

London Borough of Hammersmith and Fulham
Local Plan

**Proposed Submission Local Plan Environmental Report
(Sustainability Appraisal)**

September 2016

For further information please contact:

Development Plans Team
Planning Division
Planning and Development Department
London Borough of Hammersmith and Fulham
Town Hall Extension
King Street
London
W6 9JU

Telephone 020 8753 1081
Email localplan@lbhf.gov.uk
Website www.lbhf.gov.uk

TABLE OF CONTENTS

1. Introduction.....	2
2. Appraisal Methodology.....	8
3. Stage A: SA Scoping Report.....	9
4. Stage A (A1) Policies, Plans, Programmes & Objectives.....	10
5. Stage A (A2) Baseline Information.....	11
6. Stage A (A3) Key Sustainability Issues.....	20
7. Stage B Developing Alternatives & Assessing Effects.....	21
8. Stage B (B1) Testing Local Plan Objectives Against SA Objectives.....	21
9. Stage B (B2&B3) Developing Local Plan Options & Evaluating Likely Effects of the Local Plan.....	31
10. Stage B (B4) Mitigating Adverse Effects and Maximising Beneficial Effects.....	33
11. Stage B (B5) Local Plan proposed Monitoring of Significant Effects.....	34
12. Stage C: Preparation of SA Report & Stage D: Consultation.....	34
13. Monitoring.....	35
14. Conclusion.....	36
15. Next Steps.....	37

TABLE OF APPENDICES

Appendix 1: Appraisal of Individual Proposed Submission Local Plan Policies

Appendix 2: SA Framework- Objectives and Monitoring

Appendix 3: List of Plans, Policies and Programmes

Appendix 4: Representations to the SA – Draft Local Plan Consultation
(Regulation 18)

1 INTRODUCTION

Legal Requirements

- 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 social, environmental and economic considerations are taken into account during all the stages of the Local Plan's preparation. European law is contained in European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment', better known as the Strategic Environmental Assessment (SEA) or SEA Directive. The UK Government has introduced regulations, termed the SEA regulations, that transpose the SEA Directive into UK law.
- 1.2 Both European Union (EU) and national legislative provisions require local authorities to prepare sustainability appraisals of proposed land use or planning policies.

EU Statutory framework

- 1.3 The (SEA) Directive 2001/42/EC (the 'SEA Directive')² states that a Strategic Environmental Assessment is mandatory for plans or programmes which are prepared for purposes including town or country planning or land use and which set the framework for future development consent of certain listed projects.
- 1.4 The SA for the Local Plan has been undertaken together with the SEA. Government guidance suggests that the SA should identify where the requirements of the SEA have been met- this is shown in Table 1 below.

Table 1: SA/SEA report and conformity with SEA Directives

SEA Directive Requirements	Location within Report
a) An outline of report contents, the main objectives of the plan and the relationship with other plans and programmes.	SA Scoping Report 2014
b) The current state of the environment & likely evolution thereof without the implementation of the plan	The Baseline Information. SA Scoping Report (2014) and Submission SA (2016)
c) Environmental characteristics of areas likely to be significantly affected	The Baseline Information SA Scoping Report (2014) and Submission SA (2016) section 5.
d) Existing environmental problems which are relevant to the plan, including in particular, those relating to any areas of a particular environmental importance	The Baseline Information and Key Sustainability Issues SA Scoping Report (2014) and Submission SA (2016) section 5 and 6.
e) Environmental protection objectives, established at international, national or community level and the way those objectives and any environmental	Policies, Plans, Programmes & Objectives SA Scoping Report (2014) and Submission SA (2016) section 4 and Appendix 3.

considerations have been taken into account during its preparation	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and interrelationship between the above factors.	Stage B- developing and refining alternatives and assessing effects Draft SA Report (2015) and Submission SA (2016) sections 7, 8, 9 and appendix 1.
g) The measures envisaged to prevent, reduce and as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	Stage B-developing and refining alternatives and assessing effects Draft SA Report (2015) and Submission SA (2016) sections 10, 11 and appendix 1.
h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.	Stage B-developing and refining alternatives and assessing effects Draft SA Report (2015) section xx
i) a description of measures envisaged concerning monitoring in accordance with regulation 17	Stage E- Monitoring Draft SA Report (2015) and Submission SA Report (2016) sections 11, 13 and appendix 2.
j) A non-technical summary of the information provided within the SA/SEA report	Non-Technical Summary

Habitats Regulations

- 1.5 The European Directive 92/43/EEC ('The Habitats Directive') on the conservation of natural habitats, wild fauna and flora requires an Appropriate Assessment (AA) to be undertaken to assess the impacts of a land-use plan against the conservation objectives of any European Site(s) (or so-called Natura 2000 sites¹⁷) and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. The SA of the Core Strategy (2011) and the SA of the Development Management Local Plan (2013) established that there are no European sites within Hammersmith and Fulham, nor are there any adjacent to its administrative boundaries. The nearest is Richmond Park, an area for conservation (SAC) which is 5km to the south west of the borough. However, It is not considered that this site would be significantly adversely impacted upon by any of the policies in the Local Plan.

National statutory planning framework

- 1.6 Planning and Compulsory Purchase Act 2004- S19(5) of the Planning and Compulsory Purchase Act 2004 requires local authorities to carry out an appraisal of the sustainability of the proposals within each proposed local development document and to prepare a report of the findings of the appraisal.
- 1.7 Environmental Assessment of Plans and Programmes Regulations 2004 – The requirements of the Sustainability Appraisal process are detailed in the Environmental Assessment of Plans and Programmes Regulations 2004 ‘(the SEA Regulations)’. The SEA Regulations transpose the provisions of the EU Strategic Environmental Assessment (SEA) Directive 2001/42/EC or ‘SEA Directive’ into English law. However, the SEA Regulations go beyond the environmentally focussed considerations of the EU SEA Directive by also requiring an assessment of the wider social and economic effects of plans.
- 1.8 Town and Country Planning (Local Planning) (England) Regulations 2012 (‘the 2012 Planning Regulations’)- Regulation 17 of the 2012 Planning Regulations states that sustainability appraisal reports are a ‘proposed submission document’ and must be submitted to the Secretary of State with the Local Plan.
- 1.9 National Planning Policy Framework (NPPF) - Paragraph 14 states that a presumption in favour of sustainable development lies at the heart of the NPPF.
- 1.10 Paragraph 165 of the NPPF states:

‘A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process and should consider all the likely significant effects on the environment, economic and social factors.’

Purpose of the Sustainability Appraisal

- 1.11 The overall purpose of the SA (incorporating SEA) is to:
 - systematically assess the Local Plan to determine whether it takes account of environmental, social and economic considerations, collectively referred to as ‘Sustainable Development’ and by suggesting ways that can help to improve its sustainability;
 - identify and mitigate any potential adverse effects that the plan might otherwise have; and
 - ensure that the policies in the plan are the most appropriate given other reasonable policy alternatives.
- 1.12 In order to achieve its overall purpose, the development of the SA follows a prescribed staged approach, the compliance with which requires:
 - ensuring compliance with the European SEA Directive and UK regulations transposing the European Directive into UK law;
 - ensuring that the Local Plan takes account of relevant international and national legislation and policies;
 - establishing the baseline environmental, social and economic characteristics of the area by identifying any current environmental constraints, issues and problems;

- establishing sustainability objectives based on local sustainability issues and appraising and monitoring the Local Plan policies against these objectives;
- assessing viable policy options and alternatives; and
- reviewing the sustainability impacts of the options, and of the preferred policy option.

The Hammersmith and Fulham Local Plan

- 1.13 The London Borough of Hammersmith & Fulham (LBHF) has revised its principal planning policy documents which will guide development across the borough over the next 15-20 years.
- 1.14 This revision has resulted in the production of a key strategic planning policy document termed as the Hammersmith and Fulham Local Plan, which amalgamates the adopted Core Strategy (adopted in October 2011) and the Development Management Local Plan (adopted in July 2013) into one single document.
- 1.15 The policies in the Hammersmith and Fulham Local Plan document consist of:
- existing policies contained in the Core Strategy and the Development Management Local Plan;
 - policies contained in the Core Strategy and Development Management Local Plan which have been amended to reflect changes in the wider planning context;
 - new regeneration and strategic site policies which will focus on guiding development in specific parts of the borough;
 - new borough-wide development management policies, including TLC6 Addressing the concentration and clustering of betting shops and payday loan shops, TLC7 Public houses, CF4 Professional football grounds and DC10 Telecommunications and T7 Construction and Demolition Logistics; and
 - a new policy on planning contributions and infrastructure planning.
- 1.16 The council wishes to transform the borough over the next 15- 20 years. This transformation will involve the increased provision of housing, particularly affordable housing to meet the needs of local residents, and the development of sustainable communities; physical, social and economic regeneration; improved quality of life for all residents; and mitigation of and adaptation to the impacts of climate change.
- 1.17 Major regeneration and growth in the borough's four regeneration areas will deliver 19,800 new homes in the period 2015-2035 to meet local housing needs and it will also deliver 29,500 new jobs in the period 2015-2035. Regeneration will provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion.
- 1.18 After an examination in public, and upon formal adoption, the Local Plan will form the borough's principal planning policy document and will comprise a key part of the suite of statutory planning policies that will guide development across the borough over the next 15-20 years.

The development of the Local Plan and its relationship to this Sustainability Appraisal

- 1.19 The council originally commenced preparation of Development Plan Documents (DPDs) for the Core Strategy, Development Management policies and Site Specific Allocations in 2005.
- 1.20 Preferred options for the Local Development Framework Core Strategy and Site Specific Allocations were subsequently developed, taking into account the responses to an 'Issues and Options' consultation report in October 2005 and the results of the sustainability appraisal (SA) of the options identified.
- 1.21 The Core Strategy and Site Specific Allocations preferred options documents were made available for public consultation in June/August 2007.
- 1.22 The council subsequently took the decision to re-consult on Core Strategy Options (including strategic site specific allocations) in June 2009 and this document was accompanied by a revised SA report.
- 1.23 The Development Management Options document was subjected to public consultation in November 2009. A SA report was also prepared for this document.
- 1.24 The Core Strategy and accompanying SA reports were subject to consultation in October 2010. Following an Examination in early 2011, the Core Strategy was adopted in October 2011. The Development Management DPD and accompanying SA reports were subject to consultation in 2012. Following an Examination in 2012, the Development Management Local Plan was adopted in July 2013.
- 1.25 The council commenced preparation of the Local Plan in 2013. Preferred options for the Local Plan were subsequently developed, taking into account the responses to the issues and options consultation in 2013 and the results of the SA of the options. The draft Local Plan and preferred options were subject to public consultation in January 2015.

The Local Plan consists in large part of an amalgamation of the following planning policies:

- Core Strategy, adopted in October 2011; and
 - Development Management Local Plan, adopted in July 2013.
- 1.26 The majority of policies from these adopted policy documents have been included in the Local Plan and remain unchanged. However, some policies have been amended to ensure their continued relevance in the face of a changed policy context, principally the changes made to the London Plan. Additionally, the Local Plan also contains some new policies, notably those relating to the Hammersmith Regeneration Area. There are also new borough-wide development management policies to reflect changes to the planning context.
 - 1.27 The reasons for the council's decision to merge the Core Strategy and Development Management Local Plan and produce one comprehensive strategic planning policy document include:
 - the need to revise some of the policies in the Core Strategy and the Development Management Local Plan in accordance with changes to the broader policy context and/or local conditions in the borough;

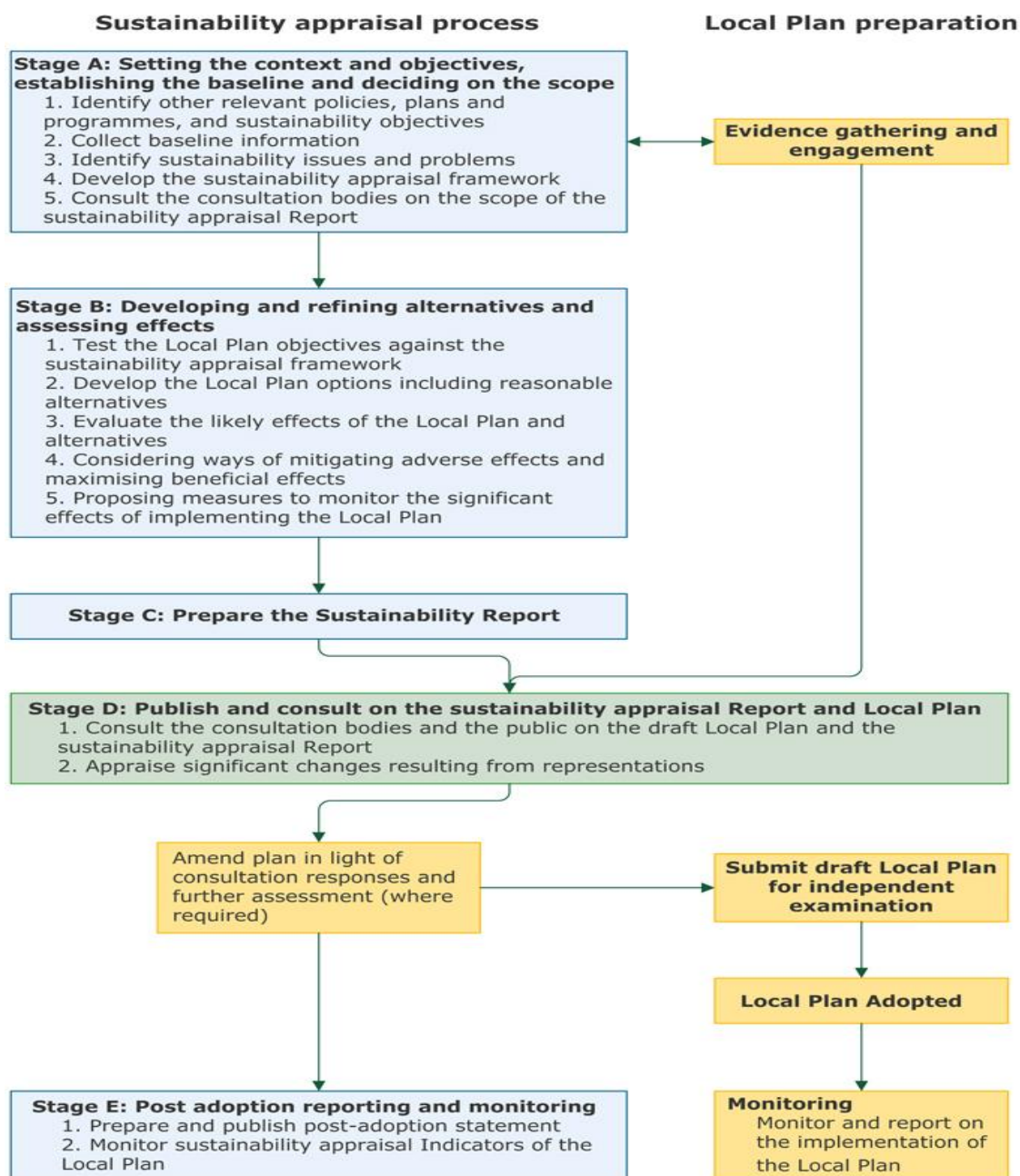
- the designation of the Old Oak and Park Royal Development Corporation covering northern parts of the borough and the removal of this area from H&F's planning authority; and
- the practical advantages of producing one comprehensive policy document, including avoiding having to duplicate the lengthy process associated with adopting Local Plans.

2 APPRAISAL METHODOLOGY

The stages of Sustainability Appraisal

- 2.1 There are five key stages in preparing a SA and these should be undertaken in parallel with the development of the Local Plan. The table below illustrates the key stages of the SA process and their relationship with the development of the Local Plan.¹

Diagram 1: The Five Stages of Sustainability Appraisal



¹ National Planning Policy Guidance: Strategic environmental assessment and sustainability appraisal (2014), <<http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>>, accessed 13 April 2014.

3 STAGE A: THE SA SCOPING REPORT

- 3.1 The first stage of the SA process (Stage A) for the Local Plan was the preparation of an initial SA report termed the 'SA Scoping Report'. The Scoping Report involved the following tasks:-
- Identifying and reviewing other relevant plans, programmes and policies and sustainable development objectives
 - setting out the 'baseline' of the existing social, environmental and economic conditions in the borough;
 - identifying sustainability issues facing the borough from the baseline conditions in the borough; and
 - identifying a number of sustainability objectives that were derived from an analysis of the specific sustainability issues facing the borough. These sustainability objectives form the basis for the SA and are used to test the sustainability of the Local Plan policies.
- 3.2 The SA Scoping Report was completed in January 2014 and sent out to prescribed agencies and other relevant stakeholders, particularly those with a sustainability remit for consultation.
- 3.3 Three comments were received to the SA Scoping Report consultation from English Heritage, Natural England and the Environment Agency. Their responses to the Consultation, including officer comments are set out in the draft SA (January 2015). This exercise established the overall framework of the sustainability appraisal.

Please see the [SA Scoping Report \(2014\)](#) in full for further information.

4 STAGE A (A1): POLICIES, PLANS, PROGRAMMES AND OBJECTIVES

- 4.1 The policies in the Local Plan have been influenced by a number of existing relevant international, national, regional and local legislation and policies.
- 4.2 The SEA regulations and government guidance require that existing policies, plans programmes and objectives that may influence the production of a Local Plan are reviewed and identified within the SA Scoping Report. The key plans, policies and programmes that have been reviewed during the SA process are listed below, with a full list provided within Appendix 3 of this document. Additional relevant documents that have been published since the production of the SA Scoping Report (2014) have also been included in this list.

National

- National Planning Policy Framework (2012) DCLG
- Planning Practice Guidance (2014) DCLG
- UK Sustainable Development Strategy “Securing the Future” (2005)
- The Code for Sustainable Homes: Setting the Sustainability Standards for new homes (2008)
- The Code for Sustainable Homes: Technical Guide (2012)
- Sustainable Communities: Building for the Future (2003) OPDM
- Sustainable Communities in London: Building for the Future (2003) OPDM
- National Infrastructure Plan 2014
- National Planning Policy for Waste (2014)
- Historic England Good Practice Advice in Planning (2015) Historic England
- Sustainable Drainage Systems- an Introduction (2003) Environment Agency
- Planning Policy for Travellers Sites (2012 & 2015) DCLG

London/Sub Regional

- Mayor of London, The London Plan: spatial development strategy for Greater London, GLA March (2016)
- The Mayor of London’s Housing SPG (2016)
- Town Centres SPG (2014) The London Strategic Housing Land Availability Assessment (SHLAA) 2013
- The Mayor’s Economic Development Strategy for London (2010)
- London Infrastructure Plan 2050 Update (2015) Mayor of London
- OPDC draft Local Plan (2015) Mayor of London

Local

- Core Strategy (2011) LBHF
- Development Management Local Plan (2013) LBHF
- Planning Guidance Supplementary Planning Document (2013) LBHF
- Earls Court and West Kensington Opportunity Area Joint SPD (2012)
- White City Opportunity Area Planning Framework (2013)
- South Fulham Riverside Regeneration Area (2013)
- Strategic Housing Market Assessment (2014, 2015 & 2016) LBHF

- Community Infrastructure Levy Charging Schedule (2015) LBHF
- Community Infrastructure Levy Viability Assessment (2014) Peter Brett
- Affordable Housing Viability Assessment (2016) BNP
- Employment Study Borough of Hammersmith and Fulham 2015 & 2016
- Retail Needs Study (2016)
- Waste Background Paper (2016) LBHF
- Open Space Background Paper (2016) LBHF
- Five Year Housing Land Supply Paper (2016) LBHF
- Tall Buildings Background Paper (2016) LBHF
- Strategic Flood Risk Assessment (2015) LBHF
- Surface Water Management Plan (2015) LBHF
- Parks and Open Space Survey (2008) LBHF

5 STAGE A (A2): BASELINE INFORMATION

Baseline information and sustainability issues

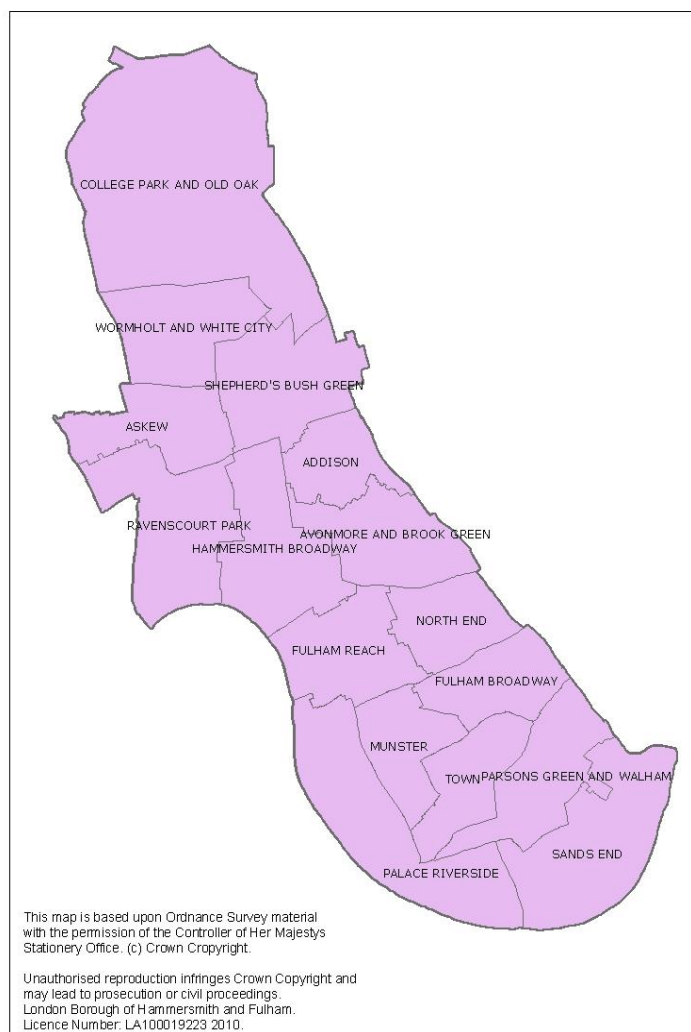
- 5.1 In order to carry out the Sustainability Appraisal of the Local Plan, information was collected and analysed to establish social, environmental and economic conditions of the borough. This is known as 'baseline data' and is primarily collected from the latest census data (2011) the council's own monitoring records and statistics as well as those collected from the GLA and other statutory partners.
- 5.2 Baseline information on the borough was gathered as part of the SA Scoping Report (January 2014). A summary profile of the information is set out below and data has been updated wherever appropriate. For further information, please see the SA Scoping Report (2014).

Context and baseline data

- 5.3 Hammersmith & Fulham is one of 13 inner London boroughs and is situated in the centre-west of London on the transport routes between the City and Heathrow airport. It is a long narrow borough running north to south with a river border at its south and south-west side. It is bordered by six London boroughs: Brent to the north; Kensington and Chelsea to the east; Wandsworth and Richmond-Upon-Thames to the south; and Ealing and Hounslow to the west. Excluding the City of London, it is the third smallest of the London boroughs in terms of area, covering 1,640 hectares.²
- 5.4 It is an area of contrasts, of wealth and poverty, and of attractive environments, many of which are protected by conservation area designations and other areas that are less attractive and that need improvement.

² Borough profile, 2014.

Map 1: Wards in H&F



Population

- 5.5 Hammersmith and Fulham is a small and densely populated west London borough. The population of Hammersmith and Fulham has risen by over 10% from 165,242 in 2001 to 182,500 in 2011. The GLA's 2015 projections estimate the population to be 186,800. The population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about half of all households having moved in the previous five years. Nearly half of the population (45%) is between the ages of 20 and 40 years old which is significantly higher than in London (32%) and the rest of the country (27%). The borough has a high proportion of single people, the fourth highest proportion (55.9%) in London. Three in ten (29%) of all households consist of one person (Source: 2011 Census).
- 5.6 According to the 2015 GLA population projections (SHLAA)³ the borough's population is expected to increase by 11,895 people (6.7%) between 2011 and 2021. This compares to a 9.1% increase in London as a whole. The further projected

³ Linked to the development trajectories from the Strategic Housing Land Availability Assessment (SHLAA)

increase in population between 2021 and 2031 is 8.2% a similar level to the London average (8.3%).

- 5.7 The main growth will occur for people aged 85 and over and is expected to increase by 2,260 by 2031, equivalent to 110%. During the same period, the population aged 65 to 84 is expected to grow by 61% and the population aged 50 to 64 to grow by 30%. The main growth in number of households will be in 'one person' households (32% up to 2026), while the number of 'couple' households will decrease by nearly 8%. The growth in population and the changing age distribution will place new demands on local public services such as education, health and housing.
- 5.8 The borough has a relatively young and ethnically diverse population with a higher proportion of young adults aged 20-40 (45%) than London and the rest of the country. According to the 2011 Census, 55.1% of the total population are from other ethnic group other than White British compared to 42% in 2001. Just over one in five residents are from non-white ethnic backgrounds, 3.5% were born in Ireland and there is a well established Polish community. Some ninety different languages are spoken in local schools. London's place as a world city means that the borough will continue to be home for many diverse groups of people, of different nationality, ethnic origin, religion and culture. A significant section of the population is highly mobile.

Housing

- 5.9 In 2010, there were 81,620⁴ dwellings in the borough. In 2011, only 34% of households in Hammersmith and Fulham were owner occupiers compared to an average of 56.5% across London. In 2001, more than 23% of all households in the borough were living in the private rented sector (Census 2001), rising to 33.3% in 2011. The constantly changing private tenant population also provides its own challenges for the borough's neighbourhoods and communities and for local public services.
- 5.10 Approximately one third of Hammersmith and Fulham's housing stock is social rented housing (31%) compared to an average of 24.1% in London. Social rented housing is particularly concentrated in the north of the borough, where over 40% of the housing is in this tenure. Shared ownership and other intermediate low cost housing only makes up 1.6% of housing stock in the borough (Census, 2011).
- 5.11 House prices and private sector rents are well above the London and the West London average. The very high cost of market housing both for owner and occupation and for rent impacts on who can afford to live in the borough, particularly those on low to middle incomes. As a simple measure of affordability, the ratio between lower quartile income and lower quartile house prices is calculated. Hammersmith and Fulham has a significantly higher ratio than Inner London, London and England as a whole. Using the 3.5x earnings as a measure of affordability and the current lower quartile income house price for the borough (at £360k), a household would need an income of £103k per annum to purchase an "entry level" property in the borough. The need for more affordable housing is demonstrated by the number of households on the Housing Register – 850 applicants.
- 5.12 Another key challenge in relation to housing supply is overcrowding. Hammersmith and Fulham is ranked 12th in terms of boroughs with the most overcrowded properties. All four wards in the northern sub area of the borough rank within the top

⁴ Source: HSSA, Regulatory Statistical Return and Joint Regional returns.

five for overcrowding. According to the 2011 census, 13% of dwellings are overcrowded by at least one bedroom. Private rented and social rented households have proportionately more overcrowding (17%) than owner occupied households (5%). Around two thirds of the housing stock in Hammersmith and Fulham is owned by the private sector. About 85% of this private housing stock is over 60 years old and about two thirds of the dwellings are in flats. Nearly one fifth of the boroughs private sector housing does not meet the governments decent homes standard.

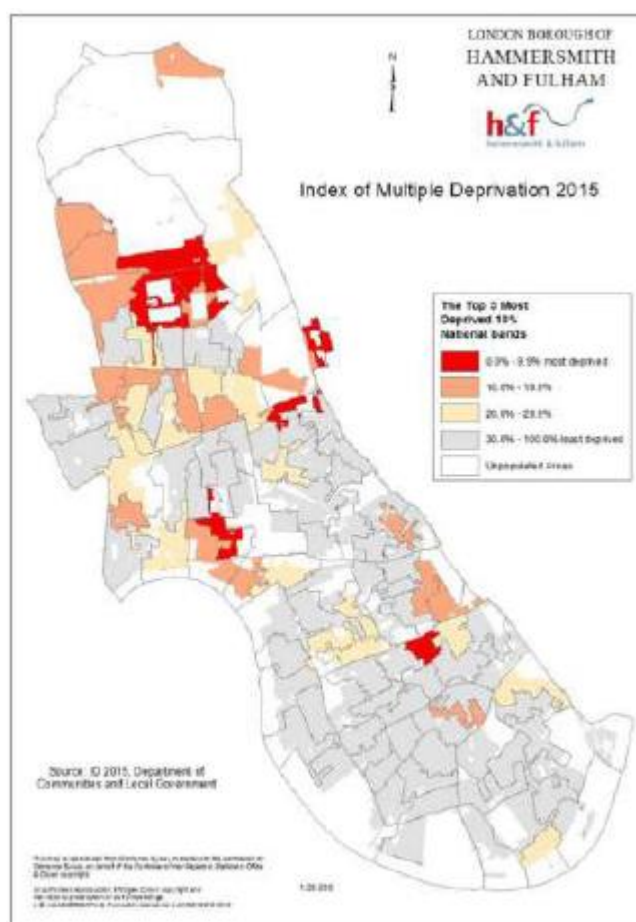
Deprivation

- 5.13 The borough has high levels of deprivation, with a strong correlation between high concentrations of social rented housing in the borough and deprivation. Social rented housing has increased from 24,630 (31.7%) in 2001 Census to 25,133 (31.1%) in 2011 Census. According to the 2015 indices of deprivation, it is ranked 76th most deprived Local Authority area in the Country (31st in 2010 and 38th in 2007). In some parts of the borough, in particular the north of the borough the proportion is significantly higher with significant pockets of deprivation. Eight (7%) of the borough's Lower Super Output Areas (LSOAs) are within the top 10% most deprived nationally. These areas comprise major public sector housing estates: White City, Clem Atlee, Edward Woods, Ashcroft Square, Wormholt and Charecroft. A further 15% of the borough's LSOAs are in the 10-20% worst nationally. Hammersmith and Fulham not only has high levels of deprivation, it is polarised socially and economically. E.g. in the last census (2011) 41% of household heads classified themselves as managers or professionals, while more than ¼ said they were entirely dependent on benefits.
- 5.14 Deprivation and low household incomes result in high levels of child poverty and health inequalities. About 20% of people are in poverty in Hammersmith and Fulham compared to 32% of children in poverty.⁵ Childhood poverty in Hammersmith and Fulham does not follow the general north-south divide, but is much more scattered geographically across the borough. In 2013, over 30% of nursery and primary school children and 23.8% of stated-funded secondary school children were entitled to free school meals in Hammersmith and Fulham compared to national figures of 15% and 12% respectively. Further details of the health, wellbeing and social care needs of the borough can be found in the Joint Strategic Needs Assessment 2013/14⁶ carried out by the council and NHS Hammersmith and Fulham (now NHS Hammersmith & Fulham Clinical Commissioning Group).

⁵ Children and Young People's Plan 2008-11

⁶ Joint Strategic Needs Assessment 2013/14

Map 2: Index of Multiple Deprivation (IMD), 2015



Education

- 5.15 Hammersmith and Fulham's overall GCSE results for 2013 were above the national average. However, there is a significant difference in attainment between schools. In 2012/13, approximately 66% of pupils achieved 5 GCSE A*-C grades including English and Maths.⁷ In some schools, the percentage of passes was much higher than the average, while in others it was much lower.
- 5.16 According to GLA projections, by 2031 the number of 4-10 year olds (Primary School) is predicted to rise from 13,368 to 16,208. For the age range 11-15 (Secondary School) numbers will rise from 7,337 to 9,975. Projections clearly show that the need for additional secondary places will increase after 2017 at a much faster rate than primary.

⁷ Borough profile, 2014.

Crime

5.17 The Annual Residents' Survey Results 2013, revealed that residents felt that motor vehicle crime, violence or assault, noisy neighbours and abandoned or burnt out cars were a worsening problem whilst robbery and burglary were felt to be less of a problem than in previous years. Overall residents said they felt safer in the borough. Total crime has reduced by 14% between 2013/14 and 2012/13, an actual reduction of 2,625 crimes. The official statistics show residential burglary down by 10% between 2013/14 and 2012/13. All wards saw a decrease in violent crimes between 2013/14 and 2012/13. Between 2012-13 and 2013-14 most anti-social behaviour incidents decreased.⁸

Health

5.18 In 2013, the standard mortality ratio (SMR) for Hammersmith and Fulham was 96 compared to 91 in London (England SMR=100). For deaths from all causes in Hammersmith and Fulham has decreased significantly since 2011. The average life expectancy for men in the borough was 79.1 years in 2010-12 which is at the same level as in England and Wales but slightly lower than in London (79.7 years). For women, the average life expectancy was 83.3 years in 2010-12, compared to 83.8 years in London and 82.9 years in England and Wales. Life expectancy in the north of the borough is on average 6 years less than in the south.⁹

Employment and the economy

5.19 Hammersmith and Fulham's economy is part of the wider London and West London economic area. It has seen significant growth in employment and economic activity, with the central Hammersmith area becoming an important sub-regional location for offices. It has a very successful and diverse economy and makes a significant contribution to the economies of London and the UK, with its concentration of businesses, retail and tourism.

5.20 In 2014, 155,450¹⁰ people worked in the borough which is an increase from the 127,173 in 2012 and 113,600 in 2007. Over the last ten years, there has been a 23% increase in the numbers of people working in the borough, and a 12% increase over the last five years.

5.21 However local employment opportunities are not shared by all residents. In order to ensure that all sections of the community benefit from projected economic growth, it is necessary to provide the opportunities to access necessary education, training and development that will fill emerging skills gaps.

⁸ Borough profile, 2014.

⁹ Borough profile, 2014.

¹⁰ LBHF Employment Study 2016

Transport

- 5.22 The strategic location of the borough and its position in relation to London's transport network means that it suffers from the worst congestion in London¹¹. Nearly one sixth of carbon emissions in Hammersmith and Fulham in 2011 was from road transport¹² and traffic related emissions contribute to the exceedance of air quality targets in the borough. The continuing population growth could increase congestion on the roads and transport systems and impact on the environment of the borough including air quality.
- 5.23 Public transport provision in the borough has improved, with a major transport interchange at Shepherd's Bush and new railway stations at Imperial Wharf on the West London line and at Wood Lane on the Hammersmith and City Line. However, pockets in the south and particularly those in the north of the borough have relatively poor levels of personal accessibility. The proposed HS2/Crossrail/Great Western Main Line interchange at Old Oak Common will significantly increase public transport capacity.
- 5.24 A specific challenge will involve ensuring that proposed growth in the borough, especially in the regeneration areas is adequately provided with new and improved transport infrastructure. The Council also supports more environmentally friendly means of transport, such as cycling and walking, and is investigating options for removing barriers to cycling and walking by replacing the Hammersmith flyover and other sections of the A4 with a tunnel.

Heritage assets

- 5.25 The borough has a rich and varied townscape character that is largely a result of its historical development. Archaeological remains from Roman, Saxon and Medieval periods have been discovered in the borough in areas which today form the focus for development. The current townscape and landscape structure of the borough can be clearly traced through the successive layers of development over the past two hundred years. Most of the borough's earliest buildings are now statutorily listed and most of the early patterns of development are recognised in conservation area designation. The river Thames is important site of archaeological value.

The borough has 45 conservation areas, with approximately 500 statutorily Listed Buildings, 2,150 locally designated Buildings of Merit, as well as a number of archaeological priority areas and the ancient monument of Fulham Palace moated site.

Open Space and Green infrastructure

- 5.26 There are three nature conservation areas of metropolitan importance in the borough, namely the River Thames and its inlets, the Grand Union Canal and the Kensal Green Cemetery. The waterways enhance the environment and character of the borough and provide the potential for further benefit to the borough.

¹¹ TfL RNPR Tech Note 3 April 2006

¹² Local & Regional CO₂ Emissions Estimates for 2005-06, DEFRA

- 5.27 The Thames performs many functions, ranging from being a transport resource to a refuge for plants and wildlife. Hammersmith and Fulham has three safeguarded wharves in the south of the borough identified in the London Plan (2016)¹³. The stretch of the Grand Union Canal within the borough now lies within the Old Oak Park Royal Development Corporation.
- 5.28 Many borough parks and open spaces are subject to nature conservation area designations. The borough also contains Registered Parks and Gardens of Historic Interest, Fulham Palace's gardens and Bishops Park. However, Hammersmith and Fulham has relatively little open space per person, just 231 hectares of public open space or 1.3 hectares of open space per 1,000 residents¹⁴. In some parts of the borough, particularly to the east, many residents do not have convenient access to local parks. Additional development in the borough will put further pressure on the open space that is available to local residents and visitors, unless additional open space can be created as part of new developments.

Efficient resource management

- 5.29 In order to accommodate the extra residential and commercial properties required to provide for the expected growth over the next ten years, there will need to be better strategic and local management of resources.
- 5.30 The cleanliness of local streets and open spaces is one of the most important issues for residents, with 40% of local people ranking cleanliness as the most important area for improvement in the borough, with 16% stating that parks are the most important area for improvement.
- 5.31 Although, the total amount of local authority collected waste has fallen from 79,407 tonnes in 2009-10 to 74,848 in 2014-15 the council's percentage of household waste sent for reuse, recycling or composting has also fallen. In 2014/15, 20.72% was sent for re-use, recycling or composting compared to 30.1% in 2011-12 and 23% in 2012-13. It is considered that this reduction in domestic recycling performance is largely based on the behaviour of individual households and can therefore be difficult to understand and predict.

Climate change

- 5.32 Climate change is, perhaps, the most significant issue for the 21st century affecting all our futures. Rising temperatures, building subsidence, flooding and increased precipitation will affect buildings, people, biodiversity and the overall environment of the borough. Climate change needs to be addressed in the Local Plan.
- 5.33 The borough can reduce its impact on climate change by using adaptation and mitigation measures. By reducing carbon emissions as a result of fewer vehicle movements, the use of transport that has low/zero carbon emissions such as modal shift to water and rail transport, reducing energy use, increasing energy efficiency in buildings and the management of waste and flood risk.

¹³ Mayor of London, The London Plan GLA 2016

¹⁴ Open Spaces and Outdoor Recreation Facilities in H&F 2006

- 5.34 Significant areas of this borough are subject to some risk of flooding. Climate change, will lead to more frequent extreme weather events, increasing the risk of flooding in Hammersmith and Fulham, particularly from surface water and sewer flooding. This will be an important consideration in planning for future development in the borough. New development will need to be flood proof and incorporate sustainable drainage systems where appropriate.
- 5.35 A further serious challenge is that of air quality. Road traffic is one of the main causes of carbon dioxide emissions, poor air quality and noise pollution in the borough. The main other cause of noise pollution and air pollution is air traffic, the flightpaths to Heathrow and its associated road traffic. In 2000, the whole of the borough was designated as an Air Quality Management Area for Nitrogen Dioxide, with an Action Plan adopted with the aim of meeting the government's national air quality objectives for nitrogen dioxide and particulates.

6 STAGE A (A3) KEY SUSTAINABILITY ISSUES

- 6.1 The review of relevant policies, plans and programmes and the baseline information gathered helped to identify a number of key sustainability issues and problems for which the Local Plan needs to address.
- 6.2 The key sustainability issues have been categorised under the sub-elements of sustainability, namely environmental, social and economic issues and are set out in table 2 below.

Table 2: Sustainability Issues in the London Borough of Hammersmith & Fulham

Sub-Element	Sustainability issue
Social	<ul style="list-style-type: none"> • Reduce deprivation and polarisation • Improve provision of essential social infrastructure to cater to projected changes in the population(Health, education and sports and leisure facilities) • Reduce crime and anti-social behaviour • Promoting housing opportunities for all by increasing housing supply, home ownership rates and diversifying tenure • Improving housing quality • Reduce the relatively high mortality(early deaths) ratio by improving health outcomes for residents and reducing health inequalities • Reduce the polarisation of employment opportunities and reduce dependency on benefits • Improve the quality of education in state schools • Increase council support for the third sector and volunteering • Improve amenity and quality of life for residents by creating safe and pleasant environments with a strong sense of place
Economic	<ul style="list-style-type: none"> • Reduce unemployment and increase investment in the borough; • Improve the level of education, training and local employment opportunities; • Prevent the loss of viable employment land • Enhance the vitality and viability of town and local centres • Identify and regenerate suitable areas to boost economic investment and employment
Environmental	<ul style="list-style-type: none"> • Improve the quality of the borough's public realm and green spaces and expand the borough's green infrastructure; • Conserve and enhance the borough's natural and built environment • Increase biodiversity across the borough • Reduce congestion and improve transport accessibility • Ensure a high quality public realm and design • Reduce and mitigate the local causes of climate change

	<ul style="list-style-type: none"> • Reduce flood risk • Improve efficiency in resource (water, materials and energy) • consumption; • Reduction of waste generated and an increase in waste treatment and recycling; • Improving street cleanliness and environmentally responsible behaviour with regard to fly tipping and waste disposal.
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

7 STAGE B: DEVELOPING AND REFINING ALTERNATIVES AND ASSESSING EFFECTS

7.1 In order to ensure that the Local Plan addresses the sustainability issues identified in the Scoping Report each policy option was assessed against the SA objectives in order to choose the most sustainable and preferred policy option. This stage included:-

- Testing the Local Plan objectives against the SA framework established in the SA Scoping Report.
- Developing the Local Plan options including reasonable alternatives
- Evaluating the likely effects of the Local Plan and alternatives
- Considering ways of mitigating adverse effects and maximising beneficial effects
- Proposing measures to monitor the significant effects of implementing the Local Plan.

8 STAGE B (B1) – TESTING THE LOCAL PLAN OBJECTIVES AGAINST THE SUSTAINABILITY OBJECTIVES

8.1 The strategic objectives of the Local Plan set out what the Plan is aiming to achieve in spatial planning terms. Testing the compatibility of the Local Plan's strategic objectives with the SA objectives is a formal stage in the SA process to establish the degree to which the Local Plan's objectives reflect the principles of sustainable development. This compatibility testing may also help in further refining the Local Plan's strategic objectives if needed. In order to ensure a more rigorous assessment and to help identify any internal inconsistencies and tensions, the Local Plan's strategic objectives were first tested for compatibility with one another.

8.2 It must be noted that whilst the aim should be to achieve consistency between plan's strategic objectives, in practice there may be tensions between objectives. Where win-win outcomes cannot be achieved, decision makers need to determine where the priorities should lie and this should be recorded explicitly as part of the SA process.

The objectives of the Local Plan

8.3 The Local Plan sets out a number of objectives, which outline the measures the council will encourage to help achieve the strategic vision for the borough. The objectives are listed below:

Table 3: Strategic Objectives of the Local Plan

Strategic Objectives	
Regenerating the Borough	<ol style="list-style-type: none"> 1. To regenerate the most deprived parts of the borough and the designated town centres, regeneration and opportunity areas by improving their viability and vitality and promoting a network of supporting key local centres providing local services. 2. To ensure that regeneration in the borough benefits and involves all sections of the community and meets the diverse needs of residents and visitors now and in the future.
Achieving sustainable communities	<ol style="list-style-type: none"> 3. To create opportunities for education, training and employment in order to reduce polarisation and worklessness and create more stable, mixed and balanced communities. 4. To ensure that both existing and future residents and visitors have access to a range of high quality facilities and services, including, health, education and training, retail, leisure, recreation, sporting activities, arts, entertainment and other community infrastructure, such as policing facilities and places of worship.
Delivering affordable homes for local people	<ol style="list-style-type: none"> 5. To increase the supply and choice of high quality housing and ensure that the new housing meets local needs and aspirations, particularly the need for affordable housing for local residents to rent or buy and for homes for families. 6. To protect social housing, improve services for council residents and provide more new affordable homes for local residents to buy or rent.
Building a stronger local economy	<ol style="list-style-type: none"> 7. To encourage inward investment, help foster job growth and promote the borough's many smaller and younger firms enabling a highly entrepreneurial economy to develop and remain in the borough. 8. To help advance businesses, particularly local firms and the third sector so that they maximise job opportunities, develop apprenticeships and recruit and maintain local people in employment and enhance the vitality and vibrancy of high streets. 9. To protect and enhance the borough's attractions for arts, science and technology and creative industries.
Delivering an environmentally sustainable borough	<ol style="list-style-type: none"> 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 design. 11. To protect and enhance the boroughs open green spaces and create new parks and open spaces where there is major regeneration, promote biodiversity and protect private gardens.

	<p>12. To increase public access and use of Hammersmith and Fulham's waterways as well as enhance their environment, quality and character.</p> <p>13. To reduce and mitigate local causes of climate change, mitigate flood risk and other impacts and support the move to a low-carbon future.</p> <p>14. To ensure the development of a safe, sustainable transport network that includes improvements to public transport, cycling and walking infrastructure which will improve transport accessibility and local air quality and reduce traffic congestion and the need to travel.</p>
Improving local health and adult social care provision	15. To maintain and improve health care provision in the borough and encourage and promote healthier lifestyles, for example through better sports facilities, to reduce health inequalities.
Tackling crime and anti-social behaviour and ensuring a safer borough	<p>16. To protect and enhance the amenity and quality of life of residents and visitors by providing a safe, accessible and pleasant local environment, characterised by a strong sense of place.</p> <p>17. To promote the safety and security of those who live, work and visit Hammersmith and Fulham.</p>
Delivering social and digital inclusion	18. To work with partner organisations to reduce social exclusion and facilitate access to high-speed internet across the borough.
Providing the best start for younger people	19. To ensure that the child care facilities and schools in the borough meet the needs and aspirations of local parents and their children.

Testing the compatibility of the Local Plan objectives

- 8.4 The internal compatibility of the Local Plan objectives have been tested using the matrix in table 5, with the results shown in table 4. This identified any inconsistencies between these objectives that could give rise to adverse environmental effects and if so mitigation measures or alternatives should be considered.

Table 4: Testing the compatibility of Local Plan strategic objectives

Objective 1																			
Objective 2	++																		
Objective 3	++	+/?																	
Objective 4	+	+																	
Objective 5	++	++	+/?	+/?															
Objective 6	++	++	++		+/?														
Objective 7	++	+			+/?														
Objective 8	++	+		+	+/?		++												
Objective 9	+/?	+/?		+	?		+/?	++											
Objective 10	+/?	+/?	?	+/?	+/?	+/?	?												
Objective 11	+/?	+/?	?	+	?	?	?			++									
Objective 12	+/?	+/?	+/?	+	+/?	?				++	++								
Objective 13	?	+/?	+/?	+/?	+/?	?				?	+								
Objective 14	++	++		++	++		++	++	+	++	+/?	+/?	+/?						
Objective 15	?	+/?		+	?					+/?	++	++	+/?	+/?					
Objective 16	+/?	+	+/?	+	+/?	+/?	+/?	+	+	++	++	++	?	+	+				
Objective 17	+/?	+/?	+/?	+		+/?				+	+/?	++	+/?	+	+	+			
Objective 18			+	+															
Objective 19		+/?		++												+			
	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9	Objective 10	Objective 11	Objective 12	Objective 13	Objective 14	Objective 15	Objective 16	Objective 17	Objective 18	Objective 19

Table 5: Methodology

Key	Definition of Impact
+/++	Compatible/ Strong compatibility
-	Incompatible/Tensions
?	Dependent on implementation
Blank	No Links

8.5 Generally, the Local Plan strategic objectives show a general internal compatibility subject to the actual implementation of the Local Plan policies. While no obvious incompatibilities were identified between the Local Plan strategic objectives, there are some inevitable tensions between the objectives promoting housing, businesses and local employment, open and green spaces and biodiversity, climate change mitigation and preservation of the character of the borough's natural and built environment. When implementing the policies of the Local Plan, it will be important for the council to recognise any potential conflicts between the Local Plan strategic objectives at an early stage so that any likely adverse or undesired effects can also be recognised and mitigated as far as possible.

The Sustainability objectives

8.6 The sustainability objectives developed during the SA Scoping Report are listed in the table below:

Table 6: Sustainability 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

Testing the Local Plan strategic objectives against the sustainability appraisal objectives

8.7 In order to identify any potential synergies or inconsistencies, the compatibility of the Local Plan objectives and the SA objectives were tested against each other. The SA objectives and most of the Local Plan objectives remain substantially unchanged since the adoption of the Core Strategy in 2011.

8.8 The SA prepared for the Core Strategy included a detailed assessment of the compatibility between both the Core Strategy objectives and the sustainability objectives, concluding that these objectives were broadly compatible with each other. Some tensions were identified, particularly between the objectives of increasing housing and economic development and those concerned with protecting and enhancing environmental quality. Measures to mitigate against and reduce the impact of any negative environmental effects included a recommendation that sustainability considerations be taken into account when implementing the Core Strategy policies, for example by incorporating energy and resource efficiency measures, encouraging biodiversity, ensuring public transport accessibility and avoiding inappropriate developments in areas prone to flooding. The assessment of the Local Plan objectives against the SA objectives came to similar conclusions as the Core Strategy, these are explained in more detail below.

8.9 The compatibility of the Local Plan objectives against the SA objectives were tested using the matrix in Table 8, with the results given in Table 7. A more detailed commentary is provided in Table 9.

Table 7: Compatibility of the Local Plan objectives against the Sustainability Appraisal Objectives

Local Plan Strategic Objectives												
1	+/?	+/?	+/?	++	+	+/?	+/?	?	+/?	+/?	+/?	+
2	+	+	+/?	+	+/?	+/?	+/?	+/?	+	?	+/?	+
3	+	+	+	+	+	+	+/?					+
4	+	+	+	+	+	+	+/?	?	+/?		?	++
5	+	+/?	+/?	++	+	+/?	+/?	?	+/?	+/?	+/?	+
6	++	+/?		++	+		+		?	+/?	+/?	+
7	+/?	+/?	+	+/?	+	+/?	+/?	?	?	+/?		++
8	+	+/?	+		+	+/?	?	?	?			++
9	+	+	+		+	+	?	?				+
10	+	+		?	++	+	++	+			+	+/?
11	+	++		?	++		++	+			+	?
12	+	++		+	+		+	+/?		+/?	+/?	+/?
13	+			+/?			?	++	++	+	++	?
14	+	+	+	+/?	+/?	+/?	?	++	+	+/?	+	+
15	++	++	+	+	+/?	+/?	+/?	++	++		+	+
16	+	+		+/?	++	+/?	+/?	++	+	+	?	+/?
17	++	++	+	+/?	++	?		+	+			+
18	++											
19	++	+	++	+	+	+			+/?		+/?	++
SA Objectives	1	2	3	4	5	6	7	8	9	10	11	12

Table 8: Methodology

Key	Definition of Compatibility
+/++	Compatible/ Strong compatibility
-/--	Incompatible/Strong incompatibility
?	Dependent on implementation
Blank	No Links

8.10 Overall, an analysis of Table 7 shows that the Local Plan's strategic objectives are compatible with the sustainability objectives. However, in many instances this compatibility will depend upon how the Local Plan policies are implemented. The results are explained in more detail below.

Table 9: Explanation of compatibility test between the Sustainability Appraisal Objectives and Local Plan Strategic Objectives

Sustainability Appraisal Objective	Effect on compatibility with Local Plan strategic objectives
1. Increase equity and social justice	Overall positive and very positive compatibility, particularly for Local Plan (LP objectives 14,10 & 12. However, care should be taken when implementing regeneration (1) and economic development (5) objectives to ensure that vulnerable groups of people living and working within these areas are not placed at particular disadvantage or treated inequitably.
2. Improve health of population overall	Overall positive and very positive compatibility, particularly for LP objectives 15,12 11 & 12. Care should be taken when implementing LP objectives 1,5,6,7 & 8. In particular, if regeneration of identified areas includes estate renewal and rebuilding of new housing, care should be taken that these areas are equally or better provided with affordable housing, sustainable transport modes, access to open spaces and community and leisure centres and are not located in areas of relatively poor air quality, noise or other pollution sources which could adversely impact on health.
3. Improve the education and skills of young people and adults	Broadly positive compatibility. Care should be taken when implementing policies supporting LP objectives 1, 5, 2 as there is the potential for some tensions to arise between these objectives and those promoting education, notably in terms of any competition for space between education uses(developing new schools, colleges, etc) and other key priorities such as housing and commercial uses.
4. Provide decent and affordable homes	Very strong positive compatibility with LP objectives 1,5 & 6, with positive compatibility with other objectives. However, care should be taken when implementing policies furthering LP objectives 7,12,16 & 14 to ensure that these are balanced against the objective to provide an increased range of better and more affordable housing. For instance, care should be taken to balance housing need with overall scheme viability and with other priorities such as the need to attract economic investment to support business growth. Similarly, the need for additional new housing should not come at the expense of the amenity and quality of life of existing residents. This may be mitigated by ensuring new housing development is well designed and located, complements the scale and character of the area and preserves local amenity and the quality of life of local residents by not encroaching upon open and green spaces.
5. Increase local residents' sense of	Generally, there is a positive compatibility between objectives, with a very strong positive compatibility with LP objectives 17,16 ,10 & 11 . LP objectives 8,15 ,14 & 2 pose some uncertainty and care

Sustainability Appraisal Objective	Effect on compatibility with Local Plan strategic objectives
community and social cohesion	should be taken when implementing policies supporting these objectives to ensure the preservation and enhancement of any existing sense of community and social cohesion. This may be achieved through sensitive and careful planning based on best practice, sustainable urban design principles and early consultation with local residents on major planning proposals. Other measures to mitigate or reduce any negative impacts may include seeking S106 developer contributions or allocating Community Infrastructure Levy funds towards suitable infrastructure projects in the areas concerned.
6. Increase the opportunities for satisfying and well paid work	While there is general compatibility with the LP objectives, a strong compatibility between the objectives will be dependent on the implementation of relevant policies. Policies supporting LP objectives 1,5,7,8,14 & 2 all offer varying potential to help achieve Sustainability objective 8. However, care should be taken that regeneration and economic development policies do not adversely affect existing viable businesses and niche employment sectors that may be located in these areas of change. Where such impact is unavoidable, the impacts should be mitigated or reduced as far as possible. This may include modifying planning applications if appropriate, seeking developer contributions and/or Community Infrastructure Levy funds to mitigate impacts by supporting these employment sectors or assisting affected businesses to relocate in other suitable locations in the borough. Additionally, there may be potential conflict with policies supporting LP objectives 15 ,17 & 16 if these are not implemented in a sustainable manner. For instance, permitting and locating employment generating industries that cause pollution in close proximity to residential areas can result in reduced health outcomes and amenity for affected communities and can increase health inequalities in the borough.
7. Improve the local environment and heritage	While there is a strong positive compatibility with LP objectives 10 and 11, overall, the compatibility of this SA objective with other LP objectives will be dependent upon the implementation of relevant LP policies, notably those concerning regeneration, housing, employment and economic development, which may conflict with this sustainability objective. The fact that any loss of these heritage features will be permanent emphasises the need for sensitive and innovative planning and urban design measures that can achieve positive sustainability outcomes. Nonetheless, tensions for space for different land uses, including pressures to develop on the borough's open and natural spaces are likely to remain.
8. Reduce the level of pollution	There is general compatibility between the objectives with strong compatibility with LP objectives 15,16,13 & 14. The main tensions however concern the objectives to intensify land use through regeneration and additional housing and economic development and the likely increase in pollution that this intensification is likely to result in. Air pollution resulting from the increase in motorised transport is likely to be the greatest source of additional pollution

Sustainability Appraisal Objective	Effect on compatibility with Local Plan strategic objectives
	<p>associated with increased development in the borough. New buildings will also consume energy and water and contribute to carbon emissions. A range of mitigation measures may be applied to reduce the negative effects of this pollution. These could include, reducing the need to travel using private motorised transport and encouraging sustainable transport modes; ensuring new buildings are resource efficient; locating developments that are substantial transport generators close to public transport and incorporating Sustainable Drainage Systems in new developments to divert polluted runoff away from waterways.</p>
<p>9. Reduce the effect of transport on the environment</p>	<p>This SA objective is very similar to the previous one, but is broader in scope as it encompasses the wider effects of transport on the environment, which would include pollution but also other issues such as the severance effect of communities by roads in particular, road safety issues, amenity and associated planning issues caused by increased private vehicle ownership such as parking stress on local streets, the pressure to provide parking in new developments, increased pressure on the existing road infrastructure to accommodate more vehicles, the loss of front gardens for parking purposes and the paving over of land for parking which contributes to runoff and flooding. There is very strong compatibility with LP objectives 15 & 13 and positive compatibility generally with objectives aimed at improving amenity and quality of life for people within the borough. The compatibility of LP objectives 1, 5, 6, 7, 8, 4 & 19 with this SA objective will depend largely on the implementation of the policies related to these objectives. Regeneration and housing schemes of all scales should consider the effects, including cumulative and synergistic effects of any additional transport needs generated as a result of these developments and its effects on the environment. Mitigation measures should be implemented to reduce the negative transport effects on the environment and could include ensuring the provision of adequate public transport in close proximity to the proposed developments, seeking developer contributions and/or using CIL funds to fund sustainable transport infrastructure, promotion of sustainable transport use and preventing wherever possible, the paving over of gardens and other permeable spaces for parking purposes.</p>
<p>10. Responsible consumption of resources in the borough</p>	<p>The compatibility of this SA objective with those of the LP objectives will be dependent on the implementation of relevant LP policies. Increased development in the borough will inevitably lead to an increased consumption of resources. Policies should include measures that aim to maximise efficiency in the development process by placing an emphasis on reducing resource consumption and increasing recycling from the earliest stages of any proposed development.</p>
<p>11. Reduce climate change and its impact</p>	<p>The compatibility of this SA objective with those of the LP objectives will be dependent on the implementation of the relevant LP policies. Local authorities have a statutory duty to address climate change;</p>

Sustainability Appraisal Objective	Effect on compatibility with Local Plan strategic objectives
on the borough	the London Plan also contains a number of policies aimed at addressing this issue. As such, it is reasonable to surmise that LP policy implementation will contribute towards ensuring compatibility between the LP objectives and the SA.
12. Improve the sustainability of the local economy	There is very strong compatibility with LP objectives 4, 7, 8 & 14. The compatibility with LP objectives 16, 10, 11, 12 & 13 relating to the preservation of amenity, the natural and built environment (including the borough's waterways) and addressing climate change will depend on how policies aimed at achieving SA objective 12 are implemented. It is likely that tensions will arise between the pursuit of economic development objectives and those related to the above mentioned objectives.

9 STAGE B (B2 & B3) - DEVELOPING THE LOCAL PLAN OPTIONS AND EVALUATING THE LIKELY EFFECTS OF THE LOCAL PLAN

- 9.1 This section of the SA covers task B2: Developing the Local Plan options and task B3: Evaluate the likely effects of the Local Plan. The SEA Directive requires that consideration is given to alternative options to addressing key issues within the Local Plan, with a view to informing the selection and development of the preferred strategy. The assessment of alternative policy options for the Local Plan was presented in the draft [SA Report \(January 2015\)](#) and is not replicated in this SA. Instead, an appraisal of the proposed policies in the Proposed Submission Local Plan are set out in Appendix 1 of this document.
- 9.2 As part of the preparation of the draft Local Plan, the preferred policies and alternative options were appraised and any issues that arose through the assessment process were identified. Where a preferred policy option was found to generally be the most sustainable but could be improved, recommendations were put forward and included in the Local Plan.
- 9.3 Throughout the sustainability appraisal process, many detailed discussions took place during the development of the Local Plan policy options between the planning officers and the officer who undertook the appraisal process. During these meetings feedback was provided by the officer appraising the policies on how the wording of the specific policies could be improved, so that these would have a better impact in terms of social, environmental and economic sustainability.
- 9.4 The Local Plan consists of policy options arising from:
- Existing policies in the Core Strategy (2011) and Development Management Local Plan (2013)
 - Policies in the Core Strategy and Development Management Local Plan which have been amended to reflect changes in wider planning context.
 - New regeneration and strategic site policies which will focus on guiding development in specific parts of the borough

- new borough-wide development management policies, including TLC6 Addressing the concentration and clustering of betting shops and payday loan shops, TLC7 Public houses, CF4 Professional football grounds, DC10 Telecommunications and T7 Construction and Demolition Logistics.
 - a new policy on planning contributions and infrastructure.
- 9.5 As a consequence of the background of the Local Plan policies, some of these policies have already been subject to a number of separate SA reports. The development of the Local Plan policies has drawn upon the previous sustainability appraisals where appropriate and refreshed these appraisals if needed.
- 9.6 The following sustainability appraisal reports for the Core Strategy and Development Management Local Plan are available to view and download from Hammersmith and Fulham's website:
- *Sustainability Appraisal Core Strategy (2011)*
https://www.lbhf.gov.uk/sites/default/files/Sustainability_Appraisal.pdf
 - *Sustainability Appraisal for the Submission Development Management Local Plan (2013)*
https://www.lbhf.gov.uk/sites/default/files/section_attachments/dm_4_sustainability_appraisal_for_submission_dm_dpd_tcm21-173805.pdf
- 9.7 The SA of the appraised Local Plan reveals that policies are broadly in accordance with the identified sustainability objectives. However, in practice, the sustainability of the strategic regeneration promoted by the Local Plan as well as more minor development will largely depend on the degree to which the numerous measures promoting sustainability within the policy document are implemented when planning applications are determined.
- 9.8 All of the preferred and alternative policy options in the draft Local Plan (2015) and proposed policies within the Proposed Submission Local Plan (2016) have been appraised using the matrix displayed in Table 10. The Secondary, cumulative and synergistic effects for each policy chapter have also been identified.
- 9.9 Table 10: Local Plan sustainability matrix:-

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

- 9.10 Section 7 of the draft SA Report (2015) provides an appraisal of the preferred and alternative policy options within the draft Local Plan, whilst Appendix 1 of this Submission SA Report (2016) provides an appraisal of the proposed policies within the Proposed Submission Local Plan (2016).

10 STAGE B (B4)-MITIGATING ADVERSE EFFECTS AND MAXIMISING BENEFICIAL EFFECTS

Mitigation measures to minimise adverse effects and maximise beneficial effects

- 10.1 The Local Plan sits within a hierarchy of wider statutory planning instruments which broadly govern the strategic parameters of development in the borough. These instruments include national planning legislation, the National Planning Policy Framework, the London Plan and other statutory guidance issued by the Mayor of London. It is expected that Local Plan policies should be in general conformity with those in the London Plan unless relevant conditions and evidence exist that justify a variation in policy approach. As these higher level planning policies must also comply with the SEA Directive and Regulations, the Local Plan's scope to cause significant adverse environmental impacts is already limited.
- 10.2 Furthermore, a number of the Local Plan policies have already been adopted as part of the council's Core Strategy and Development Management Local Plan. These policies have therefore been subjected to a series of earlier SA's. This history of plan making further limits the possibility that the policies within the Proposed Submission Local Plan will result in significant adverse environmental effects.
- 10.3 Notwithstanding the above circumstances, the policy context as well as the issues facing the borough is subject to continuing change. The SA for the Local Plan has revisited previous SA's for the Core Strategy and Development management Local Plan and has updated and refreshed these policy appraisals where necessary. In the case of new policies, these have required completely new appraisals. A number of recommendations were made as part of the appraisal process to improve the overall sustainability of the Local Plan in accordance with the iterative nature of the SA and as part of the need to mitigate any negative effects that the SA considered might arise on implementation of the policy. In most instances, planning officers accepted the recommended changes and these have been incorporated into the Local Plan. Recommendations included the following:
- The White City Opportunity Area Planning Framework SPD may need to be updated to reflect the revised adopted policy WCRA (White City Regeneration Area) in the Local Plan. The accompanying sustainability appraisal of the SPD may also need updating.
 - Most of the Hammersmith Regeneration area (HRA) is at risk from tidal flooding and is located in Flood Zone 3a. As such specific Flood Risk Assessments will be required for any planning application and more vulnerable uses will need to pass the Exception Test in accordance with National Planning Policy Framework and national Planning Practice Guidance.
 - SFFRA (South Fulham Riverside Regeneration Area) suffers from relatively poor accessibility and therefore it is essential that public transport and accessibility improvements should be sought for this area.
 - Policy HO10 Gypsy and traveller accommodation- The council will need to continue to work closely with RBKC and the local traveller community to determine how best to meet the identified needs.
 - Policy TLC6 Addressing the concentration and clustering of betting shops and payday loan shops will need to be supported by robust evidence to justify the Council's approach to restricting betting shops in the borough. Evidence could

focus on the potential health impacts of betting shops and payday loan shops on the local community as well their finances.

- Policy C6 Strategic Waste Management – Now that our waste sites lie within OPDC, the council will need to continue to work closely with OPDC and other WRWA's to ensure London Plan waste apportionments are met. This may involve the preparation of a joint waste study with the WRWA's and OPDC.

11 STAGE B (B5) - LOCAL PLAN PROPOSED MONITORING OF SIGNIFICANT EFFECTS

- 11.1 The council is legally required to monitor the significant environmental effects of the implementation of the Local Plan, with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.
- 11.2 The results of this monitoring will be included in the council's Monitoring Reports. Among other things, the Monitoring Reports will identify and assess a number of indicators linked to the Sustainability Objectives. A list of proposed indicators is included in appendix 2. Most will fall upon the council to gather information and monitor, but some will require the input of other public bodies. It will be necessary for sufficient resources to be allocated for the task of monitoring. In addition, it will be important to keep the list of indicators under review so that monitoring remains effective.
- 11.3 The list of indicators, if monitored consistently, will enable any significant sustainability effects to be identified, demonstrating progress made towards the achievement of the objectives or alerting the council on remedial action that may need to be taken if negative effects have arisen. Although it is recognised that monitoring is subject to factors such as quality of data and resources, the benefits of monitoring will increase as a time series of performance is built up which will assist in identifying trends and suitable policy responses.

12 Stage C: Preparation of SA Report and Stage D: Consultation

Draft SA and Draft Local Plan

- 12.1 Following assessment of the Local Plan policy options and alternatives during stage B, a draft SA report was prepared to accompany the draft Local Plan. This outlined the SA process undertaken to date and presented the findings of the individual assessment of the policy options and alternatives in the draft Local Plan. Reasons for selecting the preferred options and rejecting the alternatives were also given, with recommendations provided where improvements could be made to the sustainability of the policy. The draft SA and draft Local Plan were published for a 6-week consultation in January 2015.
- 12.2 Comments were received specifically to the draft SA from the Environment Agency in relation to a number of environmental policies in the draft Local Plan. In addition, a number of comments were made directly on the draft Local Plan which provided support for some of the alternative policy options, most notably the alternative policy option of not actively promoting the regeneration areas and strategic sites within the borough. However, as shown in the draft SA, the alternative options for the regeneration areas and strategic sites were found to be less sustainable than the

preferred options and therefore dismissed and the council have not been convinced otherwise.

Submission SA and Proposed Submission Local Plan

- 12.3 Following consultation on the draft Local Plan, a number of changes were made to the Local Plan policies. These changes resulted from consideration of consultation responses, updated national and regional planning policy and new evidence gathered by the council.
- 12.4 Appendix 1 of this Submission SA Report provides an updated assessment of the proposed policies within the proposed Submission Local Plan, which includes consideration of any amendments made following the previous stage of consultation. This has involved revisiting stage B of the SA process to consider and assess the impact, if any, on the sustainability objectives. Amendments have also been made to the Local Plan in relation to changes to national legislation and London Plan policies and where updated evidence has pointed to a need for redrafting.
- 12.5 A number of key changes to the Local Plan are highlighted below. Further commentary is then provided as part of the individual assessments of all Proposed Submission Local Plan policies in Appendix 1 of this document:-
- **Policy H03 Affordable Housing** - Increase in affordable housing requirement from 40% to 50%.
 - **Strategic Policy OORA Old Oak Regeneration Area**- policy removed from Proposed Submission Local Plan
 - **Strategic Policy HRA2: King Street East**- policy removed from Proposed Submission Local Plan
 - **Policy DC11 Basements**- additions and amendments made to the criteria in the policy
 - **Policy HO6 Accessible Housing**- Amendments made to the policy in accordance with changes to national planning policy
 - **Policy CC4 Minimising Surface Water Run Off and SUDS**- new policy to address surface water run-off
 - **Policy CC3 Minimising Flood Risk and Reducing Water Use**- changes to the criteria in the policy
 - **Policy T5 Housing with Reduced Parking**- policy removed from Proposed Submission Local Plan.
 - **Policy TLC4 Local Centres** -changes to the use class quotas for Key Local Centres, Neighbourhood Parades and Satellite Parades to allow greater flexibility for changes of use to non A class uses where appropriate.
 - **Policy TLC3 Town Centres**- policy removed from Proposed Submission Local Plan (moved justification of TLC3 into justification of TLC2)
 - **Policy TLC2: Town Centres**- changes to the use class quotas and policy criteria to allow greater flexibility for changes of use from A class use where appropriate
- 12.6 This submission SA Report will be published alongside the Proposed Submission Local Plan for a further stage of consultation in September 2016 (Regulation 19).

13 Stage E: Monitoring

- 13.1 The council is legally required to monitor the significant environmental effects of the

implementation of the Local Plan with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

- 13.2 The results of the monitoring will be included in the council's Monitoring Report's. Among other topics, the monitoring reports will identify and assess a number of indicators linked to the SA objectives. This will assist in measuring how well the Local Plan contributes towards sustainable development and will also help to inform any future review of policies and plans in the Local Plan.
- 13.3 As part of the SA, a monitoring framework has been developed (Appendix 2) with a series of key performance indicators to measure against the SA objectives.

14 Conclusions

Summary of Key Findings and Effects

- 14.1 The assessment of Local Plan policy options has informed the preparation of the Proposed Submission Local Plan which outlines the council's strategy and policies for development in the borough over the next 15-20 years.
- 14.2 This SA Report is the latest in a series of SA's to be published on Council planning documents, with previous reports being made in June 2007 (Core Strategy Preferred Options), June 2009 (Core Strategy Options), October 2011 (Core Strategy), July 2013 (Development Management Local Plan) and January 2015 (draft Local Plan).
- 14.3 The strategic objectives of the Local Plan set out the many and varied aims of the council in relation to land use and future development in the borough. Overall, the SA has revealed that the Local Plan policies exhibit a broad commitment to the principles of sustainable development and are largely compatible with the assessment objectives of the SA process.
- 14.4 It is the Local Plan's objective to regenerate the most deprived parts of the borough and increase housing where there is most tension with the SA objectives. Nonetheless, the SA has considered that through appropriate mitigation measures, any in-compatibilities can be reduced and in some cases eliminated, provided that the policies in the Local Plan are implemented in a sustainable manner. For example by incorporating energy and resource efficiency measures, making space for biodiversity, ensuring public transport accessibility and avoiding inappropriate development in flood risk areas.
- 14.5 The Local Plan's proposed approach is to focus major growth in four key regeneration areas to promote new housing and employment activities throughout these areas and to deliver supporting infrastructure. In addition, the Local Plan sets out a designated town and local centre hierarchy, which overlaps with the regeneration areas.
- 14.6 The SA has found the council's approach to regeneration is sustainable. For each of the four regeneration areas identified, the Local Plan sets out policies for the overall strategy and vision for the area and the proposals for sites of strategic importance. In relation to the policies for the key regeneration areas and strategic sites, the SA has found no wholly unsustainable policies have been put forward. In general, the policies meet social and economic criteria but there is less certainty as to whether

they will meet the environmental objectives as this will depend on implementation of the policies through development management.

- 14.7 Throughout the SA process recommendations were made in order to ensure a high level of sustainability in those development management policies concerned with environmental criteria. The SA has also recommended that more in depth SA's are carried out for the key regeneration areas, for example as individual area planning frameworks are prepared or updated and that appropriate appraisals accompany major planning applications.
- 14.8 In addition to the overarching spatial strategy and regeneration area policies, the Local Plan includes a number of boroughwide development management policies to help deliver the spatial strategy and to ensure that development both inside and outside the proposed regeneration areas contributes to meeting the council's objectives. The proposed boroughwide development management policies in the Local Plan are generally sustainable, and in addition are accompanied by viability assessment criteria where appropriate.
- 14.9 Overall, therefore the strategic objectives, spatial policies, regeneration areas and strategic sites and boroughwide development management policies are generally sustainable. This is expected given the iterative nature of the Local Plan process and the fact that the sustainability appraisal has run side by side with the development of policy options.
- 14.10 It should also be borne in mind that, in general, growth in London is supported by national and London wide policy and can be more sustainable in highly accessible areas like Hammersmith and Fulham. Achieving the council's vision, including regenerating deprived areas of the borough and delivering affordable housing for local people and improving local health and social care provision will, however have an impact on the environment and will need to be managed carefully, (e.g. minimising carbon emissions and resource use) through development management and environmental standards.
- 14.11 The sustainability effects of the Local Plan will largely depend upon the implementation of its policies through the development management process and therefore it will be important to ensure that the policies in the Local Plan are monitored closely and at an early stage in order to identify any unforeseen negative effects, which may occur.
- 14.12 Some policies may require further SA assessments as part of the preparation of more detailed regeneration area SPD's for the borough or when planning applications are submitted. Therefore, despite this SA appraisal, the difficult target of achieving sustainable development will remain and it will be necessary for future development, particularly major schemes to be assessed on an individual basis in terms of its impact on sustainability.

15 Next Steps

- 15.1 The next stage of the SA process is to consult on this Submission SA Report alongside the Proposed Submission Local Plan for 6-weeks (Regulation 19). The Proposed Submission Local Plan along with any representations received will be submitted to the Secretary of State for independent examination. The appointed inspector will consider whether the Local Plan is found sound and legally compliant.

Appendices

Appendix 1: Appraisal of Individual Proposed Submission Local Plan Policies

Appendix 2: The SA Framework- Objectives & Monitoring Indicators

Appendix 3: List of Policies, Plans & Programmes

Appendix 4: Representations to the SA- Draft Local Plan Consultation (Regulation 18)

Appendix 1: Proposed Submission Local Plan Individual Policy Assessments

Policy DEL1-Delivery and Implementation

The council will implement the policies and proposals of the Local Plan by:

- **working with stakeholders and partner organisations through a variety of fora and other arrangements, including resident working groups and designated neighbourhood forums;**
- **preparing other Local Plan documents, supplementary planning documents, joint Opportunity Area Planning Frameworks (OAPFs) development briefs, master plans and best practice guidance where necessary;**
- **maintaining an Infrastructure Schedule (part of the Infrastructure Delivery Plan) that identifies the infrastructure projects and programmes that seeks to create the most benefits from development;**
- **utilising development management powers, including pre-application discussions and involving partner organisations where appropriate;**
- **having regard to the financial viability of development in the following ways:**
 - **plan-making;**
 - **CIL charge-setting; and**
 - **negotiating Section 106 Agreements ('106s'), including for affordable housing.**
- **allocating council funding and seeking other monies for projects which support the Local Plan; and**
- **preparing authority monitoring reports on an annual basis to review the effectiveness of policies and identifying alterations where necessary.**

This policy on delivery and implementation of the policies and proposals in the Local Plan should have a positive impact on all of the SA objectives. It emphasises that the council will work with partner organisations, resident working groups and designated neighbourhood forums when implementing the policies and proposals in the Local Plan. The introduction of resident working groups and the designation of neighbourhood forums in the borough will enable local communities to have more involvement in planning decisions that affect their local areas and will enable resident's views to be considered at an early stage of a scheme's development.

The policy refers to negotiating section 106 agreements for affordable housing as well as using funding for other projects. In accordance with the principles of the Local Plan Viability Protocol (Appendix 9) the policy will seek to ensure that the maximum reasonable level of affordable housing is provided on sites and that other plan requirements are met.

Continual monitoring of the policies and proposals in the Local Plan will ensure that those which are not effective will be reviewed and updated which should help to ensure that the SA objectives continue to be achieved.

Section 106 agreements will be levied at a rate that does not threaten viability of development in the borough.

POLICY	SUSTAINABILITY OBJECTIVES											
Delivery and implementation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Assessing secondary, cumulative and synergistic effect

The delivery and implementation policy, with its identification of viability as a factor to be taken into account, is anticipated to contribute positively towards the Local Plan's strategic objectives including: objective 5 – which seeks to increase supply of housing, particularly affordable housing for local residents, 4 – which seeks to provide a range of high quality facilities and services and other community infrastructure, and 2 – which seeks to ensure that regeneration benefits the whole community. The policy makes reference to the council negotiating Section 106 agreements for affordable housing and working with partner organisations and resident working groups, as well as neighbourhood forums to deliver the policies and proposals in the plan. The delivery and implementation of the Local Plan's proposals and policies are likely to have a positive, short to long-term cumulative effect on SA objectives.

Regeneration Area Strategies

Strategic Policy- Regeneration Areas

The Council supports major regeneration and growth in the borough's four regeneration areas and will work with the local community and key stakeholders to ensure that within these areas, proposals will:

- **provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion;**
- **deliver 19,800 new homes in the period 2015-2035 to meet local housing needs and enable local residents to access affordable homes to buy or rent;**
- **deliver 29,500 new jobs in the period 2015-2035, providing a range of skills and competencies and supported by initiatives to enable local residents to access employment and training; and**
- **deliver new physical, social and environmental infrastructure that meets the needs of new residents as well delivering tangible benefits for surrounding communities.**

The proposed policy will have numerous positive effects for the majority of the sustainability appraisal objectives. The overriding objective of the proposed policy is to achieve new mixed, balanced communities and provide new homes to meet local housing needs. The mix of housing in the regeneration areas will be determined by the Borough-wide policies on housing.

Around 19,800 new homes are proposed to be delivered over the plan period in the four regeneration areas across the borough. The proposed policy refers to providing the appropriate social, physical, environmental and transport infrastructure to support these new communities. This will have a positive impact on the social justice, health and education sustainability objectives. The provision of new infrastructure will also benefit nearby existing communities.

New development in each of the regeneration areas will need to respect and enhance the existing townscape context and heritage assets both within and around the area. This will have a positive impact on the heritage sustainability objective.

New development will increase local employment opportunities and provide training programmes for local people to access new jobs. This will have a positive effect on the satisfying work sustainability objective.

The proposed policy seeks to deliver 29,500 new jobs over the plan period across the four regeneration areas in the borough as well as employment and training initiatives. This will help support economic growth in the borough by creating a skilled local work force. The proposed policy will positively contribute to the economic, social and education sustainability objectives. It may also contribute to health objectives by providing people with the skills and knowledge to earn more money and sustain healthier lifestyles. Encouraging businesses to adopt the Living Wage will have benefits for those workers who are in low paid jobs and contribute to the social justice objective.

The policy encourages major regeneration and this could have a positive effect on the careful consumption sustainability objective by making efficient use of the land as well as the reducing pollution levels by reusing land. Combined with other borough wide policies aimed at increasing resource efficiency, the implementation of this proposed policy will help in having a positive effect on reducing climate change and its impact on the borough.

It is important to note that the former Old Oak Regeneration Area, now lies within the boundary of the Old Oak and Park Royal Development Corporation (OPDC) and is subject to the Local Plan being prepared by the OPDC. The OPDC was established in April 2015 and, as a consequence, unlike the Core Strategy and Development Management Local Plan, the Proposed Submission Local Plan (2016) includes no policies for the part of the borough now situated within the OPDC boundary. This change is not considered to impact on the sustainability of the Local Plan.

The council will continue to work with the OPDC on the development of their Local Plan to ensure that the needs of the borough, including affordable housing and job opportunities for local people are appropriately met.

POLICY	SA OBJECTIVES											
Strategic Policy-Regeneration Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: The Council supports major regeneration and growth in the borough's four regeneration areas and will work with key stakeholders to ensure that within these areas,	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓

POLICY	SA OBJECTIVES											
Strategic Policy-Regeneration Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
proposals will:												
Proposed policy: Provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion;	✓	✓	0	0	✓	0	✓	✓	✓	✓	✓	✓
Proposed policy: Deliver 19,800 new homes in the period 2015-2035 to meet local housing needs and enable local residents to access affordable homes to buy or rent	✓	✓	0	✓	✓	0	0	✓	✓	✓	✓	✓
Proposed policy: Deliver 29,500 new jobs in the period 2015-2035, providing a range of skills and competencies and supported by initiatives to enable local residents to access employment and training; and	0	0	✓	0	0	✓	0	0	✓	0	0	✓
Proposed policy: Deliver new physical, social and environmental infrastructure that meets the needs of new residents as well delivering tangible benefits for surrounding communities.	✓	✓	✓	0	✓	0	✓	✓	✓	✓	✓	✓

Assessing secondary, cumulative and synergistic effects

The Strategic Regeneration Area Policy is anticipated to contribute towards a number of the Local Plan's strategic objectives including: 1 - which seeks to encourage regeneration in the most deprived areas of the borough, 5 - which seeks to increase supply and choice of housing to meet local needs, 3 - which seeks to create employment and training opportunities, 7 - which seeks to encourage investment and job growth, 8 - which seeks to support maintain local people in employment, 4 - which seeks to provide residents with social and physical infrastructure and 2 - which seeks to ensure that regeneration benefits and involves the whole community.

It is predicted that the effects of this strategic policy will have a significant, positive, medium to long-term effect. The effects of this strategic policy will be permanent in implementation and have a direct impact on the Borough's residents and visitors. It is expected that it will also lead to secondary impacts on a number of the SA objectives. The delivery of this strategic policy in conjunction with the other regeneration and strategic site allocation policies in the Local Plan will have a significant, positive, cumulative effect in regenerating the borough's most deprived areas and maximising the opportunities to improve existing infrastructure and provide new social, physical and environmental infrastructure. It will also contribute substantially in the delivery and provision of new homes and jobs in the borough.

Strategic Policy WCRA- White City Regeneration Area

Indicative additional homes	Indicative new jobs
6,000	10,000

The Council will work to secure the comprehensive regeneration of WCRA, in particular the creation of a new high quality mixed-use development in White City East, along with the creation of a major educational facility with supporting retail, community facilities and open space; the regeneration of the historic Shepherd's Bush Town Centre; and the phased renewal of the estates. In order to achieve this, the Council will:

- work with the GLA, TfL, other strategic partners, and landowners to secure the comprehensive regeneration of the area;
- actively engage with local residents and community groups to ensure that the regeneration delivers benefits for the surrounding area; and
- work with the community and local enterprises, to establish ongoing partnerships and initiatives to provide sustainable public sector service delivery in the area.

Proposals for development in WCRA should:

- contribute to the provision of 6,000 new homes across a variety of tenures and 10,000 jobs, mainly within White City East, but also in smaller scale developments elsewhere in White City West and in the

town centre;

- **provide commercial uses within a new mixed-use area in White City East, capitalising on existing activities in the area including academic and research facilities as well as the creative, media and bio-technology sectors;**
- **include educational use, together with a limited amount of student accommodation;**
- **sustain regeneration of the historic town centre, by locating retail activities within the town centre. Major leisure and retail that cannot be located within the town centre may be appropriate north of Westfield on the edge of the existing town centre boundary;**
- **improve the vitality of the important Shepherd's Bush Market;**
- **provide appropriate social, physical, environmental and transport infrastructure to support the needs arising from the development of WCRA as a whole and create new sustainable communities;**
- **support the maintenance of existing open space and encourage the creation of new open space;**
- **secure economic benefits for the wider community by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;**
- **improve connections to existing communities, including between White City West, the town centre and east to RBKC to improve both north-south and east-west connectivity within the WCRA and connections to the wider area;**
- **ensure that development extends and integrates with the urban grain and pattern of development in the WCRA and its surrounding area;**
- **ensure that new development recognises the substantial scope offered by the scale and location of the White City Regeneration Area to create a new sense of place and range of densities. There may be scope for tall buildings, however any tall buildings would need to be justified by a full urban design analysis; and**
- **provide further enhancements across the area to ensure high public transport use, along with provision for more pedestrian and cycle infrastructure, including an enhanced Wood Lane, a bridge across the A3220 adjacent to the Hammersmith & City and Circle Line and the provision of an east-west underpass from the Imperial College former Woodlands site to land to the west in RBKC.**

The proposed policy will make a positive contribution towards achieving the social justice objective by pursuing the phased renewal of housing estates in the White City Regeneration Area (WCRA) and providing new housing across a variety of tenures to provide alternative accommodation choice. The mix of housing in the regeneration areas will be determined by the Local Plan's housing policies, in particular Borough-wide policy HO3 Affordable Housing which seeks to provide new affordable homes for local residents to buy or rent.

The proposed policy promotes the development of educational institutions and associated student housing. Additionally, it states that new developments should provide programmes to enable local people to access new job and business enterprise opportunities through training, local apprenticeships and targeted recruitment. These initiatives are likely to have a positive impact upon education and skills sustainability objective and raise the standard of achievement at all ages.

The proposed policy states that new development should provide new homes across a variety of tenures. The quantum of the affordable housing will be determined by Borough-wide Policy HO3 Affordable housing which requires 50% of new homes to be affordable and therefore estimates on the likely amount of new social housing are not able to be determined at this point. The Local Plan's objective is to protect social housing and provide new affordable homes for local residents to buy or rent.

The proposed policy aims to attract significant investment in mixed use developments, commercial, retail and leisure uses and also seeks to sustain the vitality of both the Shepherd's Bush historic town centre and the Shepherd's Bush market. Ensuring the viability of these important social and cultural centres will contribute to the sense of community and social cohesion among locals and assist in helping to achieve this objective.

The proposed policy aims to provide 10,000 jobs in the WCRA created through the creation of a wide range of different roles including in retail, office, creative industries and education. It also seeks to further capitalise on the area's existing strengths in the creative, media and bio-technology sectors as well as its academic and research facilities

The proposed policy seeks to ensure the sustained vitality and vibrancy of the Shepherd's Bush historic town centre by actively prioritising retail activities within the town centre boundary. Those retail activities that cannot be located within the boundary may be appropriate for location on the edge of the existing town centre.

The proposed policy requires development proposals to provide appropriate transport infrastructure to support the needs arising from the development as a whole. The justification for this policy supports improved connectivity for cycling and walking and increasing the capacity of public transport modes rather than measures aimed at furthering car dependency. This is likely to reduce greenhouse gas emissions and therefore contribute towards reducing the impacts of climate change.

The proposed policy aims to create 6000 new homes and 10,000 new jobs in the WCRA by adopting a range of measures including promoting a diverse range of

commercial uses, capitalising on the area's unique employment sectors, and seeking training and apprenticeships for local people as part of the development approval process. These measures are likely to have a significant positive impact on the local economy.

The policy does make reference to tall buildings which may be acceptable at this location. However, on implementation of the policy, it must be demonstrated that they enhance and do not have a negative impact on the character and setting of Listed Buildings, Conservation Areas and the local area in general to ensure no negative effects on the heritage objectives.

When the White City Opportunity Area Planning Framework SPD is updated to reflect the revised adopted policies in the Local Plan then its sustainability appraisal will need to be updated accordingly.

POLICY OPTIONS	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Strategic Policy WCRA- White City Regeneration Area												
Proposed policy: <i>See policy wording above.</i>	✓	0	✓ / ?	✓	✓	✓	✓	0	✓	0	✓	✓

Strategic Site Policy WCRA1- White City East

Strategic Site Policy WCRA1 – White City East

The council will seek regeneration in White City East for a mixed-use urban quarter within a high quality environment.

Proposals for development in White City East should:

- be mixed use providing housing, employment, including creative and academic based industries, community uses, a major educational hub, leisure facilities as well as small-scale retail;
- provide large amounts of housing for residents across all tenures, house sizes and affordability;
- ensure that on sites primarily developed for higher educational purposes, that a mix of uses is provided, including non-student accommodation and other non-educational uses;
- demonstrate how the proposal fits within the context of a detailed masterplan, and how it integrates and connects with the surrounding context. There should be improved permeability and access between Westfield and areas north in the WCRA, particularly through areas of public open space including opening up arches underneath the

- Hammersmith and City Line railway viaduct, where appropriate;**
- provide a network of green corridors and public open spaces including a local park located centrally of approximately 2ha;**
 - ensure that development provides high quality places for living and working that are well integrated with, and respect the setting of, the surrounding area;**
 - retain those remaining parts of the former BBC TV Centre which have historic and/or architectural interest. The Centre's setting should be integrated with the surrounding public realm, providing connectivity to the east, west and south of the site; and**
 - contribute proportionally to the achievement of the objectives and policies for the area; to the overall provision of social and physical infrastructure such as: a health centre, educational facilities, public open space, employment training and recruitment programmes, community facilities, a decentralised energy network and other necessary improvements to the transport infrastructure to enable the White City Regeneration Area to be developed to its potential.**

The proposed policy will assist in contributing towards the social justice objective by pursuing the phased renewal of housing estates in the White City Regeneration Area (WCRA) and providing new housing across all tenures, house sizes and affordability.

The creation of new open space, including a centrally located park and the development of a network of green corridors is likely to encourage physical activity, and positively impact on physical and mental health of the community and contribute towards achieving the health objective.

The proposed policy aims for the provision of the development of a major higher educational hub in the area and this will have a positive impact on the education and skills sustainability objective.

It is predicted that there will be a positive effect on affordable housing as this policy seeks proposals to provide large amounts of new residential development across all tenures, house sizes and affordability. However it is difficult to ascertain the full effect as proposals will need to adhere to the requirements of the Borough wide HO3 Affordable Housing policy which requires 50% affordable housing for new developments with 60% of additional affordable housing for social or affordable renting.

The proposed policy contains a number of provisions which collectively will increase local residents' sense of community and social cohesion. These provisions include the emphasis on creating mixed use communities and providing a range of services to meet the everyday needs of the community, the provision of a range of different housing types, tenures and sizes and the creation of a new open space and network of green corridors. A commitment to a high quality urban design, protection of heritage assets and careful location of tall buildings to create a distinct character.

The proposed policy will have a positive impact on the heritage sustainability objective by preserving heritage assets by retaining those parts of the BBC TV Centre which have historic and/or architectural interest. Tall buildings will also be carefully located in areas which are suitable to minimise adverse effects on conservation areas and important views.

The mixed use regeneration of the area providing housing, employment and community uses, creative industries, educational and leisure facilities is likely to boost the local economy.

The effect of the proposed policy on the pollution, transport, resources and climate change sustainability objectives are dependent on implementation of the policy.

POLICY	SA OBJECTIVES											
Strategic Site Policy WCRA1 - White City East	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	✓

Strategic Site Policy WCRA2 - White City West

Strategic Site Policy WCRA2 - White City West

The council will work with estate residents and other stakeholders to secure the renewal of the estates and the creation of a sustainable community. Development proposals within this strategic site should:

- support employment and skills training opportunities to assist residents in obtaining local jobs
- enable existing residents to remain in the area, providing a more sustainable community through provision of new housing with a mix of tenures and sizes of units that enable greater housing choice;
- provide an appropriate level of social, environmental, transport and physical infrastructure and co-locate facilities where this will make the most efficient use of infrastructure;
- assist in providing a permeable street pattern that is well integrated with the surrounding area; and
- enable the continuation of some commercial uses in areas less suitable for residential purposes.

If either the Loftus Road Stadium or Territorial Army (TA) Centre come forward for redevelopment, the council will seek residential led development.

On the Loftus Road site, in particular, there should be provision of community facilities and open space.

The proposed policy seeks to regenerate the White City Estate by promoting refurbishment and/or redevelopment. The policy aims to ensure that existing residents of the estate remain in the area and are provided with the option of moving into better quality new accommodation as part of any estate redevelopment scheme. Prima facie this policy approach has the potential to increase equity and social justice for deprived communities in the area. However, the actual benefits are dependent on implementation of the policy.

The proposed policy aims to secure the renewal of the estates by providing a greater choice of housing through a mix of tenures and sizes. As such, implementation of the policy will assist in meeting the affordable homes sustainability objective.

The proposed policy's purpose is to regenerate the White City Estate in order to create a mixed and balanced community. In doing so, the policy seeks to provide new housing with a mix of tenures and sizes. This is likely to act as a catalyst in altering the social composition of the estate community in terms of demographics and socio-economic background. The impacts of this change on social cohesion are difficult to predict. However, it is reasonable to surmise that the change is likely to have a beneficial impact on the key indicators of deprivation.

The proposed policy states that development proposals for this site should support employment and skills training opportunities. This will have a positive effect on the education and skills and satisfying work sustainability objectives.

POLICY	SA OBJECTIVES											
Strategic Site Policy WCRA2 - White City West	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓	0	✓ / ?	✓	✓ / ?	✓	0	0	0	0	0	0

Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land

Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land

The Council will continue to support and work with existing traders for the retention and improvement of Shepherd's Bush Market to provide a more vibrant mix of town centre uses, retaining accommodation for existing market traders and traders along Goldhawk Road.

Development proposals for this strategic site should:

- **Retain and improve the market, including its layout, to create a vibrant, mixed use area; include additional leisure uses, offices and residential development to ensure a more vibrant mix; and**
- **Consider including adjacent Pennard Road Laundry site in any development scheme and land to the west of the market off Lime Grove.**
- **Provide the opportunity for the re-provision of Goldhawk Road businesses within new high quality retail premises within the proposed frontage.**
- **Provide affordable housing in accordance with Policy H03.**

The proposed policy aims to regenerate the Shepherd's Bush Market by providing a mix of town centre uses including leisure uses, offices and residential development whilst also maintaining existing market traders. This will increase and improve employment opportunities and should also contribute to reducing unemployment in the borough.

The proposed regeneration may result in a material change to the existing appearance, layout and character of the Shepherd's Bush Market. If so, this would represent the loss of an area of cultural value.

The proposed regeneration of the market and surrounding areas will increase the efficiency and intensity of land use, creating more employment and enabling an increase in the number of people living in the area, which would improve the local economy.

Good quality housing, including affordable housing to meet local needs will also be provided in line with policy HO3.

The policy is likely to have a positive effect on the social justice and social cohesion objectives, but this will depend on the implementation of the policy which seeks to ensure that existing market traders and local businesses are retained as part of the redevelopment.

POLICY	SA OBJECTIVES											
Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓ I/?	0	0	✓	✓/ ?	✓	x/?	0	0	0	0	✓

Assessing secondary, cumulative and synergistic effects

Strategic Policy WCRA – White City Regeneration Area is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 3, 4, 5, 6, 9, 15 and 19. It is predicted that the effects of Strategic Policy WCRA in terms of a time frame is medium to long term. The policy is likely to have a permanent and direct effect on a number of the sustainability objectives. The provision of 10,000 new jobs in this regeneration area will have both a cumulative and synergistic effect for the satisfying work and sustainable economy sustainability objectives.

Strategic Site Policy WCRA1 – White City East is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 3, 4, 5, 9, 15, 16 and 19. It is predicted that the timeframe of the effect of Strategic Site Policy WCRA1 will be medium to long term. It's also predicted that the effects of this proposed policy will be both permanent and direct in its impact. The provision of a new mixed use development along with new public open space is likely to have a cumulative effect on this regeneration area.

Strategic Site Policy WCRA2 – White City West is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 4, 5 and 6. It is predicted that the timeframe of the effect of Strategic Site Policy WCRA2 will be medium to long term. It's also predicted that the effects of this proposed policy will be both permanent and direct in its impact on the existing residents living at White City Estate.

Strategic Site Policy WCRA3 – Shepherd's Bush Market and adjacent land is anticipated to positively contribute towards the Local Plan strategic objectives 1, 5, 6, 7, and 8. It is predicted that the timeframe of the effect of Strategic Site Policy WCRA3 will be medium to long term. It is expected that the effects of this proposed policy will have both a permanent and direct effect on the satisfying work, heritage and sustainable economy sustainability objectives.

Strategic Policy Hammersmith Regeneration Area

Strategic Policy HRA – Hammersmith Regeneration Area

Indicative additional homes	Indicative new jobs
6,000	10,000

The Council will encourage the regeneration of Hammersmith town centre and seek development that builds upon the centre's major locational advantages for office and retail development.

Opportunities will be taken to secure more modern accommodation, to continually improve the environment and public realm, and to improve access between the town centre and the Thames.

In order to achieve this, the Council will:

work with the GLA, TfL, other strategic partners, including the Hammersmith BID and landowners to secure the regeneration of the area; actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area; support the continuation of Hammersmith as a major town centre with a wide range of major retail, office, local government services, leisure, arts, entertainment, community facilities and housing; promote the continued regeneration of Hammersmith Town Centre by actively encouraging the improvement of the Kings Mall and other retail in this part of the town centre, and the range and quality of independent and specialist shops; promote the continuation of the town centre as a key strategic office location, through provision of modernised office blocks; support proposals for the regeneration of the western part of the town centre around the vicinity of the Town Hall; support proposals that expand Hammersmith's arts and leisure offer, capitalising on the existing facilities such as Hammersmith Apollo, Lyric Theatre, St Pauls Green, Lyric Square, Riverside Studios and the river front; promote and support the replacement of the flyover and section of the A4 with a tunnel; and return the Hammersmith Gyratory to two way working provided that this can be done without unacceptable traffic and environmental costs in the neighbouring areas.

Proposals for development in the HRA should:

improve pedestrian and cycle infrastructure, including connectivity with the River; improve the range and quality of independent and specialist shops and services, as well as leisure services; provide appropriate social, physical, environmental and transport infrastructure to support the needs arising from the development of HRA;

secure economic benefits for the wider community around the Hammersmith Regeneration Area by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;
seek the creation of a high quality urban environment, with public spaces, architecture and public realm of the highest quality, that is sensitively integrated into the existing context;
improve and enhance St Pauls Green and Furnivall gardens and their connections to the rest of the regeneration area; and
ensure that feeder roads to the gyratory are not widened or properties demolished as part of these plans.

The policy refers to the provision of a wide range of new housing development in the regeneration area. The regeneration area has the potential to provide affordable housing. The amount of affordable housing will be determined by the boroughwide policy HO3: Affordable Housing, which requires 50% affordable housing for residential developments over 10 dwellings. The justification text does refer to all new housing developments will be expected to contribute to creating a more sustainable community and provide housing for people on low to middle incomes.

Around 2,800 new homes are proposed in this regeneration area. It is important that necessary social infrastructure, including but not limited to community and health facilities, is also provided to meet the needs of the local community. The proposed policy refers to supporting a wide range of facilities including community facilities and for development proposals to provide appropriate social, physical, environmental and transport infrastructure. The justification text refers to likely need for new schools to be provided.

The policy aims to create 10,000 new jobs in the regeneration area, covering a wide range of sectors but principally focusing on office development. This is likely to increase the opportunities for relatively well paid service sector work. New development will increase local employment opportunities and provide training programmes for local people to access new jobs. This will have a positive effect on the satisfying work sustainability objective.

The policy seeks to further capitalise on the strong tradition of arts, culture and entertainment in the regeneration area by supporting proposals that seek to expand these sectors. New development will have to be of a high quality design and sensitively integrated into the existing context.

Hammersmith Town Centre has a number of existing tall buildings and further tall buildings of a similar height could be appropriate in some parts of the centre. Any proposals for tall buildings will need to be assessed against the criteria in policy DC3 which will include consideration of heritage assets.

The policy aims to create 10,000 new jobs in the regeneration area, in a number of different sectors, but principally in the service sector. Retail sector development will also be encouraged in order to maintain the town centre's status and to enable it to better compete in the London wide retail market. The policy also aims to create

around 2800 new homes in the regeneration area. The influx in the local population will help to sustain the local economy further and contribute to its long-term sustainability.

Most of this area is at risk from tidal flooding and lies within Flood Zone 3a. As such a site specific Flood Risk Assessment will be required for any planning application, with more vulnerable uses needing to pass the Exception Test in accordance with the NPPF and PPG.

The proposed policy also promotes the tunnelling of the Hammersmith Flyover and parts of the A4. If the 'flyunder' is implemented and additional connections to the river are also developed, connectivity to the River will improve, encouraging people to increase passive and active use of the riverside walk. This may contribute to improved quality of life and associated health outcomes.

It is also important to note that former policy Strategic Site HRA2- King Street East no longer forms part of the Hammersmith Regeneration Area and the specific policy relating to this area has been removed from the Local Plan. This policy change is likely to have no significant impact on the sustainability objectives as the site remains in the regeneration area for which an area based supplementary planning document is to be produced.

POLICY	SA OBJECTIVES											
Strategic Policy HRA –Hammersmith Regeneration Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Option: <i>See policy wording above.</i>	0	✓/!	0	✓	✓	✓	?/✓	0	0	0	0	✓

Strategic Site Policy HRA1: Town Hall Extension and adjacent land, Nigel Playfair Avenue

Strategic Site Policy HRA1 - Town Hall Extension and adjacent land, Nigel Playfair Avenue

The council will work with partners to upgrade the Town Hall Extension and neighbouring land to provide refurbished or replacement council offices of high quality design along with a mix of other uses to contribute to the improvement of the area at street level. Proposals will be expected to:

- include replacement council offices and a mix of town centre uses, including retail, employment and housing;
- provide an active frontage along King Street, complementing the core

shopping area and helping to improve the economic health of the western part of the town centre;

- improve the area at street level by either opening up the Grade II listed Town Hall frontage and creating a new public space or refurbishing the Extension building and including an area of civic space;
- provide space for a cinema;
- improve links with Furnivall Gardens and the river; and
- ensure building height is generally consistent with the existing height in the townscape, having particular regard to the civic significance of the site and the importance of enhancing the contribution and setting of the Grade II listed Town Hall building and respecting views along the river.

The proposed policy will lead to improved connectivity between Hammersmith town centre and the river Thames, this will encourage people to increase passive and active use of the riverside walk. This may contribute to improved quality of life and associated health outcomes.

This site has the potential to deliver affordable housing. The amount of affordable housing will be delivered in line with Local Plan policy HO3: Affordable Housing.

The proposed policy aims to either replace or refurbish the existing Town Hall extension building in order to “open up” the Grade II Town Hall building. The heritage aspects of the area will also be protected by the imposition of height restrictions on any new building replacing the existing town hall extension.

The proposed policy aims to improve the economic health of this part of the Town Centre by supporting the provision of an active frontage, which would include a mix of retail units along King Street. The council has also indicated its support for an anchor retail store in the area which could act as the catalyst for further development. These initiatives are likely to improve the sustainability of the local economy.

POLICY	SA OBJECTIVES											
Strategic Site Policy HRA1 – Town Hall Extension and adjacent land, Nigel Playfair Avenue	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Option: See policy wording above.	0	✓/?	0	✓	✓/?	✓	?/✓	0	0	0	0	✓

Strategic Site Policy HRA3: A4, Hammersmith Flyover and adjoining land

Strategic Site Policy HRA3: A4, Hammersmith Flyover and adjoining land

The Council will work with Transport for London and other stakeholders to replace the Hammersmith Flyover and sections of the A4 with a tunnel, thereby releasing land for development that will contribute to the social, environmental and economic regeneration of Hammersmith town centre.

The council will expect any proposal to remove the Hammersmith Flyover and a section of the A4 and replace it with a tunnel to:

- **result in the release of land formerly occupied by the Flyover and its approaches for redevelopment;**
- **ensure that there will be no detrimental impact on the flow of traffic on this strategic route and no increase in levels of traffic congestion in Hammersmith Regeneration Area and the surrounding road network, minimising the displacement impact;**
- **develop and improve the quality and safety of pedestrian and cycle routes, particularly those connecting Hammersmith Town Centre to the riverside;**
- **improve the quality of the environment of Hammersmith town centre and its environs by removing high levels of noise, vibration and air pollution;**
- **ensure that the tunnel entrances and exits have a minimal impact on the amenity of nearby residents; and**
- **minimise disruption during construction.**

Development proposals for the strategic site released by the tunnel should:

- **provide for mixed-use redevelopment, including housing for local people across a range of tenures and affordabilities, employment, hotels, retail and arts, cultural and leisure facilities and supporting infrastructure;**
- **improve and enhance St Paul's Green and Furnivall Gardens and their connections with the rest of the regeneration area;**
- **provide new areas for public open space and improve physical connections between the town centre and the riverside; and**
- **be of a coherent urban design that has regard to the setting and context of the regeneration area.**

In respect of the Hammersmith Centre West Island Site, the Council will work with Transport for London and other stakeholders to assess and bring forward the redevelopment of this site as well as return the Hammersmith Gyratory to two way working and improve the capacity of Hammersmith bus station. Development proposals for this site will be required to:

- **provide a state of the art inter-modal interchange that facilitates the safe and efficient movement of passengers from buses, taxis and trains,**

- including cycles, into and out of the station;
- provide for mixed-use redevelopment , including office, retail, arts, cultural and leisure facilities and supporting infrastructure to help retain a strong commercial role for the Town Centre and increase its vitality and viability;
- include the provision of housing for local people across a range of tenures and affordabilities;
- ensure that there will be no detrimental impact on cyclists or pedestrians or on the flow of traffic on this strategic route, and no increase in levels of traffic congestion in Hammersmith Regeneration Area and the surrounding road network, minimising the displacement impact;
- ensure that feeder roads to the gyratory are not widened or residential properties demolished as part of these plans;
- ensure that building height is generally consistent with the prevailing height in the townscape, whilst recognising the scope offered by the scale and location of the Regeneration Area to create a range of densities. Any tall buildings would need to be justified by a full urban design analysis; and
- be designed to help facilitate any future proposals to replace the flyover and A4 with a tunnel

The proposed policy will result in more housing, employment, culture and retail facilities and supporting infrastructure. New public open spaces will also be created. Environmental quality will also be improved. These developments will all increase equity and social justice by helping to improve the quality of life of all people in the area impacted by the policy.

The proposed policy seeks to ensure that noise, vibration and air pollution are minimised as far as possible within the Hammersmith Town Centre. This is likely to have a positive benefit on the health of people living and working within this town centre.

Subject to the quantum of housing, there may be a need for new educational facilities to be built therefore there could potentially be a positive impact on the education and skills sustainability objective.

The proposed policy seeks to develop additional housing across a range of affordabilities and tenures for local people on the flyover site. This could potentially entail the provision of an increased number of affordable homes in accordance with the council's housing policies.

The proposed policy aims to replace the flyover with new development that includes essential social infrastructure and improved access to the river and town centre. Removing the flyover and replacing it with a tunnel is also likely to help resolve the current severance and pollution issues facing the town centre. The provision of cycle and pedestrian routes into the town centre and to the riverside will also enable better access into the public realm for people of all ages and abilities. These improvements

are likely to increase local residents' sense of community and pride in the town centre and surrounding area.

The policy proposes to provide employment on the flyover site. This will increase the opportunities for relatively well paid service sector employment.

Although the proposed policy does not specifically refer to the protection for heritage and conservation areas which may be impacted upon by the tunnel and associated infrastructure, new development, including consideration of tall buildings will need to have regard to the setting and context of the regeneration area. Careful consideration will need to be given to minimise any adverse impacts on nearby heritage assets arising from the removal and replacement of the flyover.

It is uncertain at present whether the removal and replacement of the flyover with a tunnel will reduce the level of traffic related pollution (air, noise, vibration). Similarly, the proposed policy does not offer robust protection of the amenity of people who are likely to be affected by the tunnel development both during and after construction.

It is likely that the tunnel will reduce the current severance effect in the town centre associated with large numbers of vehicles using the flyover. The tunnel option will remove the barrier the A4 creates in terms of access to the riverside along the east end of the town centre. It is likely to have a positive effect on reducing the impacts of transport on the environment as the policy encourages improving the quality and safety of pedestrian and cycle routes connecting Hammersmith town centre to the riverside.

It is likely that the tunnel option will contribute to the local economy by encouraging new employment development in the form of retail, leisure and other employment opportunities along with increases in residential development. These initiatives are likely to stimulate and sustain the economic development of the area. However it is important to highlight that the construction of a new tunnel will be a costly piece of transport infrastructure and this will have an impact on the viability and deliverability of any development proposals.

Development of the Hammersmith West Island site presents an opportunity to improve the gyratory system and capacity of Hammersmith Bus Station to provide a state of the art inter modal interchange, which will have further positive effects on the transport objectives.

POLICY	SA OBJECTIVES											
Strategic Site Policy HRA3: A4, Hammersmith Flyover and adjoining land	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓	✓	?/✓	✓	✓	✓	?	?	✓	0	0	✓

Assessing secondary, cumulative and synergistic effects

Strategic Policy HRA – Hammersmith Regeneration Area is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 3, 5, 6, 7, 8, 17 and 19. It is predicted that the timeframe of the effect of Strategic Policy HRA policy will be medium to long term. It is expected that the effects of this proposed policy will have both a permanent and direct effect on a number of the sustainability objectives; health, affordable homes, social cohesion, satisfying work, heritage and sustainable economy. There is likely to be a cumulative impact on the sustainable economy.

Strategic Site Policy HRA1 – Town Hall Extension and adjacent land, Nigel Playfair Avenue is anticipated to positively contribute towards the Local Plan strategic objectives 1, 3, 5, 6, 8, 10, 11, and 12. It is predicted that the timeframe of the effect of Strategic Site Policy HRA1 will be medium to long terms. It is expected that the effects of this proposed policy will have both a permanent and direct effect on the heritage and sustainable economy objectives. It is likely that the provision of mixed town centre uses along with better links to the river will have a cumulative impact on the local community and economy.

Strategic Policy HRA3-A4, Hammersmith Flyover and adjoining land is anticipated to positively contribute towards the Local Plan strategic objectives 1, 3, 5, 6, 8, 10, 11, 12 and 14. It is predicted that the timeframe of the effect of Strategic Site Policy HRA4 will be long term. It is considered that the proposed policy will have positive, permanent, cumulative and synergistic effects in respect of many of the social, environmental and economic sustainability objectives. The replacement of Hammersmith flyover with a tunnel provides a significant opportunity to release land for redevelopment and provide mixed use development and improve access to the riverside from the town centre and quality of life for existing residents.

Strategic Policy FRA – Fulham Regeneration Area

Strategic Policy FRA – Fulham Regeneration Area

Indicative additional homes	Indicative new jobs
7,000	9,000

There is a substantial opportunity for regeneration within the Fulham Regeneration Area (FRA) and for the development of strategic sites to benefit the wider community. In order to achieve this, the Council will:

- **work with the GLA, Royal Borough of Kensington and Chelsea, other strategic partners and landowners to secure the regeneration and renewal of the area; and**
- **actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area.**

Development proposals should:

- **contribute to the provision of 7,000 homes and 9,000 jobs;**
- **enhance the vitality and viability of Fulham Town Centre, particularly on**

North End Road and explore opportunities to secure the long term future of and enhance the North End Road street market;

- provide for the improvement of the West Kensington, Gibbs Green and Registered Provider estates;**
- secure economic benefits for the wider community around the Fulham Regeneration Area to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;**
- provide appropriate social, physical, environmental and transport infrastructure to support the needs arising from the area as a whole;**
- demonstrate a high quality of urban design and public realm; and**
- preserve or enhance the character, appearance and setting of heritage assets including the Grade II* listed Fulham Town Hall.**

The proposed policy has the potential to increase equity and social justice for the deprived communities living in the area. The proposed policy promotes active engagement with local communities to ensure that regeneration delivers benefits to the area, it also promotes improvements of the West Kensington, Gibbs Green and Registered Provider estates and for development proposals to provide the relevant infrastructure to support local needs.

There is likely to be a positive effect on the affordable homes sustainability objective as the proposed policy seeks the renewal of and additions to all or part of the estates in order to provide improved housing, including affordable housing opportunities for local residents.

The proposed policy aims to develop 7,000 new homes and 9,000 new jobs in the area. This in itself may contribute towards increased public participation in community life. The proposed policy also seeks to regenerate the large council estates in the area and signals the council's intention to explore opportunities to secure the long-term future of and enhance the North End Road Street market. If these initiatives are implemented, care should be taken to ensure that any existing positive elements of community life associated with the estates and the street market are preserved and enhanced.

The proposed policy aims to create 9,000 new jobs in the Earl's Court and West Kensington Opportunity Area and for development proposals to provide local people access to new job opportunities through training and local apprenticeship schemes. This will play a significant role in reducing local unemployment and improving earnings of local people.

The proposed development of new homes and jobs will predominantly take place in an area of high public transport accessibility. This will encourage people to use sustainable transport modes and reduce the private car usage.

The location of the proposed development in an area of high public transport accessibility is likely to contribute to a reduction in the amount of greenhouse gas emissions that would result if the development was taking place in a location poorly provided with public transport.

The creation of 9,000 new jobs in this regeneration area is likely to significantly improve the sustainability of the local economy by increasing levels of investment in businesses. The proposed policy also supports proposals that will provide employment training opportunities for local people. These initiatives will contribute towards improving the sustainability of the local economy.

POLICY	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Strategic Policy FRA – Fulham Regeneration Area												
Proposed policy: <i>See policy wording above.</i>	✓	0	0	✓	?/ ✓	✓	0	0	✓	0	✓	✓

Strategic Site Policy FRA1 – Earl’s Court and West Kensington Opportunity Area

Strategic Site Policy FRA1 – Earl’s Court and West Kensington Opportunity Area

The Council will support the phased mixed use residential led redevelopment of the Earl’s Court and West Kensington Opportunity Area. Development proposals should:

- provide a mix of land uses, including housing, employment, hotels, leisure and associated facilities, retail and cultural facilities. Cultural facilities should include a major arts, leisure or entertainment activity;
- provide adequate social, physical, environmental and transport infrastructure to support the needs of the area as a whole;
- provide for improvement to the West Kensington, Gibbs Green and Registered Provider estates, as part of the comprehensive approach to the regeneration of the Opportunity Area;
- provide green corridors and public open spaces including the provision of a centrally located local park of at least 2 hectares; and
- recognise the substantial scope offered by the scale and location of the Opportunity Area to create a new sense of place and range of densities. There may be scope for tall buildings, however any tall buildings would need to be justified by a full urban design analysis.

The proposed policy includes initiatives that are likely to increase levels of equity and social justice in the regeneration area. The proposed policy also has the potential for the creation of 7,500 new homes and 8,500 new jobs and the provision of accessible new social, physical and green infrastructure for use by all local people.

The provision of new public open space and local park has the potential to positively contribute towards health outcomes.

The quantum of new housing development proposed for this regeneration area will mean that new educational facilities will need to be provided. This will have a positive effect on the education and skills sustainability objective.

The proposed policy aims to improve the estates via renewal and additions. It is intended that the new homes will be better suited to the needs of estate residents and as such, will contribute towards achieving the affordable homes objective. The justification for the policy refers to no net reduction in the amount of social rented housing in this regeneration area. The types and mix of housing will be determined by the local plan's housing policies. The proposed policy promotes a mixture of land uses including supporting the development of a major visitor attractor in this regeneration area. Development along these lines is likely to help create a place of distinctive character and encourage a sense of community and social cohesion among local residents.

The proposed policy aims to create around 8,500 new jobs within the Earl's Court and West Kensington Opportunity Area. A diverse range of new employment opportunities will be created in the retail, leisure and culture sectors.

The proposed policy aims to ensure that new development will take account of, and respect the local context and setting, including local conservation areas and local/long distance views, particularly when considering the suitability of tall buildings. The policy seeks to ensure that a full urban design analysis will be undertaken when considering tall buildings in this location in order to minimise adverse impacts on heritage assets and the surrounding area.

This proposed policy also aims to provide a network of green corridors and public open spaces. The justification also states the need to protect the West London Line railway corridor which is designated partly as a green corridor and partly as a nature conservation area of borough wide importance.

The good transport accessibility of the area should ensure that the need for private car use is minimised, however any new development would need to take care not to overload the system and the proposed policy recognises that additional infrastructure may be required. It also seeks to improve pedestrian connections.

The proposed policy aims to create around 8,500 new jobs within the regeneration area. A diverse range of new employment opportunities will be created including in the retail, leisure and culture sectors. The proposed policy also aims to create around 7,500 new homes in the regeneration area. The associated increase in population will further contribute to demand for local services and the sustainability of the local economy.

The proposed policy could potentially be very resource intensive in both the construction and operational phases. The redevelopment of this area will need to incorporate sustainable design and construction techniques and will need to implement the policies in the Local Plan's environmental issues chapter.

POLICY	SA OBJECTIVES											
Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓	✓/ ?	✓/ ?	✓/ ?	✓/ ?	✓	✓/ ?	0	?	0	0	✓

Assessing secondary, cumulative and synergistic effects

Strategic Policy FRA - Fulham Regeneration Area is anticipated to positively contribute towards the Local Plan strategic objectives 1, 2, 3, 4, 5, 6, 8 and 10. It is predicted that the timeframe of the effect of Strategic Policy FRA will be medium to long term. It is expected that the effects of the proposed policy will be both direct and permanent on the socio-economic objectives. The creation of 9,000 new jobs in the Fulham Regeneration Area will have a cumulative and synergistic impact as well as having a significant positive impact on local economy. Whilst the potential for renewal of the housing estates will have a significant positive effect of tackling the high levels of social, economic and physical deprivation.

Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area is anticipated to positively contribute towards the Local Plan strategic objectives 1, 4, 5, 6, 9, 10, and 11. It is predicted that the timeframe of the effect of Strategic Site Policy FRA1 will be medium to long term. This proposed policy will have a positive, direct and permanent impact on the socio-economic sustainability criteria, particularly on job creation, improving the local economy and providing decent and affordable homes. Linking redevelopment to the housing estate sites to the Earls Court site and adjacent land would have further benefits through improved housing and community cohesion.

Strategic Policy SFRRA - South Fulham Riverside Regeneration Area

Strategic Policy SFRRA - South Fulham Riverside Regeneration Area

Indicative homes	Indicative jobs
4,000	500

The council will work with landowners and other partners to secure the phased regeneration of the area to become a high quality residential area together with a mix of other uses. In order to achieve this, the Council will work with:

- neighbouring boroughs, strategic partners, and landowners to secure regeneration of the SFRRA; and
- actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area.

Proposals for development in SFRRA should:

- predominantly be for residential purposes to contribute to the South Fulham Riverside target of 4,000 additional dwellings by 2035;
- include employment based uses that will meet local business needs and are compatible with residential development in the most accessible parts of the area, particularly in the vicinity of Imperial Wharf Station and on sites close to the Wandsworth Bridge Road, Townmead Road and Carnwath Road junction;
- include appropriate small scale retail, restaurants/ cafes and leisure uses to support day to day needs. These uses are likely to be appropriate on the Thames frontage to provide activity adjacent to the river. Opportunities for river related uses will be encouraged in accordance with the objectives of the Local Plan River Thames policies;
- create a high quality urban environment. On the riverside, a very high standard of urban design will be necessary. Opportunities will be encouraged that maximise the permeability and connectivity between sites, including the extension of the Thames Path and provision of open spaces that create interest and activity;
- demonstrate how they integrate and connect with the surrounding context, particularly the river;
- support the implementation of a pedestrian and cycle bridge that will provide access to the south of the river;
- provide appropriate social, physical and environmental infrastructure to support the needs arising from development and the area as a whole;
- secure economic benefits for the wider community around the South Fulham Regeneration Area by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;
- be acceptable in terms of their transport impact and contribute to necessary public transport accessibility and highway capacity in the SFRRA; and

- **be sensitively integrated with the existing townscape, ensuring no substantially harmful impact on heritage assets, and respect for the scale of the surrounding residential buildings Building height can be gently stepped up toward the riverside, to provide a presence and give definition to the river frontage. The council will work with Transport for London and other Stakeholders to seek a new Crossrail 2 station at Imperial Wharf.**

The proposed policy which seeks residential uses will increase the range and affordability of housing. The quantum of new housing development proposed for the South Fulham Regeneration Area means new educational facilities will need to be provided to support the community.

The proposed policy will contribute towards increasing sport and leisure activities and improvement of the riverside path. This will have a positive impact on health through increased physical activity.

The proposed policy's emphasis on a very high standard of urban design, especially along the riverside will help to increase perceptions of personal safety in the public realm and will also contribute towards increasing local residents' sense of community'.

Although largely residential development led, the proposed policy also promotes employment in selected areas along with small scale retail and related uses in suitable areas to cater to the daily needs of residents. These initiatives are likely to increase employment opportunities for local people.

The proposed policy places significant emphasis on protecting and improving the local environment and heritage. It requires a very high standard of urban design for riverside developments. Tall buildings may be appropriate, but will only be permitted in those locations that minimise any adverse impacts on local heritage assets and values. Retaining and enhancing the character and use of the river will improve the local environmental heritage, particularly if development is of a suitable design and a scale/height appropriate to the riverside location.

Re-developing riverside vacant and underused sites will reduce derelict, degraded land, bring it back into public use and improve access to the river. The river Thames is a nature conservation area of metropolitan importance, therefore any development proposals will need to take into consideration this sensitive location and protect the river's ecological value and related biodiversity.

The proposed policy proposes a number of measures to encourage the development of better transport connections, given the poor accessibility at present. Sustainable transport measures and enhanced public transport infrastructure and services, including promotion of a Crossrail 2 station at Imperial Wharf are proposed in the policy. The proposed policy also aims to reduce the need for travel, particularly for some employment and small scale retail in appropriate areas. Improvements to the road network are also proposed. These initiatives are likely to reduce the negative impacts of transport on the local community.

Although development in this regeneration area will principally be residential in nature, the proposed policy seeks the development of compatible employment uses along with suitable small scale retail and leisure uses in suitable locations. This is likely to improve the sustainability of the local economy and improve local residents' access to key local services.

POLICY	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Strategic Policy SFRRRA – South Fulham Riverside Regeneration Area												
Proposed policy: <i>See policy wording above.</i>	0	✓/ ?	✓/ ?	✓ /?	✓	✓	✓/ ?	?	✓/ ?	0	0	✓

Strategic Site SFRRRA1 - Imperial Gasworks National Grid

Strategic Site SFRRRA1 - Imperial Gasworks National Grid

The council supports comprehensive residential-led development of the site with supporting community facilities and open space. Development proposals for this site should:

- be predominantly residential with supporting social, physical, environmental and transport infrastructure;
- provide for a link road through the site connecting Imperial Road through to the New Kings Road together with a network of pedestrian and cycle connections.
- aim to provide a pedestrian access under the West London Line at the southern end of the site connecting to Lots Road;
- provide an area of public open space of at least 1 hectare to support the needs of the development and contribute to reducing open space deficiency in the area;
- be of high quality design which respects the character and appearance of the Imperial Square and Gasworks Conservation Area and protects

the Grade II Listed Gasholder and its setting and other heritage assets in the surrounding townscape;

- ensure building heights and massing has an acceptable impact on the skyline and views from and to the riverside and waterways and heritage assets in the area, and contributes positively to the surrounding townscape context; and
- ensure any remaining gas operations that may be required are designed in such a way to ensure that that may be required health and safety requirements are met and integrated into the high quality design for the area with minimal impact.

The proposed policy has the potential to have a positive impact on the affordable housing sustainability objective. The amount of affordable housing will be determined by policy HO3 Affordable Housing which requires 50% affordable housing on residential developments of 10 or more dwellings.

The proposed policy aims to ensure that new development will protect existing heritage values by ensuring that building heights are predominantly low to medium rise with tall buildings permitted in limited and suitable locations. Additionally, the proposed policy requires new development to be of a high quality design which respects the character and appearance of the Imperial Square and Gasworks Conservation Area and the setting of the Grade II listed Gasholder and other associated structures. These policy initiatives will help to ensure the protection and enhancement of local heritage values.

POLICY	SA OBJECTIVES											
Strategic Site SFRA1 – Imperial Gasworks National Grid	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	0	0	0	✓/?	0	0	✓	✓	✓	0	0	✓

Assessing secondary, cumulative and synergistic effects

Strategic Policy SFFRA – South Fulham Riverside Regeneration Area is anticipated to positively contribute towards the Local Plan's strategic objectives 1, 2, 3, 5, 10, 11, 12 and 14. It is predicted that the timeframe of the effect of Strategic Policy SFFRA will be medium to long term. This proposed policy will have a positive, direct and permanent impact on the number of the sustainability objectives. In particular, the proposed policy is likely to have an indirect effect of increasing local residents' sense of community and social cohesion due to the policy's emphasis on high quality urban design and supporting active river frontage uses.

Strategic Site Policy SFRA1 – Imperial Gasworks National Grid is anticipated to positively contribute towards the Local Plan's strategic objectives 1, 5, 10, 11 and 14. It is considered that the effects of Strategic Site Policy SFRA1 will be medium to long term and will have permanent and direct impact on affordable housing and heritage sustainability objectives as development proposals will be predominantly residential and be of high quality design that respects the character and appearance of the conservation area

MEETING HOUSING NEEDS AND ASPIRATIONS

Borough-wide Policy HO1 Housing supply

Policy HO1- Housing supply

The council will work with partner organisations and landowners to exceed the proposed London Plan target of 1,031 additional dwellings a year up to 2025 and to continue to seek at least 1,031 additional dwellings a year in the period up to 2035. The new homes to meet London's housing need will be achieved by:

- a. the development of strategic sites identified within the Local Plan;**
- b. the development of sites identified in the council's Strategic Housing Land Availability Assessment;**
- c. the development of windfall sites and the change of use of buildings where there is no reasonable prospect of that site and/or premises being used for that purpose;**
- d. the provision of new homes through conversions;**
- e. ensuring that new dwellings meet local needs and are available for occupation by people living in London;**
- f. the retention of existing residential accommodation and improvement in the quality of private rented housing; and**
- g. working to return vacant homes to use and ensure that new homes are occupied.**

The following are estimates of the likely increases in new housing in different parts of the borough.

Overall, increasing home ownership will positively influence social equity and justice. However, it is important that pursuing the objective of creating mixed and balanced communities does not prejudice already disadvantaged sections of the community.

The majority of new homes in the borough will be built in areas with good access to public transport. The proposed density of development will also help to ensure the boroughs town centre's continue to remain viable and attractive destinations serving a number of different functions including employment, leisure, recreation, health and shopping functions. Having easy access to a wide range of services and amenities is likely to improve the quality of life of local people and therefore exert a positive impact on people's physical and mental health.

The policy further seeks to return vacant homes back into use and ensure new homes are occupied, whilst also encouraging new dwellings to be marketed and occupied by local and UK residents in line with the Mayor's New Homes for Londoners Concordat. This is likely to have a positive impact on the social and housing objectives.

Increasing the number of homes in the borough will, however place greater demand on the borough's educational institutions. It is likely that these institutions will require and will receive increased investment in order to cater to this increased demand. This in turn should positively impact on the quality of education and the standard of achievement of students of all ages.

The proposed policy does not address affordability or housing quality because it focuses on the numbers of homes to be provided over the life of the Local Plan. Affordability and housing quality are addressed in other Local Plan policies.

Increasing the number of homes in the three town centre areas is likely to foster an increased sense of community and social cohesion, simply by the fact that there will be a greater amount of 'human capital' in these areas than currently exists. Notwithstanding this, the degree to which this will be achieved will be heavily dependent upon the urban design policies and policies aimed at reducing economic polarisation within these communities. In particular, care should be taken to avoid as far as possible the negative effects gentrification can exert on community polarisation.

The implementation of the proposed policy will inevitably have some impact on heritage and conservation. The sustainability issues concerning these issues are addressed in other policies in the Local Plan.

Increasing the intensity of development in the borough will almost inevitably add to pollution levels in terms of air, water quality and waste. However, development will also reduce the amount of derelict and degraded land and can also result in the remediation of previously contaminated land.

Increasing residential density in areas that have good access to public transport and local amenities will both reduce the need to travel and will encourage the use of sustainable modes of transport including walking and cycling. Increasing residential density will also result in greater efficiencies in terms of land and resource use, including water and energy by incorporating sustainable urban design principles and higher building design standards.

Implementing this policy will improve the viability and vitality of the local town centres and is likely to catalyse employment and economic development in the borough.

POLICY	SA OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Policy HO1 Housing supply												
Proposed policy: <i>See policy wording above.</i>	✓	✓	0	0	✓	0	0	?	✓	✓	✓	✓

Borough-wide Policy HO2 Housing conversion and retention

Policy HO2 -Housing Conversion and Retention

The council will:

- a. **Permit conversions of existing dwellings into two or more dwellings where:**
 - the net floor area of the original dwelling is more than 120sqm;
 - at least 50% of the proposed units consist of two or more bedrooms;
 - housing appropriate for families has access to any garden or amenity space; and
 - there is no adverse impact on on-street parking stress.
- b. **Resist proposals which would result in a net loss of permanent residential accommodation as a result of redevelopment or change of use without replacement (measured by floorspace), including to short stay accommodation.**
- c. **In streets where there is less than 10% night-time free space the number of additional dwellings may be restricted or conditioned to allow no additional on-street parking.**

Residential conversions that result in an increase in the number of high quality family size dwellings will be supported, particularly where the reinstatement of a family house can be achieved.

The proposed policy will address the under-provision of family homes in the borough. It will have a positive impact on the social and affordable homes objectives by increasing the range of homes available and improving social justice and cohesion. Effects on pollution and climate change are uncertain and will depend on mitigation measures.

The proposed policy has positive effects on maintaining housing accommodation, on social cohesion and justice. No negative impacts have been identified although as old housing was not built to sustainable codes its retention may not be so beneficial to climate change.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO2- Housing conversion and retention	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: a) Permit conversions of existing dwellings into two or more dwellings where:	✓	0	0	✓	✓	0	0	?	✓	0	?	0

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO2- Housing conversion and retention	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"> the net floor area of the original dwelling is more than 120sqm; at least 50% of the proposed units consist of two or more bedrooms; housing appropriate for families has access to any garden or amenity. there is no adverse impact on on-street parking stress. 												
Proposed policy: b) Resist proposals that would result in a net loss of permanent residential accommodation as a result of redevelopment or change of use without replacement (measured by floorspace), including to short stay accommodation.	✓	0	0	✓	✓	0	?	0	0	0	?	0
Proposed policy: c) In streets where there is less than 10% night-time free space the number of additional dwellings may be restricted or conditioned to allow no additional on-street parking	0	0	0	0	0	0	0	?	✓	0	?	0
Proposed policy: Residential conversions that result in an increase in the number of high quality family size dwellings will be supported, particularly where the reinstatement of a family house can be achieved.	✓	0	0	✓	✓	0	0	✓	0	0	0	0

Borough-wide Policy HO3 Affordable Housing

Policy HO3 - Affordable Housing

Housing development should increase the supply and improve the mix of affordable housing to help achieve more sustainable communities in the borough.

On sites with the capacity for 10 or more self-contained dwellings affordable housing should be provided having regard to the following:

- a. A borough wide target that at least 50% of all dwellings built between 2015-25 should be affordable.**
- b. 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing.**
- c. Affordable dwellings should be located throughout a new development and not concentrated on one part of the site.**
- d. The provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership.**
- e. In negotiating for affordable housing a proposed development, the council will seek the maximum reasonable amount of affordable housing and take into account:**
 - o site size and site constraints; and**
 - o financial viability, having regard to the individual circumstances of the site and the availability of public subsidy.**
- f. 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.**

In addition, there should be no net loss of social/affordable rented housing on any development sites.

The proposed policy seeks to increase the supply and mix of affordable housing. This approach will have a positive impact on the social justice objective by enabling the creation of mixed and sustainable communities and by contributing towards reducing the differences in housing standards between different communities in the borough.

The provision of affordable housing will have a positive impact on the affordable homes objective by increasing the range and affordability of housing available in the borough and will contribute towards providing decent homes. Providing social or affordable renting, with a focus on family accommodation, along with intermediate housing will help meet the borough's housing needs.

As affordability is a key issue in the borough, the council have increased the affordable housing target in the Local Plan from 40% to 50% in order to maximise the

amount of affordable housing to meet local needs. This change is likely to result in a further positive effect on the affordable homes and social sustainability objectives, but will be dependent on implementation of the policy taking into account viability. An updated viability assessment has been undertaken by consultants to support the affordable housing target in policy H03.

It will be important to monitor this policy closely as the level of affordable provision at 50% could also affect the viability of some developments and potentially reduce the number of homes coming forward in the future.

Through the Housing and Planning Act (2016) the Government has introduced Starter Homes as an alternative to more traditional forms of affordable housing. Starter Homes are aimed at first time buyers, under 40 to enable them to buy their own home which will be offered at a discount of at least 20% below market value and in London will cost no more than £450,000. A supply of Starter Homes in the borough may have some potential to retain middle income households that would otherwise have to move elsewhere to satisfy aspirations for owner occupation, but will do little to meet the aspirations of lower income households in housing need. However, until the exact details of Starter Homes are known, there is a great deal of uncertainty on how this initiative may affect the sustainability objectives.

The provision of intermediate housing recognises the particular need in London to cater for people that are above social rent income levels, but are able to afford private market housing. This forms a relatively broad demographic in London, as a result of high property prices. It offers these people opportunities to get into the property ladder in the borough and remain living in the borough rather than having to move out of London in order to attain home ownership. This will help to achieve a more sustainable community in the borough.

The proposed policy will ensure that there is no reduction in the social rented stock and this will have a positive impact by continuing this supply of accommodation to meet local need.

Affordable housing located near to public transport is likely to be less detrimental in terms of the effect of transport on the environment. Any new development will have some unavoidable environmental footprint, which differs by type of housing.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy H03- Affordable Housing	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: a) a borough wide target that at least 50% of all dwellings built between 2015-25 should be affordable.	✓	0	0	✓	✓	0	0	0	0	0	0	0

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO3- Affordable Housing	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: b) 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing.	✓	0	0	✓	✓	0	0	0	0	0	0	0
Proposed policy: In addition, there should be no net loss of social/affordable rented housing on any development sites.	✓	0	0	✓	✓	0	0	0	0	0	0	0

Borough-wide Policy HO4 Housing quality and density

Policy HO4 Housing quality and density

Housing Quality

The council will expect all housing development to respect the local setting and context, provide a high quality residential environment, be well designed internally and externally and energy efficient and (subject to the size of scheme) provide a good range of housing types and sizes.

All new housing must take account of the amenity of neighbours (see also Design and Conservation policies) and must be designed to have adequate internal space in accordance with London Plan Policies unless it can be shown that not building to those standards is justified by the circumstances of a particular site.

Ground level family housing should have access to private gardens/amenity space and family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity and design considerations, or to shared amenity space/ and/or children's playspace.

Housing Density

In existing residential areas, and in substantial parts of regeneration areas, new housing will be expected to be predominantly low to medium rise consisting of developments of houses, maisonettes and flats, and modern forms of the traditional mansion block and other typologies of residential development that may be suitable for its context, with gardens and shared amenity space in street based layouts (see also policy OS1 Improving and Protecting Parks and Open Spaces).

Some high density housing with limited car parking may be appropriate in locations with high levels of public transport accessibility (PTAL 4-6) provided it is satisfactory in all other respects

Acceptable housing density will be dependent primarily on an assessment of these factors, taking account of London Plan policies and subject to public transport and highway impact and capacity.

The proposed policy seeks to ensure that all housing developments are provided to a satisfactory quality and well related to their surroundings. It has a wide range of positive effects including environmental benefits, (particularly in relation to climate change), careful consumption and pollution. It will lead to sustainable developments and potentially maintain the character/heritage of the borough. It will also improve social justice and cohesion by increasing residents' sense of community. Indirectly, well designed houses could lead to improving the health of the population.

The provision of ground floor level family housing with access to private gardens or amenity space will have a number of positive effects particularly in relation to health.

The proposed policy scores positively on the social and environmental objectives in terms of providing residential development that responds to its surroundings. The provision of well-designed homes that fit into the surroundings will have a positive impact on the well-being of the community and indirectly on its health. High density housing can impact upon flood risk and consequently it will be important to ensure that sustainable urban drainage systems are incorporated in developments.

The proposed policy supports high density housing in appropriate locations with high levels of public transport accessibility. This is likely to have a positive effect on a number of the sustainability objectives in terms of providing new housing development in areas of good transport accessibility meaning local services can be accessed easily.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO4- Housing quality and density	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: The council will expect all housing development to respect the local setting and context, provide a high quality residential environment, be well designed internally and externally and energy efficient, and (subject to the size of scheme) provide a good range of housing types and sizes.	✓	✓	0	✓	0	0	✓	✓	0	✓	✓	0
Proposed policy: All new housing must take account of the amenity of neighbours (see also Design and Conservation policies) and must be designed to have adequate internal space in accordance with London Plan Policies unless it can be shown that not building to those standards is justified by the circumstances of a particular site; and	✓	✓	0	✓	✓	0	✓	✓	0	✓	✓	0
Proposed policy: Ground level family housing should have access to private gardens/amenity space and family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity and design considerations, or to shared amenity space and/or children's playspace.	✓	✓	0	✓	✓	0	0	0	0	0	0	0
Proposed policy: In existing residential areas, and in substantial parts of regeneration areas, new housing will be expected to be	✓	✓	0	✓	✓	0	✓	✓	0	0	0	0

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO4- Housing quality and density	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	careful consumption	Climate change	sustainable economy
predominantly low to medium rise consisting of developments of houses, maisonettes and flats, and modern forms of the traditional mansion block and other typologies of residential development that may be suitable for its context, with gardens and shared amenity space in street based layouts. (See also policy OS1 Improving and Protecting Parks and Open Spaces)												
Proposed policy: Some high density housing with limited car parking may be appropriate in locations with high levels of public transport accessibility (PTAL 4-6) provided it is satisfactory in all other respects.	0	0	0	0	0	0	0	?	? / ✓	0	?	0

Borough-wide Policy HO5 Housing mix

Policy HO5 - Housing mix

The council will work with Registered Providers and other house builders to increase the supply and choice of high quality residential accommodation that meets local residents needs and aspirations and demand for housing. In order to deliver this accommodation there should be a mix of housing types and sizes in development schemes, including family accommodation.

Developments should aim to meet the following mix subject to viability, locational characteristics and site constraints being considered on a site by site basis

- for social and affordable rented housing approximately: 1 bedroom: 10% of units; 2 bedrooms: 40% of units; 3 bedrooms: 35% of units; 4+ bedrooms 15% of units;
- for intermediate housing approximately: 1 bedroom: 50%; 2 bedroom:

- 35%; 3 or more bedrooms : 15% of units; and**
c. for market housing, a mix of unit sizes including larger family accommodation.

The proposed policy sets out a defined housing mix which will seek to address the lack of family sized social housing in the borough on a site by site basis, thus allowing viability and other factors to be considered. It therefore scores positively on social justice, social cohesion and affordable homes. It will be important to monitor the mix that is provided so as to ensure housing needs are being met.

The proposed policy seeks to meet local needs and will have a positive impact on the social, health and pollution sustainability objectives.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy H05: Housing mix	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: The council will work with Registered Providers and other house builders to increase the supply and choice of high quality residential accommodation that meets local residents' needs and aspirations and demand for housing. In order to deliver this accommodation: - there should be a mix of housing types and sizes in development schemes, including family accommodation. Developments should aim to meet the following mix subject to viability, locational characteristics and site constraints being considered on a site by site basis: [...] See <i>policy wording above</i> .	✓	✓	0	✓	✓	0	0	0	0	0	0	0

Borough-wide Policy HO6 Accessible housing

Policy HO6 - Accessible housing

The council will seek to secure high quality accessible homes in all developments that include housing, in particular we will require that:-

- a. 90% percent of new housing should meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and where feasible, additional dwellings resulting from conversions, changes of use and dwellings formed from extensions or floors added to existing blocks of flats should also meet this requirement.
- b. 10% percent of new housing should meet Building Regulation requirement M4(3) 'wheelchair user dwellings' designed to be wheelchair accessible users. 'Wheelchair user dwellings should be provided in proportion to the tenure mix of the development.

Accessible width car parking spaces should be provided to meet the needs of blue badge holders in accordance with Policy T6 and British Standards.

The proposed policy seeks to address the shortage of accessible and adaptable housing in London. By enhancing choice and enabling independent living it could help in reducing differences between communities. This will have a positive impact on the social, housing and transport objectives.

The policy formerly referred to Lifetime Homes, but in response to the Government introducing new national technical standards, this policy has been modified to include reference to part M4 of the Building Regulations rather than Lifetime Homes. These regulations are considered to be broadly equivalent to be broadly equivalent to satisfy lifetime homes criteria and will continue to have a impact on the social justice, social cohesion, housing and health objectives. The regulations are also referred to in the London Plan 2016.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO6 Accessible housing	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Option: <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	0	0	✓	0	0	0

Borough-wide Policy HO7 Meeting needs of people who need care and support

Policy HO7 - Meeting needs of people who need care and support

Applications for development that would result in the loss of special needs housing will only be granted permission if it can be demonstrated that there is no longer an established local need for this type of accommodation or that the currently facility is unfit for purpose or that it will be replaced elsewhere. Proposals for the loss of existing accommodation should demonstrate that there is no longer a need for that particular type of accommodation or that the current facility is unfit for purpose or that it will be replaced elsewhere.

The council will encourage and support applications for new special needs and supported housing, including specialist housing for older people, if it meets the following criteria.

- there is an established local need for the facility;
- the standard of the facilities are satisfactory and suitable for the intended occupants;
- there is a good level of accessibility to public transport and other facilities needed by the residents; and
- the impact of the proposed development will not be detrimental to the amenity of the local area or to local services.

Where relevant, it will be necessary for evidence of lack of need to consider the full range of special needs, including the frail elderly, people with physical and learning difficulties and people needing short term support.

The proposed policy should allow the retention of a stock of special needs accommodation thereby meeting health and social objectives, including housing needs where they exist. For many of the sustainability objectives, the proposed policy has no obvious significant positive or negative effects.

The proposed policy will require applications for special needs housing to show that they are considering the impact on the local area in terms of local needs, suitability, accessibility, environmental impacts on the community and amenity of areas. It will have numerous positive effects related to the above.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO7 Meeting needs of people who need care and support	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: Applications for development that would	✓	✓	0	✓	✓	0	0	0	0	0	0	0

POLICY	SUSTAINABILITY OBJECTIVES											
Policy H07 Meeting needs of people who need care and support	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
result in the loss of special needs housing will only be granted permission if it can be demonstrated that there is no longer an established local need for this type of accommodation or that the current facility is unfit for purpose or that it will be replaced elsewhere. Proposals for the loss of existing accommodation should demonstrate that there is no longer a need for that particular type of accommodation or that the current facility is unfit for purpose or that it will be replaced elsewhere.												
Proposed policy: The council will encourage and support applications for new special needs and supported housing, including specialist housing for older people, if it meets the following criteria: [...]. <i>See policy wording</i>	✓	✓	0	✓	✓	0	0	0	✓	0	0	0

Borough-wide Policy HO8 Hostels and houses in multiple occupation

Policy HO8 - Hostels and houses in multiple occupation

The acceptability of planning applications for new houses in multiple occupation (HMOs) or hostels or for the loss of existing HMOs or hostels will be considered in relation to the following criteria:

- the quality of the accommodation that is proposed or might be lost;
- the impact of the accommodation on the locality; and
- the local need for the proposed or existing HMO or hostel accommodation.

The proposed policy assesses the need for or loss of houses in multiple occupation (HMOs)/hostels by considering the impact on the local area, the quality of the development and local needs for this type of accommodation. The provision of types of housing such as hostels is generally sustainable given that it will help to support vulnerable groups and those in education and contribute to the housing mix. It will have significant positive effects on the social and housing objectives, but have uncertain effects on the health objectives because existing HMO accommodation can sometimes be of low standard.

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy HO8 Hostels and houses in multiple occupation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	?	0	✓	✓	0	0	0	0	0	0	0

Borough-wide Policy HO9 Student accommodation

Policy HO9 - Student accommodation

The council recognises the London-wide need for student accommodation, and to assist in meeting this need it will support applications for student accommodation as part of mixed use development schemes within the White City and Earls Court and West Kensington Opportunity Areas. Applications for student accommodation outside of these areas will be assessed on a site by site basis, however the council will resist proposals which are likely to have adverse local impacts.

An application for student accommodation will need to show that:

- a. the site is in an area with good public transport accessibility (normally

- PTAL 4-6) with access to local convenience services and the proposal would not generate additional demands for on-street parking;**
- b. there would be no loss of existing housing;**
 - c. the development does not have a detrimental impact on the local area, and should include a management and maintenance plan for the accommodation to demonstrate how the amenity of neighbouring properties will be protected and what steps would be taken to minimise the impact of the accommodation on neighbouring uses;**
 - d. the accommodation is of high quality, including size of units, daylight and sunlight standards;**
 - e. wheelchair accessible accommodation is provided to meet the needs of disabled students in accordance with relevant British Standards; and**
 - f. the student accommodation should be secured for occupation by members of specified London-based educational institutions or an element of affordable accommodation in accordance with the relevant London Plan (2016) policies.**

The proposed policy considers that student accommodation will be best delivered in the two main Opportunity Areas where it can be planned and integrated as part of major mixed use developments. The effects on a number of sustainability objectives are uncertain and will depend upon the specifics of individual schemes. Those effects will need to be kept under review.

The proposed policy seeks to mitigate the potential negative impacts of student accommodation on neighbouring properties by assessing the overall impact of the proposal on the Opportunity Areas strategies and applications outside those areas on a site-to-site basis. There are a number of positive effects but some uncertainties as well because much will depend upon specific proposals.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO9 Student accommodation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: The council recognises the London-wide need for student accommodation, and to assist in meeting this need it will support applications for student accommodation as part of mixed use development schemes	✓	0	?	?	?	0	✓	?	✓	?	?	✓

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO9 Student accommodation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
within the White City and Earls Court and West Kensington Opportunity Areas. Applications for student accommodation outside of these areas will be assessed on a site by site basis, however the council will resist proposals which are likely to have adverse local impacts.												
Proposed policy: An application for student accommodation will need to show that [...]. <i>See policy wording above.</i>	✓	?	?	?	?	0	✓	?	✓	?	?	✓

Borough-wide Policy HO10 Gypsy and traveller accommodation

Policy HO10 - Gypsy and traveller accommodation

The council will work closely with the Royal Borough of Kensington and Chelsea to protect, improve and, if necessary, increase the capacity of the existing gypsy and traveller site at Westway.

Following the completion of a Gypsy and Traveller Accommodation Needs Assessment in 2015 with the Royal Borough of Kensington and Chelsea, the study suggested a need for extra pitches for an additional five families by 2020.

The council will work with the Royal Borough of Kensington and Chelsea to accommodate this need if necessary. The provision of pitches to meet the full accommodation needs of the traveller community would provide a small number of affordable dwellings to meet a particular housing need. The effects on a number of the sustainability objectives are currently uncertain and so this policy will need to

be reviewed and monitored in liaison with Royal Borough of Kensington and Chelsea.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO10 Gypsy and traveller accommodation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	?	?	0	?	✓	0	0	0	0	0	0	0

Borough-wide Policy HO11 Detailed residential standards

Policy HO11 - Detailed residential standards

The council will ensure that the design and quality of all new housing, including new build, conversions and change of use, is of a high standard and that developments provide housing that will meet the needs of future occupants and respect the principles of good neighbourliness.

To achieve a high standard of design, the following considerations will be taken into account:

- a. floor areas and room sizes in new build dwellings, conversions and changes of use, including meeting 'Nationally Described Space Standards;
- b. accessibility for disabled people;
- c. amenity and garden space provision;
- d. a safe and secure environment;
- e. car parking and cycle parking;
- f. flood protection measures and attenuation of surface water run off;
- g. sustainable energy measures that provide resilience to climate change impacts
- h. use of durable construction materials to construct low maintenance dwellings with low environmental impacts;
- i. provision of waste and recycling storage facilities;
- j. noise insulation and layout to minimise noise nuisance between dwellings; and
- k. protection of existing residential amenities, including issues such as loss of daylight, sunlight, privacy and outlook.

Proposals for extensions will be considered acceptable where it can be demonstrated that there is no detrimental impact on:

- Privacy enjoyed by neighbours in adjoining properties;
- daylight and sunlight to rooms in adjoining properties;
- outlook from windows in adjoining properties; and
- openness between properties.

The council has prepared a Planning Guidance SPD that provides further guidance on these and other residential amenity issues referred to in the Local Plan.

The proposed policy has a wide range of positive effects including environmental (particularly in relation to climate change, careful consumption and pollution) social, transport and heritage benefits. It will lead to high standards of design and sustainable developments in the borough.

There is a strong correlation between this housing policy and design/heritage policies. The provision of supporting SPD's should flesh out some of the details of these standards.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy HO11- Detailed residential standards	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	✓	✓	✓	✓	✓	✓

Assessing secondary, cumulative and synergistic effects

Proposed policy HO1 Housing Supply is anticipated to positively contribute to the Local Plan's strategic objective 5, which seeks to increase the supply and choice of high quality housing. It is predicted that the policy will have a significant positive effect in the medium to long term, especially on the social sustainability objectives because new homes provided will need to meet local needs. New housing will be located in areas of good transport accessibility and the proposed density of new development will help to ensure the borough's town centres remain viable and attractive destinations providing employment, leisure and retail.

Proposed policy HO2 Housing Conversion and Retention is anticipated to positively contribute towards the Local Plan's strategic objective 5, which seeks to increase the supply and choice of high quality housing in the borough. The effect of proposed policy HO2 is medium to long term. Overall, the proposed policy has been found sustainable against the sustainability objectives and will have both a permanent and direct effects on the social justice, affordable homes and social cohesion sustainability objectives. The uncertain effects will need to be monitored.

Proposed policy HO3 Affordable housing is anticipated to positively contribute towards the Local Plan's strategic objective 5 to increase the supply and choice of housing, particularly the need for affordable housing and strategic objective 6 to protect social housing and provide more new affordable homes for local residents to buy or rent. It will have permanent and direct effects as well as a cumulative effect on the social justice, affordable homes and social cohesion sustainability objectives. The monitoring of this policy will be essential, particularly in relation to Starter Homes regulations to ensure that appropriate tenure mixes are being secured and that social and economic polarisation in the borough is being reduced.

Proposed policy HO4 Housing quality and density is anticipated to positively contribute towards the Local Plan's strategic objectives 5, 10, 13, and 16. The effect of proposed policy HO4 will be medium to long term. It will have permanent and direct effects as well as a cumulative effect on the social and environmental sustainability objectives as the policy seeks to provide high quality housing developments which are well related to its surroundings. This will help maintain the character of the borough and the protection of residential amenity

Proposed policy HO5 Housing mix is anticipated to positively contribute towards the Local Plan's strategic objectives 5 which seeks to provide more housing in the borough and 6 which seeks to provide more affordable homes for local residents to buy or rent. Policy HO5 is likely to have medium to long-term sustainability effect. It will have both permanent and direct effects by providing a mix of housing types that meet the borough's identified housing needs and this will have an overall positive effect and will increase the supply and choice of high quality housing.

Proposed policy HO6 Accessible housing is anticipated to positively contribute towards the Local Plan's strategic objective 5 which seeks to ensure that new housing meets local needs. The effect of this policy is short to long term and is predicted to have a permanent and direct impact on the social sustainability objectives. Overall, the proposed policy has been found sustainable and no uncertain or negative effects have been identified.

Proposed policy HO7 Meeting needs of people who need care and support is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objective 5 which seeks to ensure that new housing meets local needs. It is likely that the effects of this policy will be short to long term and will have a positive effect on the social justice sustainability objective by providing housing for those with special needs. Overall policy HO7 is sustainable and has no uncertain or negative effects.

Proposed policy HO8 Hostels and houses in multiple occupation is anticipated that it will positively contribute towards the Proposed Submission Local Plan's strategic objective 5 by seeking to increase the supply and choice of high quality housing. Proposed Policy HO8 recognises the role that hostels and HMOs play in providing accommodation for single people who cannot afford self-contained accommodation.

Proposed Policy HO8 is likely to have a medium to long-term effect. Overall, the proposed policy has been found sustainable.

Proposed policy HO9 Student accommodation is anticipated to positively contributing towards the Local Plan's strategic objective 2 by increasing the supply and choice of high quality housing. The policy seeks to provide new student accommodation as part of mixed use development schemes within the identified regeneration areas. It is predicted that effects of this policy will be medium to long term in terms of timeframe. The uncertain effects of proposed policy HO9 on some sustainability objectives means that individual schemes will need to be looked at carefully as and when they come forward.

Proposed policy HO10 Gypsy and traveller accommodation may contribute towards the Proposed Submission Local Plan's strategic objective 5 to ensure housing meets local needs and aspirations as it focuses on exploring the potential to increase the capacity of the existing site. The uncertain effects of policy HO10 on the social justice, health and affordable homes sustainability objectives will need to be monitored and the policy reviewed in liaison with Royal Borough of Kensington and Chelsea.

Proposed policy HO11 Detailed residential standards is anticipated to positively contribute towards the Local Plan strategic objective 5 which seeks to increase the supply and choice of high quality housing. Overall, proposed policy HO11 has been found sustainable, with a wide range of positive effects including environmental particularly in relation to climate change, careful consumption and pollution. It is likely that the effects of this policy will be medium to long term in terms of its timeframe and have both permanent and direct impacts on the sustainability appraisal objectives.

Local Economy and Employment

Borough-wide Policy E1 Providing for a range of employment uses

Policy E1- Providing for a range of employment uses

The council will support proposals including mixed use schemes for new employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services, bio-medical and other research based industries such as those at Imperial College in Shepherd's Bush.

The council will also support the retention and intensification of existing employment uses. It will require flexible and affordable space suitable for small and medium enterprises in large new business developments, unless justified by the type and nature of the proposal. When considering new employment floorspace or the extension of existing floorspace the council will also take into account:

- a. whether the scale and nature of the development is appropriate, having regard in particular to local impact, the nature of the surrounding area, and public transport accessibility;**
- b. impact upon small and medium sized businesses that support the local community;**
- c. scale and nature of employment opportunities generated in the new development;**
- d. whether there will be displacement of other uses such as community facilities or housing; and**
- e. the Hammersmith and Fulham Economic Growth Plan and the council economic strategies.**

The borough's three town centres and the White City and Earl's Court and West Kensington Opportunity Areas will be the preferred locations for new office development above 2500 sq m. Proposals outside of these areas for large new office development (above 2,500 sq.m.) will generally be discouraged unless it can be demonstrated that provision cannot be provided within the town centres or the White City and Earl's Court and West Kensington Opportunity Areas.

By enhancing opportunities for the development of a range of different employment uses the proposed policy will have positive effects on creating a sustainable economy and will also have the potential for providing satisfying work and social justice for borough residents. However, increasing employment could lead to an increase in pollution in the form of waste, emissions and consumption of resources if not carefully managed. These potential consequences may adversely impact upon the council's objectives to minimise the borough's impact on climate change and will need to be carefully considered when making planning decisions.

Identifying the town centres and regeneration areas as preferred locations for major office developments is in accordance with national and London wide policy. It is these locations which have identified development sites, good transport accessibly and/or opportunities and supportive infrastructure that will enable the achievement of sustainable development.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy E1 Providing for a range of employment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy : The council will support proposals including mixed use schemes for new employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services, bio-medical and other research based industries. The council will also support and the retention and intensification of existing employment uses. It will require flexible and affordable space suitable for small and medium enterprises in large new business developments, unless justified by the type and nature of the proposal. When considering new employment floorspace or the extension of existing floorspace the council will also take into account: [...]. See <i>policy wording above</i> .	✓	0	0	0	0	✓	0	?	0	?	?	✓

POLICY	SUSTAINABILITY OBJECTIVES											
Policy E1 Providing for a range of employment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Option: The borough's three town centres and the White City and Earl's Court and West Kensington Opportunity Areas will be the preferred locations for new office development above 2500 sq m. Proposals outside of these areas for large new office development (above 2,500 sq.m.) will generally be discouraged unless it can be demonstrated that provision cannot be provided within the town centres or the White City and Earl's Court and West Kensington Opportunity Areas.	0	0	✓	0	0	✓	0	?	0	?	?	✓

Borough-wide Policy E2 Land and premises for employment uses

Policy E2 - Land and premises for employment uses

The council will require the retention of land and premises capable of providing continued accommodation for employment or local services. Permission will only be granted for a change where:

1. continued use would adversely impact on residential areas; or
2. an alternative use would give a demonstrably greater benefit that could not be provided on another site; or
3. it can be evidenced that the property is no longer required for employment purposes.

Where the loss of employment use is proposed in line with sub para.3 above, the council will have regard to:

- the suitability of the site or premises for continued employment use with or without adaptation;
- evidence of unsuccessful marketing over a period of at least 12 months;
- the need to avoid adverse impact on established clusters of employment use; and
- the need to ensure a sufficient stock of premises and sites to meet local need for a range of types of employment uses, including small and medium sized enterprises, in appropriate locations.

The mixed use enhancement of employment sites will be considered acceptable where these are under-utilised, subject to the satisfactory retention or replacement of employment uses in the scheme where this continues to be appropriate.

A shortage of land and premises for employment activities and competition from other uses, as well as permitted development rights allowing change of use from office to residential is likely to reduce the possibility of maintaining a sustainable economy and business diversity in the borough.

Therefore, it is appropriate to protect this local resource, although allowing for release of land and premises where this is justified by site circumstances, viability etc. Loss could also impact upon opportunities for the education, training and employment prospects of local residents. The proposed policy will allow the mixed use enhancement of sites to be sustainable where uses do not impact detrimentally on their neighbours.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy E2 Land and premises for employment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	0	0	✓	0	0	✓	0	0	0	0	0	✓

Borough-wide Policy E3 Provision for visitor accommodation and facilities

Policy E3 - Provision for visitor accommodation and facilities

Permission will be granted for new visitor accommodation and facilities or the extension of existing facilities within the three town centres, the Earl's Court and West Kensington and White City Opportunity Areas subject to:

- **the development being well located in relation to public transport;**
- **the development and any associated uses not having a detrimental impact on the local area;**
- **no loss of priority uses such as permanent housing;**
- **provision of adequate off street servicing;**
- **at least 10% of hotel bedrooms designed as wheelchair accessible;**
- **the facility being of a high standard of design;**
- **the scheme adding to the variety and quality of visitor accommodation available locally; and**
- **all new hotel applications should demonstrate that the site can provide appropriate servicing and pick up points for the type of facility proposed.**

Outside the identified areas, the following will be considered appropriate, subject to meeting the above criteria:

- **small scale hotels; and**
- **visitor accommodation related to major visitor attractions of sub-regional or greater significance in accordance with the provisions of London Plan.**

The proposed policy seeks to ensure that new visitor accommodation and facilities are located in clearly defined areas with good public transport accessibility and other facilities. The criteria based-approach that will apply to individual proposals will ensure that impacts on the social justice, housing, heritage, transport and economic objectives are positive. The policy will ensure that outside of the defined areas, new developments are of a smaller scale and not detrimental to the local and residential areas.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy E3 Provision for visitor accommodation and facilities	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓	0	0	✓	?	✓	✓	✓	✓	0	✓	✓

Borough-wide Policy E4 Local employment, training and skills development initiatives

Policy E4 - Local employment, training and skills development initiatives

The council will require the provision of appropriate employment and training initiatives for local people of all abilities in the construction of major developments and in larger employment generating developments, including visitor accommodation and facilities, when these are completed. Local businesses will be encouraged to adopt the London Living Wage.

The proposed policy will seek employment and training initiatives as part of major developments and will help support sustainable economic growth in the borough by creating a skilled local work force. The proposed policy will positively contribute to the economic, social and education sustainability objectives. It may also contribute to health objectives by providing people with the skills and knowledge to earn more money and sustain healthier lifestyles. Encouraging businesses to adopt the Living Wage will have benefits for those workers who are in low paid jobs and contribute to the social justice objective.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy E4 Local employment, training and skills development initiatives	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed policy: <i>See policy wording above.</i>	✓	0	✓	0	✓	✓	0	0	✓	0	0	✓

Assessing secondary, cumulative and synergistic effects

Proposed policy E1 Providing for a range of employment uses is anticipated to contribute positively towards the Proposed Submission Local Plan's strategic objective 3 seeking to reduce polarisation and worklessness, and objective 7 and objective 8 that look to support the local economy, inward investment and businesses by maximising job opportunities. Overall, proposed policy E1 has been found sustainable, but uncertain environmental effects on the SA objectives will have to be monitored.

Proposed policy E2 Land and premises for employment uses is anticipated to contribute positively towards the Proposed Submission Local Plan's strategic objectives 7 and 8 that look to support the local economy, inward investment and businesses. Overall, proposed policy E2 has been found sustainable, however the policy will also allow for the provision of alternative uses, such as housing, which will assist in meeting other strategic objectives.

Proposed policy E3 Provision for visitor accommodation and facilities is anticipated to contribute positively towards the Proposed Submission Local Plan's strategic objectives 7 and 8 that look to support the local economy, inward investment and businesses. Overall, proposed policy E3 has been found sustainable however it will protect other uses, such as housing, thereby contributing to other social appraisal objectives and will include an assessment of transport accessibility and have positive environmental impacts.

Proposed policy E4 Local employment, training and skills development initiatives is anticipated to contribute positively towards the Proposed Submission Local Plan's strategic objectives 3, 7 and 8 that look to create opportunities for training and employment and support the local economy, inward investment and businesses. Overall, proposed policy E4 has been found sustainable and will also contribute to other social appraisal objectives.

Taken as a whole, the 4 policies are considered to provide a balanced and coordinated approach to the issue of employment policy that will not impact detrimentally on the achievement of sustainable development throughout the borough.

Town and Local Centres

Borough-wide Policy TLC1 Hierarchy of town and local centres

Policy TLC1 - Hierarchy of town and local centres

The council will work with the Mayor of London and other stakeholders, such as Business Improvement Districts, to enhance the vitality and viability of the borough's hierarchy of three town centres, 5 key local centres, 15 neighbourhood parades and 6 satellite parades (see Appendix 2 and Map 5 for details). In particular the council will:

- a. support the regeneration of the town centres for a mix of town centre uses, including residential development on appropriate sites;**
- b. maintain the predominant retail function of primary shopping areas;**
- c. support the night time economy in town centres;**
- d. support the conversion of unused or underused space above ground floor units for new residential accommodation (subject to the requirements of other relevant policies);**
- e. seek a mix of shop sizes and types, with independent as well as national traders, that are accessible to local residents, workers and visitors;**
- f. ensure that new developments for town centre uses are appropriately located, are of an acceptable scale, and do not negatively impact on the existing hierarchy, in accordance with national and regional policy and local need;**
- g. require a retail impact assessment for out of centre retail proposals which are in excess of 300 sqm (gross);**
- h. require a sequential test for out of centre retail development proposals in accordance with the NPPF;**
- i. promote the provision of shopmobility schemes;**
- j. safeguard local shops and other local services within local centres to meet local need;**
- k. support and protect local markets and clusters of specialist shopping;**
- l. negotiate planning obligations where appropriate, feasible and viable to mitigate the loss of, and/or secure or support, affordable retail space to encourage small or independent traders.**

The proposed policy will seek to locate major shopping developments in the borough's larger shopping centres. This will help to protect smaller centres from over-development and will reduce the need to travel as the borough's larger centres generally have the best public transport accessibility. A hierarchy of town centres, key local centres and smaller neighbourhood parades will make local shops and services more accessible to residents. The proposed policy seeks to support the regeneration of the town centres for a mix of town centre uses and to minimise adverse impacts on surrounding residential properties, which will have a positive effect on the social sustainability objectives.

The impacts on the environmental objectives from this regeneration will to a large extent depend on implementation. By concentrating economic development in the town centres is likely to exert a positive effect by boosting the local economy. The provision of local convenience stores and other shops for day to day needs as part of major developments, will create employment opportunities for surrounding residents. Overall it is considered that this policy will have no significant effects and there should be an overall improvement on the local economy.

POLICY	SA OBJECTIVES											
Policy TLC1: Hierarchy of Town and Local Centres	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy See Policy wording above	✓	0	0	0	✓	✓	0	0	✓	0	0	✓

Boroughwide Policy TLC2- Town Centres

Policy TLC2 –Town Centres

In the designated town centres (as shown on the Proposals Map and defined in Table 4 below), changes from A class use at street level will be permitted for alternative uses which can be shown to be complementary to the shopping frontage, maintain or increase the vitality and viability of the town centre and do not have an adverse impact on the local area. In particular, permission for changes of use will be considered on the following basis:

1. no more than 40% of the length of the prime retail frontage as a whole will be permitted to change to non-class A1 uses;
2. additional A4 and A5 uses (pubs, bars and takeaways), betting shops, pay day loan shops, amusement centres, mini cab offices and residential uses will not be permitted on the ground floor of the prime retail frontages.

- 3. the nature and characteristics of the proposed use are complementary to the shopping frontage;**
- 4. the proposed use contributes to the function of the centre in terms of the size of the unit, the length of its frontage and the location of the unit within the centre;**
- 5. planning conditions will be imposed in any permission for such changes of use to secure provision of a shop style fascia, and window display at street level, and to control the hours of opening of class A3-A5 uses; and**
- 6. consent will not be granted for residential use within the ground floor frontage**

In non prime retail frontages criteria 3-6 above will apply. In all calculations of the proportion of the frontage in class A1, the lawful use and unimplemented extant permissions for changes of use will be taken into account.

The proposed policy has a variety of positive impacts. By seeking to protect the amount of retail frontage and floorspace within town centres, it will help in achieving a sustainable economy, however the policy may need to be applied flexibly in times of economic downturn. There will also be positive impacts on transport as vibrant town centres with a good range of uses will reduce the need for residents to travel further to access a wider variety of retail premises.

Over recent years the nature of the high street and consumer shopping habits have changed with a greater variety of non-retail uses seeking to locate within the boroughs town centres. This coupled with vacant units suggests a more flexible policy approach to non-retail uses is required and there is a risk that a too prescriptive approach may stifle economic development.

This policy has therefore been modified to ensure there is greater flexibility to allow for a wider variety of uses within the prime retail frontage of town centres where appropriate, but still seeks to protect the predominance of retail (A1 uses). Those units within the designated non-prime retail frontage of town centres have less restrictions for changes of use from class A1 retail, with no requirement to meet a set quota figure. This will contribute positively to the sustainable economy objective. Having greater flexibility built into the policy to allow for a wider variety of uses will enhance the vitality and viability of the three town centres by offering a greater choice of uses and adding diversity. However, in order to have a positive impact on the health and social behaviour objectives, on implementation of the policy the concentration and location of takeaways as well as betting shops and pay day loan shops will need to be managed.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy TLC2-town centres	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓/!	0	0	✓/!	0	0	0	✓	0	0	✓

Borough-wide Policy TLC3 Local centres

Policy TLC3 - Local centres

The council has designated key local centres, neighbourhood parades and satellite parades to provide accessible shopping and service facilities to meet local needs (see Proposals Map and Appendix 2). In these centres, changes of use will be permitted subject to the proposed use being shown to be complementary to the function of the centre, enhancing the centre's viability and vitality and not having an adverse impact on the local area and where it meets the quotas set out below:

Neighbourhood Parades:

a. no more than 40% of the neighbourhood parade frontage as a whole will be permitted to change to non-class A1 uses; and

Key Local Centres:

a. No more than 50% of the length of the key local centre frontage as a whole will be permitted to change to non-class A1 uses; and

Satellite Parades:

a. no more than 60% of the satellite parade frontage as a whole will be permitted to change to non-class A1 uses; and

Where a proposal does not meet the quotas set out above and where the premises have been vacant for at least 1 year with evidence of marketing, the council may consider granting permission taking into account other factors such as:

- the contribution the unit makes to the function of the centre in terms of the size of the unit and the length of its frontage;
- the nature and characteristics of the proposed use and evidence of need;
- the location of the unit within the centre; and
- shop front appearance.

In all calculations of the proportion of the frontage of street blocks in class A1

and non-A1 uses, the lawful use and unimplemented extant permissions for changes of use will be taken into account.

Consent will not be granted for any ground floor residential frontages however residential may be appropriate at the rear of premises, subject to satisfactory evidence that neither shopping policy nor the long term viability of the retail unit will be prejudiced.

The quota policies, although more flexible and less restrictive than previously will contribute to maintaining the viability and vitality of the centres and protect the more local retail base of those centres. The flexibility that is built into the policy will allow a considered approach to the issue of vacancy. The proposed policy will have a positive impact on the economy, social justice (by improving the range and quality of shops and meeting residents' needs), and sustainable transport objectives (by reducing the need to travel).

On implementation of the policy the location and concentration of takeaways as well as pay day loan and betting shops will need to be monitored carefully to ensure there is no negative impact on health and social behaviour.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy TLC3 Local centres	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓/?	0	0	?/✓	0	0	0	✓	0	✓	✓

Borough-wide Policy TLC4 Small non designated parades, clusters and corner shops

Policy TLC4 - Small non designated parades, clusters and corner shops

Outside town centres, key local centres, neighbourhood parades and satellite parades, the council will seek to retain shops and other local services to meet local needs. Residential use and changes to other non- class A uses will be permitted except where this will result in a demonstrable shortage of class A1 uses in the locality.

In assessing an application in a non-designated parade or cluster for a change of use from a class A1 use to any other use, the council will take into account:

- a. the proximity and the range of shops in the locality to meet local needs (where town centres, key local centres, protected parades and satellite parades are not within 400 metres);
- b. the length of time that the application premises may have been vacant and the marketing of the premises; and
- c. the number of uses that may adversely impact on the quality of the parade or cluster, such as betting shops and amusement centres.

Corner shops are important for meeting local needs and will be protected for continued retail use (class A1). Changes of use of corner shops from retail use will not be permitted where there is a shortage of alternative shopping (where town centres, key local centres, protected parades and satellite parades and non-designated parades and clusters are not within 3400 metres).

In all calculations of the proportion of the frontage of street blocks in Class A1 and non-A1 uses, the council will take into account the lawful use and unimplemented extant planning permissions for changes of use.

Outside of the Local Plan retail hierarchy this policy is more flexible and allows for changes of use to residential and other uses where appropriate, with no quotas to be applied. Rather than setting a maximum threshold of non-retail uses that would be permitted, flexibility is applied to enable the council to consider the impacts of the proposal on a case by case basis having regard to local circumstances. This will contribute positively to the sustainable economy objective. However, the policy still seeks to protect local retail premises. Shops in these areas can provide important goods and services to local residents and this will contribute positively to social objectives, local employment and the economy, to health (by sustaining local shops that people can get to by walking) and sustainable transport (by reducing the need to travel).

POLICY	SUSTAINABILITY OBJECTIVES											
TLC4 Small non designated parades, clusters and corner shops	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	✓	✓	0	0	✓	0	0	✓

Borough-wide Policy TLC5 Managing the impact of food, drink and entertainment uses

Policy TLC5 - Managing the impact of food, drink and entertainment uses

Planning permissions for use class A3, A4 and A5 food and drink establishments as well as arts, culture, entertainment and leisure uses will be subject to conditions controlling hours of operation, as follows:

- a. Except in predominantly commercial areas, such as parts of town centres – premises shall not be open to customers later than the hour of 23:00; and**
- b. Within predominantly commercial areas, such as parts of town centres – premises shall not be open to customers later than the hour of 24:00.**

Extended opening may be permitted where:

- The activities would not be likely to cause impact especially on local residents, and that, if there is potential to cause adverse impact, appropriate measures will be put in place to prevent it; and**
- There will not be any increase in the cumulative impact from these or similar activities, on an adjacent residential area; and**
- There is a high level of public transport accessibility to and from the premises at appropriate times; and**
- The activity will not be likely to lead to a demonstrable increase in car parking demand in surrounding residential streets and roads forming part of the Strategic London Road Network or the London Bus Priority Network.**

In addition, subject to the location of the proposals, the council will consider the type of activities appropriate to the class A3, A4 and A5 premises, and apply conditions on uses where these are appropriate.

Where a use will impact on local amenity, the council may also set an appropriate start time.

Proposed policy TLC5 seeks to mitigate the impact of A3, A4 and A5 establishments by controlling hours of operation, type and location of activities. This will have positive significant effects on the health, and social objectives for example through safeguarding residential amenity. The locational criteria will also have positive impacts on transport. Permitting later opening hours will assist in achieving a sustainable economy, including a night-time economy.

POLICY	SUSTAINABILITY OBJECTIVES											
TLC5 Managing the impact of food, drink and entertainment uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: Planning permissions for use class A3, A4 and A5 food and drink establishments as well as arts, cultural entertainment and leisure uses will be subject to conditions controlling hours of operation, as follows: [...]	0	✓	0	0	✓	0	0	✓	✓	0	0	✓
See policy wording above.												

Town and Local Centre policy TLC6- Betting Shops, Pawnbrokers and Payday Loan Shops and Food Takeaways

Policy TLC6 – Betting shops, Pawnbrokers and Payday Loan Shops and Hot Food Takeaways

To ensure that shopping areas remain diverse and balanced, the council will seek to limit the amount and concentration of betting shops, pawnbrokers and payday loan shops in areas of high concentration.

Planning permission for new betting shops and payday loan shops will not be permitted in the prime retail frontage of town centres or within 400 metres of the boundary of an existing or permitted betting shop or payday loan shop.

Outside of these areas, planning permission will only be granted for a betting shop or payday loan shop in accordance with the quotas that apply and where it can be demonstrated that the proposal will not impact on residential amenity and will add to the vitality of the existing shopping parade or cluster.

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.

This is a new policy in the Local Plan. Local retail health checks have confirmed that the over representation of betting shops is especially high in the most deprived parts of the borough. There are currently 46 licensed premises across the borough and notable concentrations on North End Road and in our designated town and local centres.

The proposed policy has scored both positively and uncertain in relation to the health sustainability objective. Evidence indicates that the concentration of betting shops can have an impact on health for the more vulnerable members of the community.

Further work will be needed to gather evidence on the impact the presence of betting shops and payday loan shops have on vulnerable members of the local community. This proposed policy also scores positively in terms of social sustainability by contributing towards local residents' sense of community and social cohesion by helping reduce anti-social behaviour in the community.

This proposed policy will also have a positive impact on the economy as limiting betting shops in areas of high concentration will mean that retail choice would not be displaced by more betting shops and would therefore contribute towards the vitality of town and local centres.

POLICY	SA OBJECTIVES											
Policy TLC6 Betting shops, pawnbrokers, payday loan shops and hot food takeaways	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓ /?	0	0	✓	0	0	0	0	0	0	✓

Town and Local Centre policy TLC 7 Public houses

Policy TLC7 - Public houses

1. The Council will only permit the change of use or redevelopment of a public house (A4) after consideration of relevant town and local centre retail policies and an assessment of the following:

- a. a viability report that demonstrates to the Council's satisfaction that the public house is no longer economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months;**
- b. the role the public house plays in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in local provision;**
- c. the design, character and heritage value of the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance; and**
- d. the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.**

2. Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as making a significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic environment, the Council will require the building to be retained.

3. The proposed change of use of a ground floor of a public house for residential use will only be acceptable where:

- a. the premises are not within a town centre, key local centre, satellite parade or neighbourhood parade;**
- b. the proposal has been assessed against parts 1c and 1d of this policy and the impact of the proposal on these features; and**
- c. the Council is satisfied that residential use is acceptable, the accommodation to be provided will be of the highest quality and it meets the requirements outlined in residential standards.**

4. The applicant will be required to carry out an assessment of the needs of the community for community facilities to show that the existing or former public house is no longer needed and that alternative provision is available in the area.

The proposed policy scores positively on a number of sustainability objectives. This proposed policy will provide the community access to a wide range of services by protecting the provision of community space in public houses and would reduce the need to travel if community space is available locally.

The National Planning Policy Framework identifies public houses as a community facility that contributes to enhancing the sustainability of communities and residential environments. As such, pubs should be safeguarded and retained for the benefit of the community and planning policies and decisions should guard against the unnecessary loss.

There would be a positive impact on heritage objective and this policy seeks to protect public houses which make a positive contribution of the historic environment. Reuse of the building will maximise the use of existing resources and encourage responsible consumption in the borough. It would also contribute towards achieving a sustainable economy. Effects on pollution and climate change are uncertain and dependant on mitigation measures.

POLICY	SA OBJECTIVES											
Policy TLC7 Public houses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: 1. The Council will only permit the change of use or redevelopment of a public house (A4) after consideration of relevant town and local centre retail policies and an assessment of the following: a. a viability report that demonstrates to the Council's satisfaction that the public house is no longer economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months; b. the role the public house plays	✓	0	0	0	✓	0	✓	?	✓	✓	?	✓

POLICY	SA OBJECTIVES											
Policy TLC7 Public houses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<p>in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in local provision;</p> <p>c. the design, character and heritage value of the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance; and</p> <p>d. the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.</p>												
<p>Proposed Policy</p> <p>2. Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as</p>	0	0	0	0	0	0	✓	?	0	0	?	0

POLICY	SA OBJECTIVES											
Policy TLC7 Public houses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
making a significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic environment, the Council will require the building to be retained.												
Proposed Policy 3. The proposed change of use of a ground floor of a public house for residential use will only be acceptable where: a. the premises are not within a town centre, key local centre, satellite parade or neighbourhood parade; b. the proposal has been assessed against parts 1c and 1d of this policy and the impact of the proposal on these features; and c. the Council is satisfied that residential use is acceptable, the accommodation to be provided will be of the highest quality and it meets the requirements outlined in DM LP Policy HO1 (Detailed residential standards).	0	0	0	?	0	0	0	0	0	0/?	0	0

Assessing secondary, cumulative and synergistic effects

Proposed policy TLC1 Hierarchy of town and local centres is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objectives 1 and 8, seeking to regenerate Hammersmith and Fulham's town centres to improve their viability and vitality and sustain a network of supporting Key Local Centres providing local services. It is predicted that the policy will have a positive effect on the objective, especially in the medium to long term. The economies of scale offered by concentrating economic development in the town centres is likely to exert a positive synergy to boost the local economy.

Proposed policy TLC2 Town Centres is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objectives 1 and 8 which seek to regenerate Hammersmith & Fulham's town centres to improve their viability and vitality. It is predicted that this policy will have a positive secondary impact on the promotion of small businesses and the creation of job opportunities by making the retail mix better and more accessible. It is likely that the policy will have a positive effect on the sustainability appraisal objectives, especially in the medium to long term. Proposed policy TLC2 could combine cumulatively and synergistically with the other shopping policies to strengthen the local economy and in particular, the retail offer in the borough's town centres.

Proposed policy TLC3 Local Centres is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objective 1 which seeks to promote a network of supporting key local centres providing local services. It also contributes to achieving strategic objective 4 which seeks to ensure that residents have access to a range of facilities and services including retail. It is predicted that this policy will have a positive secondary impact on the local economy by making retail more accessible. It is expected that the policy will have a positive effect on the SA objectives, especially in the medium to long term. The policy could combine cumulatively and synergistically with the other shopping policies, in particular proposed Policies TLC5-8 to strengthen the local economy across the whole borough and help protect residential amenity and create sustainable communities.

Proposed policy TLC4 Small non-designated parades, clusters and corner shops is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objective 1 which seeks to promote a network of supporting key local centres providing local services. It also contributes to achieving strategic objective 4 which seeks to ensure that residents have access to a range of facilities and services including retail, in the case of this policy out of centre retail. It is predicted that this policy will have a positive secondary impact on the local economy by making retail more accessible. It is predicted that the policy will have a positive effect on the objective, especially in the medium to long term. The policy could combine cumulatively and synergistically with the other shopping policies, in particular proposed policies TLC3, TLC5-7 to strengthen the local economy across the whole of the borough and help protect residential amenity, contributing towards sustainable communities.

Proposed policy TLC5 Managing the impact of food, drink and entertainment uses is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objective 16 which seeks to protect and enhance the amenity and quality of life of residents and visitors. It is predicted that this policy will have a positive secondary impact on the safety and security of those who live, work and visit Hammersmith and Fulham. It is predicted that the policy will have a positive effect on the SA objectives, especially in the medium to long term. Proposed policy TLC6 could combine cumulatively and synergistically with the other shopping policies, in particular proposed Policies TLC6 and TLC7 to contribute towards sustainable communities.

Proposed policy TLC6 Addressing the concentration and clustering of betting shops and payday loan shops is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objectives 1 and 8, which seek to improve the vitality and vibrancy of high streets and key local centres as well as strategic objective 16 which aims to protect the amenity and quality of life of residents.

Effects of this proposed policy are likely to be permanent in its implementation and have a direct effect on the community in terms of impact on finances and health. It is predicted that the effects of this policy in terms of time frame is long term. This policy in conjunction with the implementation of the other town centres policies will have a positive cumulative effect on the town centre hierarchy in terms of maintaining and enhancing vitality of town centres. Collating an evidence base for this proposed policy will provide a greater level of certainty over its effect.

Proposed policy TLC7 Public houses is anticipated to positively contribute towards the Proposed Submission Local Plan strategic objective 4 which seeks to ensure that residents have access to a range of community infrastructure. It is predicted that the effects of this proposed policy will be permanent in implementation and will have a medium term to long-term effect by ensuring that local and accessible community space is protected. The proposed policy does not have a direct relation with traffic. However, the promotion and protection of local facilities may lead to a reduction in the need to use private transport.

COMMUNITY FACILITIES, LEISURE AND RECREATION

Borough-wide Policy CF1 Supporting community facilities and services

The council will work with its strategic partners to provide borough-wide high quality accessible and inclusive facilities and services for the community by:

- 1. Seeking to ensure high quality healthcare and the retention and enhancement of existing healthcare facilities, such as accident and emergency departments, including Charing Cross Hospital; and**
 - a. assisting in securing sites and buildings for future healthcare provision or reorganisation of provision, including local hubs for a wide range of health services in the north, centre and south of the borough, including new provision in the regeneration areas; and**
 - b. supporting renewal of existing GP premises and other healthcare facilities where this is required.**
- 2. Seeking the improvement of school provision, including:**
 - a. improvement and/or expansion of secondary schools;**
 - b. improvement and/or expansion of primary schools through the primary school capital programme;**
 - c. supporting the creation of new free schools;**
 - d. requiring the building of new primary schools as appropriate and applicable to the need generated by development proposals and available existing capacity in the White City Opportunity Area, the Fulham Regeneration Area (including Earls Court and West Kensington Opportunity Area);**
 - e. working with and supporting the Old Oak and Park Royal Development Corporation in the provision of school facilities to meet the need arising from proposed development in the OPDC area;**
 - f. supporting the provision of schools and facilities for those with special needs; and**
 - g. supporting provision of childcare nurseries.**
- 3. Improving the range of leisure, recreation, sports, arts, cultural and entertainment facilities by:**
 - a. protecting existing premises that remain satisfactory for these purposes;**
 - b. supporting re-provision of facilities for existing users in outworn premises where opportunities arise; and**
 - c. Seeking new facilities where appropriate and viable, including as part of major development proposals, in particular:**
 - major new leisure, arts, sports and recreation facilities in the White City Opportunity Area, especially east of Wood Lane and in Shepherds Bush town centre, in the Earls Court and West Kensington Opportunity Area;**

and

-water related sports and educational facilities in riverside developments.

- 4. Supporting the continued presence of the major public sports venues for football and tennis, subject to the local impact of the venues being managed without added detriment to local residents;**
- 5. Enhancing sport, leisure and cultural provision for schools and public use in suitable local parks;**
- 6. Protecting all existing community facilities and services throughout the borough unless there is clear evidence that there is no longer an identified need for a particular facility or service, or where that facility or service can be appropriately replaced or provided elsewhere in the locality;**
- 7. Supporting the Metropolitan Police Service, the London Fire and Emergency Planning Authority and Her Majesty's Court Service and action to deal with safety, crime and anti-social behaviour; and**
- 8. Requiring developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities.**

By working with strategic partners, the council should ensure that needs and requirements of residents, including health and wellbeing and education, are identified in a holistic and comprehensive manner. The proposed policy is aimed at safeguarding and providing for community facilities to assist in meeting the needs of borough residents and visitors to the borough which, will help meet many of the social objectives of the sustainability appraisal.

There will also be economic benefits in maintaining arts, cultural and entertainment facilities, many of which contribute to the night-time economy and provide local jobs, as well as transport benefits in having local facilities within easy reach of the community. By seeking new facilities in the regeneration areas, where there will be significant population growth, these areas should be well supplied with appropriate social infrastructure and should not give rise to unsustainable pressure on existing facilities elsewhere in the borough.

The policy will also result in positive effects on the social and health objectives, through protecting and improving social infrastructure such as health care, as well as improving leisure sport and recreational facilities. There will also be benefits to the community by seeking to reduce incidents of crime and antisocial behaviour.

By seeking to provide and protect schools and childcare facilities to meet local needs, the policy is likely to have a positive effect on the education objective.

POLICY	SA OBJECTIVES											
Policy CF1 Supporting community facilities and services	Social Equity	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful Consumption	Climate Changes	Sustainable Economy
Proposed Policy: 1) Seeking to ensure high quality healthcare and the retention and enhancement of existing healthcare facilities, such as accident and emergency departments, including Charing Cross Hospital and Hammersmith Hospital, and; [...] <i>See policy wording above.</i>	✓	✓	✓	0	✓	?	?	?	✓	✓	?	✓
Proposed Policy: 2) Seeking the improvement of primary and secondary school provision, including [...] <i>See policy wording above.</i>	✓	0	✓	0	✓	?	?	?	?	?	?	✓
Proposed Policy: 3) Improving the range of leisure, recreation, sports, arts and cultural facilities by: [...] <i>See policy wording above.</i>	✓	✓	✓	0	✓	✓	?	?	?	?	?	✓
Proposed Policy: 4) Supporting the continued presence of the major public sports venues for football and tennis, subject to the local impact of the venues being managed without added detriment to local residents	✓	✓	✓	0	✓	✓	✓	?	?	?	?	✓
Proposed Policy: 5) Enhancing sport, leisure and cultural provision for schools and public use in suitable local parks.	✓	✓	✓	0	✓	?	?	?	?	?	?	✓

Proposed Policy: 6) Protecting all existing community facilities and services throughout the borough unless there is clear evidence that there is no longer an identified need for a particular facility or service, or where that facility or service can be appropriately replaced elsewhere in the locality.	✓	✓	✓	0	✓	✓	?	?	?	?	?	✓
Proposed Policy: 7) Supporting the Metropolitan Police Service, the London Fire and Emergency Planning Authority and Her Majesty's Court Service and action to deal with safety, crime and anti-social behaviour;	✓	✓	0	0	✓	0	0	0	0	0	0	0
Proposed Policy: 8) Requiring developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities.	✓	✓	✓	0	✓	?	0	?	?	?	?	✓

Borough-wide Policy CF2 Enhancement and Retention of community uses

Policy CF2 – Enhancement and Retention of community uses

Proposals for new or expanded community uses should meet local needs, be compatible with and minimise impact on the local environment and be accessible and inclusive to all in the community they serve.

The provision of new or expanded community uses should be provided as part of the necessary supporting social infrastructure for significant new housing and other development proposals. Where it is not appropriate to provide community uses on site or in total as part of a development scheme, a contribution to new and/or enhanced uses in the locality will be sought.

In any development proposal, existing community uses should be retained or replaced, unless there is clear evidence that there is no longer an identified short or long-term need for a particular facility or service, or where the existing facility or service can be appropriately replaced or provided elsewhere in the locality. In assessing need, the council will:

- take into account the role the facility plays in the provision of space for community groups and whether the loss of such space would contribute to a shortfall in local provision; and**
- require a viability report that demonstrates to the council's satisfaction that the facility or alternative community uses is not economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months**

The proposed policy will ensure that the community has access to a wide range of services, including health and education uses. This will have a positive impact on social objectives, including education. It will also help reduce the need to travel if community uses are available locally and provided on site as part of a new development. It should also contribute to achieving a sustainable economy by providing an opportunity for local jobs.

The loss of existing community facilities could potentially have a significant negative effect on the social sustainability objectives, particularly if it is not replaced. The proposed policy will help to ensure that existing community facilities are not lost if local needs exist. However, by including a criteria against which proposed loss of uses will be assessed, the policy will allow for alternative uses where this is justified by evidence. This is considered to be a flexible approach that should mean that premises do not lie vacant for long periods.

New major developments are likely to place additional strain on existing community uses and social infrastructure such as schools and health care facilities. Therefore, it is considered appropriate that the proposed policy places an onus on developers to provide for additional facilities on site or in the locality, thereby contributing to sustainable development.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CF2 Enhancement and Retention of community uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : Proposals for new or expanded community uses should meet local need, be compatible with and minimise impact on the local environment and be accessible and inclusive to all in the community they serve.	✓	✓	✓	0	✓	0	✓	?	✓	0	✓	✓
Proposed Policy: The provision of new or expanded community uses should be provided as part of the necessary supporting social infrastructure for significant new housing and other development proposals. Where it is not appropriate to provide community uses on site or in total as part of a development scheme, a contribution to new and/or enhanced uses in the locality will be sought.	✓	✓	0	0	✓	0	0	✓	✓	✓	0	✓
Proposed Policy : In any development proposal, existing community facilities should be retained or replaced, unless there is clear evidence that there is no longer an	✓	✓	0	0	✓	0	0	✓	✓	✓	0	✓

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CF2 Enhancement and Retention of community uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
<p>identified short or long term need for a particular facility or service, or where the existing facility or service can be appropriately replaced or provided elsewhere in the locality. In assessing need, the council will take into account the role the facility plays in the provision of space for community groups [...]</p> <p><i>See policy wording above.</i></p>												

Borough-wide Policy CF3 Enhancement of arts, culture, entertainment, leisure, recreation and sport uses

Policy CF3 – Enhancement and Retention of arts, culture, entertainment, leisure, recreation and sport uses

The council will support the enhancement of arts, culture, entertainment, leisure, recreation and sport uses by:

- a. **supporting the continued presence of the borough's arts, culture, entertainment, leisure, recreation and sports venues subject to the local impact of venues being managed without added detriment to local residents;**
- b. **requiring proposals for new and expanded venues to be accessible and inclusive and to be supported by evidence of how impacts such as noise, traffic, parking and opening hours have been assessed, minimised and mitigated;**
- c. **seeking retention or replacement of existing arts, culture, entertainment, leisure, recreation and sport uses, unless there is clear evidence that there is no longer an identified need for a particular facility or alternative community arts, culture, entertainment, leisure, recreation and sport uses. A viability report that demonstrates to the Council's satisfaction**

that the facility or alternative arts, culture, entertainment, leisure, recreation and sport use is not economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months, will be required; and

- d. encouraging the temporary use of vacant buildings for community uses, including for performance and creative work.**

Support for arts, culture, entertainment, leisure, recreation and sport uses will have social and economic benefits for the community as these uses contribute to health, education, the economy and many aspects of the borough. These uses are often part of the boroughs heritage and their retention can add to quality of life. The activities also provide an opportunity for local jobs, however, in recognition of the impact these uses can sometimes have on amenities, the policy seeks to manage impacts that may arise from these venues, thereby assisting in managing pollution and transport impact. The loss of existing facilities could detrimentally impact upon the quality of life of the community, particularly those who are vulnerable in terms of mobility and income. The loss of community facilities is likely to adversely impact on levels of social cohesion in the affected community and also could have a potential negative effect on the local economy, particularly if no replacement is delivered in the area.

The proposed policy will ensure that the number of existing facilities is not reduced if local needs exist. However, by including criteria against which proposed loss of uses will be assessed, the policy will allow for alternative uses where this is justified by evidence. This is considered to be a flexible approach that should mean that premises do not lie vacant for long periods.

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy CF3 Enhancement and retention of arts, culture, entertainment, leisure, recreation and sport uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Uustainable economy
Proposed Policy : <i>See policy wording above.</i>	✓	✓	✓	0	✓	?	✓	✓	?	0	0	✓

Borough-wide Policy CF4 Professional football grounds

Policy CF4 - Professional football grounds

In considering any redevelopment proposal for all or part of an existing football ground, the council will require the provision of suitable facilities to enable the continuation of professional football or other field-based spectator sports.

The three football clubs in this borough are an important part of the borough's fabric and the council wishes to retain these in the borough. They provide jobs and entertainment and contribute to education and skills and social cohesion objectives. However, redevelopment of these venues for alternative uses could also provide benefits to the borough in respect of homes, alternative employment, etc. In some cases, it might also be possible to envisage retaining football facilities, but introducing additional uses that could benefit the borough. In general, the proposed policy is considered to have a neutral impact on sustainability appraisal objectives.

POLICY	SUSTAINABILITY OBJECTIVES											
CF4- Professional football grounds	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	0	0	0	0	0	0

Assessing secondary, cumulative and synergistic effects

Proposed policies CF1 to CF3 have been found sustainable. These community facilities policies will work well together and positively contribute to a number of the Local Plan's strategic objectives, including objective 4 seeking to ensure that residents and visitors to the borough have access to a range of high quality facilities and services. Taken as a whole, the policies should contribute to the creation of a sustainable community.

Proposed policy CF1 Supporting community facilities and services is also anticipated to contribute towards the Local Plan's strategic objective 19 which seeks to ensure that child care facilities and schools in the borough meet the needs of local parents and children as it seeks improvement to school provision and childcare nurseries. It will also contribute towards strategic objective 15 which seeks to maintain and improve the health care provision in the borough as it seeks high quality healthcare and retention of existing facilities. This policy will have a positive short to long-term effect on the borough's residents.

Proposed policy CF3 Enhancement and retention of arts, culture, entertainment, leisure, recreation and sport uses is also anticipated to contribute towards the Local Plan's strategic objective 9 which seeks to protect and enhance the borough's attractions for arts and creative industries as the policy supports the enhancement of these facilities and seeks retention or placement of these uses unless there is no longer an identified need. Proposed policy CF3 will have a permanent and long-term effect resulting in social and economic benefits for the community as these uses contribute to health, education, the economy and many other aspects of the borough.

Proposed policy CF4 Professional football grounds is considered to have a neutral effect on the appraisal objectives.

GREEN AND PUBLIC OPEN SPACE

Borough-wide Policy OS1 Parks and open spaces

Policy OS1 - Parks and open spaces

The council will protect, enhance and increase provision of parks, open spaces and biodiversity in the borough by:

- a. designating a hierarchy of open space that includes metropolitan open land (MOL), open space of borough wide importance and open space of local importance (see Appendix 3) as well as a hierarchy of nature conservation areas of metropolitan, borough and local importance, and green corridors along the borough's railway lines (see Appendix 4);**
- b. requiring a mix of new public and private open space in the White City and Earls Court and West Kensington Opportunity Areas and the South Fulham Riverside Regeneration Area and in any new major development; and**
- c. improving existing parks, open spaces and recreational facilities throughout the borough.**

The protection of open space has a number of benefits. The majority of the borough's open spaces are long established and form an important part of the borough's cultural and environmental heritage. Whether old or new, the open spaces form a focal point for communities and provide opportunities for exercise, social interaction and relaxation, which will have a positive effect on the social and health sustainability objectives. Open spaces provide a "natural sink" for carbon dioxide and particulates and protection of such spaces therefore has positive benefits in relation to climate change and pollution objectives, offering opportunities to contribute positively to biodiversity and flood risk management.

The provision of new open spaces as part of the development of the borough's regeneration areas will help contribute to the creation of sustainable mixed use developments. It will be important for green infrastructure to be part of regeneration if these areas are to be truly places where people will want to live, work and spend their leisure time. The open spaces, new parks, play spaces and nature conservation areas will contribute to the creation of sustainable communities throughout the borough.

POLICY	SUSTAINABILITY OBJECTIVES											
OS1 Parks and open spaces	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	✓	0	✓	✓	?	✓	✓	0

Borough-wide Policy OS2 Access to parks and open spaces

Policy OS2 - Access to parks and open spaces

The council will seek to reduce open space deficiency and to improve the quality of, and access to, existing open space by:

- a. refusing development on public open space and other green open space of borough-wide importance (see Appendix 3 and Proposals Map) unless it can be demonstrated that such development would preserve or enhance its open character, its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity;
- b. refusing development on open space that is not identified in the Local Plan where such land either on its own or cumulatively has local importance for its open character or as a sport, leisure or recreational facility, or for its contribution to local biodiversity or visual amenity unless:
 - o the proposed development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic objectives of the Local Plan and provision is made for replacement of open space of equal or greater value elsewhere;
- c. requiring accessible and inclusive new open space in any new major new development, and
- d. Seeking improvements to existing open space and the facilities within them, such as Linford Christie Stadium, where appropriate and when development proposals impact upon provision.

Larger developments are likely to place additional strain on existing open spaces. The proposed policy therefore places an onus on developers to provide new open spaces in any new major developments. This will help to create sustainable communities and will have a positive significant effect on the health of residents by improving their quality of life and making better places to live. Seeking improvements to existing open spaces and facilities will have similar sustainability benefits.

The proposed policy proposes to resist development on existing open space unless it leads to a qualitative improvement to the open space. The policy will have positive impacts on the community, heritage and sustainable economy objectives. Also, retaining open space will have positive effects on climate change and pollution because these areas provide a “natural sink” for carbon dioxide and particulates, as well as offering opportunities to contribute positively to biodiversity and flood risk management. There should be no impact on housing or employment objectives because enough land falling outside of the open space category is allocated for these uses.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy OS2 Access to parks and open spaces	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above</i>	✓	✓	0	0	✓	0	✓	✓	?	0	✓	✓

Borough-wide Policy OS3 Playspace for children and young people

Policy OS3 - Playspace for children and young people

Development proposals should not result in the loss of existing children and young people's playspace or result in an increased deficiency in the availability of such playspace.

In new residential development that provides family accommodation; accessible and inclusive, safe and secure communal playspace will normally be required on site that is well designed and located and caters for the different needs of all children, including children in younger age groups, older children and disabled children. The scale of provision and associated play equipment will be in proportion to the scale and nature of the proposed development.

Protection of existing playspace and associated facilities is important because these are an important part of the social infrastructure of an area, particularly for those that do not have access to a private garden or amenity space. Residential developments will lead to an increase in population and are likely to place additional strain on existing children and young peoples' playspace. The proposed policy therefore places an onus on developers to provide or pay for additional accessible and inclusive playspaces across all ages and groups, including disabled children, on-site or in the locality.

By referring to the Mayor of London's SPG "Shaping Neighbourhoods Play and Informal Recreation (2012)" the policy will provide additional guidance. The Proposed policy is likely to have positive effects on social equity, social cohesion and health objectives by seeking to improve the quality of life of residents and making better places to live.

POLICY	SUSTAINABILITY OBJECTIVES											
OS3 Playspace for children and young people	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	ustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	?	0	✓	0	0	0	?	0	0	✓

Borough-wide Policy OS4 Nature conservation

Policy OS4 - Nature conservation

The nature conservation areas and green corridors identified on the Proposals Map (and shown on Map 7 and listed in Appendix 4) will be protected from development likely to cause demonstrable harm to their ecological (habitats and species) value.

In these areas, development will not be permitted unless:

- a. the proposed development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic regeneration objectives of the Local Plan, and measures are included for the protection and enhancement of any substantive nature conservation interest that the site may have so that there is no net loss of native species and no net loss of habitat; or**
- b. provision is made for replacement nature conservation interest of equal or greater value elsewhere in the locality.**

Outside of the areas identified on the Proposals Map, proposals should, where appropriate to the scale and nature of the development, enhance the nature conservation interest through initiatives such as new green infrastructure and habitats, tree planting and brown and green roofs and protect any significant interest on the site and any nearby nature conservation area.

Planning conditions will be imposed, or planning obligations sought to ensure the maintenance and enhancement of nature conservation areas where these are affected by development proposals.

With a significant amount of growth and development planned in the borough, it will be important to protect the existing nature conservation areas and green corridors from harmful negative impacts. The policy seeks to ensure the protection of nature conservation areas and green corridors and will have significant positive effects on the heritage and environmental objectives. It will also have positive indirect effects on the quality of life of communities and social objectives by offering opportunity for recreation and enabling healthy lifestyles. These green areas will also, help in minimising flood risk by reducing run off.

The proposed policy aims to resist developments in nature conservation areas unless these lead to greater qualitative benefits; the condition being no net loss of native species and habitat. This will have significant positive effects on environmental SA objectives and will not preclude development where this improves or replaces existing nature conservation resources.

Seeking green infrastructure on development sites, for example in the regeneration areas, will add to the biodiversity stock of the borough and help reduce and mitigate local causes of climate changes and will assist in reducing flood risk. By placing onus on developers to pay for the maintenance and enhancement of nature conservation areas affected by their developments there should be a guaranteed income stream to sustain and enhance this valuable resource.

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy OS4 Nature conservation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : The nature conservation areas and green corridors identified on the Proposals Map (and shown on Map 7 and listed in Appendix 4) will be protected from development likely to cause demonstrable harm to their ecological (habitats and species) value.	✓	✓	0	0	✓	0	✓	✓	0	0	✓	0
Proposed Policy : In these areas, development will not be permitted unless: [...] See <i>policy wording above</i> .	✓	0	0	0	✓	✓	✓	✓	✓	0	✓	0
Proposed Policy : Planning conditions will be imposed or planning obligations sought to ensure the maintenance and enhancement of nature conservation areas where these are affected by development proposals.	0	0	0	0	0	0	✓	✓	0	0	✓	0

Borough-wide Policy OS5 Greening the borough

Policy OS5 - Greening the borough

The council will seek to enhance biodiversity and green infrastructure in the borough by:

- a. maximising the provision of gardens, garden space and soft landscaping and seeking green or brown roofs and other planting as part of new development;
- b. protecting back, front and side gardens from new development and encouraging planting in both back and front gardens;
- c. seeking to prevent removal or mutilation of protected trees;
- d. seeking retention of existing trees and provision of new trees on development sites; and
- e. adding to the greening of streets and the public realm.

Enhancing biodiversity and improving green infrastructure in the borough will have a number of benefits, including enhanced environmental quality. Biodiversity improvements can, for example, help to reduce the impact of high summer temperatures and reduce rainfall run-off rates, helping to reduce the risk of surface water flooding. As well as improving the boroughs health through improved local air quality. This policy will therefore have significant positive effects on the environmental and health objectives and on the quality of life of the communities.

It should be possible for the proposed policy to be applied in such a way that it does not constrain new housing development or, for example, the aspirations of home owners, but this will need to be monitored. It is understood that there will be additional planning guidance in supporting SPD on a number of the requirements set out in the policy. The London Mayor's SPG on Green Infrastructure and Open Environments should also provide further guidance. Both documents should assist in the application of the policy and lead to developments of a high standard that will meet the needs of occupants and respect the principles of good neighbourliness.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy OS5 Greening the borough	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : <i>See policy wording above.</i>	✓	✓	0	?	✓	0	✓	✓	0	0	✓	0

Assessing secondary, cumulative and synergistic effects

The policies provide comprehensive coverage of open space and green infrastructure matters. There is no indication that they cannot work well with each other as well as with other policies within the Local Plan.

Proposed policy OS1 Parks and open spaces is anticipated to positively contribute towards the Local Plan's strategic objective 11 which seeks to protect and enhance the borough's open green spaces and create new parks where there is major regeneration. Proposed policy OS1 meets a number of the social and environmental sustainability objectives and is likely to have a cumulative impact as open space is important for people's quality of life, provides a space for social interaction, exercise and provides positive long term benefits for climate change and pollution.

Proposed policy OS2 Access to parks and open spaces is anticipated to positively contribute to the Local Plan's strategic objective 11 that seeks to protect and enhance the borough's open green spaces, strategic objective 4 which ensures that residents have access to recreation and strategic objective 15 which seeks to encourage and promote healthier lifestyles through better sports facilities to reduce health inequalities. Overall, proposed policy OS2 has been found sustainable and will have a positive short to long-term impact on the health and welfare of the community.

Proposed policy OS3 Playspace for children and young people is anticipated to positively contribute towards the Local Plan strategic objective 11 that seeks to protect and enhance the borough's open green spaces as well as a number of other strategic objectives that enhance the environmental quality of the borough and the health and welfare of the community. Proposed policy OS3 is likely to have a cumulative positive effect in terms of social justice as it promotes the provision of accessible and communal playspace to meet the needs of all children. This proposed policy also links to the principles of accessible and inclusive design as promoted in proposed policy DC2 Design of new build.

Proposed policy OS4 Nature conservation will contribute towards the Local Plan's strategic objective 11 which seeks to protect and enhance the borough's open green spaces and strategic objective 13 that seeks to reduce and mitigate local causes of climate change. The protection and provision of biodiversity should not impact on economic objectives if designed as an integral part of new developments. Overall, proposed policy OS4 has been found sustainable.

Proposed policy OS5 Greening the borough will contribute towards the Local Plan's strategic objective 11 seeking to protect and enhance the borough's open green spaces but its impact on some of the other strategic objectives will depend on its application. Provision of green infrastructure will need to be balanced against provision of other social and physical infrastructure so that sustainable development is achieved throughout the borough. Overall, proposed policy OS5 has been found sustainable.

RIVER THAMES

Borough-wide Policy RTC1 River Thames

Policy RTC1 - River Thames

The council will work with its partner organisations, including the Environment Agency, Port of London Authority, Thames Water and landowners to enhance and increase access to, as well as use of, the waterways in the borough, namely the River Thames, and improve waterside environments by:

- a. identifying the Thames Policy Area on the Proposals Map and setting out general criteria for the design of development in this area, in this Local Plan and in the planning framework for the South Fulham Riverside Regeneration Area;**
- b. encouraging the development of vacant or underused land along the waterways, namely the River Thames, Chelsea Creek and taking into account their local context and character;**
- c. protecting existing water dependent uses and requiring new development to provide opportunities for water based activities where appropriate and enhance river and canal related biodiversity, safeguard and enhance where necessary flood defences, as well as encouraging public access especially for leisure and educational activities; and**
- d. ensuring the provision, or improvement and greening, of the Thames Path National Trail (the riverside walk) in all riverside developments.**

Working with the identified partner organisations and, in the case of the river, identifying the Thames Policy Area, and setting out general criteria for development affecting the waterways will help ensure a coordinated and comprehensive approach to the river and should allow through consideration of sustainability objectives as and when matters arise.

Encouraging the development of vacant and underused land along the Thames and Chelsea Creek will help to improve the local environment of these waterways and reduce the amount of underused land. It is understood that such development will be in accordance with other policies of the Local Plan and if this is mixed use it should allow the achievement of a number of sustainability objectives, including provision of affordable housing and jobs.

The importance of the waterways to biodiversity and heritage will require sensitive development if these assets are to be protected and enhanced. It is noted that further detail is provided in the policies for the South Fulham Riverside Regeneration Area.

Requiring new development to provide water based activities and enhance river related biodiversity and public access to the riverside will have social, health and environmental benefits in addition to benefitting the local economy by encouraging local water-based leisure activities, which are already an important feature of the borough. However, a balance must be struck with nature conservation interests. The provision or improvement of walkways adjoining the river will improve accessibility and offer opportunities for healthy lifestyles.

Safeguarding and enhancing flood defences will assist in reducing the risk of flooding.

POLICY	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Policy RTC1 River Thames												
Proposed Policy: a)Identifying the Thames Policy Area and setting out general criteria for the design of development in this area, in this Local Plan and in the planning framework for the South Fulham Riverside Regeneration Area	0	0	0	0	✓	0	✓	0	0	?	✓	0
Proposed Policy : b) Encouraging the development of vacant or underused land along the waterways, namely the River Thames, Chelsea Creek and taking into account their local context and character	✓	✓	0	✓	✓	✓	✓	0	✓	?	✓	✓
Proposed Policy: c)Protecting existing water dependent uses and requiring new development to provide opportunities for water based activities where appropriate and enhance river and canal related biodiversity, safeguard and enhance where necessary flood	✓	✓	0	0	✓	✓	✓	✓	✓	✓	✓	✓

defences, etc												
Proposed Policy: d)Ensuring the provision and greening of the Thames Path National Trail in all riverside developments	✓	✓	0	0	✓	0	✓	0	✓	?	✓	0

Borough-wide Policy RTC2 Access to the Thames riverside and foreshore

Policy RTC2 - Access to the Thames riverside and foreshore

The council will seek accessible and inclusive public access to the riverside, including through-site links when riparian development takes place and the provision and enhancement of the Thames Path National Trail (the riverside walk). It will also seek the retention and enhancement of access to and from the foreshore in development schemes where it is appropriate and safe to do so, and will promote enjoyment of riverside heritage assets and open spaces.

The riverside walk should generally be at least 6 metres wide and should be accessible to cyclists if this can be achieved without risk to the safety of pedestrians or river users.

All proposals will need to ensure that flood defences are not adversely affected.

The proposed policy seeks to improve access to the river by all local residents and will increase opportunities for healthy lifestyles by ensuring the provision of a riverside walk. It will also contribute to the borough's heritage in terms of enhancement of the character of the river, the buildings adjacent to it and open spaces, reducing pollution and possibly reducing the impact of climate change on the borough. There will also be transport benefits through improvements of the riverside walk and encouraging walking and cycling.

Although a significant part of the borough is at risk of flooding, it is protected from flooding by the Thames Barrier and by river walls. However, there is a risk of breach in or over the top of the river walls, which is likely to increase with climate change. The proposed policy will positively contribute to the climate change objective by seeking to safeguard and enhance flood defences, thereby minimising the risk of flooding from storm events and overflow of the river.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy RTC2 Access to the Thames riverside and foreshore	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: The council will seek accessible and inclusive public access to the riverside, including through-site links when riparian development takes place and the provision and enhancement of the Thames Path National Path (the riverside walk). It will also seek the retention and, enhancement of access to and from the foreshore in development schemes where it is appropriate and safe to do so, and will promote enjoyment of riverside heritage assets and open spaces.	✓	✓	0	0	✓	0	✓	✓	✓	0	✓	0
Proposed Policy : The riverside walk should generally be at least 6 metres wide and should be accessible to cyclists if this can be achieved without risk to the safety of pedestrians or river users.	0	✓	0	0	0	0	0	✓	✓	0	0	0
Proposed Policy: All proposals will need to ensure that flood defences are not adversely affected.	0	✓	0	0	0	0	0	0	0	0	✓	0

Borough-wide Policy RTC3 Design and appearance of development within the Thames Policy Area

Policy RTC3 - Design and appearance of development within the Thames Policy Area

Development will not be permitted within the Thames Policy Area as shown on the Proposals Map, unless it:

- respects the riverside, including the foreshore, context and heritage assets,
- is of a high standard of accessible and inclusive design, and
- maintains or enhances the quality of the built and natural environment.

The council will encourage the greening and naturalising of the river bank and/or flood defences with reference to the Thames Estuary 2100 Plan to create habitats for wildlife and improve the visual attractiveness of the area. Schemes that meet these requirements, and, by their design, contribute to creating an attractive, safe and interesting riparian environment will be welcomed. The council will require the submission of a design and access statement as part of a planning application within the Thames Policy Area.

The policy seeks to permit riverside development, which respects the unique character of the river and is of a suitable height, massing and bulk. Implementing the proposed policy is likely to result in increased protection of heritage assets and conservation areas located alongside the river. Many of the policy objectives are expanded upon in related Local Plan policies on design and conservation (see also policy DC3 on tall buildings and the South Fulham Riverside Regeneration Area Policy-SFRRRA) which provides further guidance.

Achievement of the policy objectives will depend upon the application of a number of related policies within the Local Plan, and different development scenarios and different land uses will exert varying impacts on sustainability.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy RTC3 Design and appearance of development within the Thames Policy Area	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : <i>See policy wording above.</i>	0	✓	0	0	0	0	✓	0	?	0	✓	0

Borough-wide Policy RTC4 Water-based activity on the Thames

Policy RTC4 - Water-based activity on the Thames

Development will not be permitted if it would result in the loss of existing facilities in the river for water-based activities and uses, unless the facilities are demonstrably surplus to current or anticipated requirements, or unless alternative facilities of similar or greater utility are to be provided. Specific requirements regarding development of the borough's three safeguarded wharves are set out in the London Plan.

Developments that include provision in the river for water-based and river-related activities and uses, including new permanent moorings, passenger services, and for facilities associated therewith, particularly where these would be publicly accessible, will be welcomed, provided:

- a. they are compatible with the character of the river, the riverside, and the importance of the river as a wildlife habitat;**
- b. they do not impede or give rise to hazards to navigation, water flow, the integrity of flood defences or public safety; and**
- c. they accord with other objectives and policies of the Plan.**

Maintaining water based uses could have a number of benefits, including retaining the character of the river (e.g. by retaining uses that have activities which add to the waterside ambience); reducing the impact of transport on the environment (e.g. by keeping wharves and pontoons that could be used by waterborne passengers or freight services); and improving health (e.g. by retaining rowing and sailing clubs).

By encouraging developments that include the provision of water based and river related activities, the proposed policy will promote the sustainability objectives outlined above. Also by listing a number of identified criteria that developments have to meet, the proposed policy will ensure consideration of environmental sustainability objectives.

However, although the policy promotes the increased use of the river and the provision of new facilities as part of any riverside development, a balance must be struck with regard to other issues that may be affected negatively if not managed, such as ecological and navigational interest, heritage assets and amenity of residential neighbours.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy RTC4 Water-based activity on the Thames	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : Development will not be permitted if it would result in the loss of existing facilities in the river for water-based activities and uses, unless the facilities are demonstrably surplus to current or anticipated requirements, or unless alternative facilities of similar or greater utility are to be provided. Specific requirements regarding development of the three safeguarded wharves are set out in the London Plan.	?	✓	0	0	0	0	?	✓	✓	0	✓	✓
Proposed Policy : Developments that include provision in the river for water-based and river-related activities and uses, including new permanent moorings, passenger services, and for facilities associated therewith, particularly where these would be publicly accessible, will be welcomed, provided: [...] See policy wording.	✓	✓	0	✓	✓	0	✓	✓	✓	0	✓	✓

Assessing secondary, cumulative and synergistic effects

The riverside policies RTC1 to 4 have been found to be generally sustainable. In the South Fulham Riverside Regeneration Area it will be important to ensure that the regeneration area policies and borough wide policies are considered side by side. The SA has not picked up any inconsistencies, but as is the case with many policies it will be necessary for a balanced approach to be taken so that weight is given to all sustainability objectives.

All the policies have a slant towards protection and enhancement of heritage assets and careful design and conservation. As there are particular development opportunities along the borough's waterways it will be necessary to ensure that development is of a high standard that balances the many functions of the waterways and their surrounds.

Proposed policy RTC1 River Thames is anticipated to positively contribute towards the Local Plan's strategic objective 12, which seeks to increase public access and use of Hammersmith and Fulham's waterways as well as enhance their environment, quality and character. It also contributes to strategic objective 10, which seeks to preserve and enhance the quality, character and identity of the borough's natural environment. Proposed policy RTC1 is likely to have positive cumulative and secondary effects in the medium to long term because it requires new development to provide water based activities and enhance river related biodiversity and public access to the riverside. This proposed policy will have both social and environmental benefits in addition to benefitting the local economy by encouraging local water-based leisure activities, which are already an important feature of the borough.

Proposed policy RTC2 Access to the Thames riverside and foreshore is anticipated to contribute positively towards Local Plan strategic objective 15 which encourages and promotes healthier lifestyles and strategic objective 12 which seeks to increase public access and use of the waterways. It will also contribute positively towards strategic objective 14, which seeks the development of a sustainable transport network. Proposed policy RTC2 seeks provision of the riverside walk which will increase opportunities for healthy lifestyles. This is likely to have a positive short to long term effect, in particular on the sustainability objective for health and in the long term will have a positive effect on climate change and reducing the effect of transport on the environment by encouraging walking and cycling via the riverside walk.

Proposed policy RTC3 Design and appearance of development within the Thames Policy Area is anticipated to contribute positively towards the Local Plan strategic objective 10, which seeks to preserve and enhance the quality, character and identity of the borough's natural and built environment, and strategic objective 12, which seeks to increase public access and use of the borough's waterways. This proposed policy is supported by the design and conservation policies and is therefore likely to have a positive cumulative effect in the medium to long term on the borough's riverside built environment.

Policy RTC4 Water-based activity on the Thames is anticipated to contribute positively towards the Local Plan strategic objective 15, which encourages and promotes healthier lifestyles, strategic objective 12 which seeks to increase public access and use of the borough's waterways and strategic objective 13, which seeks to mitigate flood risk. Proposed policy RTC4 could have a number of positive medium to long-term benefits, including retaining the character of the riverside and reducing the impact of transport on the environment. The use of the safeguarded wharves for cargo handling uses could have positive transport impacts, but only if serviced by the river.

DESIGN AND CONSERVATION

Borough-wide Policy DC1 Built environment

Policy DC1 - Built environment

All development within the borough, including in the regeneration areas, should create a high quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that demonstrates how good design, quality public realm, landscaping, heritage assets and land use can be integrated to help regenerate places.

The proposed policy focuses in ensuring that development should be of a high quality and that the principles of accessible and inclusive urban design are incorporated into borough wide design policies. This will help to lead to more equitable and socially just outcomes insofar as the design of the public realm is concerned.

The proposed policy will make a positive contribution towards improving the health of the population. It aims to ensure that new developments are designed to be accessible and inclusive. This will help to improve the quality of life of all people living, working and visiting the borough including the young, the elderly and disabled people. Incorporating these design principles may also encourage people of all ages and abilities to participate more in the public domain, improving both their physical and mental health.

A focus on accessible and inclusive design is likely to encourage people of all ages and abilities to make greater use of the public domain. This in turn is likely to increase people's sense of being connected with their local community.

The proposed policy places significant emphasis on helping to ensure that new development will respect and enhance natural assets.

In addition, high quality design (together with other attributes of the borough should continue to make the borough a destination where businesses will wish to settle and grow, thereby helping to sustain the local economy.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC1- Built environment	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: See policy wording above.	✓	✓	0	0	✓	0	✓	0	0	0	0	✓

Borough-wide Policy DC2 Design of new build

Policy DC2 - Design of new build

New build development will be permitted if it is of a high standard of design and compatible with the scale and character of existing development and its setting.

All proposals must be designed to respect:

- a. the historical context and townscape setting of the site, and its sense of place;
- b. the scale, mass, form and grain of surrounding development and connections to it;
- c. the relationship of the proposed development to the existing townscape, including the local street pattern, local landmarks and the skyline;
- d. the local design context, including the prevailing rhythm and articulation of frontages, local building materials and colour, and locally distinctive architectural detailing, and thereby promote and reinforce local distinctiveness;
- e. the principles of residential amenity;
- f. the local landscape context and where appropriate should provide high quality landscaping and public realm with good permeability;
- g. sustainability objectives; including adaptation to, and mitigation of, the effects of climate change;
- h. the principles of accessible and inclusive design; and
- i. principles of Secured by Design

The proposed policy will have benefits in relation to the heritage, the responsible consumption of resources and climate change objectives. Applying the principles of inclusive design will have positive effects on the community, social justice and cohesion objectives, especially in regeneration and opportunity areas where most change will happen. There will be benefits for the wider community by increasing permeability through developments improving access and potentially reducing crime and anti-social behaviour through good design.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC2- Design of new build	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: New build development will be permitted if it is of a high standard of design and compatible with the	✓	✓	0	✓	✓	0	✓	?	?	✓	✓	?

<p>scale and character of existing development and its setting.</p> <p>All proposals must be designed to respect: [...]</p> <p>See <i>policy wording above</i>.</p>												
---------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--	--	--	--	--	--	--	--	--	--	--

Borough-wide Policy DC3 Tall buildings

Policy DC3 - Tall buildings

Tall buildings which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline will be generally resisted by the council. However, areas where tall buildings may be appropriate are as follows:

- White City Regeneration Area
- Earls Court & West Kensington Opportunity Area
- South Fulham Riverside Regeneration Area
- Hammersmith Town Centre

In the areas identified as appropriate for tall buildings, any proposal will need to demonstrate that it:

- a. **Has positive relationship to the surrounding townscape context in terms of scale, streetscape and built form;**
- b. **Is of the highest quality of architectural design and materials with an appropriate form and silhouette which contributes positively to the built heritage and image of the borough;**
- c. **Has an acceptable impact on the skyline, and views from and to open spaces, the riverside and waterways and other locally important views and prospects;**
- d. **Has no harmful impact in terms of the setting of, and views to and from, heritage assets;**
- e. **Is supported by appropriate transport infrastructure;**
- f. **Has an appropriate design at the base of the tall building and provides ground floor activity;**
- g. **Interacts positively to the public realm and contributes to permeability of the area;**
- h. **Is of a sustainable design and construction, including minimising energy use and the risk of overheating through passive design measures, and the design allows for adaption of the space**
- i. **Does not have a detrimental impact on the local environment in terms of microclimate, overshadowing, light spillage and vehicle movements; and**
- j. **Respects the principles of accessible and inclusive design.**

Apart from those areas identified in the Local Plan, tall buildings which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline will be resisted by the council. This policy although dependent on implementation is likely to have a positive impact on the heritage objective by seeking to ensure that tall buildings are only permitted in suitable locations and there is no harmful impact in terms of the setting of and views to and from heritage assets.

The criteria in the policy, to be used when considering planning applications should ensure benefits in relation to most of the sustainability objectives if applied appropriately and consistently.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC3 Tall buildings	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	0	0	0	0	✓	✓/ ?	✓	✓	✓	✓	0

Borough-wide Policy DC4 Alterations and extensions (including outbuildings)

Policy DC4 - Alterations and extensions (including outbuildings)

The council will require a high standard of design in all alterations and extensions to existing buildings. These should be:

- compatible with the scale and character of existing development, neighbouring properties and their setting;
- subservient and successfully integrated into the architectural design of the existing building; and
- should never dominate the parent building in bulk, scale, materials or design.

In considering applications for alterations and extensions the council will take into account the following:

- a. scale, form, height and mass;
- b. proportion;
- c. vertical and horizontal emphasis;

- d. **relationship of solid to void;**
- e. **materials;**
- f. **impact on skyline silhouette (for roof top additions);**
- g. **relationship to existing building, spaces between buildings and gardens;**
- h. **good neighbourliness in particular the amenities of the neighbouring properties, and other properties most directly affected by the proposal; and**
- i. **the principles of accessible and inclusive design.**

The proposed policy on alterations and extensions seeks to ensure that developments respect the scale and character of existing buildings. Criteria used when considering applications will contribute positively to conserving and enhancing the local environmental heritage. The principles of accessible and inclusive design will impact positively on social objectives and possibly the health objective. Good neighbourliness can also help foster social cohesion.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC4 Alterations and extensions (including outbuildings)	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: The council will require a high standard of design in all alterations and extensions to existing buildings. These should be: [...] <i>See policy wording above.</i>	0	?	0	0	0	0	✓	0	0	0	✓	0
Proposed Policy: In considering applications for alterations and extensions the council will take into account the following: [...] <i>See policy wording above.</i>	✓	?	0	0	✓	0	✓	0	0	0	✓	0

Borough-wide Policy DC5 Shopfronts

Policy DC5 - Shopfronts

In order to improve the appearance of the borough's streets, the council will encourage high quality shopfronts that are designed in sympathy with the age and architectural style of the building concerned, achieving a satisfactory relationship between the ground floor and the rest of the building. The scale of the shopfront should be carefully considered with its proportions, detailing (including vertical and horizontal subdivision) and materials, which have an affinity with the building.

Where an original shopfront is converted to another use or a consistent traditional shopfront remains, the council will expect it to be retained and restored.

New developments which include retail areas should provide a framework into which a shopfront of a suitable scale can be inserted.

Fascia signs and projecting signs should not be overly large and should be designed to be appropriate to the styles of the shopfront (see section on Shopfront Guidance in the Planning Guidance Supplementary Planning Document).

New shopfronts should be designed to meet the principles of accessible and inclusive design.

The proposed policy seeks to improve the appearance of the borough's street by encouraging high quality shopfronts. This is likely to have a positive effect on the heritage, social and sustainable economy objectives. Accessible and inclusive design of shopfronts will particularly benefit disabled people and those with push chairs.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC5 Shopfronts	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	0	0	0	0	0	✓	0	0	0	0	✓

Borough-wide Policy DC6 Replacement windows

Policy DC6 - Replacement windows

Replacement windows should respect the architectural character of the building and its surroundings. In this respect it will be important that the design of replacement windows matches the original windows in terms of material, type and size, method of opening, profile and section, and sub-division.

The proposed policy will seek a high standard of design that is compatible with the local environment. It will have significant positive impacts on the heritage objective. New windows could also have benefits in respect of consumption of resources and climate change objectives.

POLICY	SUSTAINABILITY OBJECTIVES											
Borough-wide Policy DC6 Replacement windows	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	✓	✓	0

Borough-wide Policy DC7 Views and landmarks

Policy DC7 - Views and landmarks

The council will protect the strategic view of St Paul's Cathedral and important local views shown on the Proposals Map.

Local views afforded by the open nature of the borough's riverfront are important in determining the character of each stretch of the riverside. Many heritage assets are located along the river, and it is important that their setting and relationship with the river is preserved or enhanced. The council will refuse consent where proposed development in these views would lead to harm to the significance of a designated heritage asset and townscape generally, unless it can be demonstrated that the harm is necessary to achieve public benefits that outweigh the harm caused. Opportunities for enhancement of strategic and local views will be pursued where they arise.

1. Development within the Thames Policy Area will not be permitted if it would cause demonstrable harm to the view from the following points:
 - a. From Hammersmith Bridge, the view along the river, foreshore,

- and riverside development and landscape between Hammersmith Terrace to the west and Fulham Football Ground to the south.
- b. From Putney Bridge, the views along the river, foreshore and riverside, extending upstream from All Saints Church and its environs, along Bishops Park as far as Fulham Football Ground, and from Putney Railway Bridge the view downstream to the grounds of the Hurlingham Club.
 - c. From Wandsworth Bridge, the view up and downstream of the river, its foreshore and banks, and of commercial wharves and riverside buildings.
2. Development will also not be permitted if it would cause demonstrable harm to the view from within the Thames Policy Area of any of the following important local landmarks identified on the Proposals Map, or their settings:
- a. Upper and Lower Mall. The richness, diversity and beauty of the historical waterfront which includes Hammersmith Terrace, Kelmscott House and neighbouring group of listed buildings, and the open space of Furnivall Gardens allowing views of the skyline of Hammersmith and the spire of St. Paul's Church.
 - b. Bishops Park. The parallel avenues of mature London plane trees and dense shrubbery which define the character of this important open space and the riverfront.
 - c. Grounds of the Hurlingham Club. The landscaped edge of the grounds providing glimpsed views to the listed Hurlingham House.
 - d. Hammersmith Bridge. This fine example of a suspension bridge is particularly dominant, and is an important landmark along this stretch of the river.
 - e. Putney Bridge and the adjacent All Saints Church.

The implementation of the proposed policy will have a significant positive impact on preserving and enhancing the character and identity of the boroughs natural and built environment including its heritage assets.

The proposed policy will meet the heritage sustainability objective, but will have no significant effects on the other sustainability objectives as long as its application does not put an unnecessary brake on development within areas that are subject to identifiable views.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC7 Views and Landmarks	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	0

Borough-wide Policy DC8 Heritage and Conservation

Policy DC8 - Heritage and Conservation

The council will conserve the significance of the borough's historic environment by protecting, restoring and enhancing its heritage assets. These assets include: listed buildings, 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:

- 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;**
- b. development affecting designated heritage assets, including alterations and extensions to buildings will 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. 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;**
- c. development 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 setting;**
- 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;**
- e. particular regard will be given to matters of scale, height, massing, alignment, materials and use;**
- 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;**
- g. applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposed development 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.**
- h. proposals which involve harm to, or loss of, any designated heritage asset will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 133 of the National Planning Policy Framework.**
- 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 before it is lost, in order to 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;

- j. the proposal respects the principles of accessible and inclusive design;
- k. 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
- l. 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.

The proposed policy aims to conserve the significance of the borough's historic environment by protecting, restoring and enhancing its heritage assets. The policy will therefore have positive benefits on the heritage objective. Proposed development that could affect these assets will need to ensure, among other things a positive contribution to the setting and character of these heritage assets.

The policy will have no significant effects on the other sustainability objectives and should not put an unnecessary brake on development if applied in an appropriate manner that ensures all sustainable development objectives are met.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC8 Heritage and Conservation	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	0

Borough-wide Policy DC9 Advertisements

Policy DC9 - Advertisements

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 impact adversely on public safety. The council will resist excessive or obtrusive advertising and inappropriate 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 form. The council will use its powers to remove unsightly and inappropriate signs.

Advertisements should normally be located at ground floor level and related to commercial zone of the street frontage and the architectural design of the facade. 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.

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.

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 impose a detrimental impact on the building or street scene in terms of the size, illumination and/or content; or where the advertisement would 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. 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.

The proposed policy will seek a high standard of design for advertisements in keeping with their location and setting. The proposed policy will have a positive effect in conserving areas of cultural and historical value and protecting their characteristics.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC9- Advertisements	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	✓	0	✓	0	0	0	0	0

Borough-wide Policy DC10 Telecommunications

Policy DC10 - Telecommunications

The council support the expansion of Telecommunications networks, but are keen to avoid any detrimental impact on the local townscape. Proposals for telecommunications development should meet the following criteria:

- the proposed apparatus and associated structures should be sited and designed in order to integrate successfully with the design of the existing building, and thereby minimise its impact on the external appearance of the building;**
- the siting and appearance of the proposed apparatus and associated structures should be compatible with the scale and character of existing development, their neighbours and their setting, and should minimise impact on the visual amenity, character or appearance of the surrounding area;**
- the siting and appearance of the apparatus and associated structures should not have an unacceptable impact on conservation areas, listed buildings, buildings of merit or areas of open space; and**
- where appropriate, proposed apparatus and associated structures should share locations where there is an existing facility.**

The proposed policy will help to ensure that new telecommunication structures will respect local built character and will not adversely impact upon the borough's heritage assets. Design should minimise the impact of telecommunications equipment on the environment.

Better telecommunications, subject to safeguarding against environmental impact, should benefit the borough as a whole, including having a potentially positive impact on the sustainable economy objective by providing better communications for businesses and home workers.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC10 Telecommunications	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	✓	0	0	0	0	?/ ✓

Borough-wide Policy DC11-Basement Accommodation and Lightwells

Policy DC11 – Basement Accommodation and Lightwells

New basements and extensions to existing basements will only be permitted where they:

- do not extend into or underneath the garden further than 50% of the depth of the host building measured from the principal rear elevation;
- do not extend into or underneath the garden further than 50% of the depth of the garden;
- are set back from neighbouring property boundaries where it extends beyond the footprint of the host building;
- do not comprise more than one storey. Exceptions may be made on large sites;
- do not result in any adverse impact on the amenity of adjoining properties or on the local, natural and historic environment;
- are designed to minimise the risk of flooding to the property and nearby properties from all sources of flooding.
- include a minimum of one metre of soil above any part of the basement beneath a garden;
- ensure that the basement helps reduce the volume and flow of surface water run-off through appropriate use of SuDS and will provide active drainage devices to minimise the risk of sewer flooding;

- i. ensure that lightwells and railings at the front or side of the property are as discreet as possible and allow the scale, character and appearance of the property, street or terrace to remain largely unchanged;
- j. are designed to safeguard the structural stability of the existing building, nearby buildings and other infrastructure;
- k. provide a Construction Method Statement (CMS) (carried out by a qualified structural or civil engineer) to be submitted with planning applications for all basement projects;
- l. ensure that traffic and construction activity does not cause unacceptable harm to pedestrian, cycle, vehicular and road safety.

New self contained basement flats will not be permitted in the Environment Agency's Flood Zone 3 areas where there is a risk of rapid inundation by flood waters in the event of a breach of the river's flood defences, unless a satisfactory means of escape can be provided.

The effects of proposed policy DC11 are primarily related to environmental and residential amenity objectives.

The proposed policy states that basements should not exceed 50% of the garden area and not exceed 50% of the depth of the host building. This will restrict the extent of the basement excavations and does not allow basements deeper than a single storey. Because of the likely impact of the construction phase on the amenity and living conditions of those who live in the vicinity, the higher carbon embodiment of basements and the greater risk of harm to structural stability associated with deeper basement digs, the policy will assist in meeting a number of environmental sustainability objectives.

The approach will also be compatible with reducing the transport impacts as a reduction in the amount of excavation is likely to reduce the number of vehicle movements required. A reduction in traffic and the construction process will have a corresponding positive impact on air quality and pollution and upon creation of construction waste and reduction in traffic. Where structural stability is maintained, this will have a positive impact on the heritage sustainability objective.

The proposed policy also makes a specific reference to the need to minimise the risk of surface water runoff and sewer flooding. This requirement is considered to be compatible with the reduction of pollution and reduce the impact of climate change sustainability objectives as its purpose is to mitigate both flooding and pollution events.

Basement construction can also cause nuisance and disturbance for neighbours and others in the vicinity, through construction traffic, parking suspensions and the noise, dust and vibration of construction itself. The policy will help to ensure that disruption to neighbouring properties is minimised by requiring a construction management statement to be submitted alongside any planning application for basement development. Although only for the short term, this may have a positive effect on the health objective by seeking to ensure disturbance to neighbours is considered and minimised where possible.

The council is preparing a non-immediate Article 4 Direction to remove permitted development rights for basements. When in place, all future basement developments will be subject to a planning application and will need to be assessed against the council's adopted Local Plan. Proposed policy DC11 is considered to be sound, reasonable and consistent with the emerging Article 4 Direction.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy DC11 Basement accommodation and lightwells	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	✓	0	0	✓	0	0	✓	✓	0

Assessing secondary, cumulative and synergistic effects

Proposed policy DC1 Built Environment will contribute towards the Proposed Submission Local Plan strategic objective 10 which seeks to preserve and enhance the quality, character and identity of the borough's built environment by respecting the local context and seeking good quality developments. The policy is likely to have short, medium and long-term effects. The effects are likely to be permanent, resulting in a cumulative impact on the social justice, health, sense of community and heritage sustainability objectives.

Proposed policy DC2 Design of New Build will contribute towards the Proposed Submission Local Plan strategic objective 17 which seeks to promote the safety and security of those who live and work in the borough and strategic objective 16 which seeks to protect and enhance the amenity and quality of life of residents as well as strategic objective 10 which seeks to preserve and enhance the quality and character of the borough's built environment. Overall proposed policy DC2 has been found sustainable, but the few uncertain effects will need to be monitored. The effects of the proposed policy is likely to be short to long term and is likely to have a cumulative impact on the social sustainability objectives as proposals need to incorporate accessible and inclusive design.

Proposed policy DC3 Tall Buildings will contribute towards the Local Plan's strategic objective 10, which seeks to preserve and enhance the quality, character and identity of the borough's built environment by respecting the local context, seeking good quality developments and compliance with the principles of inclusive and sustainable design. Overall proposed policy DC3 has been found sustainable, but the impact of tall buildings on heritage objective will need to be monitored. It is likely that the timeframe for the effects of this policy will be medium to long term. It is anticipated that proposed policy DC3 will positively contribute towards a number of the sustainability objectives.

Proposed Policy DC4 Alterations and Extensions (including outbuildings) will contribute towards the Proposed Submission Local Plan strategic objective strategic objective 16 which seeks to protect and enhance the amenity and quality of life of residents and strategic objective 10 which seeks to preserve and enhance the quality, character of the borough's built environment with inclusive and sustainable design. Overall, proposed policy DC4 has been found sustainable. It is likely to have a short to long-term effect of permanent and direct nature. Proposed policy DC4 is anticipated to positively contribute towards the heritage and climate change sustainability objectives.

Proposed Policy DC5 Shopfronts will contribute towards the Proposed Submission Local Plan strategic objective 10 which seeks to preserve and enhance the quality, character and identity of the borough's built environment by respecting the local context, seeking good quality developments and compliance with the principles of inclusive and sustainable design. Overall, proposed policy DC5 has been found sustainable. Proposed policy DC5 is anticipated to positively contribute towards the sustainability objectives for social justice, heritage and sustainable economy.

Proposed Policy DC6 Replacement Windows will contribute towards the Local Plan strategic objective 10, which seeks to preserve and enhance the quality and character of the borough's built environment. Overall, proposed policy DC6 has been found sustainable.

Proposed Policy DC7 Views and Landmarks will contribute towards the Proposed Submission Local Plan strategic objective 10 which seeks to preserve and enhance the quality, character and identity of the borough's built environment by respecting the local context, seeking good quality developments and compliance with the principles of inclusive and sustainable design. Overall, proposed policy DC7 has been found sustainable. Proposed policy DC7 is likely to have a long-term effect on the heritage sustainability objective.

Proposed Policy DC8 Heritage and Conservation will contribute significantly towards the achievement of the Proposed Submission Local Plan's strategic objective 10 preserving and enhancing the quality, character and identity of the borough's natural and built environment including its heritage assets), and will have no significant effects on the other sustainability objectives. Overall, proposed policy DC8 has been found sustainable.

Proposed Policy DC9 Advertisements will contribute towards the achievement of strategic objective 10 (seeking to preserve and enhance the quality, character and identity of the borough's natural and built environment including its heritage assets) and will have no significant effects on the other sustainability objectives. Overall proposed policy DC9 has been found sustainable.

Proposed Policy DC10 Telecommunications will contribute towards the achievement of strategic objective 10. The impact of this policy is likely to have a short to long term impact as more equipment is installed. The effect is likely to be direct and permanent and likely to provide synergistic effects as telecommunications are a benefit to the economy and could increase business development and enhance competitiveness.

Proposed Policy DC11 Basement Accommodation and Lightwells will contribute towards the Local Plan's strategic objectives 5, 10, 13, 14, 16, and 17. The policy aims to reduce the short and long-term impacts of basements, particularly any potential negative impacts on neighbours during both the construction and operational phases of the development.

The design and conservation policies have been found to support environmental objectives and contribute positively to the broad commitment to sustainable development. However, when developments are proposed and the land uses are considered acceptable in principle, the policies will need to be carefully balanced against social and economic objectives in this intensively developed borough where there are many competing needs.

ENVIRONMENTAL SUSTAINABILITY

Borough-wide Policy CC1 Reducing Carbon Dioxide Emissions

Policy CC1 - Reducing Carbon Dioxide Emissions

The council will require all major developments to implement energy conservation measures by:

- **Implementing the London Plan sustainable energy policies and meeting the associated carbon dioxide (CO₂) reduction targets to ensure developments are designed to make the most effective use of passive design measures, minimise energy use and reduce CO₂ emissions;**
- **Ensuring developments are designed to make the most effective use of passive design measures, and where an assessment such as BREEAM (or equivalent) is used to determine a development's environmental performance, this must be supplemented with a more detailed Energy Assessment in order to show compliance with the London Plan's CO₂ reduction targets;**
- **Requiring energy assessments for all major developments to demonstrate and quantify how the proposed energy efficiency measures and low/zero carbon technologies will reduce the expected energy demand and CO₂ emissions;**
- **Requiring major developments to demonstrate that their heating and/or cooling systems have been selected to minimise CO₂ emissions. This includes the need to assess the feasibility of connecting to any existing decentralised energy systems or integrating new systems such as Combined (Cooling) Heat and Power units or communal heating systems, including heat networks;**
- **Using on-site renewable energy generation to further reduce CO₂ emissions from major developments, where feasible;**

Where it is not feasible to make the required CO₂ reductions by implementing these measures on site or off site as part of the development, a payment in lieu contribution should be made to the council which will be used to fund CO₂ reduction measures in the borough or elsewhere in London; and

Encouraging energy efficiency and other low carbon measures in all other (i.e. non-major) developments, where feasible. The council will also encourage developers to use energy performance standards such as PassivHaus to guide development of their Energy Strategies.

The proposed policy will support the London Plan's policies by tackling climate change in relation to the built environment. It will have significant positive effects on mitigating climate change, reducing pollution, encouraging careful consumption of resources and ultimately on promoting the health and quality of life of communities.

Requiring energy assessments on major developments will improve the contribution of new schemes in mitigating and adapting to climate change. Incorporating such measures at an early stage will be an essential part of the development process. Renewable energy generation on major sites will also be encouraged and will provide further reduction of CO₂ emissions.

The council will seek planning obligations to mitigate the effects of a development on climate change on or off site. This will contribute positively to the pollution, climate change and careful consumption objectives and will improve the quality of life of communities in the borough.

The proposed policy will have significant positive effects. In the long-term, these measures could potentially lead to savings and contribute positively to the sustainable economy objective by promoting the demand for and therefore supply of related goods and services.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC1 Reducing Carbon Dioxide Emissions	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: Implementing the London Plan sustainable energy policies and meeting the associated carbon dioxide (CO ₂) reduction targets;	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?
Proposed Policy: Ensuring developments are designed to make the most effective use of passive design measures, and where an assessment such as BREEAM (or equivalent) is used to determine a development's environmental performance, this must be supplemented with a more detailed Energy Assessment in order to	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC1 Reducing Carbon Dioxide Emissions	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
show compliance with the London Plan's CO2 reduction targets.												
Proposed Policy: Requiring energy assessments for all major development to demonstrate and quantify how the proposed energy efficiency measures and low/zero carbon technologies will reduce the expected energy demand and CO ₂ emissions.	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?
Proposed Policy: Requiring major developments to demonstrate that their heating and/or cooling systems have been selected to minimise CO2 emissions. This includes the need to assess the feasibility of connecting to any existing decentralised energy systems or integrating new systems such as Combined (Cooling) Heat and Power units or communal heating systems, including heat networks;	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?
Proposed Policy: Using on-site renewable energy generation to further reduce CO2 emissions from major developments, where feasible;	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?
Proposed Policy: Where it is not feasible to make the required CO ₂ reductions by	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC1 Reducing Carbon Dioxide Emissions	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
implementing these measures on or off site as a part of the development, a payment in lieu contribution should be made to the council which will be used to fund CO2 reduction measures in the borough or elsewhere in London and;												
Proposed Policy: Encouraging energy efficiency and other low carbon measures in all other (i.e. non-major) developments where feasible. The council will also encourage developers to use energy performance standards such as PassivHaus to guide development of their Energy Strategies.	0	✓	0	0	0	0	0	✓	0	✓	✓	✓/ ?

Borough-wide Policy CC2 Ensuring Sustainable Design and Construction

Policy CC2 - Ensuring Sustainable Design and Construction

The council will require the implementation of sustainable design and construction measures in all major developments by:

a. Implementing the London Plan sustainable design and construction policies to ensure developments incorporate sustainability measures, including:

- minimising energy use**
- making the most effective use of resources such as water and aggregates,**
- sourcing building materials sustainably,**
- reducing pollution and waste, promoting recycling and conserving and promoting biodiversity and the natural environment,**
- ensuring developments are comfortable and secure for users and avoiding impact from natural hazards (including flooding); and**

b. Requiring Sustainability Statements (or equivalent assessments such as BREEAM) for all major developments to ensure the full range of sustainability issues has been taken into account during the design stage; and

The integration of sustainable design and construction measures will be encouraged in all other (i.e. non-major) developments, where feasible.

The proposed policy will support the London Plan policies on sustainable design and construction, which look to achieve the highest standards of sustainable design.

The proposed policy will help to ensure that the impacts of development on the environment, health and wellbeing of residents are properly managed and mitigated where possible. Through this policy, the design and construction of developments will be considered against these impacts, whilst also helping to reduce consumption of scarce resources, reduce pollution, enhance open spaces and contribute to the health and wellbeing of residents. The proposed policy will therefore, have positive effects on the environment and heritage objectives by implementing sustainable measures. It will also contribute to improving the quality of life and health of residents.

Requiring sustainability assessments on major developments will improve the contribution of new schemes in mitigating and adapting to climate change and will promote sustainability. Incorporating such measures at an early stage will be an essential part of the development process.

The proposed policy will have significant positive effects on sustainability matters and in the long-term, this could potentially lead to savings and contribute positively to the sustainable economy objective. Effects on the social and economic objectives will depend on the implementation of the proposed policy, but it is expected that positive economic impacts would be created by promoting the demand for and therefore supply of related goods and services. Also, the social cohesion benefits are expected through the provision and conservation of the natural environment and biodiversity and the promotion of measures such as recycling.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC2 Ensuring Sustainable Design and Construction	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Carer support	Climate change	Sustainable economy
Proposed Policy: See policy wording above.	?	✓	0	0	✓/ ?	0	✓	✓	0	✓	✓	✓/ ?

Borough-wide Policy CC3 Minimising Flood Risk and Reducing Water Use

Policy CC3 - Reducing Water Use and the Risk of Flooding

The council will require developments to reduce the use of water and minimise current and future flood risk by implementing the following measures:

A site specific Flood Risk Assessment (FRA) will be required for the following development proposals:

- All proposals for developments in the Environment Agency's Flood Zones 2 and 3
- Proposals for new developments over 1 hectare in size in Flood Zone 1
- All proposals for new development in areas identified in the council's SWMP as being susceptible to surface water flooding – i.e. those located in a flooding hotspot
- All proposals for new development which includes a subterranean element in areas identified in the council's SWMP as being at risk from elevated groundwater levels
- As part of the FRA, the requirements of the National Planning Policy Framework must be addressed and, where applicable, an Exception Test must also be carried out and included in the FRA;
- The FRA must assess the risk of flooding from all relevant sources, in particular tidal, surface and ground water, as well as sewer flooding and

where there is a risk of flooding, appropriate flood proofing measures must be integrated, in accordance with the guidance in the H&F SFRA;

- New self-contained basement flats will not be permitted in the Environment Agency's Flood Zone 3 areas where there is a risk of rapid inundation by flood waters in the event of a breach of the river's flood defences or in surface water flooding hotspots where the flood hazard rating is defined a significant or higher in the SWMP, unless a satisfactory means of escape can be provided;
- Where development is proposed in the Environment Agency's Groundwater Source Protection Zones 1 or 2, measures must be taken to ensure the protection of groundwater supplies;
- All developments that include a subterranean element must provide details of the structural waterproofing measures to be integrated to prevent any increase in on or off-site groundwater flood risk;
- All developments that are classified as 'more' or 'highly' vulnerable to flooding that include proposals at basement or lower ground floor level must install a non-return valve or equivalent to protect against sewer flooding;

All development proposals will be required to demonstrate that there is sufficient water and wastewater infrastructure capacity both on and off site to serve the development or that any necessary upgrades will be delivered ahead of the occupation of development;

In line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the river Thames must maintain and where necessary enhance or raise flood defences (or show how they could be raised in the future), demonstrating that they will continue to provide adequate flood protection for the lifetime of the development.

All developments must include water efficient fittings and appliances, where provided, in line with London Plan water consumption targets. In addition, major developments and high water use developments must include other measures such as rainwater harvesting and grey water re-use.

Hammersmith and Fulham suffers from risk of flooding, with over 60% of the borough in the Environment Agency's Flood Zone 2 and 3. With an increase in housing development planned for the borough, this will have an impact on flooding if it is not managed appropriately. This policy will help to mitigate the risk of flooding by requiring development to submit a site-specific flood risk assessment and incorporate specific design measures.

The requirement for a site-specific flood risk assessment will help to assess the risk inappropriate and unfit developments. This will have a positive impact on the health and climate change sustainability objectives.

The proposed policy is in conformity with the sustainability objective on reducing climate change impact by seeking to minimise the risk of flooding from storm events and breach of the River Thames flood defences. It is important to reduce run-off of water so that it does not exceed the capacity of the local drainage systems. This is already a serious London-wide problem and results in localised flooding in some streets and contamination of the River Thames by untreated sewage from the increasing intensity of rainfall. Also encouraging efficient water consumption will contribute towards reducing the impacts of climate change.

Although a significant part of the borough is at risk of flooding, it is protected from flooding by the Thames Barrier and by river walls. However, there is a risk of breach in or the over topping of the river walls and this risk is likely to increase with climate change. The proposed policy is therefore important as it requires development to make provision for the maintenance of the river defences. It also requires an assessment of the flood risk of new developments and it also ensures that vulnerable uses are protected. Residential use can be particularly vulnerable where there are basement dwellings with no internal access to a higher level.

The policy also seeks to ensure that sufficient water and wastewater infrastructure capacity is in place. This will have a positive impact on the pollution, careful consumption and climate change objectives.

Implementing the proposed policy will increase the overall efficiency of water use, reducing per person daily consumption.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC3 Reducing Water Use and the Risk of Flooding	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	✓	✓	0

Borough-wide policy CC4- Minimising Surface Water Run-off with Sustainable Drainage Systems

Policy CC4- Minimising Surface Water Run-off with Sustainable Drainage Systems

All proposals for new development must manage surface water run-off as close to its source as possible and on the surface where practicable, in line with the London Plan drainage hierarchy. Other requirements include:

- **All major developments must implement Sustainable Drainage Systems(SuDS) to enable a reduction in peak run-off to greenfield run off rates for storms up to the 1 in 100 year event (plus climate change allowance);**
- **Major developments will be required to provide a sustainable drainage strategy that demonstrates how SuDS will be integrated to reduce peak flow volumes and rates in line with the requirements of this policy;**
- **All other developments must maximise attenuation levels, achieving greenfield run off rates where possible, particularly where they are located in surface water flooding hotspots, or increase a site's impermeable area,**
- **As well as being designed to minimise flood risk, surface water drainage measures must be designed and implemented where possible to help deliver other Local Plan policies such as those on biodiversity, amenity and recreation, water efficiency and quality;**
- **All new outdoor car parking areas and other hard standing surfaces shall be designed to be rainwater permeable with no run-off being directed into the sewer system, unless there are practical reasons for not doing so;**
- **All flat roofs in new developments should be green or brown roofs to help contribute to reducing surface water run-off**
- **Where installed, SuDS measures must be retained and maintained for the lifetime of the development and details of their planned maintenance must be provided to the council.**

The inclusion of a locally specific policy on surface water and implementation of SuDS has been incorporated into the Local Plan in order to reduce the impact of surface water run-off and will help to reduce the risk of flooding by ensuring that surface water run-off is managed on site where possible through the use of SuDS where appropriate. This will positively contribute to the environmental and health sustainability objectives. SuDS includes measures such as rainwater harvesting which involves the collection of rainwater for re-use. This promotes the careful consumption of water.

SuDS can also provide an array of amenity, recreational and biodiversity benefits.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC4 Minimising Surface Water Run-off with Sustainable Drainage Systems	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	✓	✓	0

Borough-wide Policy CC5 Water Quality

Policy CC5- Water Quality

The council will require that where a private supply or distribution system is proposed as part of a development, the quality of water is assessed so that any required treatment is identified and an on-going monitoring and maintenance plan is established.

The proposed policy will protect and improve the water quality in the borough by requiring new developments to provide water quality assessment and if necessary an ongoing monitoring and maintenance plan. This will contribute positively towards the pollution and health objectives by reducing the level of water pollution and improving water quality.

The use of private water supplies also reduces demands on the mains water supply and are better able to cope with climate change impacts such as drought.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC5 Water Quality	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	✓	0

Borough-wide Policy CC6 Strategic Waste Management

Policy CC6- Strategic Waste Management

The council will pursue sustainable waste management, including:

- a. Planning to manage 247,000 tonnes per annum of waste in LBHF by 2036**
- b. Promoting sustainable waste behaviour and maximum use of the WRWA Smuggler's Way facility; and**
- c. Seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport.**

The boroughs municipal waste is managed through a riverside site (Smugglers Way) close to Wandsworth Bridge in the London Borough of Wandsworth. Currently most of the non-recyclable municipal waste is transported by river to an energy waste facility in Bexley.

In addition to the site at Smugglers Way, two large sites (Powerday at Old Oak Sidings and EMR site) exist within the Old Oak Common Opportunity Area. Since April 2015, this Opportunity Area and the waste sites have fallen within the boundary of the Old Oak and Park Royal Development Corporation (OPDC).

The council considers that the Old Oak Sidings (Powerday) site could meet the borough's waste apportionment target set out in the London Plan and will continue to work with them by encouraging them to retain the site.

The health sustainability objective will be influenced by the implementation of the policy. If waste is sustainably transported to minimise traffic and air quality impacts, then adverse health impacts may be somewhat mitigated. However, if transportation of waste is dependent on road transport, there are likely to be negative health impacts resulting from the increased traffic impacts including increased risk of noise and air pollution along the roads used.

The proposed policy promotes sustainable management of waste. This is likely to positively impact upon resource consumption in the borough. The reuse and recycling of construction and demolition waste would have a number of benefits including the reduction in the number of transport movements and the amount of waste going to landfill sites.

Developing the borough's waste sites into more high value uses will improve the local economy in a number of ways, including increasing the number of people living, working and visiting the borough, increasing local employment and generating increased levels of investment in the borough

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC6 Strategic Waste Management	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: The council will pursue sustainable waste management, including: planning to manage 247,000 tonnes per annum of waste in LBHF by 2036;	0	0	0	0	0	✓	0	?	?	✓	?	✓
Proposed Policy: Promoting sustainable waste behaviour, and maximum use of the WRWA Smuggler's Way facility; and	0	0	0	0	0	0	0	✓	✓	✓	✓	0
Proposed Policy: Seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport.	0	✓	0	0	0	0	✓	✓	✓	✓	✓	0

Borough-wide Policy CC7 On-site Waste Management

Policy CC7- On-site Waste Management

All new developments must include suitable facilities for the management of waste generated by the development, including the collection and storage of separated waste and where feasible on-site energy recovery.

- a. **All developments, including where practicable, conversions and change of use, should aim to minimise waste and should provide convenient facilities with adequate capacity to enable the occupiers to separate, store and recycle their waste both within their own residence and via accessible and inclusive communal storage facilities, and where possible compost green waste on site;**
- b. **In major development proposals on-site waste management should be provided, particularly for commercial and industrial waste streams;**
- c. **Sustainable waste behaviour, including the re-use and recycling of construction, demolition and excavation waste will be encouraged and recyclable materials should wherever feasible be segregated on site, providing there is no significant adverse impact on either site occupants**

or neighbours. On larger demolition sites the council will expect details of the type and quantity of waste arising and details of proposed methods of disposal, including means of transport.

Encouraging efficient resource use and recycling during all stages of the development process will reduce the amounts of waste that is transported for disposal, reducing greenhouse gas emissions.

The implementation of the proposed policy will reduce the amount of waste transported. This will have a positive impact by reducing emissions of greenhouse gases and other air and noise pollution. The proposed policy will also contribute positively to increasing the overall efficiency of resource use and the responsible consumption of resources.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC7 On-site Waste Management	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	0	✓	✓	✓	✓	0

Borough-wide Policy CC8 Hazardous Substances

Policy CC8- Hazardous Substances

The council will ensure the protection of new and existing residents, by rejecting proposals involving provision for hazardous substances that would pose an unacceptable risk to the health and safety of occupants of neighbouring land, and rejecting development proposals in the vicinity of existing establishments if there would be an unacceptable risk to future occupants.

The council will ensure that development takes account of major hazards identified by the Health and Safety Executive, namely:

- **Fulham North Holder Station, Imperial Road**
- **Fulham South Holder Station, Imperial road**
- **Swedish Wharf, Townmead Road**

The proposed policy seeks to ensure the protection of new and existing residents by resisting the expansion of or new developments which may cause unacceptable safety risks. This policy will therefore have positive impacts on the health objective and on reducing the level of potential pollution in the borough. There are no other significant effects associated with the implementation of the proposed policy.

POLICY	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Policy CC8 Hazardous Substances Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0

Borough-wide Policy CC9 Contaminated Land

Policy CC9- Contaminated Land

When development is proposed on or near a site that is known to be, or there is good reason to believe may be, contaminated, or where a sensitive use is proposed, an applicant should carry out a site assessment and submit a report of the findings in order to establish the nature and extent of the contamination.

Development will not be permitted unless practicable and effective measures are to be taken to treat, contain or control any contamination so as not to:

- Expose the occupiers of the development and neighbouring land uses including, in the case of housing, the users of open spaces and gardens to unacceptable risk;
- Threaten the structural integrity of any building built, or to be built, on or adjoining the site;
- Lead to the contamination of any watercourse, water body or aquifer; and
- Cause the contamination of adjoining land or allow such contamination to continue.

Any application will be assessed in relation to the suitability of the proposed use for the conditions on that site. Any permission for development will require that the measures to assess and abate any risks to human health or the wider environment agreed with the authority must be completed as the first step in the carrying out of the development.

Through this policy, developers must ensure that any development proposed on or near a site which is considered to be contaminated must carry out the necessary site assessments and if necessary, effective measures to treat, contain or control any contamination will need to be provided. This will have positive impacts on the overall health of the population and on reducing the level of pollution in the borough.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC9 Contaminated Land	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	0	0	0

Borough-wide Policy CC10 Air Quality

Policy CC10- Air Quality

The council will seek to reduce the potential adverse air quality impacts of new developments by:

- a. Requiring all major developments to provide an air quality 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;
- 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; and
- 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.

The proposed policy will have a number of positive effects on environmental amenity and social equity objectives by helping to address the adverse health impacts of poor air quality, particularly on more vulnerable groups. The requirement for all major developments to consider air quality issues at an early stage and if necessary provide an air quality assessment which will encourage better and more sustainable planning by ensuring that developers consider the wider implications of the development and design led mitigation measures can be established.

This is likely to have a positive impact in relation to greenhouse gas emissions if sustainable transport and other design measures to reduce the need to travel are adopted as part of the mitigation measures for new development.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC10 Air Quality	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	✓	✓	✓	0

Borough-wide Policy CC11 Noise

Policy CC11- Noise

Noise (including vibration) impacts of development will be controlled by implementing the following measures:

- a. Noise and vibration sensitive development should be located in the most appropriate locations and protected against existing and proposed sources of noise and vibration through careful design, layout and use of materials, and by ensuring adequate insulation of the building envelope and internal walls, floors and ceilings as well as protecting external amenity areas;
- b. Housing, schools, nurseries, hospitals and other noise-sensitive development will not normally be permitted where the occupants/users would be affected adversely by noise, both internally and externally, from existing or proposed noise generating uses. Exceptions will only be made if it can be demonstrated that adequate mitigation measures will be taken, without compromising the quality of the development; and
- c. Noise generating development will not be permitted, if it would be liable to materially increase the noise experienced by the occupants/users of existing or proposed noise sensitive uses in the vicinity.

Where necessary, applicants will be expected to carry out noise assessments and provide details of the noise levels on the site. Where noise mitigation measures will be required to enable development to take place, an outline application will not normally be acceptable.

The proposed policy will have a positive effect on ensuring the amenity of residents who are likely to be affected by excessive noise or vibration associated with new development. The proposed policy will benefit less well-off communities and other vulnerable groups which may be disproportionately affected by exposure to excessive noise or vibration based on a number of factors including the location of their homes and the lack of sound insulation measures in these.

The proposed policy will limit exposure of noise sensitive uses to excessive noise or vibration, thus it will positively impact upon the objectives to promote social equality, health, well-being and reduce pollution. There is some uncertainty about the overall economic impacts of refusing new development that is deemed likely to materially increase noise levels and adversely impact upon nearby noise sensitive uses.

POLICY	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Policy CC11 Noise												
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	0	0	0	?

Borough-wide Policy CC12 Light Pollution

Policy CC12- Light Pollution

The potential adverse impacts from lighting arrangements will be controlled by requiring all developments that include proposals for external lighting including illuminated signs and advertisements, security and flood lights and other illuminations to submit details showing that it:

- is appropriate for the intended use;**
- provides the minimum amount of light necessary to achieve its purpose;**
- is energy efficient; and**
- provides adequate protection from glare and light spill, particularly to nearby sensitive receptors such as residential properties and Nature Conservation Areas, including the River Thames and the Grand Union Canal.**

The proposed policy aims to ensure that external lighting provided as part of a new development is provided in the most efficient manner in terms of maximising safety and amenity objectives as well as minimising energy use and any environmental impact. As it also encourages the most efficient provision of external lighting in terms of design, energy efficiency and seeks to manage any negative impacts on the environmental and amenity of neighbours, which will have positive effects on the

environmental objectives, namely reducing pollution, the careful consumption of resources, reducing climate change impacts.

The proposed policy will also have positive effects on the health sustainability objective by facilitating the extended use of outdoor sports facilities and also maximising amenity.

POLICY	SUSTAINABILITY OBJECTIVES											
	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Policy CC12 Light Pollution												
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	0	✓	✓	0

Borough-wide Policy CC13 Control of Potentially Polluting Uses

Policy CC13- Control of Potentially Polluting Uses

All proposed developments (including new buildings, demolition of existing buildings, conversions and changes of use) will be required to show that there will be no undue detriment to the general amenities enjoyed by existing surrounding occupiers of their properties, particularly where commercial and service activities will be close to residential properties. In the case of mixed use developments, similar protection will also be afforded to the prospective residents and other users where there is potential for activities within the new development to impact on their immediate neighbours on the same site.

The council will, where appropriate, require precautionary and/or remedial action if a nuisance for example, from smoke, fumes, gases, dust, steam, light, vibration, smell, noise, spillage of gravel and building aggregates or other polluting emissions would otherwise be likely to occur, to ensure that it will not.

The proposed policy seeks to ensure that new developments are not detrimental to the amenity of surrounding occupiers. By preventing pollution and other nuisances from occurring, the proposed policy will have a positive effect on the social justice and health objectives. There is some uncertainty associated with the costs of mitigation that would need to be provided on the economic development objectives in the borough, but these are considered to be relatively minor when set against the benefits they will confer.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy CC13 Control of Potentially Polluting Uses	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	0	0	0	✓	0	0	0	?

Assessing secondary, cumulative and synergistic effects

Proposed policy CC1 Reducing Carbon Dioxide Emissions is anticipated to positively contribute to the Proposed Submission Local Plan's strategic objective 15, which seeks to encourage healthier lifestyles and strategic objective 13 which seeks to reduce and mitigate the local causes of climate change and the move to a low carbon future. By tackling climate change in relation to the built environment it will have significant positive and cumulative effects on climate change, pollution, careful consumption and ultimately on the health and quality of life of the communities' appraisal objectives. Particularly in the long-term, these measures could potentially lead to savings and contribute positively to the sustainable economy objective.

Proposed policy CC2 Ensuring Sustainable Design and Construction is anticipated to positively contribute to the Proposed Submission Local Plan's strategic objective 10 which seeks to ensure that the built environment complies with the principles of sustainable design and strategic objective 13 which seeks to reduce and mitigate the local causes of climate change. There will be positive and permanent long-term effects on the environment and heritage objectives by implementing sustainable measures. These will also contribute to improving quality of life.

Proposed policy CC3 Reducing Water Use and the Risk of Flooding is anticipated to positively contribute towards the strategic objective 13, which seeks to reduce and mitigate the local causes of climate change and mitigate flood risk. The effects of proposed policy CC3 are likely to be short to long term and will have a direct effect.

Proposed policy CC4 Minimising Surface Water Run-off with Sustainable Drainage Systems is anticipated to positively contribute to Local Plan Strategic Objective 13 which seeks to reduce and mitigate the local causes of climate change and mitigate flood risk.

Proposed policy CC5 Water Quality is anticipated to positively contribute towards the strategic objective 13 which seeks to reduce and mitigate the local causes of climate change. The effects of this policy are likely to be permanent and positive in the short to long term on reducing levels of pollution sustainability objective.

Proposed policy CC6 Strategic Waste Management is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objective 12 which seeks to increase the use of Hammersmith & Fulham's waterways and objective 13 which seeks to reduce and mitigate the local causes of climate change as the policy encourages the movement of waste by water and seeks to deal with waste in a sustainable manner therefore reducing the potential negative impact waste management can have on pollution levels and on the local environment. This will have a permanent and cumulative effect in the long term.

Proposed policy CC7 On-site Waste Management is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objectives 11 and 13 as dealing with waste on site will benefit the local environment as waste is dealt with on site therefore reducing pollution caused by transport and reducing carbon emissions. Proposed policy CC6 will have a positive short to long-term effect on the environmental sustainability objectives.

Both proposed policy CC8 Hazardous Substances and Policy CC9 Contaminated Land are anticipated to positively contribute to the Proposed Submission Local Plan's strategic objective 15 which seeks to encourage healthier lifestyles and 13 which seeks to reduce and mitigate of climate change. Both of these proposed policies will have a short to long term positive impact on the health objective and reducing the level of potential pollution in the borough.

Proposed policy CC10 Air quality is anticipated to positively contribute to Proposed Submission Local Plan's strategic objectives 13, 15, 16, and 17 as it promotes the health, amenity and quality of life of people living and working in the borough and mitigating the local causes of climate change across the borough. Proposed policy CC10 will have a positive short to long-term impact on the social, health and reduction of pollution sustainability objectives.

Proposed policy CC11 Noise is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objectives 15 to reduce health inequalities and strategic objective 16, which seeks to protect and enhance the amenity and quality of residents as it outlines measures to protect noise sensitive uses from incompatible developments. This proposed policy will have a short to long-term effect on the social, health and reduction of pollution sustainability objectives.

Proposed policy CC12 Light Pollution is anticipated to positively contribute towards the Proposed Submission Local Plan's strategic objectives 13, 15 and 16 and 17 as it outlines measures to control light pollution. This will have a positive short to long-term effect on the health and reducing the level of pollution sustainability objectives. Overall, proposed policy CC12 has been found sustainable.

Proposed policy CC13 Control of Potentially Polluting Uses is anticipated to positively contribute to Strategic objectives 13, 15, 16 and 17. By preventing pollution and other nuisances from occurring, the proposed policy will have a positive short to medium term effect on the social justice and health objectives.

TRANSPORT AND ACCESSIBILITY

Borough-wide Policy T1Transport

Policy T1 - Transport

To work with strategic partners to improve transportation provision, accessibility, and air quality in the borough, by improving and increasing the opportunities for cycling and walking, and by improving connections for bus services, underground, national and regional rail by:

Major Scheme Targets

- **seeking and promoting the routing of Crossrail 2 via South Fulham, with an interchange to the Overground line at Imperial Wharf;**
- **supporting the implementation of a HS2 Crossrail/Great Western interchange at Old Oak with interchanges with the West London Line and underground services;**
- **seeking a road tunnel replacing all or parts of the A4, including the Flyover through Hammersmith allowing for major new housing, community facilities and office developments within the town centre and improved links to the Thames;**
- **continuing to promote major improvements with new stations and enhanced local and sub-regional passenger services on the West London Line;**
- **seeking the increased capacity and reliability of the Piccadilly and District Lines;**
- **seeking increased use of the Thames -for passenger services and freight use where this is compatible with the capacity of the connecting road network and meets environmental concerns;**
- **increasing the opportunities for walking, for example by extending the Thames Path National Trail, and for cycling by supporting the Mayor's Cycling Vision; and**
- **seeking localised improvements to the highway network to reduce congestion on north-south routes in the borough.**

Borough wide Targets:

- **promoting and supporting the continued development of initiatives designed to encourage modal shift away from private vehicles, in order to improve congestion and air quality within the borough;**
- **developing and promoting safe environments for cyclist and pedestrians to encourage residents and businesses to consider these modes;**
- **extending the Mayor's Bike Hire scheme throughout the borough;**
- **working with Transport for London and bus operators to develop zero exhaust emission bus services and routes across the borough;**
- **securing access improvements for all, particularly people with disabilities, as part of planning permissions for new developments in**

the borough;

- **ensuring that there are adequate levels of provision of electric charging infrastructure to support local residents and visitors;**
- **working towards changing the behaviour patterns and vehicle types of private hire vehicles and taxis;**
- **ensuring that traffic generated by new development is minimised so that it does not add to parking pressures on local streets or congestion, or worsen air quality; and**
- **relating the intensity of development to public transport accessibility and highway capacity.**

Implementing the proposed policy will bring positive equity and social justice benefits. A number of public transport upgrades are proposed which will enable sustainable travel and improve the quality of life of people from all walks of life regardless of their socio-economic backgrounds, age and physical abilities.

The proposed policy aims to extend the Mayor's bike hire scheme throughout the borough and also seeks to increase opportunities for walking and cycling. These initiatives are likely to positively contribute towards improving overall health levels.

The replacement of Hammersmith Flyover with a tunnel will enable major housing led development to be constructed on this space. The replacement of the Hammersmith Flyover will also bring positive benefits to the local environment in the borough. It would enable the town centre and adjoining areas to be reconnected to the river, improving people's access to the open spaces of the river and Furnivall Gardens. The construction of new homes would provide additional opportunities for high quality developments to be built in this area, further improving the local environment. The transport improvements suggested will all promote social cohesion and a sense of community by curbing the negative impacts of uncontrolled car dependency, which can exert a significant severance effect on communities.

The policy's focus on public transport oriented development, accessible to all, will help the borough's town centres and regeneration areas to develop their own distinct identities and character and will enable people of all ages and abilities to actively participate in public life. The policy will also result in lower levels of air, water and noise pollution and aims to manage car dependency and use by controlling parking provision to avoid negative impacts on the quality of the urban environment, this is likely to have a positive impact on the health objective. It also aims to increase the opportunities for sustainable transport modes of transport such as walking and cycling which will serve to reduce greenhouse gas emissions and will contribute to reducing climate change impacts.

The policy supports greater use of the River Thames for both passenger services and freight movements which will further encourage the use of more sustainable modes of transport.

By aiming to sustainably address the transport needs associated with the planned intensification of development in the borough, the policy will ensure that the drivers

of economic growth are provided with essential transport infrastructure, thereby improving the movement of people and resources.

The proposed policy promotes the responsible consumption of resources in the borough and will result in reduced levels of consumption of non-renewable fossil fuels.

It is important to note that former policy T5-Housing with Reduced Parking has been removed from the Proposed Submission Local Plan. It was not considered necessary to retain this policy as the assessment of parking on housing schemes will be considered against the other relevant Local Plan policies, in particular Policy T4 and the London Plan (2016).

POLICY	SUSTAINABILITY OBJECTIVES											
Policy T1 Transport	Social justice justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption consumption	Climate change	Sustainable economy economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	✓	✓	0	0	✓	✓	✓	✓	✓

Borough-wide Policy T2 Transport assessments and travel plans

Policy T2 - Transport assessments and travel plans

All development proposals will be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network. The existing and potential availability of public transport, and its capacity to meet increased demand will also be assessed for any development.

The council will require a Transport Assessment (TA), together with a Travel Plan where a development is anticipated to generate a level of trips that impacts on the local network or have an impact on any strategic routes. Delivery and Servicing Plans should be secured in line with TfL's London Freight Plan and should be co-ordinated with Travel Plans.

The proposed policy will require all developments to be assessed in terms of their impact on traffic generation and where necessary a Transport Assessment and Travel Plan may be required. It will have a significant positive effect on the transport and environmental objectives as well as the health of residents.

The policy will also require appropriate mitigation to be provided by developers for any impacts on the public highway or local network as well as financial contributions for associated infrastructure and improvements to public transport capacity.

POLICY	SA OBJECTIVES											
Borough-wide Policy T2 Transport assessments and travel plans	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0	✓	✓	0	✓	0

Borough-wide Policy T3 Increasing and Promoting Opportunities for Cycling and Walking

Policy T3 – Increasing and Promoting Opportunities for Cycling and Walking

The Council will encourage and support the increasing use of bicycles by requiring:

- new developments to include the provision of convenient accessible and safe secure cycle parking within the boundary of the site (see appendix 8);
- the provision of suitable changing and showering facilities, following the guidance outlined in the Hammersmith and Fulham Cycling Strategy 2015; and
- developer contributions for improvements to cycling infrastructure, including contributions to the extension of TfL's Cycle Hire Scheme.

The council will facilitate walking by requiring larger developments to provide:

- accessible, inclusive and safe pedestrian routes within and through the larger developments;
- accessible and inclusive pedestrian access to the river and canal, where appropriate; and
- contributing to improvements in the local highway infrastructure and walking environment.

The proposed policy will encourage more sustainable modes of transport, namely walking and cycling, in the borough. It will have positive effects on accessibility, will lead to a reduction of carbon emissions and better use of resources. It will have a positive significant effect towards reducing stress and improving health. It will also lead to more accessible and legible developments and maximise connections with the river and the canal.

POLICY	SUSTAINABILITY OBJECTIVES											
Policy T3 Increasing Opportunities for Cycling and Walking	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	✓	0	✓	✓	✓	0	✓	0

Borough-wide Policy T4 Vehicle Parking Standards

Policy T4 – Vehicle Parking Standards

The council will require any proposed development (new build, conversion or change of use) to conform to its car parking standards (appendix 7). The council will also require car parking permit free measures on all new development unless evidence is provided to show that there is a significant lack of public transport available.

This policy seeks to provide adequate parking provision, in accordance with London Plan (2016) parking standards, that does not result in over reliance on the use of the car and will assist in reducing carbon emissions, thereby improving air quality.

Policy 6.13 from the London Plan sets out maximum parking standards. Within this policy, a more flexible approach applies to town centres especially where there are issues of viability and vitality.

The policy also requires the provision of designated parking spaces for disabled people which will have a positive effect on the social objectives. It is anticipated that implementing the London Plan Policy will contribute positively towards transport objectives as excessive car-parking provision could undermine more sustainable modes of transport such as cycling, walking and public transport. It could reduce spatial disparities by encouraging more car parking in town centres and therefore improving the local economy. It is also likely to contribute positively to the social objectives.

Through this policy, the council will also require 5% of parking spaces to be equipped with electric car charging points and a further 25% passive provision. This is likely to have a positive impact on the climate change and transport sustainability objectives.

POLICY	SA OBJECTIVES											
Borough-wide Policy T4 Vehicle Parking Standards	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	✓	0	0	✓	✓	0	✓	✓	0	✓	✓

Borough-wide Policy T5 Parking for blue badge holders

Policy T5 - Parking for blue badge holders

New developments that include vehicular access must provide accessible, off street car parking bay for Blue Badge holders even if no other general parking is provided as part of the development.

The proposed policy will contribute towards increasing equity and social justice, including a sense of community for disabled people. It will have uncertain effects on the pollution and transport objectives, but it is considered that these are outweighed by the benefits for disabled people.

POLICY	SA OBJECTIVES											
Borough-wide Policy T5 Parking for blue badge holders	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	✓	0	0	0	✓	0	0	?	?	0	0	0

Borough-wide Policy T6 Borough road network - hierarchy of roads

Policy T6 - Borough road network - hierarchy of roads

Developments, construction and other operations that affect the borough's road network will be regulated according to the council's hierarchy of roads, shown on the Proposals Map, as follows:

Tier 1: Strategic routes (Transport for London Road Network)

Development will not be permitted if it would prejudice the effectiveness of the strategic route network to provide safe and unobstructed road connections to national and international transport networks, to provide for long distance and commercial traffic to traverse the region, or to reduce traffic demand on lower tier roads. Direct frontage access from development sites to such routes will be resisted unless there is no prospect of alternative access to a lower tier road, and the particular section of frontage concerned already performs lower tier functions, and the safe flow of traffic will be maintained. Proposals likely to increase car commuting into central London along such routes will be resisted.

Tier 2: London distributor roads

Development will not be permitted if it would prejudice the effectiveness of these roads to provide links to the strategic route network, provide access to and between town centres, and distribute traffic to and around, but not within, local areas.

Tier 3: Borough distributor roads

Development will not be permitted if it would prejudice the effectiveness of these roads to distribute traffic to land and property within any local area bounded by the strategic route network and London distributor roads, or introduce additional through traffic on them.

Tier 4: Local access roads

Development will not be permitted if it would prejudice the effectiveness of these roads to provide safe and convenient access to individual properties, or result in their use by through traffic.

There are some uncertainties around the impacts of the proposed policy in combating motor vehicle related pollution and minimising greenhouse gas emissions. On one hand the efficient functioning of the road network will maximise the efficiency of resource use while on the other, this may lead to more vehicles using the road increasing congestion and total vehicular emissions.

POLICY	SA OBJECTIVES											
Borough-wide Policy T7 Borough Road- Network Hierarchy of Roads	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	0	0	0	0	0	0	?	?	✓	?	✓

Boroughwide Policy T7 Construction and Demolition Logistics

Policy T7 Construction and Demolition Logistics

All construction, demolition, utilities and major logistics activities within the borough will be required to work with the council in developing the scope and impact of their operations. In order to mitigate the impact of any additional traffic or potential disruption to the network, careful planning and co-ordination with the council is required to ensure the smooth operation of the highway network.

This policy seeks to ensure that any additional traffic or disruption that may have a negative impact on the road network in association with the construction and demolition of development is managed and mitigated effectively. This is likely to have a positive effect on the transport objective by encouraging the use of more sustainable modes of delivery and could possibly lead to more use of rail and river.

Limiting additional traffic will also reduce pollution and have health benefits.

POLICY	SA OBJECTIVES											
Borough-wide Policy T7 Construction and Demolition Logistics	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy: <i>See policy wording above.</i>	0	✓	0	0	0	0	0/?	?/✓	✓	0	0	0

Assessing secondary, cumulative and synergistic effects

Policy T1 Transport is anticipated to contribute positively to the proposed Submission Local Plan's strategic objective 14 which seeks to ensure the development of a safe, sustainable transport network. It includes improvements to public transport, cycling and walking infrastructure which will improve transport accessibility and local air quality and reduce traffic congestion and the need to travel. It is considered that this policy will have a positive secondary impact on the local economy by maintaining and improving accessibility. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. The policy could combine cumulatively and synergistically with the other transport policies to strengthen and improve transport infrastructure and provision for sustainable transport modes which in turn will help reduce pollution and have positive benefits for the environment and climate change.

Policy T2 Transport Assessments and Travel Plans is anticipated to contribute positively to strategic objective 14 seeking to ensure there is a high quality transport infrastructure. It is considered that this policy will have a positive secondary impact on the environment by ensuring that new developments are appropriately assessed for their transport impacts and appropriate mitigation measures are put in place to improve accessibility and ease congestion. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. The policy could combine cumulatively and synergistically with the other transport policies to strengthen and improve transport infrastructure and provision for sustainable transport modes which in turn will help reduce pollution and have positive benefits for the environment and climate change.

Policy T3 Increasing Opportunities for Cycling and Walking is anticipated to contribute positively to strategic objective 14 seeking to ensure the development of a safe, sustainable transport network that includes improvements to public transport, cycling and walking infrastructure. It is considered that this policy will have a positive secondary impact on environmental, health and social objectives by reducing car dependency and pollution and promoting active travel. It is predicted that the policy will have a positive effect on the objectives, especially in the medium to long term. This policy could combine cumulatively and synergistically with other Local Plan policies to improve accessibility in the borough, reduce pollution and improve the health of residents and visitors

Policy T4 Vehicle Parking Standards is anticipated to positively contribute to strategic objective 14 seeking to ensure there is a high quality transport infrastructure. It is considered that this policy will have a positive secondary impact on social objectives by ensuring that new developments provide an appropriate level of parking, improving accessibility to key services and facilities. It is predicted that the policy will have a positive effect on the objective, especially in the medium to long term. If parking provision is provided at the right level, this policy could combine cumulatively and synergistically with the other transport policies to lead to strengthened and improved transport infrastructure and provision for sustainable transport modes which in turn will help reduce pollution and have positive benefits for the environment and climate change.

Policy T5 Parking for Blue Badge Holders is anticipated to positively contribute to strategic objective 14 seeking to ensure there is a high quality transport infrastructure. It is predicted that this policy will have a positive secondary impact on social objectives by ensuring that new housing developments provide an appropriate level of blue badge parking. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. If blue badge parking is provided at the right level, this policy could combine cumulatively and synergistically with the other transport policies to improve access to services and facilities for disabled people

Policy T6 Borough Road Network-Hierarchy of Roads is anticipated to positively contribute to strategic objectives 7, 8, 4 and 14. These objectives broadly relate to supporting the local economy and businesses, attracting investment into the borough and to ensuring a high quality transport infrastructure. It is predicted that this policy will have a positive secondary impact on social objectives by maximising access for residents and visitors to town centre facilities and services. It is predicted that the policy will have a positive effect on the sustainability objectives, especially in the medium to long term. This policy could combine cumulatively and synergistically with other Local Plan policies to improve accessibility in the borough and support the local economy and businesses.

Policy T7 Construction and Demolition Logistics is anticipated to positively contribute to strategic objective 19 14 by seeking to ensure a safe, sustainable transport network. It will help to reduce traffic congestion and will have a positive effect on the sustainability objectives, especially concerning pollution and health. This policy could combine cumulatively and synergistically with the other transport policies to reduce pollution and have positive benefits for the environment and climate change.

PLANNING CONTRIBUTIONS AND INFRASTRUCTURE

Planning contributions and infrastructure planning

The council will seek planning contributions to ensure the necessary infrastructure to support the Local Plan is delivered using two main mechanisms:

Community Infrastructure Levy (CIL)

The council will charge CIL on developments in accordance with the CIL Regulations (as amended) and the LBHF CIL Charging Schedule

The council will spend CIL on:

- Infrastructure in accordance with the H&F Regulation 123 (R123) List
- Projects identified for 'Neighbourhood CIL'; and
- CIL administration expenses (no more than the statutory cap).
-

Section 106 Agreements ('S106s')

The council will seek to negotiate S106s, where the S106 'tests' are met, for:

- The provision of infrastructure projects or types not specified on the R123 List (through either financial contributions or 'in kind' delivery); and
- Non- 'infrastructure' provisions, such as affordable housing (see policy H03) and S106 monitoring expenses.

CIL and S106 contributions collected in the borough will be used to fund the provision of infrastructure required to support development in the borough.

The council's CIL rates were tested through an examination in public and have been set at a rate which would not threaten the viability of development in the borough. The CIL rates were tested through an examination in public and have been set at a rate which would not threaten the viability of development coming forward in the borough. The CIL Charging Schedule was adopted in May 2015 and took effect on 1st September 2015. Alongside CIL, the council will negotiate for planning obligations that meet the necessary tests and these must also not threaten the viability of development coming forward.

Development contributions in the form of CIL and section 106 agreement payments will help to ensure the provision of necessary physical, social and green infrastructure to meet the needs of planned growth. This will help to maintain and possibly enhance levels of equity and social justice.

Contributions for necessary infrastructure could include health facilities and infrastructure to promote healthy lifestyles such as sports facilities, cycle and pedestrian pathways and improvements to parks, natural areas and open spaces.

Health outcomes for the local population are likely to improve if this infrastructure is provided.

Development contributions may be used to provide necessary education infrastructure in line with projected needs in the borough, thereby contributing positively to the education and skills sustainability objective.

Section 106 contributions will be used to provide affordable homes in the borough and this will have a positive effect on the affordable homes sustainability objective.

Provision of infrastructure, particularly social infrastructure, as part of development schemes is also likely to impact positively upon local resident's sense of community and their sense of social cohesion.

POLICY	SUSTAINABILITY OBJECTIVES											
Planning contributions and infrastructure planning	Social justice	Health	Education & Skills	Affordable homes	Social cohesion	Satisfying work	Heritage	Reduce pollution	Transport effects	Careful consumption	Climate change	Sustainable economy
Proposed Policy : <i>See policy wording above.</i>	✓	✓	✓	✓	✓	✓	0	0	✓	0	✓	0

Assessing secondary, cumulative and synergistic effects

The Planning Contributions and Infrastructure Planning policy is anticipated to contribute positively towards the Local Plan's strategic objectives including: objective 5– which seeks to increase supply of housing, particularly affordable housing for local residents, and 4 – which seeks to provide a range of high quality facilities and services and other community infrastructure. The policy makes reference to spending CIL on infrastructure, this could be social, physical or green such as new community facilities or provision of new open space and it also refers to section 106 agreements for affordable housing. Using funding to provide the different types of infrastructure will have a positive short to long-term impact on many of the SA objectives.

Conclusion of Individual Local Plan Proposed Submission Policy Assessments- Cumulative Effects

Whilst for any one single development management or regeneration area or site policy, the proposed policy might elicit a favourable sustainability comment, when policies are considered together the overall assessment of significant impacts may be different because of tension between specific policy objectives. In this context, the provision of housing, schools, workplaces, health centres, recreation centres and new shopping undeniably results in a sustainable positive outcome for local people and the quality of their lives, however any strategy that is based on 'regeneration through development' will also have wider and deeper environmental impacts, both locally and further afield.

Development inevitably consumes non-renewable resources in the form of land take, construction materials (including all forms of aggregates), energy and water. It also results in the generation of waste. The impacts of transport infrastructure and other requirements of modern living such as telecommunications infrastructure also have an effect on environmental sustainability. Despite the detail and apparent objectiveness of the SA approach now required to be applied to Local Plans and other such documents, the difficult target of 'achieving sustainable development' remains. There is a natural tension between the growth agenda and the environment, with short-term environmental impacts versus the long-term gain. However, the provision of new development in sustainable locations such as town centres with good transport accessibility, or in regeneration areas where there is the opportunity for master planning, can reduce environmental impact and result in the likelihood of a more sustainable development.

The Hammersmith and Fulham Local Plan particularly promotes new housing with a target of 1031 dwellings a year up to 2025. Although the provision of housing and supporting infrastructure scores positively against the majority of sustainability objectives, the impact on the environmental objectives will be dependent on the location of the new housing and the manner of implementation of associated policies, such as those dealing with green infrastructure, energy or flood risk.

In general, the locational policies and the development management policies of the Local Plan offer the opportunity to ensure that the environmental impact of housing provision (and other major development) is minimised by ensuring development is in the right place as well as meeting high standards of efficiency and sustainability. The council's Planning Guidance SPD (July 2013) also provides detailed guidance on sustainable construction and design and should be updated and renewed to support the Local Plan.

Appendix 2: The Sustainability Appraisal Framework – objectives and monitoring indicators

Topic	Headline Sustainability Objective	Sustainability sub-objective	Indicators measuring the sustainability 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 	<ul style="list-style-type: none"> • Index of Multiple Deprivation (IMD)
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 	<ul style="list-style-type: none"> • All age, all causes mortality rate (SMRs) • Obesity among primary school age children in year 6 • Adult participation in sport
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 	<ul style="list-style-type: none"> • Achievement of 5 or more A* - C grades at GCSE or equivalent including English and Mathematics
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 	<ul style="list-style-type: none"> • Number of net additional dwellings granted permission and completed (total, regeneration areas and rest of the borough) for current year and since the policy was first published, adopted or approved. • Net additional affordable homes permitted and completed by tenure for the current year and since the policy was first published, adopted or approved Proposed units from conversions with 2 or more bedrooms

			<ul style="list-style-type: none"> • Number and % of homes granted permission that are wheelchair accessible in developments providing ten or more residential units • % of homes granted permission achieving Lifetime Homes standards • % of homes permitted meeting the Code for Sustainable Homes Levels 3,4,5 and 6
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 	<ul style="list-style-type: none"> • Net change in D2 use class floorspace • Number of total offences in the borough
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 	<ul style="list-style-type: none"> • Overall employment rate • Working age people on out of work benefits • Working age people claiming out of work benefits in the most deprived areas of the borough
Heritage	7.Improve the local environment and preserve and enhance the setting of heritage assets	<ul style="list-style-type: none"> • Conserve and enhance the setting of heritage assets including 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 	<ul style="list-style-type: none"> • % of conservation areas with up to date conservation area statements/management plans • Proportion of designated Heritage assets (including building at risk, conservation areas and scheduled monuments) • Length of riverside walk • Net change in total area of public open space • Net change to areas of nature conservation interest • Number of planning applications that include

			<p>any of the following measures to protect and/or enhance biodiversity:</p> <ul style="list-style-type: none"> - Green or Brown roofs - Living walls - Native planting schemes - Bird and/or bat boxes
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 	<ul style="list-style-type: none"> • Number of times the level of pollution exceeds the guide limits for PM10 and NO2 • Number of planning permissions granted where Health and Safety Executive (HSE) objected
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 	<ul style="list-style-type: none"> • Method of children's travel to school (5-16 year olds) • Number of planning permissions involving Transport Impact Assessments • Cycle parking provision in permitted development schemes
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 	<ul style="list-style-type: none"> • % of household waste sent to recycling
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 • 	<ul style="list-style-type: none"> • Per capita CO₂ emissions in the borough • Number of developments permitted where on-site renewable energy generation is integrated • Number of properties permitted connected to decentralised energy networks • Types and number of SuDS measures approved for installation

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 	<ul style="list-style-type: none"> • Percentage of frontage in A1, A2 and other use classes in frontages identified in policy C2 • Percentage of frontage in A1, A2 and other use classes in the non-prime frontage areas • Percentage of frontages in non-A1 use; percentage in A3, A4 and A5 uses in frontages identified in policy C4 • Percentage of frontage in non-A1 use; percentage in A3, A4 and A5 uses non-designated parades and clusters and corner shops • Proportion of vacant shopping frontages in retail designations • Employment land available by type • Amount of permitted/completed employment floorspace (by type, regeneration areas and rest of the borough) • The business stock
---------------------	-----------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Appendix 3: Policies, Plans & Programmes

International
Conservation of Natural Habitats of Wild Fauna and Flora Directive 92/43/EEC
The Wild Birds Directive 2009/147/EC
The Convention on Biological Diversity 93/626/EEC
The EU Water Framework Directive 2000/60/EC
Ambient air quality assessment and management Directive 1996/62/EC
Limit values for sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air Directive 1999/30/EC
Air Quality Directive 2008/50/EC
Environmental Noise Directive 2002/49/EC
Approval of the Kyoto Protocol on Climate Change Decision 2002/358/EC
Allocation of emission levels under the Kyoto Protocol Decision 2010/778/EU
Landfill Directive 1999/31/EC
EU Renewable Energy Directive 2001/77/EC
EU Energy Efficiency Directive 2012/27/EU
EU Floods Directive 2007/60/EC
Pan-European Biological and Landscape Diversity Strategy 2003
Mainstreaming sustainable development into EU policies: Review of the European Union Strategy for Sustainable Development 2009
European Spatial Development Perspective 1999
Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system, White Paper 2011
European Landscape Convention 2000
Proposal for a new EU Environment Action Programme to 2020 - "Living well, within the limits of our planet" 2012
The Johannesburg Declaration on Sustainable Development 2002
Living Planet Report 2012 – Biodiversity, bio-capacity and better choices

National
National Planning Policy Framework (2012)
National Planning Practice Guidance
Housing and Planning Bill (2016)
National Infrastructure Plan (2014)
National Planning Policy for Waste (2014)
The Community Infrastructure Levy Regulations 2010 and amendments 2014
Planning policy for traveller sites 2012
Planning for Town Centres: Practice guidance on need, impact and the sequential approach 2009
Historic Environment Planning Practice Guide to PPS5 2010
Planning for climate change – guidance for local authorities 2012
Good Practice Guide on Planning for Tourism 2006
Localism Act 2011
Public Services (Social Value) Act 2012
'Reuniting health with planning: healthier homes, healthier communities' 2012
UK Sustainable Development Strategy "Securing the Future" 2005
Conservation of Habitats and Species Regulations 2010

Biodiversity 2020: A strategy for England's wildlife and ecosystem services 2011
UK Biodiversity Action Plan (UK BAP) 1994
UK Post-2010 Biodiversity Framework 2012
Transport White Paper – "Creating Growth, Cutting Carbon: making sustainable local transport happen" 2011
Draft aviation policy framework 2012
The Wildlife and Countryside Act (as amended) 1981
Sustainable Communities Act 2007 (as amended)
Building a Greener Future- Towards Zero Carbon Development (2006)
UK Energy Efficiency Strategy 2012
Climate Change Act 2008
UK Climate Projections 2009
The Air Quality Strategy (Volume 1, 2007; Volume 2; 2011 2)
Air Pollution: Action in a Changing Climate 2010
National Flood and Coastal Erosion Risk Management Strategy for England
Natural England Corporate Plan 2012-2015
The Code for Sustainable Homes: Setting the Sustainability Standards for new homes 2008
The Code for Sustainable Homes: Technical Guide 2012
English Heritage's Conservation Principles: Policies and Guidance (2008)
English Heritage Corporate Plan 2011 - 2015
The Changing Face of the High Street: Decline & Revival (2013) English Heritage
By Design: Urban Design in the Planning System- Towards Better Practice (OPDM & CABE 2000)
Suburbs and the Historic Environment 2007
Guidance on Tall Buildings (CABE and English Heritage) 2007
Historic Environment Good Practice Advice in Planning (Historic England, 2015)
The Water Resources Act 1991
The Water Act 2003
Flood Risk Regulations 2009
Flood and Water Management Act 2010
Sustainable Drainage Systems- An Introduction (Environment Agency, 2003)
Non-statutory technical standards for sustainable drainage systems, DEFRA 2015
Healthy Lives, Healthy People: Our Strategy for Public Health in England
CLAIRE Definition of Waste: Development Industry Code of Practice 2011
Waste Management Plan for England (2013)
The Plan for Growth 2011
A Practical Guide to the SEA Directive 2006
"The Natural Choice: Securing the value of nature" White Paper (2011)
Planning Policy for Traveller Sites (2012 & 2015)
Circular 01/2006- Planning for Gypsies and Traveller Caravan Sites
Planning Practice Guidance for Renewable and Low Carbon Energy (July 2013)
Laying the Foundations- A Housing Strategy for England (CLG 2011)

Regional- London
The London Plan: Spatial Development Strategy for Greater London 2016
The Mayor's Housing SPG (2016)
The Mayor's Town Centre SPG (2014)
Land Industry and Transport SPG 2012
The Mayor's Green Infrastructure & Open Environments: preparing borough tree and woodland strategies SPG 2013
London Strategic Housing Land Availability Assessment (2013)
London Infrastructure Plan (2015)
The Mayor's Housing Strategy (draft) 2012

The Mayor's Transport Strategy (draft) 2010
The Mayor's Ambient Noise Strategy (2004)
The Mayor's Air Quality Strategy (2010)
The Mayor's Biodiversity Strategy (2002)
The Mayor's Cultural Strategy (2010)
The Mayor's Economic Development Strategy (2010)
The Mayor's Climate Change Mitigation and Energy Strategy (2011)
The Mayor's Climate Change Adaptation Strategy (draft) 2010
The Mayors Sustainable Design and Construction SPG (2014)
Crossrail Mayoral CIL (2012)
Sustainable Design and Construction- April 2014 and the control of dust and emissions during construction and demolition-July 2014
Accessible London: Achieving an inclusive environment (2014)
London Boroughs Gypsy and Traveller Accommodation Needs Assessment (2008)
Shaping Neighbourhoods: Play and Informal Recreation (2014)
London's wasted resource: waste management strategy
London Biodiversity Action Plan 2001
Sub Regional Development Framework for the south sub region (2006)
Thames Waterway Plan (2006-2011)
Thames Corridor Catchment Abstraction Management Strategy (2004)
Thames River Basin Management Plan (2009)
Thames Catchment Flood Management Plan (2009)
The Thames Estuary 2100 Plan (2012)
The Lower Thames Flood Risk Management Strategy (draft) 2010
London Strategic Parks Project (2006)
Transport Assessment Best Practice Guidance (2010)
A New Way to Plan – Travel planning for new development in London (2010)
Managing Freight Effectively: Delivery and Servicing Plans (2010)
The Mayor's Equality Framework (2009)
West London Retail Needs Study Update (2010)
OPDC Draft Local Plan (2016)
Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, Experian (2013)
Local and Regional CO2 Emissions Estimates for 2005-2006 DEFRA

Local
Core Strategy (2011) LBHF
Development Management Local Plan (2013) LBHF
Planning Guidance Supplementary Planning Document (2013) LBHF
Community Infrastructure Levy (CIL) Charging Schedule (2015) LBHF
Affordable Housing Viability Assessment (2016) BNP
CIL Viability Assessment (2015) Peter Brett Associates
Infrastructure Delivery Plan (2016) LBHF
Annual Monitoring Report (2014/15) LBHF
Strategic Housing Market Assessment (2014, 2015 & 2016) LBHF
Retail Needs Study (2016)
Strategic Flood Risk Assessment (2015)
Employment Study (2015 & 2016)
Economic Development Plan (2016-2019) LBHF

Housing Background Paper (2016) LBHF
Five Year Housing Land Supply (2016) LBHF
Open Space Background Paper (2016) LBHF
Tall Buildings Background Paper (2016) LBHF
Strategic Flood Risk Assessment
Surface Water Management Plan (2014)
Leisure Needs Assessment (2009)
Borough Profile (2014)
Earls Court & West Kensington Opportunity Area Joint SPD (2012)
White City Opportunity Area Planning Framework (2013)
South Fulham Riverside Regeneration Area SPD (2013)
Revised Statement of Community Involvement (2013)
Old Oak: A Vision for the Future (June 2013)
Park Royal Opportunity Area Planning Framework (January 2011)
Home Energy Conservation Act (2013)
Thames Strategy Kew to Chelsea.(2002)
Air Quality Progress Report (2014)
Updating & Screening Assessment for Hammersmith & Fulham (2015)
Single Equity Scheme (2009-2012)
Health Joint Strategic Needs Assessment (2013-2014)
Health & Wellbeing Strategy (2013-2015)
Independent Healthcare Commission for North West London (2015) Michael Mansfield QC
Hammersmith & Fulham CCG's out of hospital strategy: 2014/15 progress and plans for 2015/16
NHS Hammersmith & Fulham Strategic Plan (2009-2014) NHS
Alcohol Licensing Strategy 2012-2015
Community Strategy 2007-14
Housing Strategy (2012)
Housing Allocation Scheme (2012)
Homelessness Strategy (2012)
Contaminated Land Strategy 2001
A Transport Plan for H & F (LIP 2) 2011-2031
Air Quality Progress Report and Air Quality Action Plan Review (April 2011)
Biodiversity Action Plan (2004)
Parks and Open Spaces Strategy 2008-2018 (May 2008)
Parks Capital Programme 2013/16 (April 2013)
Open Spaces and Outdoor Recreation Facilities in H&F 2006
Sport and Physical Strategy 2006 to 2012
Hammersmith and Fulham CSPAN Physical Activity Strategy 2011-2016 (November 2011)
A Water Management Policy for Hammersmith and Fulham (September 2013)
Housing Strategy: Building a Housing Ladder of Opportunity (October 2012)
Third Sector Strategy (2009)
Children and Young People's Plan 2009 Review (March 2010)
Schools Organisational Strategy 2012/13 (January 2013)
Community Safety Strategy (2005)
Hammersmith and Fulham Crime Reduction Partnership Plan 2008-2011 (June 2008)
Hammersmith and Fulham Community Safety Partnership Strategic Assessment 2012-1 (April 2012)
NHS Hammersmith and Fulham Strategic Plan 2009-2014 (November 2009)
Better Care Closer to Home. Our Strategy for Coordinated, High Quality Out of Hospital Care. Hammersmith and Fulham. 2012-2015. (October 2012)
Secretary of State for Health Decision on Shaping a Healthier Future (October 2013)
Joint Health and Wellbeing Strategy (Consultation Draft 2013-2015)

Appendix 4: Representations to the SA- draft Local Plan consultation (January 2015)

Environment Agency

creating a better place



Development Plans Team
London Borough of Hammersmith & Fulham
Localplan@lbhf.gov.uk

Our ref: NE/2007/103171/CS-03/IS1-L01
Your ref:
Date: 20 February 2015

Dear Sirs

**Draft Local Plan
Regulation 18 consultation, January 2015**

Thank you for consulting the Environment Agency on your Draft Local Plan, January 2015. We hope that you find these comments useful as you progress with the final document.

This letter sets out what we believe are the key issues impacting on your borough and the policy approaches to take. The advice is suitable for strategic and development management policies. We suggest you use these comments to help ensure you have identified and addressed all the potential impacts of your plan in the associated Sustainability Appraisal (SA). We have referenced useful strategies, plans and evidence to support our advice and have provided links to these at the end of the letter. Please consider this our formal response to your consultation and a checklist to ensure you have covered the key environmental issues at each developing stage of your plan. If you require further advice or feedback about a specific issue or policy please contact me on the number below.

Flood Risk
Hammersmith & Fulham has areas of tidal flood risk from the River Thames in the south of the borough. We are pleased to see that your proposed policy (CC3) builds on the principles outlined in the NPPF (and Planning Practice Guidance) and implements recommendations made within your Strategic Flood Risk Assessment (SFRA).

Developments within areas of flood risk should only be allocated/permitted if the Sequential and, where necessary, the Exception Tests have been passed (see paragraphs 100-102 of the NPPF and Technical Guide). It's essential you consult us on any sequential tests carried out for your plan and we would be happy to provide bespoke advice to assist with this process. Basement dwellings, for example, are classed as highly vulnerable and not appropriate in areas at risk of flooding. Policies and guidance on basement developments will help applicants understand the potential risks, locations to avoid and measures to make developments safe and resilient to any potential flood risks.

As a Lead Local Flood Authority (LLFA) it will benefit you if your policies are informed by your boroughs Surface Water Management Plan (SWMP) and SFRA. We are therefore pleased to see that your policies require developments to adhere to recommendations made within these plans. Sustainable Drainage Systems (SuDS) should be encouraged

Cont/d..



by your policies in line with London Plan Policy 5.13 and Supplementary Planning Guidance: Sustainable Design and Construction. SuDS will help to reduce surface water run-off and reduce the risk of surface water flooding within your borough.

Thames Estuary 2100

As your borough has some frontage of the River Thames your policies should also be informed by the Thames Estuary 2100 plan ([TE2100](#)). You may need to safeguard sites to ensure that necessary flood defence improvement works can be undertaken in the future.

Many communities within London and the Thames Estuary currently benefit from a robust and well organised system of tidal flood risk management but increasing pressures, including climate change mean flood risk is increasing. With climate change we predict that by 2060 we will be closing the Thames Barrier around 50 times a year.

The TE2100 Plan was written and published by the Environment Agency in November 2012. It sets out our recommendations for flood risk management for London and the Thames estuary through to the end of the century and beyond. Policy units (grouped together into Action Zones) describe the existing vulnerability and flood risk management current measures and future options for a specific geographic area along the Thames estuary.

Hammersmith and Fulham is located within the Hammersmith Policy Unit of Action Zone 1 (West London) in the TE2100 Plan. For Hammersmith the TE2100 policy is P5 which is to take further action now or in the future to reduce flood risk beyond that required to keep pace with climate change. This policy recognises the commercial, economic and historic value of West London and justifies an increased standard of protection from the current 1:1000 year level to 1:10,000.

Borough-wide Policy RTC2, access to the Thames riverside and foreshore, states that 'the riverside walk should generally be at least 6 meters wide.... all proposals will need to ensure that flood defences are not adversely affected'. Whilst we support the intentions of the policy, consideration should be given to the future raising of flood defences as this may impact on the path and current access.

Riverside developments should be seen as an opportunity to soften and naturalise river banks at the same time as improve flood defences. We would therefore encourage you to include policies within your plan which makes this a requirement/consideration of any riverside development.

The TE2100 selected policy for the Hammersmith policy unit is P5 'to take further action to reduce flood risk beyond that required to keep pace with climate change.' Although the Thames Barrier will continue to provide tidal flood protection to the same high standard as the rest of London, within 25 years it will no longer be sustainable to use the Thames Barrier to assist with lower order (i.e. more frequent) flood events, particularly for the protection of undefended areas. A higher standard of protection is needed in the form of flood defence raising or realignment with floodplain management. As there is a potentially high risk of pluvial (rainfall) and urban drainage flooding, mitigation measures should be developed in detail which could include improvement of drainage outfalls and flood resilience in affected areas. The requirements of TE2100 need to be reflected in your policies. For further information please refer to the Hammersmith policy unit (page 88) of the TE2100 plan.

Land will be needed to implement the TE2100 Plan, e.g. for flood defence repair, realignment or raising. In many cases land will not be needed for many years into the future so therefore there is a need to safeguard land so it is available when required. We can provide further information about this on request.

Works to defences need to be aligned with other objectives such as recreational use and public access, landscape design, intertidal habitat enhancements and other riverside developments. We encourage all Local Authorities to prepare a planning vision (riverside strategy) which can then be used to inform the design of flood defence improvements; this could be done in partnership with us and neighbouring Local Authorities.

Policy recommendations

The following are the policy messages that need to be included in your Local Plan and/or supplementary guidance so that the recommendations of TE2100 are implemented in strategic planning and new developments.

The Council will work in partnership with the Environment Agency and others to ensure the recommendations of the TE2100 plan are implemented in new and existing developments aiming to keep communities safe from flooding in a changing climate and improving the local environment.

The Council will require developments to reduce flood risk now and in the future and act on the recommendations of Hammersmith Policy Unit of the TE2100 plan. These actions include:

- Safeguarding land beside flood defences where it is expected that defence raising and improvements will be required in the future;
- Maintaining, enhancing or replacing flood defences so they provide adequate protection for the lifetime of development whilst improving the river frontage to provide amenity space, habitat, access and environmental enhancement;
- Safeguarding land and access routes where defence realigning is required and maintaining and improving flood storage areas whilst offering benefits for wildlife and people;
- Ensuring land for secondary defences at vulnerable locations including tube station entrances and critical infrastructure
- The NPPF principles are applied to development to ensure vulnerable developments are appropriately located;
- Flood resilience and resistance is built in where developments are at risk from flooding.

In order to comply with the recommendations of the Thames Estuary 2100 plan, where appropriate, proposed developments will be required to:

- Demonstrate how the tidal flood defences protecting their site can be raised to the required TE2100 levels in the future through submission of plans and cross-sections of the proposed raising;
- Demonstrate provision of improved access to existing flood defences and incorporate anticipated land requirements for future flood defence raising or realignment including access; and
- Raise existing flood defences or realign flood defences to the required TE2100 levels in preparation for future climate change impacts;

- Incorporate landscape, amenity and habitat improvements within any flood defence raising and/or realignment.
- Demonstrate how the risks of pluvial flooding have been taken into account in the design of the development using the recommendations of the Surface Water Management Plan.

Climate Change

Climate change will present significant challenges to the people and environment of your borough. You should therefore consider evidence bases, plans and policies that ensure your borough is resilient to current and future climate change risks.

Planning for Climate Change: Guidance for Local Authorities produced in April 2012 contains helpful guidance and examples of how to incorporate climate change in plan-making. Our Climate Ready service is also a potential source of information as it provides tools and practical information to help businesses and other organisations live with the changing climate.

Water Framework Directive

The Water Framework Directive (WFD) is European legislation designed to protect and enhance the quality of our rivers, lakes, streams, groundwater, estuaries and coastal waters, with a particular focus on ecology. The Environment Agency is the lead authority on the WFD in England and Wales. We are required to plan and deliver actions that will improve our water environment. We have prepared the Thames River Basin Management plan which includes waterbodies within your local authority. For a specific summary of the status of the waterbodies in your borough please refer to the London Borough Environmental Fact Sheet that we have produced on our website.

You are required to help deliver the objectives of the River Basin Management plan and aims to improve the status of waterbodies in your borough. Therefore you should consider recommendations from the Thames River Basin Management Plan and work these into your planning policies as you draft and develop them.

This topic is particularly relevant to your borough because urban diffuse pollution is an issue and measures to address this in line with WFD outcomes should be a consideration.

Biodiversity

Protecting and enhancing biodiversity should be considered throughout any policy document, with native species planting a priority. Green Infrastructure delivers biodiversity benefits and climate change adaptation. Open spaces can be designed to serve as flood storage areas with high biodiversity value if they are located in areas of high risk of flooding or functional floodplain. Buffer zones along rivers in your borough can provide valuable green networks for wildlife, and rivers should be protected and restored to a more natural state to enhance biodiversity. Green spaces and buffer zones can bring about benefits of amenity, biological enhancements, sustainable drainage and reduction in surface/storm water flooding. Green roofs are beneficial for a wide range of wildlife and can also be a valuable amenity space and would ensure policy 5.11 of the London Plan is being met.

You should consider policies that promote opportunities for river restoration through new development as these would also make a significant contribution to meeting the actions in the RBMP.

The natural environment should feature in policies to ensure it is recognised as a priority. Even if the development site would have very minimal impact on the

environment, it should aim to improve the natural environment where it can. This would go towards ensuring policy 2.18 on Green Infrastructure of the London Plan, including planning green infrastructure needs and managing them to realise the value of green and open space to communities is addressed, in addition to Policy 5.10 of the London Plan on Urban Greening.

Water Resources

Hammersmith and Fulham is within Thames Water's London Water Resource Zone – this is classified as 'seriously water stressed.' This means there is a high population with high water demands and limited water availability – it does not reflect water companies ability to supply water. Average water use in Hammersmith and Fulham in 2010-11 was 166.5 litres per head per day (l/h/d) which is above the England and Wales average of 148 l/h/d. Improving the water efficiency of new development should be a priority and as a minimum new development should comply with London Plan policy 5.15 which requires residential development to meet water consumption targets of 105 l/h/d.

Inefficient use of water can lead to unnecessary carbon emissions. Currently water use accounts for 27 percent of all carbon emissions from our homes. Building a house to 105 l/h/d will save 79 kilograms of CO₂ and 15 cubic meters of water per year, per house, over and above building regulations (125l/h/d).

Non-households consume significant amounts of water. In London non-households accounts for 29 percent of water consumption and is therefore an area where further water and carbon savings can be made. The Mayor's Water Strategy (October 2011) notes that 'commercial water efficiency has a significant potential to save water'. We therefore recommend that you consider that new non-household development, including refurbishments, achieve a water efficiency standard, such as BREEAM (BRE Environmental Assessment Method) 'Excellent' with maximum number of 'water credits'. BREEAM credits are awarded for water where water efficient appliances (e.g. low flush toilets), water metering, leak detection systems and water butts are in place. Alternatively buildings could meet the 'best practice' level of the AECB (Association for Environment Conscious Building) Water Standards.

Groundwater Protection & Contaminated Land

Parts of your borough are defined as being sensitive locations for groundwater because they are located within Source Protection Zones 1 or 2 for public water supplies and also secondary aquifers which form an important source of base flow to rivers.

Your policies and site allocations should therefore ensure that groundwater will be protected. You should ensure that only appropriate land uses are located within source protection zones as outlined within our groundwater protection guidance GP3. In addition that any proposed piling methods and sub-water table development do not pose an unacceptable risk to groundwater.

Your policies should encourage redevelopment of sites affected by land contamination. Sites with unacceptable contaminant concentrations should be remediated through redevelopment. For this reason, planning applications for potentially contaminated or contaminated sites within groundwater sensitive areas should be accompanied by a Preliminary Risk Assessment and if necessary a Site Investigation. Including these measures within your policies will contribute to your compliance with the Water Framework Directive.

Ground source heat is a technology that can help achieve the UK's targets for generating energy from renewable source. Your policies should encourage GSHC

schemes to follow our Environmental good practice guide for ground source heating and cooling ([EGPG](#)). This includes assessing and understanding the environmental risks of a proposed scheme and taking steps to reduce the environmental risks. E.g. changes in groundwater availability, flow and quality, mobilisation of contaminants, undesirable temperature changes and localised mounding.

Waste Planning

When developing policies on waste we emphasise the importance of the 'Waste Hierarchy' as set out in Article 4 of the revised EU Waste Framework Directive to maximise the reduction and re-use of waste. Local Authorities should also have regard to the guidance on making waste plans in accordance with the EU Directive, the emerging National Waste Management Plan and National Waste Prevention Plan (see references). The London Plan policies, e.g. 5.16 and 5.17 encourage greater self sufficiency for waste management in London and sustainable transportation of waste which should be considered when developing policies and allocating sites. Our Groundwater Protection Policy (GP3) recommends where waste activities are appropriate and avoiding areas that are groundwater sensitive, e.g. Source Protection Zone 1. The risks of flooding and adapting to climate change should be taken into account when allocating sites for waste facilities and developing policy criteria.

Air Quality

We regulate certain processes under the Environmental Permitting Regulations and support and work closely with local authorities in improving air quality through the UK Air Quality Strategy, Local Air Quality Management and Air Quality Action Plans, especially where these processes may have an impact on local air quality. Your Director of Public Health has to report on air quality (deaths attributable to particulate pollution) under the Public Health Framework. For these reasons, and given that main source of air pollution is frequently transport, we expect relevant local plan policies to reference and link with your Borough Air Quality Action Plan and the Mayor's Air Quality and Transport Strategies.