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London Borough of Hammersmith
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David Gawthorpe
Development Plans
Hammersmith Town Hall Extension
King Street
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Our Ref: PINS/H5390/429/7

Date: 24th March 2017

Dear Mr Gawthorpe,

LONDON BOROUGH OF HAMMERSMITH & FULHAM – LOCAL PLAN EXAMINATION

Further to my letter dated 6th March, I am progressing in my initial assessment of the evidence submitted for the Examination albeit some of the supporting documentation remains to be read. A number of matters arise upon which I would be grateful for your early response. This will inform the next steps of the process and will, as necessary, help me focus the matters for any subsequent discussion.

Housing

The matter of housing will clearly be one for further examination at any Hearing sessions. Whilst I am mindful of the Housing background paper and the referenced evidence, I would appreciate your clarification of the relationship between the Council's submitted Plan (including HO1 et al) and the London Plan in light of the comments from the GLA on the post-2025 housing trajectory, London Plan Policies 3.3 and 3.8 (see Rep ID 486) and the identification of housing needs. I have noted the Council's 2016 SHMA but, with regard to national planning guidance (PPG) and the Duty to Cooperate, I am not currently clear as to the methodology used for its production. Furthermore, I am currently uncertain as to what any locally defined housing market area may consist of and how the Council's SHMA contributes to the housing needs/requirement of the Borough and how it ultimately relates to the housing policies of the submitted Plan and the London Plan. Can you provide further clarity on these matters?

In addition, can you confirm what SHLAA data the Council relies upon?

Does the Council consider the recent Housing White Paper¹ to have any implications for the content of the submitted plan? (If so, please specify.)

¹ 'Fixing our broken housing market' Feb 2017

Gypsy and Traveller Accommodation

Once again I have noted the background paper and supporting evidence for Policy HO10. However, your clarification as to what regard has been had to national guidance in assessing the level of accommodation needs would be appreciated. At present it would appear that the focus of the Council's work (in conjunction with a neighbouring Borough) has been on the existing site provision (Westway/Stable Way) and its occupants. I am currently unclear as to how the Council has considered in detail any existing and future needs which may arise from travellers living in bricks and mortar, from new household formations and particularly from migration. How has the Duty to Cooperate, beyond the Royal Borough of Kensington and Chelsea, been exercised in this latter regard? Does the Council have data relating to relevant ethnic groups? How have the needs of travelling showpeople been considered?

Other Matters

With regard to the Council statement on the Duty to Cooperate (KD6), I believe there is an erroneous reference to Camden in para 4.16. Can you supply any further information and details on how Hammersmith and Fulham Borough Council has worked constructively with all relevant prescribed bodies on strategic matters in the preparation of the Plan, for example, meetings and liaison both in relation to, and outside of, the regulatory processes that govern plan preparation? I note some additional reference to this issue is made within the Council's Monitoring Report. If necessary an addendum or revised version of KD6 may be appropriate.

I am interested to know whether the Plan has been screened adequately for likely significant effects on any European Wildlife (Natura 2000) sites. I note within the SA that the Council considers the Plan will not have a significant adverse impact upon the nearest SAC at Richmond Park. Can you point me to, or supply, any HRA Screening that has been undertaken?

As a general point, can you confirm that the Plan has been prepared in accordance with the statutory procedures of the 2004 Act (as amended) and the associated regulations, including in respect of the publication and availability of documents, advertisements and notification?

With particular regard to the Council's SA, could you confirm that the necessary consultation has been undertaken and point me to the evidence supporting this position? I am mindful of national advice (PPG) relating to the SA production process and Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004. Whilst I have noted the Council's Consultation Statement and KD5, I would be grateful for details of the Regulation 19 consultation, including letters/notification provided.

In its document SD1, the Council mentions a pre-Regulation 18 engagement with stakeholders on issues and options for review that was undertaken from July to September 2013. Could you point me to, or supply, the details of that engagement please?

In relation to Open Space, I note that the Council's last audit was dated 2006. Whilst I also note various additional work has been undertaken in terms of updates and surveys these appear to have been prepared to support the earlier Core Strategy. Is there any further evidence to support the submitted Plan's approach to open space provision in line with national guidance or any further work planned which will revisit this matter?

Whilst this may be a matter for further discussion at any Hearing session, can you clarify the approach that the Council adopts towards 'risk and contingency' within the Plan? I may be interested in due course to discuss the way in which the Council intends to monitor the delivery of the Plan and its relationship with necessary new infrastructure. Can you confirm when the Monitoring Report for 2015/16 will be available?

Has the LDS been updated to reflect the revised timescales of the Plan's submission for Examination?

Finally, could the Council confirm whether it has considered the content of KD4 collectively and whether it remains of the view that the proposed changes are cumulatively minor?

I look forward to hearing from you shortly and if practical within the next 7 days.

Yours sincerely

Andrew Seaman

Andrew Seaman
Planning Inspector

cc Pauline Butcher (Programme Officer)