcome the modifications proposed and comment individually on the modifications below. It is still however concerning that Part 2 of Policy TLC2, preventing additional legitimate town centre uses from locating on the ground floor of the prime retail frontages, still forms part of the Plan.</p> <p>Modification Reference: FMC39</p> <p>Minor Modification FMC39 alters the supporting text in line with the provisions of MM14.</p>

(16)	Historic England (Katharine Fletcher)	<p>Thank you for consulting Historic England on the proposed modifications to the local plan following the examination in public.</p> <p>We welcome the proposed changes that have been brought forward in response to our earlier representations.</p> <p>There are only two points we wish to draw attention to at this stage:</p> <ul style="list-style-type: none"> - We have expressed reservations about the use of 'unacceptable harm' (for example in MM15) in our statement on Issue 3 (our para 5) - The reference in Appendix 6 to monitoring listed buildings at risk would be more suitably referenced to 'heritage assets at risk' to align with the NPPF (para 126) and the national register.
(17)	Natural England (Carla Wright)	<p>Thank you for your consultation on the above dated 28 July 2017 which was received by Natural England on 28 July 2017.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England does not consider that this Local Plan Main Modifications poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p>

		<p>If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again. We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p>
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