

LONDON BOROUGH OF HAMMERSMITH AND FULHAM

**PROPOSED SUBMISSION LOCAL PLAN SUSTAINABILITY
APPRAISAL- NON TECHNICAL SUMMARY**

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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

1 NON- TECHNICAL SUMMARY

Introduction

- 1.1 This summary is an overview of the assessment work carried out and explains how the Sustainability Appraisal (SA) ties in with the Local Plan as a whole. The purpose of the SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of planning policy documents. When preparing a Local Plan, it is a legal requirement for a Local Authority to carry out an SA. Under European Directive, local authorities are required to undertake a Strategic Environmental Assessment (SEA) and an 'Environmental Report' must be prepared. Both of these requirements are covered in this report by incorporating both the SA and SEA.

The Local Plan

- 1.2 The London Borough of Hammersmith & Fulham (LBHF) has revised its principal planning policy documents, which will guide development across the borough over the next 20 years.
- 1.3 This revision has resulted in the production of a key strategic planning policy document known 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 document.
- 1.4 This SA has been prepared to support the Proposed Submission Local Plan. Both documents will be published for a 6-week public consultation (Regulation 19) in September 2016.

Summary of the Sustainability Appraisal of the Local Plan

- 1.5 The preparation of the SA for the Local Plan has been undertaken in accordance with best practice guidance and involves five key stages which should be undertaken in parallel with the development of the Local Plan:
- Stage A: producing a Scoping Report which sets out the scope of the SA work to be carried out in relation to the Local Plan
 - Stage B: developing and refining alternatives and addressing effects
 - Stage C: preparing the SA Report
 - Stage D: publishing and consulting on the SA Report and Local Plan
 - Stage E: monitoring

Stage A: The SA Scoping Report (January 2014)

- 1.6 The Scoping Report was the first stage in preparing the SA for the Local Plan. In order to determine the scope of the SA, information was collected and analysed to establish the existing social, economic and environmental characteristics of the

borough. This is known as 'baseline data'. The baseline data can be found in full within the SA Scoping Report (2014) but can be summarised as follows:-

Social

1.7 House prices and private sector rents are well above the west London average in Hammersmith and Fulham, with a high need for affordable housing. The borough is ranked 31st most deprived local authority area in the country with significant pockets of deprivation, particularly in the north of the borough.

Economic

1.8 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. However local employment opportunities are not shared by all residents and so it is necessary to provide the opportunities to access necessary education, training, development and skills.

Environmental

1.9 There are three nature conservation areas of metropolitan importance in the borough, the River Thames, the Grand Union Canal and Kensal Green Cemetery. Many of the boroughs parks and open spaces are subject to nature conservation area designations, with two Registered Parks and Gardens of Historic Interest, namely Fulham Palace's gardens and Bishops Park. However, there is little open space per person in Hammersmith and Fulham and so it is important that new development provides additional open space where possible. Climate change will need to be addressed in the Local Plan, with the use of adaptation and mitigation measures to reduce its impact. A large proportion of the borough is also subject to some risk of flooding and so new development will need to be flood proof and incorporate Sustainable Drainage Systems where appropriate.

1.10 This baseline information was used to identify some of the key sustainability issues facing the borough which the Local Plan must seek to address:

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

	<ul style="list-style-type: none"> • 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 and improve air quality • Ensure a high quality public realm and design • Reduce and mitigate the local causes of climate change • 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.

1.11 A development plan document may be influenced in various ways by other plans, policies and programmes such as those down in legislation. A review of other relevant plans, programmes and objectives which may influence the development of the Local Plan and the SA was undertaken as part of the SA Scoping Report. The full list has been updated and can be found in Appendix 3 of the Submission SA Report (2016).

1.12 Taking all this information into account, an SA framework consisting of a number of SA objectives was established in order to assess the sustainability of the Local Plan policy options. The SA objectives are set out in the table below:

Topic	Sustainability Objective	Sustainability sub-objective
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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

Stage B: Developing and refining alternatives and addressing effects

- 1.13 The next stage included testing the strategic objectives of the Local Plan against the SA objectives in order to identify any potential synergies and inconsistencies between these objectives.
- 1.14 An appraisal of the Local Plan options, including the alternatives was then undertaken against the 12 SA objectives in order to identify likely positive impacts and also to determine whether any negative impacts could arise. The secondary, cumulative and synergistic effects of each of the policy options were also assessed.
- 1.15 The assessment of the Local Plan options against the SA objectives was carried out using the framework below:-

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

Summary of Key Findings and Effects

- 1.16 The assessment of Local Plan policy options informed the preparation of the Local Plan including the Council's preferred strategy and policies for development in the borough over the next 20 years.
- 1.17 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).
- 1.18 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. Overall, the SA revealed that they exhibit a broad commitment to the principles of sustainable development and are largely compatible with the assessment objectives of the SA process.
- 1.19 However, it is the Local Plan objectives to regenerate the most deprived parts of the borough and increase housing where there is most tension with the SA objectives. Nonetheless, the SA considered that in-compatibilities can be reduced and in some cases eliminated, provided that the plan policies are implemented in a sustainable fashion, for example by incorporating energy and resource efficiency measures, making space for biodiversity, ensuring public transport accessibility and avoiding inappropriate development in areas of flood risk.
- 1.20 The Local Plan's preferred 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.

- 1.21 The SA found the Council's preferred approach to regeneration was 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 found no wholly unsustainable policies had 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 through development management.
- 1.22 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 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.
- 1.23 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 policies in the Local Plan are generally sustainable.
- 1.24 Overall, therefore, the strategic objectives, spatial policies, regeneration areas and strategic sites and boroughwide development management policies are generally sustainable. This is to be 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.
- 1.25 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.
- 1.26 The sustainability effects of the Local Plan will largely depend upon the implementation of its policies and so 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.

Mitigation

- 1.27 In order to minimise the negative effects of the proposed policies within the Local Plan, a number of recommendations were made as part of the appraisal process to improve the overall sustainability of the Local Plan and to mitigate any negative effects that may arise. Where appropriate, these recommendations and mitigation measures have been incorporated into the policies within the Proposed Submission Local Plan.

Stage C: preparing the SA Report and Stage D: publishing and consulting on the SA Report and Local Plan

Draft SA and draft Local Plan

- 1.28 Following the assessment of the Local Plan policy options and alternatives against the SA objectives, a draft SA Report was prepared. This outlined the SA process undertaken to date and presented the findings of the individual policy assessments. Reasons for selecting the preferred options and rejecting the alternatives were also given, with recommendations provided where improvements could be made to the policy. This helped to inform the preparation of the policies within the draft Local Plan (the Preferred Strategy) that was published alongside the draft SA for consultation in January 2015.

Submission SA and Proposed Submission Local Plan

- 1.29 Following consultation on the draft Local Plan, a number of changes have been made to the Local Plan policies. These changes have resulted from consideration of consultation responses, updated national and regional planning policy and new evidence gathered by the Council. The policy changes have been appraised by the council and the results are included in the submission SA.
- 1.30 The Submission SA Report will be published alongside the Proposed Submission Local Plan for a further stage of consultation.

Stage E: Monitoring

- 1.31 The Council is legally required to monitor the significant environmental effects of the implementation of the Local Plan with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.
- 1.32 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.
- 1.33 As part of the SA, a monitoring framework was developed with a series of key performance indicators to measure against the SA objectives. This can be found in Appendix 2 of the Submission SA Report (2016)

Next Steps

- 1.34 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.