

Hammersmith & Fulham Local Plan Examination Main Modifications Consultation

Sustainability Appraisal of the Main Modifications

28th July 2017

1. Introduction & Methodology

- 1.1 The council is legally required under both European and UK law to prepare a Sustainability Appraisal (SA) of the Local Plan in order to help ensure that sustainability objectives including social, environmental and economic considerations are taken into account during all stages of the Local Plans preparation.
- 1.2 The process of the SA has been integral to the development of the Council's Local Plan, with findings published and consulted upon alongside the Local Plan at each stage of its preparation. This has included the preparation of a series of SA documents including the SA Scoping Report (KD9), the Draft Local Plan SA (KD13) and the Submission Local Plan SA (KD8). The SA is an iterative process and has been used to assess policy options and site selection to ensure that the plan contributes to the achievement of sustainable development and any potential negative impacts on sustainability are minimised or effectively mitigated.
- 1.3 This note is an addendum to the SA submitted as part of the Local Plan examination. During the Local Plan examination hearings which took place in June 2017, a number of main modifications to the Local Plan have been proposed by the Inspector. These main modifications are likely to be required to make the Local Plan "sound". This addendum to the SA provides an assessment as to whether the proposed main modifications to the Local Plan are likely to have significant effects on the sustainability objectives.
- 1.4 Each of the proposed main modifications have been assessed against the SA objectives to identify any new or altered impacts to the sustainability objectives listed in Table 1. A summary of the SA implications for each modification are provided in Appendix 1 of this note, with an assessment of each modification provided in Appendix 2.
- 1.5 This addendum to the SA is being published for consultation alongside the main modifications proposed to the Local Plan following the examination hearings. This should be read alongside the other SA documents submitted as part of the Local Plan examination, including the SA Scoping Report (KD9), the draft Local Plan SA (KD13) and the Submission Local Plan SA (KD8).

2. Conclusion

2.1 Overall, the assessment of the proposed main modifications found that there would be no significant effects against the sustainability objectives in the SA, with mostly neutral or positive effects being identified. The modifications therefore do not significantly alter the overall findings of the Submission SA Report (KD8) in terms of delivering positive sustainability outcomes, with greater clarity and improvements provided.

Table 1: Sustainability Appraisal Objectives

Topic	Sustainability Objective	Sustainability sub-objective
Social justice	1. Increase equity and social justice	<ul style="list-style-type: none">• Make essential services affordable to all• Reduce differences in standards between different communities• Improve support to groups that are vulnerable and have special needs including those with disabilities
Health	2. Improve health of population overall	<ul style="list-style-type: none">• Increase expected years of health life• Enable healthy lifestyles including mode of travel
Education and skills	3. Improve the education and skills of young people and adults	<ul style="list-style-type: none">• Raise the standard of achievement at all ages
Affordable homes	4. Provide decent and affordable homes	<ul style="list-style-type: none">• Reduce homelessness• Increase the range and affordability of housing• Reduce the number of unfit homes

Social cohesion	5. Increase local residents' sense of community and social cohesion	<ul style="list-style-type: none"> • Increase participation and voluntary activity • Reduce levels of crime and non-criminal anti-social disturbances • Increase sense of security and safety at home and in the street
Satisfying work	6. Increase the opportunities for satisfying and well paid work	<ul style="list-style-type: none"> • Reduce unemployment, especially long term unemployment • Improve earnings and reduce work related stress to improve health
Heritage	7. Improve the local environment and heritage	<ul style="list-style-type: none"> • Conserve and enhance sites, features and areas of cultural, historical and archaeological value • Maintain and enhance sites and species of nature conservation interest • Retain and enhance the character and use of the river
Reduce pollution	8. Reduce the level of pollution	<ul style="list-style-type: none"> • Improve local air and water quality and reduce noise levels • Reduce the amount of litter, derelict, degraded and underused land
Reduce transport impacts	9. Reduce the effect of transport on the environment	<ul style="list-style-type: none"> • Reduce the need for travel and therefore reduce traffic volume • Encourage use of more sustainable modes of transport
Careful consumption	10. Responsible consumption of resources in the borough	<ul style="list-style-type: none"> • Increase efficiency in use of resources in future plans • Reuse, recover and/or recycle waste
Climate change		

	11. Reduce climate change and its impact on the borough	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gases and ozone depleting substances • Reduce energy and water use and increase use of renewable sources • Minimise the risk of flooding from storm events and overflow of watercourses
Sustainable economy	12. Improve the sustainability of the local economy	<ul style="list-style-type: none"> • Improve the level of investment in community services and shopping facilities • Improve access to key local services, shopping and other local facilities • Encourage indigenous investment and training of local workers

Appendix 1: Table of Main Modifications and Summary of SA Implications

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM1	20	Amend Spatial Vision 3 rd paragraph	...New development will have created a high quality, <u>accessible</u> , safe and inclusive environment that respects local context and the borough's natural, built <u>and historic</u> environment...	Positive impact on objectives 1 (social justice) and 7 (heritage) because of the inclusion of the additional text referencing to accessible and inclusive environment and the historic environment. All other objectives are neutral.
MM1	20	Amend Strategic Objective 10	To preserve and enhance the quality, character and identity of the borough's natural and built environment (including its heritage assets) by respecting the local context, seeking high quality, intelligent developments and design , and ensuring compliance with the principles of inclusive, <u>accessible</u> and sustainable design...	Positive impact on Objective 1 (social justice) in terms of improving support to groups that are vulnerable and have special needs including those with disabilities, given the additional text now refers directly to accessible design. All other objectives are neutral.
MM2	25	DEL1	Amend bullets: ... The Council will implement the policies and proposals of the Local Plan by: ... <ul style="list-style-type: none"> • having regard to the financial viability of development in the following ways: <ul style="list-style-type: none"> o Plan-making; 	Neutral. All changes to the Local Plan resulting from alterations to text in MM2 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<ul style="list-style-type: none"> o CIL charge-setting; and o Negotiating Section 106 agreements ('106s'), including for affordable housing, applying the principles set out in the Viability Protocol in Appendix 9; o <u>Site specific circumstances including site specific infrastructure;</u> o <u>Site size, constraints and characteristics.</u> <p>...</p>	
MM3	2	After para 1.9	<p>Add new wording after para 1.9 as follows</p> <p><u>Neighbourhood Planning</u> <u>Neighbourhood Planning was introduced as part of the Localism Act 2011. Neighbourhood plans are development and land use documents led by members of the community. Neighbourhood plans must be developed in general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance.</u> <u>The Neighbourhood Planning Regulations sets out the procedure and key milestones in developing a neighbourhood plan. In order for a neighbourhood plan to be adopted and form part of the Development Plan Framework, they must be voted on and agreed by a majority vote, in a local Referendum.</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM3 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM4	29	Strategic Policy – Regeneration Areas	Amend Strategic Policy – regeneration Areas (Bullet 1) as follows:	Positive. The changes to the text include reference to respect for the historic environment and respecting local context which is positive in

Ref.	Page	Policy/Para	Main Modification	SA Implications
			...delivered to the highest standards of urban design, <u>respect for the historic environment, environmental sustainability, and social inclusion and respecting local context...</u> "	terms of Objective 7 (heritage). All other objectives are neutral.
MM4	29	Table 1	Amend text at bottom of Table 1 as follows: ...In the London plan (2016, the Earls Court and West Kensington Opportunity Area has a minimum target of 6,500 dwellings <u>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 Kenington 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. In the figures above, 7,000 dwellings have been allocated to that part of ECWK Opportunity Area that is within LBHF and 1000 to the area that is within RBKC.</u>	Neutral. All changes to the Local Plan resulting from alterations to text at the bottom of Table 1 are considered to have a neutral impact on all sustainability objectives.
MM4	45	HRA	Add new bullet point (as bullet 10) to the policy follows: <u>...be based on a thorough assessment of the heritage significance of the area and respond positively to local character and history, conserving and taking opportunities to enhance the significance of heritage assets...</u>	Positive. The new bullet point results in a positive assessment for Objective 7 (heritage). All other objectives are neutral.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM4	51	HRA2	<p>Amend bullet point 5 as follows: ...Ensure that the tunnel entrances and exits <u>avoid, or where this is not possible</u>, have minimal impact on the amenity of residents <u>and the local environment, including the significance and setting of heritage assets...</u></p> <p>Amend bullet point 10 as follows: ...be of a coherent urban design that has regard to the setting and context of the regeneration area, <u>including its scale and character, heritage assets and archaeology and should take opportunities to re-unify areas of severed townscape sensitively...</u></p>	Positive. The amended bullet point results in a positive assessment for Objective 7 (heritage). All other objectives are neutral.
MM5	43	WCRA3	<p>Amend 4th bullet point as follows: “Provide affordable housing <u>and affordable workspace</u> in accordance with Policy H03 <u>and Policy E1</u>”</p>	Positive. The amended bullet point includes reference to affordable workspace and is therefore positive for Objective 12 (sustainable economy).
MM6	56	FRA	<p>Amend fifth bullet point of Policy FRA as follows:</p> <ul style="list-style-type: none"> provide for the improvement of the West Kensington, Gibbs Green and Registered Provider estates, <u>including the potential for</u> 	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM6 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>renewal of and additions to all or parts of the estates</u>	
MM6	59	FRA1	<p>Amend third bullet point of Policy FRA1 as follows:</p> <ul style="list-style-type: none"> provide for improvement to the West Kensington, Gibbs Green and Registered Provider estates, <u>including the potential for renewal of and additions to all or parts of the estates,</u> as part of the comprehensive approach to the regeneration of the Opportunity Area;... 	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM6 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM7	69	HO1	<p>Amend HO1 policy as follows:</p> <p>"The council will work with partner organisations and landowners to exceed the London Plan (2016) <u>minimum</u> target of 1,031 additional dwellings a year up to 2025..."</p> <p>....</p> <p>e) Ensuring that new dwellings meet local needs and are available for occupation by people living in London....</p> <p>...</p> <p>g) working to return vacant homes to use and ensure that <u>all</u> new homes are occupied <u>and vacant homes are returned to use to meet local and London needs;</u></p> <p>...</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM7 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>Insert additional sentence to follow 'g' at Policy H01 – Housing Supply:</p> <p>h) <u>where possible, support applications for self and custom builds that are in accordance with the relevant Local Plan policies.</u></p>	
MM7	69	H01	Amend Table 2 'Indicative Housing Targets' as follows:	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM7 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

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			<table><tr><th>Area</th><th>2015/20 2016/20</th><th>2020/25 2021/26</th><th>Total 10 years</th><th>2025/30 2026/31</th><th>2030/35 2031/35</th><th>Total 20 years for Plan Period (up to 2035)</th></tr><tr><td>White City Regeneration Area/Opportunity Area **</td><td>1,000 2,200</td><td>2,500 3,500</td><td>3,500 5,700</td><td>1,500 100</td><td>1,000 200</td><td>6,000</td></tr><tr><td>Hammersmith Town Centre</td><td>200 700</td><td>600 0</td><td>800 700</td><td>1,000 1,050</td><td>1,000 1,050</td><td>2,800</td></tr><tr><td>Fulham Regeneration Area **</td><td>1,500 1,100</td><td>2,500 600</td><td>4,000 1,700</td><td>1,500 5,300</td><td>1,500 0</td><td>7,000</td></tr><tr><td>South Fulham Riverside</td><td>1,500 2,700</td><td>1,500 800</td><td>3,000 3,500</td><td>500 200</td><td>500 300</td><td>4,000</td></tr><tr><td>Rest of the borough</td><td>1,000 2,000</td><td>700 200</td><td>1,700 2,200</td><td>700 0*</td><td>0*</td><td>2,400 2,200</td></tr><tr><td>Total</td><td>5,200 8,700</td><td>7,800 5,100</td><td>13,000 13,800</td><td>5,200 6,650</td><td>4,000 1,550</td><td>22,200 22,000</td></tr><tr><td>Average/year</td><td>1,040 1,740</td><td>1,560 1,020</td><td>2,600 1,380</td><td>1,040 1,330</td><td>800 310</td><td>1,110 820</td></tr></table>	Area	2015/20 2016/20	2020/25 2021/26	Total 10 years	2025/30 2026/31	2030/35 2031/35	Total 20 years for Plan Period (up to 2035)	White City Regeneration Area/Opportunity Area **	1,000 2,200	2,500 3,500	3,500 5,700	1,500 100	1,000 200	6,000	Hammersmith Town Centre	200 700	600 0	800 700	1,000 1,050	1,000 1,050	2,800	Fulham Regeneration Area **	1,500 1,100	2,500 600	4,000 1,700	1,500 5,300	1,500 0	7,000	South Fulham Riverside	1,500 2,700	1,500 800	3,000 3,500	500 200	500 300	4,000	Rest of the borough	1,000 2,000	700 200	1,700 2,200	700 0*	0*	2,400 2,200	Total	5,200 8,700	7,800 5,100	13,000 13,800	5,200 6,650	4,000 1,550	22,200 22,000	Average/year	1,040 1,740	1,560 1,020	2,600 1,380	1,040 1,330	800 310	1,110 820	
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MM7	69	HO1	Add the following new text after paragraph 6.9: <u>The Build to Rent or Private Rent sector has the potential to boost the supply of private rental accommodation across the borough. The SHMA identifies that private renting is high and is increasing in the borough; between 2001 and 2011 the private rented sector increased from 23% to 33%. Bearing this</u>							Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM7 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.																																																		

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			<p><u>in mind, Build to Rent may offer a greater range and choice to private renters.</u></p> <p><u>The council recognises that the financial model of Build to Rent is different to traditional, private market housing and there will be separate viability concerns when considering Build to Rent schemes. Nevertheless, a range of tenures will be expected to provide accessible housing for all, subject to viability. On such schemes, affordable housing may be delivered by discount market rent using the London Living Rent (or lower) as the Council's preferred benchmark. The Council's Housing Strategy may also be used in setting appropriate rent levels to ensure schemes are affordable locally. The quantum of affordable housing units will be subject to the specifics on a scheme. Long-term covenants will be required on any scheme to ensure developments are rental for at least 15 years with a 'clawback' mechanism in place where units are sold out of the Build to Rent sector during the covenant period. Importantly, affordable housing should be maintained in perpetuity and managed by the Build to Rent provider.</u></p> <p><u>An integral part that makes Build to Rent development different is the management of the site. The council will expect that any developers will identify a suitable, long term, experienced management team in place when coming forward with any applications that will deliver high-quality housing for its residents.</u></p> <p><u>When considering Build to Rent schemes, it will be important to consider the nature of build to rent development. Higher turnover is anticipated in Build to</u></p>	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>Rent schemes which may have a wider impact in terms of the sense of community in the area and other high-street parking issues and impacts. Evidence of mitigating these issues and/or ways of managing these issues may be required by the council.</u>	
MM7	69	HO1	<p>Insert new text on Self Build and Custom Housebuilding as follows:</p> <p><u>The Self-build and Custom Housebuilding Act 2015 requires local authorities to keep a register of individuals and associations of individuals seeking to acquire serviced plots of land to build houses for those individuals to occupy as homes. Self-build typically refers to individuals seeking to build their own home and to occupy them. The council has produced a self-build register, where individuals may register their interest.</u></p> <p><u>Self build and custom housebuilding refers to individuals or groups of individuals interested in buying land and building a home to occupy. The London SHMA found that self-build provides 4% of all new homes in England. In London, the figures indicate that self-build accounts for 1.9% and 3.5% of annual housing output in London.</u></p> <p><u>The London SHMA has found from a survey conducted in 2013 that 13% of adults in London were actively researching self-build, in line with the national average. Results from the same survey found that 2% of adults in London were doing something about this in terms of acquiring land, submitting a planning application, or</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM7 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>starting construction. Those likely to complete a self-build project within a year was 1%.</u></p> <p><u>There are a number of broad barriers to delivering or undertaking such a project which indicates why there are such low output levels in London and nationally: the high cost of land, access to finance – self-build is considered as relatively risky, which in turn favour high-density development and builders able to capitalise on economies of scale. Self-build typically takes place in small infill sites, end of terrace spaces, backland sites, gardens, garages, and small industrial sites. In parts of London where land values are lower, sites which would not have interest from developers, such as on the fringe of industrial sites, there are greater opportunities to take place.</u></p> <p><u>In Hammersmith and Fulham, where land prices are high and the supply of available land for development is so competitive, these factors do not provide the best conditions for self-build or custom housebuilding to take place. Whilst the council is supportive in principle, this will continue to be monitored and assessed through the AMR and self-build register.</u></p>	
MM8	73	HO3 and supporting text	<p>Amended wording to the proposed policy, as follows:</p> <p>Housing development should increase the supply and improve the mix of affordable housing to help achieve more sustainable communities in the borough.</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>For developments of 11 or more self-contained dwellings, and on sites with the capacity for 1011 or more such self-contained dwellings, affordable housing should be provided having regard to <u>in line with the following:</u></p> <ol style="list-style-type: none"> a borough wide target that at least 50% of all dwellings built between 2015-25 should be affordable; 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing; affordable dwellings should be located throughout a new development and not concentrated on one part of the site; the provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership7. <p>In negotiating for affordable housing in a proposed development, the council will seek the maximum reasonable amount of affordable housing and take into account:</p> <ul style="list-style-type: none"> • site size and site constraints; and • financial viability, applying the principles set out in the Viability Protocol (Appendix 9) and having regard to the the individual circumstances of the site and the availability of public subsidy; 	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<ul style="list-style-type: none"> • <u>individual circumstances and characteristics of the site;</u> • <u>site specific infrastructure;</u> • <u>availability of public subsidy; and</u> • <u>CIL charge.</u> <p><u>Planning applications for developments of 11 or more self-contained dwellings, and on sites with the capacity for 110 or more such dwellings, will not be required to provide viability information, where they:</u></p> <ul style="list-style-type: none"> • <u>deliver 50% or more affordable housing on site;</u> • <u>are consistent with the relevant tenure split within this policy (see also paragraph 6.29); and</u> • <u>meet all of the other relevant Local Plan policy requirements and obligations.</u> <p><u>For the avoidance of doubt, in circumstances where the three requirements set out immediately above are satisfied, the council will regard that affordable housing provision as "the maximum reasonable amount of affordable housing.</u></p> <p>In exceptional circumstances, a financial contribution may be required to provide affordable housing off-site where other sites may be more appropriate or beneficial in meeting the borough's identified affordable housing needs.</p>	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			In addition, there should be no net loss of social/affordable rented housing on any development sites <u>as part of any development proposals.</u>	
MM8	74	Para 6.18	<p>Amend para 6.18 as follows:</p> <p><u>In order to maximise affordable housing supply, the council will seek affordable housing contributions on schemes of 11 or more dwellings. In addition, on schemes of 10 or less dwellings that have a maximum combined gross floorspace of more than 1,000 square metres (gia), the council will also seek negotiate</u> affordable housing where there is considered to be capacity for more units. In determining capacity, the council will take into account the guidance included in London Plan (2016) policy 3.13 and supporting supplementary planning guidance. for example in schemes where dwellings are large in floorspace terms but below 11 units and could yield a larger number of average sized homes the application of affordable housing policy will apply. In order to meet the target for affordable housing, the council will negotiate for affordable housing to be provided on all larger sites in accordance with the London Plan (2016) threshold for sites with the capacity for 10 or more self-contained dwellings. The affordable housing proportion should be calculated in relation to gross rather than net provision i.e, it should be based on the total number of units proposed in the final development.</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM8	75	Para 6.28	<p>Add further paragraph following 6.28:</p> <p><u>'The council will seek the maximum reasonable amount of affordable housing on any development. Vacant Building Credit (VBC) was introduced by Central Government in 2014 to incentivise the redevelopment of disused and vacant buildings on brownfield sites by offering developers a financial credit equivalent to the existing gross floor space when calculating the affordable housing contribution. Any increase in floorspace, affordable housing contributions will be required. When assessing applications, it is important to apply the Government's intended purpose for VBC.</u></p> <p><u>In an area of high affordable housing need, VBC has the potential to decrease the affordable housing supply across the borough. In order to mitigate against this potential loss, VBC will not be applicable where there is evidence of the following:</u></p> <ul style="list-style-type: none"> <u>-The building is not covered by an extant planning permission or recently expired planning permission for the same or substantially the same development;</u> <u>-The building has been left vacant for the sole purpose of redevelopment; and,</u> <p><u>The building, at the time of application, is not in any legal use</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM8	75	Para 6.29	<p>Amend paragraph 6.29 as follows:</p> <p>In considering the mix of tenure that is appropriate for additional dwellings to be built in the borough, the council has had regard to the London Plan (2016) affordable housing policies and to <u>our own its</u> assessment of the housing market, including housing need and how this can be met. <u>In considering appropriate rent levels for the various tenures, the council will be led by our Housing Strategy to ensure that all new affordable homes are affordable to people who live or work in the Borough.</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM8	75	Para 6.30	<p>Amend para 6.30 as follows:</p> <p>It is recognised that in negotiating for affordable housing, specific site constraints and financial viability may affect the amount of affordable housing that can be achieved on that site. The council encourages <u>pre-application</u> early discussions with applicants <u>which should include information on</u> during the pre-application stage when financial viability appraisals are required with planning applications. The council will apply the principles and requirements set out in the Viability Protocol (Appendix 9) when receiving and assessing financial viability appraisals submitted with planning applications and in negotiating Section 106 Agreements, to ensure the maximum reasonable level of affordable housing is provided and that other plan requirements are met. <u>Financial viability appraisals will not be required where a proposal will deliver 50% or more affordable housing on site, has a tenure split in</u></p>	<p>Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.</p> <p>The additional wording seeks to clarify the key considerations when negotiating affordable housing.</p>

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>line with our policy and meets all other relevant Local Plan policy requirements and obligations.</u>	
MM8	76	Para 6.31	<p>Amend final two sentences in para 6.31 as follows:</p> <p><u>The council favours traditional intermediate housing products such as shared ownership which can provide properties that remain affordable over a longer period of time.</u> The council will, therefore, need to weigh the needs of different groups when considering development proposals. Where Starter Homes are substituted for affordable housing in development proposals, the council will expect them to replace affordable home ownership products (primarily shared ownership) rather than affordable rented housing.</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM8	77	Para 6.33	<p>Add additional text to paragraph 6.33 as follows:</p> <p><u>"Mixed tenure housing developments should be tenure blind, meaning that it should be difficult to spot the difference in the architectural quality of market and affordable properties. It is important for the council to ensure that housing developments are inclusive for all residents. The council recognises that spreading of affordable housing units may not be practical in all schemes. For example, separate service cores may be necessary between private and all affordable housing units to maintain affordable service charges and to aid good housing management when locating affordable tenures."</u></p>	<p>Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM8 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.</p> <p>This has been added for clarity in response to consultation comment</p>

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM9	84	HO10	<p>Amend HO10 as follows:</p> <p><u>The council will seek to address the joint Gypsy and Traveller accommodation needs over the Plan period, as identified in the Gypsy and Traveller Accommodation Needs Assessment (2016).</u></p> <p>The council will work closely with the Royal Borough of Kensington and Chelsea, and any other relevant partners to protect, improve and, if necessary, increase the capacity of the existing gypsy and traveller site at Westway <u>Stable Way</u>.</p> <p><u>Applications for additional sites should meet the requirements set out in the Planning Policy for Traveller Sites (2015).</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM9 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM9	84	6.63	<p>6.63 ... Following engagement with the local traveller community an assessment of the need for traveller pitches was carried out in accordance with the Gypsy and Traveller Accommodation Needs Assessments (DCLG 2007). This study suggested a need for extra pitches for an additional five families by 2020(38). The assessment identified that 3 additional pitches are required in the first five years, 9 in total over the plan period. The council is currently working with RBKC and the local traveller community to determine how best to meet the identified needs. Both authorities are working together to determine how best to meet this identified need where possible, in accordance with further Site Appraisal work. The Council will seek to address the</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM9 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>findings from the GTANA its assessment and to meet its needs by undertaking a Site Appraisal Study in 2017 and producing an Options Paper thereafter. The Council and RBKC will explore all available options in meeting the objectives of national policy in order to identify a National Planning Policy Framework compliant supply of sites during the course of 2018, if not earlier. This will be reported upon in the Council's annual monitoring report. Sites identified will be assessed against the agreed methodology with RBKC, in accordance with the NPPF and the PPTS. Any subsequent planning applications should be considered against the criteria set out in the PPTS along with relevant planning policies and guidance.</p>	
MM10	120	OS2	<p>Amend Policy OS2 as follows:</p> <p>The council will seek to reduce open space deficiency and to improve <u>will protect and enhance</u> the quality of, and access to, existing open space by:</p> <p>refusing development on public open space and other green open space <u>of strategic</u> and borough-wide importance <u>as identified in the council's Open Space Hierarchy</u> (see Appendix 3 and Proposals Policies Map) unless it can be demonstrated that such development <u>will not harm</u> would preserve or enhance its open character, <u>and</u> its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity;</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM10 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM11	125	RTC1	<p>Add bullet point (e) and (f) to Policy RTC1 as follows:</p> <ul style="list-style-type: none"> e. <u>promoting use of the River Thames for transport uses, including passengers and freight</u> f. <u>seeking improvements to the tidal foreshore in line with the requirements of the Thames River Basin Management Plan and the Thames Estuary 2100 Plan.</u> 	<p>Positive. The changes to include promoting the River Thames for transport uses is positive in terms of Objective 9 (transport effects), as this is considered a more sustainable form of transport.</p> <p>All other objectives are neutral.</p>
MM12	91	6.80	<p>Amend para 6.80 as follows:</p> <p><u>The borough currently faces real socio-economic difficulties, including acute affordable housing need and high levels of deprivation.</u> Continued economic growth in the borough will require a growing work force. These jobs will not go to workless unemployed residents in the borough unless they have the necessary qualifications and skills. If local workless people are not moving into the local labour market, the growth in jobs will have to be met by workers from outside the local area. This will increase pressure on the already overstretched supply of housing and local transport infrastructure. This is also important in addressing social inequalities across the borough. Where major developments come forward that do not employ and/or train local people in their construction/operation, they will aggravate this situation. This is because local unemployed people will not be moving into the local labour market, and the growth in jobs related to those developments will have to be met by workers from</p>	<p>Positive. The changes to the text is positive in terms of Objective 12 (sustainable economy).</p> <p>All other objectives are neutral.</p>

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>outside the local area. This will aggravate existing circumstances by increasing pressure on the already overstretched supply of housing, and on local transport infrastructure. It will also fail to address the social inequalities across the borough. Accordingly, in order for major developments to be sustainable, particularly having regard to the social and economic strands of sustainability, they must comply with the policy.</u>	
MM13	102	TLC4	Amend point c) as follows: ... The number of <u>existing non-A1</u> uses that may adversely impact on the quality of the parade or cluster, such as betting shops and amusement centres...	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM13 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM14	105	TLC6	Amend Policy and text as follows: Policy TL6 To ensure that shopping areas remain diverse and balanced, the council will seek to limit the amount <u>manage</u> the and concentration of betting shops, pawnbrokers <u>and</u> payday loan shops in areas of high concentration. Planning permission for <u>Any proposal for a new betting shops, pawnbrokers or payday loan shops will be considered against the provisions of Policies TLC2 and TLC3 not be permitted in the prime retail frontage of</u>	Neutral. This has a neutral impact overall. The modification will reduce control of betting shops, pawnbrokers and pay day loan, which will mean the council has marginally less ability to control the concentration of such uses within a certain catchment area which may have a negative impact on the vitality/viability of town and local centres (objective 12). However, the modification provides additional criteria to consider the impact/concentration of such uses on

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>town centres or within 400 metres of the boundary of an existing or permitted betting shop, pawnbrokers or payday loan shop.</p> <p>Outside of these areas, planning permission and will only be granted for a betting shop, pawnbrokers or payday loan shop may be granted permission, in accordance with the quotas that apply, and where it can be demonstrated that the proposal:</p> <ul style="list-style-type: none"> • will not impact adversely on residential the amenity, character and function of an area; • and will add to the vitality of the existing shopping parade or cluster; and • will not result in negative cumulative impacts due to an unacceptable concentration of such uses in one area. <p>When considering proposals for hot food takeaways (class A5) and in addition to the quota policies that will apply, the council will take into account proximity to areas where children and young people are likely to congregate, such as schools, parks and youth facilities the location and nature of the proposal with regard to the proximity of existing hot food takeaways, its compatibility with surrounding uses and, as applicable, available evidence relating to potential health impacts.</p>	<p>a case by case basis which would have a neutral impact overall.</p> <p>In relation to hot food takeaways, It will reduce the council's ability to restrict this type of development which could result in a negative impact on the health objectives. However, the modification provides criteria to policy to directly consider the impact of such uses on health and so this would have a neutral impact overall.</p>

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM14	106	6.118	<p>6.118 Although hot food takeaways provide a service for the community, the council is concerned about the potential health impacts of hot food takeaways, <u>particularly</u> on children and young people. Therefore, <u>In the case of proposals for class A5 uses (hot food takeaways), consideration will be given to the proximity of schools and similar facilities, as well as the prevalence and clustering of takeaways and relevant evidence relating to potential health impacts arising from the type of use proposed. when assessing the acceptability of these uses.</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM14 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM15	134	DC3	<p>Amend DC3 as follows:</p> <p>In these <u>areas</u> identified as <u>potentially</u> appropriate for tall buildings, any proposal will need to demonstrate that it:</p> <p>...</p> <p>d) has no harmful impact in terms of <u>had full regard to the significance of heritage assets including the setting of, and views to and from, such heritage assets, has no unacceptable harmful impacts, and should have due regard to Historic England's guidance on tall buildings...</u></p>	Positive. This modification will have a positive impact on Objective 7 (heritage) because of the inclusion of the additional text referencing historic assets. All other objectives would be neutral.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM16	137	DC5	<p>Amend DC5 as follows:</p> <p>...</p> <p>Fascia signs and projecting signs should not be overly large and should be designed to be appropriate to the <u>styles scale and design</u> of the shopfront (see section on shopfront guidance in the Planning Guidance Supplementary Planning document)...</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM16 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM17	138	DC6	<p>Amend policy wording in DC6 as follows:</p> <p>...</p> <p>Replacement windows should respect the architectural character of the building and its surroundings. In this respect, <u>It will be important that the design and material</u> of the replacement windows matches the original windows <u>as closely as possible</u>, in terms of material, type and size, method of opening, profile and section and sub-division. ...</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM17 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM18	142	DC8	<p>Amend Policy DC8 as follows:</p> <p>The council will conserve the significance of the borough's historic environment by protecting, restoring and enhancing it's <u>its</u> heritage assets. These assets include: listed buildings, <u>conservation areas</u>, historic parks and gardens, the scheduled monument of Fulham Palace Moated site, unscheduled archaeological remains and buildings and features of local interest. When determining applications for development</p>	Positive. Positive impact on Objective (heritage) because of the inclusion of the additional text. All other objectives would be neutral.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>affecting heritage assets, the council will apply the following principles:</p> <p>a. the presumption will be in favour of the conservation, restoration and enhancement of heritage assets, and proposals should secure the long term future of heritage assets. The more significant the designated heritage asset, the greater the presumption should be in favour of its conservation;</p> <p>b. development applications affecting designated heritage assets, including alterations and extensions to buildings will <u>normally</u> only be permitted if the significance of the heritage asset is conserved or enhanced or where there is less than substantial harm and the harm is outweighed by the public benefits of the proposal.</p> <p>c. development applications should conserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset. The presence of heritage assets should inform high quality design within its <u>their</u> setting;</p> <p>d. applications for development affecting non-designated heritage assets (buildings and artefacts of local importance and interest) will be determined having regard to the scale and impact of any harm or loss and the significance of the heritage asset <u>in accordance with paragraph 135 of the National Planning Policy Framework</u>;</p> <p>e. particular regard will be given to matters of scale, height, massing, alignment, materials and use;</p>	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>f. where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use should be consistent with the aims of conservation of the asset's character and significance, <u>including securing its optimum viable use</u>;</p> <p>g. applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposed development proposal upon it or its setting which should be carried out with the assistance of a suitably qualified person. The extent of the requirement should be proportionate to the nature and level of the asset's significance. <u>Where archaeological remains of national significance may be affected applications should also be supported by an archaeological field evaluation</u>;</p> <p>h. proposals which involve harm to, or loss of, substantial harm, or less than substantial harm any designated to the significance of a heritage asset will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 133 and 134 of the National Planning Policy Framework;</p> <p>i. where a heritage asset cannot be retained in its entirety or when a change of use is proposed, the developer should ensure that a suitably qualified person carries out an analysis (including photographic surveys) of its design <u>and significance</u> before it is lost, in order to record and advance the understanding of heritage in the borough. The extent of the requirement</p>	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>should be proportionate to the nature and level of the asset's significance;</p> <p>j. the proposal respects the principles of accessible and inclusive design;</p> <p>k. <u>where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered the significance of the heritage asset and tailored their proposals accordingly;</u></p> <p>l. expert advice will be required to address the need to evaluate and conserve archaeological remains, and to advise on the appropriate mitigation measures in cases where excavation is justified; and</p> <p>m. securing the future of heritage assets at risk identified on English Heritage's national register, as part of a positive strategy for the historic environment.</p>	
MM19	146	DC9	<p>Amend DC9 as follows:</p> <p>The council will require a high standard of design of advertisements, which should be in scale and in keeping with the character of their location and should not <u>have an unacceptable impact on public, including road, impact adversely on public safety.</u> The council will resist excessive or obtrusive advertising and illuminated signs which adversely affect the character and appearances of the neighbourhood or the site/building, residential amenity or public safety. The design of advertisements should be appropriate to their context and should generally be restrained in quantity</p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM19 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>and form. Advertisements should normally be located at ground floor level and relate to the commercial zone of the street frontage and the architectural design of the facade.</p> <p>All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.</p> <p><u>Hoardings</u></p> <p>Hoardings and other large advertisements, such as digital screens, will be acceptable where they are of an appropriate scale with their surroundings and where they do not have a detrimental impact on areas sensitive to the visual impact of hoardings such as conservation areas, listed buildings and other heritage assets, residential areas, open spaces or waterside land.</p> <p><u>Advertisement Shrouds</u></p> <p>Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds. Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried out. This will not be permitted where the advertisement would not impose a</p>	

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>detrimental impact on the building or street scene in terms of the size, illumination and/or content; and where the advertisement would <u>not</u> be harmful to residential amenity or public safety. Where advertisement shrouds are considered to be acceptable, they should be accompanied by a 1:1 depiction of the building and only be displayed for a limited period related to the reasonable duration of the building works.</p> <p>Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once planning permissions has been granted and all pre-commencement conditions have been discharged. The display of estate agents boards within Regulation 7 areas will not be permitted.</p>	
MM19	147	Para 6.233	Amend the supporting text to include the following information deleted from the policy.	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM19 are considered to have a neutral impact on the plans

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.</u></p> <p><u>Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried out. Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds.</u></p> <p><u>Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once</u></p>	<p>approach in terms of all sustainability objectives.</p>

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>planning permissions has been granted and all pre-commencement conditions have been discharged.</u></p> <p><u>The display of estate agents boards within Regulation 7 areas will not be permitted.</u></p>	
MM20	148	DC11	<p>Amend Policy DC11 as follows:</p> <p>Amend bullet e) as follows:</p> <p>...</p> <p>e) do not result in an unacceptable any adverse impact on the amenity of adjoining properties or on the local, natural and historic environment <u>during and post construction...</u></p> <p>Amend last bullet as follows:</p> <p>...</p> <p>I. <u>provide a construction traffic management plan as part of the CMS to ensure that traffic and construction activity does not cause unacceptable harm to pedestrian, cycle, vehicular and road safety...</u></p>	Neutral. All changes to the Local Plan resulting from alterations to text as set out in MM20 are considered to have a neutral impact on the plans approach in terms of all sustainability objectives.
MM21	153	CC1	<p>Amend Policy CC1 as follows:</p> <p>Amend bullet point (d) to add text as follows:</p> <p><u>... including heat networks if this can be done without having an unacceptable impact on air quality;</u> and ...</p>	Positive. This modification will reinforce the expected positive impacts on the sustainability objectives by ensuring the impacts of air quality are considered.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM22	162/163	Para 6.280-6.285	Amend the justification for Policy CC6 in paragraphs 6.280 to 6.285 inclusive in line with the changes shown in KD4 and EX15.	Neutral. This modification will not have a significant effect on the sustainability of the Local Plan.
MM22	165	Policy CC8	<p>Amend Policy CC8 as follows:</p> <p>...The council will ensure that development takes account of major hazards identified by the Health and Safety Executive, namely:</p> <ul style="list-style-type: none"> • Fulham North Holder Station, Imperial Road; • Fulham South Holder Station, Imperial Road; and • Swedish Wharf, Townmead Road. 	Neutral. This modification will not have a significant effect on the sustainability of the Local Plan.
MM23	167	CC10	<p>Amend Policy CC10 as follows:</p> <p>The council will seek to reduce the potential adverse air quality impacts of new developments by:</p> <p>a. requiring all major developments <u>which may be impacted by local sources of poor air quality or may adversely contribute to local air quality to provide an air quality</u> assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government's air quality objective concentration targets. <u>The assessment should include separate consideration of the impacts of (i) the construction/demolition phase of development and (ii)</u></p>	Positive. This modification would reinforce the expected positive impacts on the SA objectives and would not result in any negative outcomes.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p><u>the operational phase of development with appropriate mitigation measures highlighted for each phase;</u></p> <p>b. requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government's air quality objectives;</p> <p>c. requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality;</p> <p>d. <u>requiring developments to be 'air quality neutral' and resist development proposals which would materially increase exceedances of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Council's Local Air Quality Management Plan; and</u></p> <p>e. <u>requiring all decentralised energy schemes to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be prioritised over other air quality neutral technologies.</u></p>	
MM24	184	Para 7.11	Add additional text as follows:	Neutral. This modification will not substantially change the plans approach and therefore will not have

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<u>....In limited circumstances, such as in the case of particularly large developments, where the Council concludes that the costs of administering and monitoring the development would satisfy the relevant tests in regulation 122 CIL Regulations (as amended), it will secure the payment of those costs by the developer via the Section 106 agreement.</u>	a significant effect on the sustainability of the plan.
MM25	220	Appendix 6 Indicator HO1	Delete indicative borough target with: Indicative borough target: 1,410 per year average.	Neutral. The modification to the monitoring indicators will have no significant effect on the sustainability of the plan.
MM25	221	Appendix 6: Monitoring Indicators Housing Policy HO6	The monitoring indicator for Policy HO6 to be updated to delete reference to lifetime homes and include reference to building regulations part M4(2) and M4(3). Amend Appendix 6 as follows: Housing policy HO6: Accessible housing <u>Monitoring Indicator</u> - Number and percentage of homes granted permission that meet achieving the Lifetime Homes standards <u>Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.</u> - Number and % of homes granted permission that meet Building Regulation requirement M4(3) 'wheelchair user dwellings' Building that are wheelchair accessible in developments providing ten or more residential units <u>Target and Direction</u> All new dwellings to be built to 'life homes' standards with 10% to be wheelchair accessible.	Neutral. The modification to the monitoring indicators will have no significant effect on the sustainability of the plan.

Ref.	Page	Policy/Para	Main Modification	SA Implications
			<p>90% of new housing should meet Building regulation requirement M4(2) 'accessible and adaptable dwellings'.</p> <p>10% of new housing should meet Building Regulation requirement M4(3) 'wheelchair user dwellings' designed to be wheelchair accessible.</p>	
MM25	222	Appendix 6 Indicator E2	Change to the text under monitoring indicator to read: " <u>Employment Land Supply</u> " as opposed to Employment Land Available.	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.
MM25	222	Appendix 6: Monitoring Indicators Policy E3	Employment Policy E3: provision for visitor accommodation and facilities- in "Target and Direction" column amend as follows: "London Plan: 40,000 additional hotel bedrooms by 2021 <u>2036</u> "	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.
MM25	225	Appendix 6 Indicator DC8	<p>Change the text under monitoring indicator for DC8 to read: "<u>The number of listed buildings at risk.</u>"</p> <p>Change the Target and Direction text to the following: "<u>Reduce the number of buildings at risk as a percentage of the total number of listed buildings in the borough.</u>"</p>	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.
MM25	224	Appendix 6: Monitoring Indicators Policy OS1	<p>Open Space Policy OS1: protecting parks and open spaces- amend monitoring indicator as follows: "Net change in total area of public open space"</p>	Neutral. The modification to the monitoring indicators will have no significant effect on the sustainability of the plan.

Ref.	Page	Policy/Para	Main Modification	SA Implications
MM25	225	Appendix 6 Indicator CC3	Amend as follows: "Policy: CC3 CC4: Minimising flood risk and reducing water use surface water run off with Sustainable Drainage Systems; Monitoring indicator: Average % reduction in surface water flows for major developments; Target: Minimum reduction of 50% in peak flows compared to pre-development. Maximise reductions in peak surface water discharges compared to pre-development; Data Source: LBHF (Flood Risk Assessment or SuDS Strategy) Report".	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.
MM25	226	Appendix 6 Indicator CC10	Add Indicators for Policy CC10 as follows: - " <u>Monitoring Indicator: How many permitted developments integrated emissions reduction measures</u> "; Target: No Target; Data Source: LBHF". " <u>Monitoring Indicator: How many permitted developments integrated exposure reduction measures</u> "; Target: No Target; Data Source: LBHF".	Neutral. The modification to the monitoring indicator will have no significant effect on the sustainability of the plan.

Appendix 2: Assessment of the Main Modifications against the Sustainability Objectives

Key

Symbol	Definition of Impact
✓	Positive effect
✗	Negative effect
0	No significant effect
?	Uncertain effect

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
MM1	20	Amend Spatial Vision 3 rd paragraph	...New development will have created a high quality, <u>accessible</u> , safe and <u>inclusive</u> environment that respects local context and the borough's natural, built and <u>historic</u> environment...	✓	0	0	0	0	0	✓	0	0	0	0	0
MM1	20	Amend Strategic Objective 10	To preserve and enhance the quality, character and identity of the borough's	✓	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			natural and built environment (including its heritage assets) by respecting the local context, seeking high quality, intelligent developments and design , and ensuring compliance with the principles of inclusive, <u>accessible</u> and sustainable design...												
MM2	25	DEL1	<p>Amend bullets:</p> <p>...</p> <p>The Council will implement the policies and proposals of the Local Plan by: ...</p> <ul style="list-style-type: none"> • having regard to the financial viability of development in the following ways: <ul style="list-style-type: none"> o Plan-making; o CIL charge-setting; and o Negotiating Section 106 agreements ('106s'), including for affordable housing, 	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<ul style="list-style-type: none"> o applying the principles set out in the Viability Protocol in Appendix 9; o <u>Site specific circumstances including site specific infrastructure;</u> o <u>Site size, constraints and characteristics.</u> 												
MM3	2	After para 1.9	<p>...</p> <p>Add new wording after para 1.9 as follows</p> <p><u>Neighbourhood Planning</u> <u>Neighbourhood Planning was introduced as part of the Localism Act 2011.</u> <u>Neighbourhood plans are development and land use documents led by members of the community. Neighbourhood plans must be developed in general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance.</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>The Neighbourhood Planning Regulations sets out the procedure and key milestones in developing a neighbourhood plan. In order for a neighbourhood plan to be adopted and form part of the Development Plan Framework, they must be voted on and agreed by a majority vote, in a local Referendum.</u>												
MM4	29	Strategic Policy – Regeneration Areas	Amend Strategic Policy – regeneration Areas (Bullet 1) as follows: ...delivered to the highest standards of urban design, <u>respect for the historic environment</u> , environmental sustainability, and social inclusion <u>and respecting local context...</u>	0	0	0	0	0	0	✓	0	0	0	0	0
MM4	29	Table 1	Amend text at bottom of Table 1 as follows:	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			...In the London plan (2016, the Earls Court and West Kensington Opportunity Area has a minimum target of 6,500 dwellings 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. In the figures above, 7,000 dwellings have been allocated to that part of ECWK Opportunity Area that is within LBHF and 1000 to the area that is within RBKC.												
MM4	45	HRA	Add new bullet point (as bullet 10) to the policy follows: <u>...be based on a thorough assessment of the heritage significance of the area and respond positively to local character and</u>	0	0	0	0	0	0	✓	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>history, conserving and taking opportunities to enhance the significance of heritage assets...</u>												
MM4	51	HRA2	<p>Amend bullet point 5 as follows: ...Ensure that the tunnel entrances and exits <u>avoid, or where this is not possible</u> , have minimal impact on the amenity of residents <u>and the local environment, including the significance and setting of heritage assets...</u></p> <p>Amend bullet point 10 as follows: ...be of a coherent urban design that has regard to the setting and context of the regeneration area, <u>including its scale and character, heritage assets and archaeology and should take opportunities to re-unify areas of severed townscape sensitively...</u></p>	0	0	0	0	0	0	✓	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
MM5	43	WCRA3	Amend 4 th bullet point as follows: "Provide affordable housing <u>and affordable workspace</u> in accordance with Policy H03 <u>and Policy E1</u> "	0	0	0	0	0	0	0	0	0	0	0	✓
MM6	56	FRA	Amend fifth bullet point of Policy FRA as follows: <ul style="list-style-type: none"> provide for the improvement of the West Kensington, Gibbs Green and Registered Provider estates, <u>including the potential for renewal of and additions to all or parts of the estates</u> 	0	0	0	0	0	0	0	0	0	0	0	0
MM6	59	FRA1	Amend third bullet point of Policy FRA1 as follows: <ul style="list-style-type: none"> provide for improvement to the West Kensington, Gibbs Green 	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			and Registered Provider estates, <u>including the potential for renewal of and additions to all or parts of the estates</u> , as part of the comprehensive approach to the regeneration of the Opportunity Area;...												
MM7	69	HO1	<p>Amend HO1 policy as follows:</p> <p>"The council will work with partner organisations and landowners to exceed the London Plan (2016) <u>minimum</u> target of 1,031 additional dwellings a year up to 2025..."</p> <p>....</p> <p>e) Ensuring that new dwellings meet local needs and are available for occupation by people living in London....</p> <p>...</p> <p>g) working to return vacant homes to use and ensure that all new homes are occupied and vacant homes are returned to use to meet local and London needs;</p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			... Insert additional sentence to follow 'g' at Policy H01 – Housing Supply: h) <u>where possible, support applications for self and custom builds that are in accordance with the relevant Local Plan policies.</u>												
MM7	69	H01	Amend Table 2 'Indicative Housing Targets' as follows:	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy																																																							
			<table><tr><th>Area</th><th>2015/20 2015/20</th><th>2020/25 2021/25</th><th>Total 10 years</th><th>2025/30 2025/31</th><th>2030/35 2031/35</th><th>Total 20 years for Plan Period 2015- 2035</th></tr><tr><td>White City Regeneration Area/Opportunity Area **</td><td>1,000 2,200</td><td>2,500 3,500</td><td>3,500 5,700</td><td>1,500 100</td><td>1,000 200</td><td>6,000</td></tr><tr><td>Hammersmith Town Centre</td><td>200 700</td><td>600 0</td><td>800 700</td><td>1,000 1,050</td><td>1,000 1,050</td><td>2,800</td></tr><tr><td>Fulham Regeneration Area **</td><td>1,500 1,100</td><td>2,500 500</td><td>4,000 1,700</td><td>1,500 5,300</td><td>1,500 0</td><td>7,000</td></tr><tr><td>South Fulham Riverside</td><td>1,500 2,700</td><td>1,500 800</td><td>3,000 3,500</td><td>500 200</td><td>500 300</td><td>4,000</td></tr><tr><td>Rest of the borough</td><td>1,000 2,000</td><td>700 200</td><td>1,700 2,200</td><td>700 0*</td><td>0*</td><td>2,400 2,200</td></tr><tr><td>Total</td><td>5,200 8,700</td><td>7,800 5,100</td><td>13,000 13,800</td><td>5,200 6,650</td><td>4,000 1,550</td><td>22,200 22,000</td></tr><tr><td>Average/year</td><td>1,040 1,740</td><td>1,560 1,020</td><td>2,600 1,380</td><td>1,040 1,330</td><td>800 310</td><td>1,110 820</td></tr></table>	Area	2015/20 2015/20	2020/25 2021/25	Total 10 years	2025/30 2025/31	2030/35 2031/35	Total 20 years for Plan Period 2015- 2035	White City Regeneration Area/Opportunity Area **	1,000 2,200	2,500 3,500	3,500 5,700	1,500 100	1,000 200	6,000	Hammersmith Town Centre	200 700	600 0	800 700	1,000 1,050	1,000 1,050	2,800	Fulham Regeneration Area **	1,500 1,100	2,500 500	4,000 1,700	1,500 5,300	1,500 0	7,000	South Fulham Riverside	1,500 2,700	1,500 800	3,000 3,500	500 200	500 300	4,000	Rest of the borough	1,000 2,000	700 200	1,700 2,200	700 0*	0*	2,400 2,200	Total	5,200 8,700	7,800 5,100	13,000 13,800	5,200 6,650	4,000 1,550	22,200 22,000	Average/year	1,040 1,740	1,560 1,020	2,600 1,380	1,040 1,330	800 310	1,110 820											
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MM7	69	HO1	<p>Add the following new text after paragraph 6.9:</p> <p><u>The Build to Rent or Private Rent sector has the potential to boost the supply of private rental accommodation across the borough. The SHMA identifies that private renting is high and is increasing in the borough; between 2001 and 2011</u></p>	0	0	0	0	0	0	0	0	0	0	0	0																																																							

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			<p><u>the private rented sector increased from 23% to 33%. Bearing this in mind, Build to Rent may offer a greater range and choice to private renters.</u></p> <p><u>The council recognises that the financial model of Build to Rent is different to traditional, private market housing and there will be separate viability concerns when considering Build to Rent schemes. Nevertheless, a range of tenures will be expected to provide accessible housing for all, subject to viability. On such schemes, affordable housing may be delivered by discount market rent using the London Living Rent (or lower) as the Council's preferred benchmark. The Council's Housing Strategy may also be used in setting appropriate rent levels to ensure schemes are affordable locally. The quantum of affordable housing units will be subject to the specifics on a scheme. Long-term covenants will be required on any scheme to ensure developments are rental for at least 15</u></p>												

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			<p><u>years with a 'clawback' mechanism in place where units are sold out of the Build to Rent sector during the covenant period. Importantly, affordable housing should be maintained in perpetuity and managed by the Build to Rent provider.</u></p> <p><u>An integral part that makes Build to Rent development different is the management of the site. The council will expect that any developers will identify a suitable, long term, experienced management team in place when coming forward with any applications that will deliver high-quality housing for its residents.</u></p> <p><u>When considering Build to Rent schemes, it will be important to consider the nature of build to rent development. Higher turnover is anticipated in Build to Rent schemes which may have a wider impact in terms of the sense of community in the area and other high-street parking issues and impacts. Evidence of mitigating these issues</u></p>												

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			<u>and/or ways of managing these issues may be required by the council.</u>												
MM7	69	HO1	<p>Insert new text on Self Build and Custom Housebuilding as follows:</p> <p><u>The Self-build and Custom Housebuilding Act 2015 requires local authorities to keep a register of individuals and associations of individuals seeking to acquire serviced plots of land to build houses for those individuals to occupy as homes. Self-build typically refers to individuals seeking to build their own home and to occupy them. The council has produced a self-build register, where individuals may register their interest. Self build and custom housebuilding refers to individuals or groups of individuals interested in buying land and building a home to occupy. The London SHMA found that self-build provides 4% of all new homes in England. In London, the figures indicate that self-build</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p><u>accounts for 1.9% and 3.5% of annual housing output in London.</u></p> <p><u>The London SHMA has found from a survey conducted in 2013 that 13% of adults in London were actively researching self-build, in line with the national average. Results from the same survey found that 2% of adults in London were doing something about this in terms of acquiring land, submitting a planning application, or starting construction. Those likely to complete a self-build project within a year was 1%.</u></p> <p><u>There are a number of broad barriers to delivering or undertaking such a project which indicates why there are such low output levels in London and nationally: the high cost of land, access to finance – self-build is considered as relatively risky, which in turn favour high-density development and builders able to capitalise on economies of scale. Self-build typically takes place in small infill sites, end of terrace spaces, backland</u></p>												

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			<p><u>sites, gardens, garages, and small industrial sites. In parts of London where land values are lower, sites which would not have interest from developers, such as on the fringe of industrial sites, there are greater opportunities to take place.</u></p> <p><u>In Hammersmith and Fulham, where land prices are high and the supply of available land for development is so competitive, these factors do not provide the best conditions for self-build or custom housebuilding to take place.</u></p> <p><u>Whilst the council is supportive in principle, this will continue to be monitored and assessed through the AMR and self-build register.</u></p>												
MM8	73	HO3 and supporting text	<p>Amended wording to the proposed policy, as follows:</p> <p>Housing development should increase the supply and improve the mix of</p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>affordable housing to help achieve more sustainable communities in the borough.</p> <p><u>For developments of 11 or more self-contained dwellings, and on sites with the capacity for 1011 or more such self-contained dwellings, affordable housing should be provided having regard to in line with the following:</u></p> <ul style="list-style-type: none"> g. a borough wide target that at least 50% of all dwellings built between 2015-25 should be affordable; h. 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing; i. affordable dwellings should be located throughout a new development and not concentrated on one part of the site; j. the provision of affordable rented and social rented housing in ways that 												

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			<p>enable tenants to move into home ownership.</p> <p>In negotiating for affordable housing in a proposed development, the council will seek the maximum reasonable amount of affordable housing and take into account:</p> <ul style="list-style-type: none"> • site size and site constraints; and • financial viability, applying the principles set out in the Viability Protocol (Appendix 9) and having regard to the the individual circumstances of the site and the availability of public subsidy; • <u>individual circumstances and characteristics of the site;</u> • <u>site specific infrastructure;</u> • <u>availability of public subsidy; and</u> • <u>CIL charge.</u> 												

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			<p><u>Planning applications for developments of 11 or more self-contained dwellings, and on sites with the capacity for 110 or more such dwellings, will not be required to provide viability information, where they:</u></p> <ul style="list-style-type: none"> • <u>deliver 50% or more affordable housing on site;</u> • <u>are consistent with the relevant tenure split within this policy (see also paragraph 6.29); and</u> • <u>meet all of the other relevant Local Plan policy requirements and obligations.</u> <p><u>For the avoidance of doubt, in circumstances where the three requirements set out immediately above are satisfied, the council will regard that affordable housing provision as “the maximum reasonable amount of affordable housing.</u></p>												

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			<p>In exceptional circumstances, a financial contribution may be required to provide affordable housing off-site where other sites may be more appropriate or beneficial in meeting the borough's identified affordable housing needs.</p> <p>In addition, there should be no net loss of social/affordable rented housing on any development sites as part of any development proposals.</p>												
MM8	74	Para 6.18	<p>Amend para 6.18 as follows:</p> <p><u>In order to maximise affordable housing supply, the council will seek affordable housing contributions on schemes of 11 or more dwellings. In addition, on schemes of 10 or less dwellings that</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>have a maximum combined gross floorspace of more than 1,000 square metres (gia), the council will <u>also seek negotiate</u> affordable housing where there is considered to be capacity for more units. In determining capacity, the council will take into account the guidance included in London Plan (2016) policy 3.13 and supporting supplementary planning guidance. for example in schemes where dwellings are large in floorspace terms but below 11 units and could yield a larger number of average sized homes the application of affordable housing policy will apply. In order to meet the target for affordable housing, the council will negotiate for affordable housing to be provided on all larger sites in accordance with the London Plan (2016) threshold for sites with the capacity for 10 or more self-contained dwellings. <u>The affordable housing proportion should be calculated in relation to gross rather than net</u></p>												

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			<u>provision i.e, it should be based on the total number of units proposed in the</u>												
MM8	75	Para 6.28	<p>Add further paragraph following 6.28:</p> <p><u>'The council will seek the maximum reasonable amount of affordable housing on any development. Vacant Building Credit (VBC) was introduced by Central Government in 2014 to incentivise the redevelopment of disused and vacant buildings on brownfield sites by offering developers a financial credit equivalent to the existing gross floor space when calculating the affordable housing contribution. Any increase in floorspace, affordable housing contributions will be required. When assessing applications, it is important to apply the Government's intended purpose for VBC.</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p><u>In an area of high affordable housing need, VBC has the potential to decrease the affordable housing supply across the borough. In order to mitigate against this potential loss, VBC will not be applicable where there is evidence of the following:</u></p> <p><u>-The building is not covered by an extant planning permission or recently expired planning permission for the same or substantially the same development;</u></p> <p><u>-The building has been left vacant for the sole purpose of redevelopment; and,</u></p> <p><u>The building, at the time of application, is not in any legal use</u></p>												
MM8	75	Para 6.29	<p>Amend paragraph 6.29 as follows:</p> <p>In considering the mix of tenure that is appropriate for additional dwellings to be built in the borough, the council has had</p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			regard to the London Plan (2016) affordable housing policies and to <u>our own</u> its assessment of the housing market, including housing need and how this can be met. <u>In considering appropriate rent levels for the various tenures, the council will be led by our Housing Strategy to ensure that all new affordable homes are affordable to people who live or work in the Borough.</u>												
MM8	75	Para 6.30	Amend para 6.30 as follows: It is recognised that in negotiating for affordable housing, specific site constraints and financial viability may affect the amount of affordable housing that can be achieved on that site. The council encourages <u>pre-application</u> early discussions with applicants <u>which should include information on</u> during the pre-application stage when financial viability appraisals are required with planning applications . The council will apply the principles and requirements set out in	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			the Viability Protocol (Appendix 9) when receiving and assessing financial viability appraisals submitted with planning applications and in negotiating Section 106 Agreements, to ensure the maximum reasonable level of affordable housing is provided and that other plan requirements are met. <u>Financial viability appraisals will not be required where a proposal will deliver 50% or more affordable housing on site, has a tenure split in line with our policy and meets all other relevant Local Plan policy requirements and obligations.</u>												
MM8	76	Para 6.31	Amend final two sentences in para 6.31 as follows: <u>The council favours traditional intermediate housing products such as shared ownership which can provide properties that remain affordable over a longer period of time.</u> The council will, therefore, <u>need to</u> weigh the needs of different groups when considering	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			development proposals. Where Starter Homes are substituted for affordable housing in development proposals, the council will expect them to replace affordable home ownership products (primarily shared ownership) rather than affordable rented housing.												
MM8	77	Para 6.33	<p>Add additional text to paragraph 6.33 as follows:</p> <p>"Mixed tenure housing developments should be tenure blind, meaning that it should be difficult to spot the difference in the architectural quality of market and affordable properties. <u>It is important for the council to ensure that housing developments are inclusive for all residents. The council recognises that spreading of affordable housing units may not be practical in all schemes. For example, separate service cores may be necessary between private and all</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>affordable housing units to maintain affordable service charges and to aid good housing management when locating affordable tenures."</u>												
MM9	84	HO10	<p>Amend HO10 as follows:</p> <p><u>The council will seek to address the joint Gypsy and Traveller accommodation needs over the Plan period, as identified in the Gypsy and Traveller Accommodation Needs Assessment (2016).</u></p> <p>The council will work closely with the Royal Borough of Kensington and Chelsea, and any other relevant partners to protect, improve and, if necessary, increase the capacity of the existing gypsy and traveller site at Westway <u>Stable Way</u>.</p> <p><u>Applications for additional sites should meet the requirements set out in the</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>Planning Policy for Traveller Sites (2015).</u>												
MM9	84	6.63	6.63 ... Following engagement with the local traveller community an assessment of the need for traveller pitches was carried out in accordance with the Gypsy and Traveller Accommodation Needs Assessments (DCLG 2007). This study suggested a need for extra pitches for an additional five families by 2020(38). <u>The assessment identified that 3 additional pitches are required in the first five years, 9 in total over the plan period. The council is currently working with RBKC and the local traveller community to determine how best to meet the identified needs. Both authorities are working together to determine how best to meet this identified need where possible, in accordance with further Site Appraisal work. The Council will seek to address the findings from the GTANA its</u>	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>assessment and to meet its needs by undertaking a Site Appraisal Study in 2017 and producing an Options Paper thereafter. The Council and RBKC will explore all available options in meeting the objectives of national policy in order to identify a National Planning Policy Framework compliant supply of sites during the course of 2018, if not earlier. This will be reported upon in the Council's annual monitoring report. Sites identified will be assessed against the agreed methodology with RBKC, in accordance with the NPPF and the PPTS. Any subsequent planning applications should be considered against the criteria set out in the PPTS along with relevant planning policies and guidance.</u>												
MM10	120	OS2	Amend Policy OS2 as follows: The council will seek to reduce open space deficiency and to improve will	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<p><u>protect and enhance</u> the quality of, and access to, existing open space by:</p> <p>refusing development on public open space and other green open space <u>of strategic</u> and borough-wide importance <u>as identified in the council's Open Space Hierarchy</u> (see Appendix 3 and Proposals Policies Map) unless it can be demonstrated that such development <u>will not harm</u> would preserve or enhance its open character, <u>and</u> its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity;</p>												
MM11	125	RTC1	<p>Add bullet point (e) and (f) to Policy RTC1 as follows:</p> <p>k. <u>promoting use of the River Thames for transport uses, including passengers and freight</u></p> <p>l. <u>seeking improvements to the tidal foreshore in line with the</u></p>	0	0	0	0	0	0	0	0	✓	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			<u>requirements of the Thames River Basin Management Plan and the Thames Estuary 2100 Plan.</u>												
MM12	91	6.80	Amend para 6.80 as follows: <u>The borough currently faces real socio-economic difficulties, including acute affordable housing need and high levels of deprivation.</u> Continued economic growth in the borough will require a growing work force. These jobs will not go to workless-unemployed residents in the borough unless they have the necessary qualifications and skills. If local workless people are not moving into the local labour market, the growth in jobs will have to be met by workers from outside the local area. This will increase pressure on the already overstretched supply of housing and local transport infrastructure. This is also important in addressing social inequalities across the borough. Where	0	0	0	0	0	0	0	0	0	0	0	✓

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			<p><u>major developments come forward that do not employ and/or train local people in their construction/operation, they will aggravate this situation. This is because local unemployed people will not be moving into the local labour market, and the growth in jobs related to those developments will have to be met by workers from outside the local area. This will aggravate existing circumstances by increasing pressure on the already overstretched supply of housing, and on local transport infrastructure. It will also fail to address the social inequalities across the borough. Accordingly, in order for major developments to be sustainable, particularly having regard to the social and economic strands of sustainability, they must comply with the policy.</u></p>												
MM13	102	TLC4	Amend point c) as follows:	0	0	0	0	0	0	0	0	0	0	0	0

Ref	Page	Policy/Para	Main Modification	Social Justice	Health	Education & Skills	Affordable Homes	Social Cohesion	Satisfying Work	Heritage	Reduce Pollution	Transport Effects	Careful Consumption	Climate Change	Sustainable Economy
			... The number of <u>existing non-A1</u> uses that may adversely impact on the quality of the parade or cluster, such as betting shops and amusement centres...												
MM14	105	TLC6	<p>Amend Policy and text as follows:</p> <p>Policy TL6</p> <p>To ensure that shopping areas remain diverse and balanced, the council will seek to limit the amount <u>manage</u> the and concentration of betting shops, pawnbrokers <u>and</u> payday loan shops in areas of high concentration.</p> <p>Planning permission for Any proposal for a new betting shops, pawnbrokers or payday loan shops will be considered against the provisions of Policyies TLC2 and TLC3 not be permitted in the prime retail frontage of town centres or within 400 metres of the boundary of an</p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>existing or permitted betting shop, pawnbrokers or payday loan shop.</p> <p>Outside of these areas, planning permission <u>and will only be granted for a betting shop, pawnbrokers or payday loan shop may be granted permission, in accordance with the quotas that apply, and where it can be demonstrated that the proposal:</u></p> <ul style="list-style-type: none"> • <u>will not impact adversely on residential the amenity, character and function of an area;</u> • <u>and will add to the vitality of the existing shopping parade or cluster; and</u> • <u>will not result in negative cumulative impacts due to an unacceptable concentration of such uses in one area.</u> 												

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			When considering proposals for hot food takeaways (class A5) and in addition to the quota policies that will apply, the council will take into account proximity to areas where children and young people are likely to congregate, such as schools, parks and youth facilities <u>the location and nature of the proposal with regard to the proximity of existing hot food takeaways, its compatibility with surrounding uses and, as applicable, available evidence relating to potential health impacts.</u>												
MM14	106	6.118	6.118 Although hot food takeaways provide a service for the community, the council is concerned about the potential health impacts of hot food takeaways, <u>particularly</u> on children and young people. Therefore, In the case of proposals for class A5 uses (hot food takeaways), consideration will be given	0	0	0	0	0	0	0	0	0	0	0	0

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			to the proximity of schools and similar facilities, as well as the prevalence and clustering of takeaways and relevant evidence relating to potential health impacts arising from the type of use proposed. when assessing the acceptability of these uses.												
MM15	134	DC3	<p>Amend DC3 as follows:</p> <p>In <u>these</u> areas identified as <u>potentially</u> appropriate for tall buildings, any proposal will need to demonstrate that it:</p> <p>...</p> <p>d) has no harmful impact in terms of had full regard to the significance of heritage assets including the setting of, and views to and from, such heritage assets, has no unacceptable harmful impacts, and</p>	0	0	0	0	0	0	✓	0	0	0	0	0

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			<u>should have due regard to Historic England's guidance on tall buildings...</u>												
MM16	137	DC5	Amend DC5 as follows: ... Fascia signs and projecting signs should not be overly large and should be designed to be appropriate to the styles <u>scale and design</u> of the shopfront (see section on shopfront guidance in the Planning Guidance Supplementary Planning document)...	0	0	0	0	0	0	0	0	0	0	0	0
MM17	138	DC6	Amend policy wording in DC6 as follows: ... Replacement windows should respect the architectural character of the building and its surroundings. In this respect, It <u>It</u> will be important that the design <u>and material</u> of the replacement windows matches the original windows <u>as closely as possible</u> , in terms of material , type	0	0	0	0	0	0	0	0	0	0	0	0

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			and size, method of opening, profile and section and sub-division. ...												
MM18	142	DC8	<p>Amend Policy DC8 as follows:</p> <p>The council will conserve the significance of the borough's historic environment by protecting, restoring and enhancing it's <u>its</u> heritage assets. These assets include: listed buildings, <u>conservation areas</u>, historic parks and gardens, the scheduled monument of Fulham Palace Moated site, unscheduled archaeological remains and buildings and features of local interest. When determining applications for development affecting heritage assets, the council will apply the following principles:</p> <p>a. the presumption will be in favour of the conservation, restoration and enhancement of heritage assets, and</p>	0	0	0	0	0	0	✓	0	0	0	0	0

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			<p>proposals should secure the long term future of heritage assets. The more significant the designated heritage asset, the greater the presumption should be in favour of its conservation;</p> <p>b. development applications affecting designated heritage assets, including alterations and extensions to buildings will <u>normally</u> only be permitted if the significance of the heritage asset is conserved or enhanced or where there is less than substantial harm and the harm is outweighed by the public benefits of the proposal.</p> <p>c. development applications should conserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset. The presence of heritage assets should inform high quality design within its <u>their</u> setting;</p> <p>d. applications for development affecting non-designated heritage assets (buildings and artefacts of local</p>												

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			<p>importance and interest) will be determined having regard to the scale and impact of any harm or loss and the significance of the heritage asset <u>in accordance with paragraph 135 of the National Planning Policy Framework</u>;</p> <p>e. particular regard will be given to matters of scale, height, massing, alignment, materials and use;</p> <p>f. where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use should be consistent with the aims of conservation of the asset's character and significance, <u>including securing its optimum viable use</u>;</p> <p>g. applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposed development <u>proposal</u> upon it or its setting which should be carried out with the assistance</p>												

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			<p>of a suitably qualified person. The extent of the requirement should be proportionate to the nature and level of the asset's significance.</p> <p><u>Where archaeological remains of national significance may be affected applications should also be supported by an archaeological field evaluation;</u></p> <p>h. proposals which involve harm to, or loss of, substantial harm, or less than substantial harm any designated to the <u>significance of a heritage asset</u> will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 133 <u>and 134</u> of the National Planning Policy Framework;</p> <p>i. where a heritage asset cannot be retained in its entirety or when a change of use is proposed, the developer should ensure that a suitably qualified person carries out an analysis (including photographic surveys) of its design <u>and significance</u> before it is lost, in order to</p>												

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			<p>record and advance the understanding of heritage in the borough. The extent of the requirement should be proportionate to the nature and level of the asset's significance;</p> <p>j. the proposal respects the principles of accessible and inclusive design;</p> <p>k. <u>where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered the significance of the heritage asset and tailored their proposals accordingly;</u></p> <p>l. expert advice will be required to address the need to evaluate and conserve archaeological remains, and to advise on the appropriate mitigation measures in cases where excavation is justified; and</p> <p>m. securing the future of heritage assets at risk identified on English Heritage's national register, as part of a</p>												

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			positive strategy for the historic environment.												
MM19	146	DC9	<p>Amend DC9 as follows:</p> <p>The council will require a high standard of design of advertisements, which should be in scale and in keeping with the character of their location and should not <u>have an unacceptable impact on public, including road, impact adversely on public safety.</u> The council will resist excessive or obtrusive advertising and illuminated signs which adversely affect the character and appearances of the neighbourhood or the site/building, residential amenity or public safety. The design of advertisements should be appropriate to their context and should generally be restrained in quantity and</p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>form. Advertisements should normally be located at ground floor level and relate to the commercial zone of the street frontage and the architectural design of the facade.</p> <p>All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.</p> <p><u>Hoardings</u></p> <p>Hoardings and other large advertisements, such as digital screens, will be acceptable where they are of an appropriate scale with their surroundings and where they do not have a detrimental impact on areas sensitive to</p>												

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			<p>the visual impact of hoardings such as conservation areas, listed buildings and other heritage assets, residential areas, open spaces or waterside land.</p> <p><u>Advertisement Shrouds</u></p> <p>Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds.</p> <p>Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried out. This will not be permitted where the advertisement would <u>not</u> impose a detrimental impact on the building or street scene in terms of the size, illumination and/or content; and/or where the advertisement would <u>not</u> be harmful to residential amenity or public safety. Where advertisement shrouds are considered to be acceptable, they should be accompanied by a 1:1 depiction of</p>												

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			<p>the building and only be displayed for a limited period related to the reasonable duration of the building works.</p> <p>Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once planning permissions has been granted and all pre-commencement conditions have been discharged.</p> <p>The display of estate agents boards within Regulation 7 areas will not be permitted.</p>												

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	147	Para 6.233	<p>Amend the supporting text to include the following information deleted from the policy.</p> <p><u>All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for shopfronts and advertisements in conservation areas is included in the Planning Guidance Supplementary Planning Document.</u></p> <p><u>Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p><u>out. Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds.</u></p> <p><u>Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once planning</u></p>												

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			<p><u>permissions has been granted and all pre-commencement conditions have been discharged.</u></p> <p><u>The display of estate agents boards within Regulation 7 areas will not be permitted.</u></p>												
MM20	148	DC11	<p>Amend Policy DC11 as follows:</p> <p>Amend bullet e) as follows:</p> <p>...</p> <p>e) do not result in <u>an unacceptable any</u> adverse impact on the amenity of adjoining properties or on the local, natural and historic environment <u>during and post construction...</u></p> <p>Amend last bullet as follows:</p> <p>...</p>	0	0	0	0	0	0	0	0	0	0	0	0

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			I. <u>provide a construction traffic management plan as part of the CMS to ensure that traffic and construction activity does not cause unacceptable harm to pedestrian, cycle, vehicular and road safety....</u>												
MM21	153	CC1	Amend Policy CC1 as follows: Amend bullet point (d) to add text as follows: <u>... including heat networks if this can be done without having an unacceptable impact on air quality; and ...</u>		✓						✓			✓	
MM22	162/ 163	Para 6.280- 6.285	Amend the justification for Policy CC6 in paragraphs 6.280 to 6.285 inclusive in line with the changes shown in KD4 and EX15.	0	0	0	0	0	0	0	0	0	0	0	0
MM22	165	Policy CC8	Amend Policy CC8 as follows: ...The council will ensure that development takes account of major	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>hazards identified by the Health and Safety Executive, namely:</p> <ul style="list-style-type: none"> • Fulham North Holder Station, Imperial Road; • Fulham South Holder Station, Imperial Road; and • Swedish Wharf, Townmead Road. 												
MM23	167	CC10	<p>Amend Policy CC10 as follows:</p> <p>The council will seek to reduce the potential adverse air quality impacts of new developments by:</p> <p>a. requiring all major developments <u>which may be impacted by local sources of poor air quality or may adversely contribute to local air quality to provide an air quality</u> assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution</p>		✓						✓			✓	

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			<p>levels above the Government's air quality objective concentration targets. <u>The assessment should include separate consideration of the impacts of (i) the construction/demolition phase of development and (ii) the operational phase of development with appropriate mitigation measures highlighted for each phase;</u></p> <p>b. requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government's air quality objectives;</p> <p>c. requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality;</p>												

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			<p>d. requiring developments to be 'air quality neutral' and resist development proposals which would materially increase exceedances of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Council's Local Air Quality Management Plan; and</p> <p>e. requiring all decentralised energy schemes to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be prioritised over other air quality neutral technologies.</p>												
MM24	184	Para 7.11	<p>Add additional text as follows:</p> <p><u>...In limited circumstances, such as in the case of particularly large</u></p>	0	0	0	0	0	0	0	0	0	0	0	0

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			<u>developments, where the Council concludes that the costs of administering and monitoring the development would satisfy the relevant tests in regulation 122 CIL Regulations (as amended), it will secure the payment of those costs by the developer via the Section 106 agreement.</u>												
MM25	220	Appendix 6 Indicator HO1	Delete indicative borough target with: Indicative borough target: 1,410 per year average.	0	0	0	0	0	0	0	0	0	0	0	0
MM25	221	Appendix 6: Monitoring Indicators Housing Policy HO6	The monitoring indicator for Policy HO6 to be updated to delete reference to lifetime homes and include reference to building regulations part M4(2) and M4(3). Amend Appendix 6 as follows: Housing policy HO6: Accessible housing <u>Monitoring Indicator</u> <u>-Number and percentage of homes granted permission that meet achieving</u>	0	0	0	0	0	0	0	0	0	0	0	0

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			<p>the Lifetime Homes standards <u>Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.</u></p> <p>- Number and % of homes granted permission that meet Building Regulation requirement M4(3) 'wheelchair user dwellings' Building that are wheelchair accessible in developments providing ten or more residential units</p> <p><u>Target and Direction</u></p> <p>All new dwellings to be built to 'life homes' standards with 10% to be wheelchair accessible.</p> <p>90% of new housing should meet <u>Building regulation requirement M4(2) 'accessible and adaptable dwellings'.</u></p> <p><u>10% of new housing should meet Building Regulation requirement M4(3) 'wheelchair user dwellings' designed to be wheelchair accessible.</u></p>												
MM25	222	Appendix 6 Indicator	Change to the text under monitoring indicator to read:	0	0	0	0	0	0	0	0	0	0	0	0

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		E2	" <u>Employment Land Supply</u> " as opposed to Employment Land Available.												
MM25	222	Appendix 6: Monitoring Indicators Policy E3	Employment Policy E3: provision for visitor accommodation and facilities- in "Target and Direction" column amend as follows: "London Plan: 40,000 additional hotel bedrooms by 2021 <u>2036</u> "	0	0	0	0	0	0	0	0	0	0	0	0
0	225	Appendix 6 Indicator DC8	Change the text under monitoring indicator for DC8 to read: "The number of listed buildings at risk." Change the Target and Direction text to the following: " <u>Reduce the number of buildings at risk as a percentage of the total number of listed buildings in the borough.</u> "	0	0	0	0	0	0	0	0	0	0	0	0
MM25	224	Appendix 6: Monitoring Indicators Policy OS1	Open Space Policy OS1: protecting parks and open spaces- amend monitoring indicator as follows: "Net change in total area of public open space"												

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MM25	225	Appendix 6 Indicator CC3	Amend as follows: "Policy: CC3 CC4: Minimising flood risk and reducing water use surface water run off with <u>Sustainable Drainage Systems</u> ; Monitoring indicator: Average % reduction in surface water flows for major developments; Target: Minimum reduction of 50% in peak flows compared to pre-development . Maximise reductions in peak surface water discharges compared to pre-development; Data Source: LBHF (Flood Risk Assessment or SuDS Strategy) Report".	0	0	0	0	0	0	0	0	0	0	0	0
MM25	226	Appendix 6 Indicator CC10	Add Indicators for Policy CC10 as follows: - " <u>Monitoring Indicator: How many permitted developments integrated emissions reduction measures</u> "; Target: No Target; Data Source: LBHF". " <u>Monitoring Indicator: How many permitted developments integrated</u>	0	0	0	0	0	0	0	0	0	0	0	0

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			<u>exposure reduction measures”; Target: No Target; Data Source: LBHF”.</u>												