

Hammersmith and Fulham's response to the Draft London Plan consultation

Chapter 1 Planning London's Future (Good Growth Policies)

We are supportive of the general approach of the Good Growth vision of the Plan. It incorporates many of the objectives that we are seeking to deliver in our own Local Plan.

Chapter 2 Spatial Development Patterns

Policy SD1 Opportunity Areas

We support the ambition of this policy to ensure that Opportunity areas fully realise their growth and regeneration potential. We welcome the fact that the Old Oak Park Royal Opportunity Area has been highlighted on Figure 2.8 – High Speed 2/Thameslink diagram and that the Old Oak Common Station (which will be a major transport hub for the area). We also welcome the accompanying text in paragraphs 2.1.57 – 2.1.59 that outline the fact that the area has been recognised by the Mayor for its regeneration potential. The map on Figure 2.8 is useful in identifying the fact that the Old Oak Park Royal Opportunity Area will generate 25,500 homes and 65,000 jobs. One criticism of the Figure 2.8 map is that the key seems to be incomplete. There is no explanation of what the dark blue hashed lines actually represent, therefore the map key should clarify what this symbol represents.

Figure 2.19

The Strategic Areas for regeneration based on deprivation are confusing as they do not correspond with the council's designated regeneration areas.

We recommend that references are added to the map to indicate the name of the designated regeneration areas.

Policy SD6 Town Centres

H&F object to the rather ambiguous reference to higher density development being specifically encouraged in town centre locations (bullet C). London's town centres vary in their characteristics and many have heritage assets, conservation areas and other sensitivities such as proximity to the river Thames and protected views. This is certainly the case in H&F. On this basis such a blanket approach is un-helpful and the emphasis should be on optimising development sites rather than the emphasis being on seeking higher density development. Particularly as there is no explanation of what higher density is. Surely it varies depending on the make-up of particular centres. This lack of clarity is a concern in town centres that already have high density development as the London Plan is essentially promoting even higher/taller developments.

We recommend that bullet point C is reworded.

Paragraph 2.6.2

H&F support the acknowledgement that town centres need to be flexible and adaptable to future trends and technologies. Whilst this is difficult to quantify and predict in retail studies, it is something that needs to be considered. The supporting text to this policy is however disproportionately weighted in favour of future trends rather than providing explanation for other aspects of the policy.

H&F support the reference to a diverse offer in smaller centres whilst protecting a core of retail. This is the approach that H&F have taken in its local centre policies. It is important however that such diversification is proportionate to the size of the 'smaller centre'. In more isolated, small centres such as neighbourhood centres, the retail element may be the only accessible/walkable retail for certain residents and an over concentration of non-retail in such locations could lead to a lack of amenities for elderly or disabled residents.

We recommend that the GLA address the balance in the supporting text. They should also introduce a reference to the importance of neighbourhood centres in providing accessible retail.

Annex 1 Town Centre Network

Table A1.1 on Town Centre Networks proposes that the current town centre designation for Shepherds Bush which is a Metropolitan centre should be re-designated as an International centre. We welcome this proposed change in classification as we feel that it accurately represents the current scale and operation in which the town centre currently operates.

Policy SD10 Strategic and local regeneration

As the OPDC is a Mayoral Development Corporation, the OPDC is required to replicate the London Plan policies in their emerging Local Plan. We do not feel this is appropriate, the OPDC operates at a strategic level but is reliant upon local evidence and has an important role locally in terms of providing local housing and employment opportunities. Ultimately, the OPDC do not operate at a London wide scale and are likely to overlook important local evidence in order to justify London-wide policy.

Chapter 3 Design

There is more emphasis on safety, security, emergency, fire safety and noise to ensure that measures that address this are integrated into the design of a development and not retrofitted - this is considered beneficial.

However, given that the plan is meant to provide strategic direction there is too much emphasis and detail on the process local authorities should follow in terms of plan-making, management and delivery compared to the current plan. There is great

variety across London's many boroughs and each one should be allowed to exercise some degree of discretion in respect of what processes would work best for them and their residents. For example, in Policy D2 the text under criteria E to H is too prescriptive and strays from strategic advice.

Policy D1 London's form and characteristics

Under A *The form and layout of a place should*: there is no mention of the impact on townscape. We suggest inserting an additional point near the top: "positively contribute to the townscape character"

Under A 7): add "environmental benefits" of green and open spaces

Under A 9): add "adverse wind conditions", also in para 3.1.3

Para 3.1.7 refers to the new issue of managing deliveries – We are concerned about what this would mean for the design of buildings, in particular in dense urban contexts.

Policy D1 London's form and characteristics: D1

Policy D1 (A)

Development Plans, area-based strategies and development proposals should address the following:

A The form and layout of a place should:

9) help prevent or mitigate the impacts of noise and poor air quality

The design of building in areas of poor air quality can minimise the exposure of future residential occupiers to poor air quality.

Suggested change to text

Recommended revised text of point A (9):

Help prevent or mitigate the impacts of noise and poor air quality by ensuring the habitable rooms (Bedrooms, Living Rooms) and external amenity area's including balconies are orientated away from the main sources of poor air quality and noise e.g. busy roads.

Underline represents additional text that is recommended to be added.

Policy D2 Delivering good design

Under H *Maintaining design quality*: how would this affect outline applications? The policy should either discourage outline applications, or emphasise the need to agree detailed design codes with the council before approving outline applications.

H1 - The reference to “construction details” should be clarified, particularly in relation to outline schemes where such details might not be available

Policy D6 Optimising housing density

In general, the scrapping of the density matrix is welcomed as it places emphasis on a design-led approach that takes account of new or proposed infrastructure links that is more appropriate to local contexts.

Under A 1) in respect of ‘site context’ the constraint on optimising density will nearly always be the impact of increased massing on the local townscape and any impacts on heritage assets. It is suggested that the bullet point should be expanded to reference this. 1) the site context, add: “in particular the local townscape character and heritage assets”.

Policy D8 Tall Buildings

This new policy omits reference to the benefits of clusters of tall buildings in areas which are identified as being appropriate for tall buildings.

In terms of tall buildings supporting legibility, the previous plan was useful in identifying the central activity zone, opportunity areas and town centres as the types of locations which could support tall buildings. The previous plan also made reference to points of “civic or visual significance” which again is useful in encouraging tall only on those sites where there are good townscape arguments for doing so. These points have not been carried through to the new plan.

The draft policy makes reference to stand alone towers which should rarely occur if councils have identified areas of their borough for tall buildings.

The concept of “wayfinding” in the new policy needs to be clarified.

D8 C 2 b): relating to building servicing. It should be added that building servicing should be fully integrated into the building to avoid harm to the relationship between the building and external spaces and to the characteristic urban grain.

D8 D: Publicly accessible areas within the buildings are still encouraged but there is no reference to the upper floors. It should include to integrate publicly accessible areas at ground and roof levels so that the public also has a benefit from a building form that has such a high impact on surrounding public and private spaces and buildings.

Policy D9 Basement development

H&F welcome support from the Mayor on the issue of basements, but question whether there is any need for this brief policy given that London boroughs will be applying and developing their own policies on this matter. If the Mayor is keen on reducing the size of the London Plan and focussing on key strategic issues across London then this is one such policy that could be removed from the plan.

We recommend that this policy should be deleted. However, if the policy is retained we comment as follows:

Under A – this policy only deals with the negative impacts of large-scale basement development beneath existing buildings, however large-scale basement development as part of new build schemes can have similar impacts on the local environment and residential amenity. This policy should also deal with large-scale basement excavation beneath gardens and open space, which can have an especially harmful impact on biodiversity and the local environment.

Para 3.9.2 should include reference to potential impact of basements on the historic environment and local townscape character.

The reference to ‘affordable’ in para 3.9.3 should be removed, it is inappropriate and unnecessary and no definition of ‘affordable’ has been provided. Our experience suggests that basement excavation is not an affordable option for most Londoners.

Para 3.9.4 refers to large-scale basements as potentially including those which extend significantly beyond the existing building footprint, if this is the intention then the wording of A should be amended in order to include it within the scope of the policy.

Policy D11 Fire safety

There seems to be a lack of information regarding how the Fire safety policy will be regulated. We appreciate that with the advent of the tragedy at Grenfell that fire safety standards need to be tightened but we do not feel that it should be the responsibility of Planning officers to check fire safety standards as they do not possess the necessary expertise or knowledge. This requirement puts added stress on already stretched resources at local authorities. What resources and expertise will the Mayor offer as it shouldn't be left to individual council planning departments to resource?

Chapter 4 Housing

Policy H1 Increasing housing supply

The London Plan proposes an annual housing target of 1,638 homes for LBHF. This is an uplift from previous years. Officers are concerned that the higher housing target

is unachievable, despite having an ambitious housing and regeneration strategy, and will impact the Council's ability to negotiate for larger sized dwellings across all tenures.

Another concern regarding this policy is the fact that the Government has now introduced its Housing delivery test. This will be used as a measure to ensure that local authorities are held accountable to delivering new homes in their areas. The Housing delivery test will also highlight whether the number of homes being built by an authority is below target, put into place mechanisms to establish why this is the case and then if necessary create a policy approach that would ensure that further land will become available to accommodate new homes.

The main problem with the Housing Delivery test is where local authorities are deemed to be under delivering in terms of building new homes, there are penalties imposed on them such as placing the presumption in favour of sustainable development in an area. This places additional emphasis on the need to for planning permission to be granted.

We would like assurances from the GLA that themselves and the Government will work collaboratively with each other to ensure that if local authorities miss their yearly housing targets that the GLA has set, then there will be no penalties imposed on them.

Policy H2 Small sites

Although it is appreciated that utilising small sites more effectively is necessary to make provision for more homes in London, Hammersmith and Fulham are concerned that the methodology in relation to small sites policy was not consulted on. This has major implications as our borough had a small sites target imposed upon it and have no method of challenging the assumptions made with regards to the target as they do not know how those figures were calculated. As the small sites figure forms such an integral part of the overall housing target for boroughs, we feel that it is important that boroughs are consulted on its methodology, even if this is done retrospectively. We urge the GLA to look at this request urgently as we feel that it undermines the "Soundness" of the Draft London Plan overall as a key segment of the policy was not consulted upon. Officers are concerned that whilst a large proportion of housing delivery outside of the Regeneration Areas is from conversions; by introducing a specific policy on this, this may put greater pressure on conversions to come forward, and the borough may lose existing larger dwellings.

Also of concern is the site selection process for the Strategic Housing Land Availability Assessment (SHLAA), and the restriction on the ability of London boroughs to be able to delete sites that had nil possibility of being brought forward. Instead, the option of applying a low probability cumulatively over the large quantity of sites has inflated the overall targets for the Borough.

Policy H2 Small Sites parts D and F

Twenty-five units is too large a threshold, and a presumption in favour wouldn't respect the complexity and neighbourliness of developing in a dense urban environment. A specific or more detailed design code will be needed for designated conservation areas otherwise they should be added to F as an exclusion.

We recommend that the threshold is reduced to 10 units for presumption in favour of development.

Policy H2 Part H

This is an acceptable position, but London wide guidance should be provided on how best to calculate the off-site calculation – to avoid inconsistencies between boroughs and to avoid any 'race to the bottom' in setting of contributions.

Paragraph 4.5.8

How boroughs choose to account for this funding should be at the discretion of each borough. Nominations arrangements will need to be reciprocal for offsite out of borough pooling of contributions.

Policy H6 Threshold approach to applications – Part B2 and paragraph 4.6.5.

The 50% threshold for public sector land is supported, however the need for grant or not, needs to be contextualised by the 'in the round' ask of social infrastructure on particular sites – there may be other drivers alongside affordable housing, including, civic, health schools, that may place demand on use of land value and where additional grant may be required to deliver the appropriate level of affordable housing.

Policy H13 Build to Rent

A stronger protection of affordable units within BTR schemes is needed beyond the mayor's strong preference for London living rent and must explicitly rule out discounts set by reference to the market rent elsewhere in the block. Setting by reference to incomes is preferred. Recent experience of market rent 20% below market has not been adequate to meet the needs of those requiring intermediate products.

Affordable housing must be at a discount to the market rent which will be set at a maximum of London Living Rent, and which also must include rents at a discount greater than London Living Rent.

Suggested change to text Policy H13 Build to Rent Part C:

"For Build to Rent schemes to follow the fast track route they must deliver at least 35% affordable housing, of which at least 30 % should be at a London Living Rent level, with the remainder being at a range of discounts below market rent agreed with the borough, but which must be below London Living Rent and affordable to households on incomes of £60,000 or less".

Policy H6 Threshold approach to applications

The London Plan proposes a 50% Affordable Housing target with a 35% threshold approach whereby applications that achieve 35% or above, meet the relevant tenure mix, and infrastructure requirements are not required to provide a viability assessment. Officers generally support this approach. However, policy should stress affordable means accessible to local residents and it should acknowledge that affordable thresholds at local level should prevail.

Policy H10 Redevelopment of existing housing and estate regeneration

Paragraph 4.10.05

H&F object to the lack of distinction in this paragraph between estate regeneration schemes where complete redevelopment is being considered and estate renewal projects where estates are retained, uplifted and improved. The London Plan should be looking to lend support for estate renewal projects in addition to or instead of complete redevelopment projects.

H&F support the emphasis in this paragraph on making sure that the housing is being genuinely re-provided and that no better option is available. We agree that the impact of estate regeneration schemes on existing residents is particularly important and that information about the viability of schemes is available to the public even where a high level of affordable housing is being delivered. However, the paragraph should be encouraging boroughs to scrutinise development proposals for estates carefully rather than relying on the Mayor to do so

Suggested change to text

Introduce distinction between estate regeneration and estate renewal and should provide encouragement of estate renewal projects.

Policy H12 Housing size mix

There is a lack of a family housing target in the Plan, and the Housing Mix policy does not support boroughs identifying a housing split for market and intermediate housing. This does not align with the Council's objective to provide a range of housing opportunities for families in the borough. We therefore believe that this policy is unhelpful as it undermines the council's ability to set up a housing mix that will meet its housing needs.

Chapter 5 Social Infrastructure

Policy S1 Developing London's social infrastructure

The London Plan policy, S1, is the broad policy on all social infrastructure types with dedicated policies on Education and Health. S1, however, does not have any regard to future need or demand for these types of social infrastructure. Officers consider this an important consideration and should apply to all social infrastructure.

Policy S2 Health and social care facilities

We appreciate the need to review how best to make use of land and buildings to improve service delivery but there is a lack of detail in relation to the Mayor's reference to use of the London estate, especially the NHS London Board Estate. There should be no doubt left in the policy wording that cutting back on health and social care facilities and provision is unacceptable and no decisions are to be taken without agreement from local councils and residents.

We have recommended that the following text should be amended in Policy S2 Health and social care facilities:

- A. Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:
 1. identify and address local health and social care needs ~~within Development Plans taking account of NHS Forward Planning documents and their~~ related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
 2. understand the impact and implications of locally accountable plans for integrating services to benefit local residents. ~~service transformation plans and~~ Base new models of care on current and future populations and needs to inform health infrastructure provision ~~and in order to~~ maximise health and care outcomes.
 3. regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues.
 4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision.
 5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses, except where this would result in reduced levels of acute care provision for local residents.

- B. Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be locally accountable and supported.

- C. New facilities should be easily accessible by public transport, cycling and walking.

We also suggest the following amendments to these related paragraphs:

Paragraph 5.2.2

The NHS Five Year Forward View identifies the need to **prevent avoidable illness** and **transform the way that care is organised and delivered** in order to meet increasing demands for healthcare within the resources available. It describes the following priorities:

- supporting and enabling individuals to take better care of their own health and the health of their families and communities.
- undertaking a higher proportion of healthcare in the community where appropriate rather than hospital settings.
- making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, to keep pace with the growing population and demand. This may ~~which~~ require a mix of investment and dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate accessible by public transport, cycling and walking for local people.
- ensuring that models of care change and continuously improve ~~evolve~~
- ensuring that existing and planned new health infrastructure supports local democratic accountability and facilitates change.

Paragraph 5.2.4

Sustainability and Transformation Plans (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area. LBHF and Ealing Councils did not agree with the NWL STP plans for reductions in local acute hospital capacity and challenged the evidence submitted in the Strategic Outline Case Part 1 (SOC1) business case. The NHSI rejected the business case because of its unrealistic estimates of achieving reduced hospital admissions.

Paragraph 5.2.7

Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of **efficiency savings, service reconfiguration and small adjustments in capacity**, for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that **new primary and community facilities or acute capacity will need to be provided**. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions.

Paragraph 5.2.9

Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved capacity, facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies). Whilst the London Estates Board provides a single forum for discussions it cannot override the local democratic accountability and engagement required in decisions about local borough NHS estates and hospitals.

Our main objective is to safeguard Charing Cross hospital and its facilities for the foreseeable future. We feel that this paragraph undermines our ability to achieve this ambition.

Policy S2 Health and social care facilities: S2

Policy S2 (C)

“New facilities should be easily accessible by public transport, cycling and walking.”

The design of building in areas of poor air quality can minimise the exposure of future vulnerable users of health facilities to poor air quality.

Recommended text for point (C)

New facilities should be easily accessible by public transport, cycling and walking. To Help prevent or mitigate the impacts of noise and poor air quality on these health and social care facilities any habitable rooms and external amenity areas are orientated away from the main sources of poor air quality and noise e.g. busy roads

Underline represents additional text that is recommended to be added.

Policy S3 – Education and childcare facilities

Paragraph 5.3.12

The introduction of the last sentence at the very end of this paragraph: ‘*Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities*’ is not reflected within the policy wording itself and seems to have been dropped in. Without fuller explanation and qualification it is open to abuse and could help facilitate the net loss of potential social infrastructure via the redevelopment of school sites with housing and schools on a reduced site. This sentence should therefore be qualified to clearly establish

the requirement that there should be no net loss of the education and childcare facilities.

Policy S3 Education and childcare facilities: S3

Policy S3 (B) and 5.3.10

B Development proposals for education and childcare facilities should:

- 1) locate facilities in areas of identified need
- 2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling
- 3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances
- 4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling.
- 5) maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures.
- 6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities
- 7) ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach.
- 8) ensure that facilities incorporate suitable, accessible outdoor space
- 9) locate facilities next to parks or green spaces, where possible
- 10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand

Poor Air Quality has a major impact to the health of the most sensitive child receptors. The design of educational building in areas of poor air quality can minimise the exposure of users of the facilities to poor air quality.

Revised text for Point B (3):

Help prevent or mitigate the impacts of noise and poor air quality on the Classrooms, Playgrounds (and other external amenity areas), Entrances by ensuring they are orientated away from the main sources of poor air quality and noise e.g. busy roads.

Policy S5 Sports and recreation facilities: S5 –

Policy S5 (B)

B Development proposals for sports and recreation facilities should:

- 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling.
- 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities.
- 3) support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.
- 4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

Poor Air Quality has a major impact to the health of the users of sports and recreational facilities. The design of these facilities in areas of poor air quality can minimise the exposure of users of the facilities to poor air quality.

Suggested text for change

Insertion of text for new point B (5)

Help prevent or mitigate the impacts of noise and poor air quality by ensuring they are orientated away from the main sources of poor air quality and noise e.g. busy roads

Chapter 6 Economy

Policy E3 Affordable workspace

Safeguarding and growing the supply of low cost work space is a positive move that will benefit small businesses and entrepreneurs as it gives them the opportunity to compete in a diverse economy and will enable them to use affordable workspace to achieve this.

Officers support the inclusion of policies on low cost business space as well as affordable workspace into the Draft London Plan as they should support the council's own aspirations.

The commitments on affordable workspace, however, are in the main too vague and passed down to boroughs. We expect to see this and related policy backed up by an SPG that gives weight to borough needs and consistency so individual councils aren't played off against each other. An obvious area to promote affordable workspace and new co-working space in particular would be around commercial and transport hubs like Hammersmith town centre.

Policy E4 Land for industry, logistics and services to support London's economic function

Criteria C seeking no net loss of industrial floorspace within designated SIL and LSIS – the supporting text should highlight that land capacity and land values will prevent new industrial floorspace in more central areas like H&F and intensification and co-location is likely to be the most feasible and viable option to securing no net loss in SIL and LSIS. And that practical strategies will be needed to overcome the challenges of land assembly given the fragmented ownership in many SIL and LSIS and varying lengths of leases.

Policy E11 Skills and opportunities for all

We agree with the ambition of this policy to develop an effective and responsive skills system through the Skills for Londoners Taskforce. The overall objective will be to equip Londoners with the skills that employers require and give them access to jobs and other opportunities that will enable them to contribute to London's economy. The intention of this policy is to address low pay in work and to create apprenticeships and other education and training initiatives which will especially tackle youth unemployment and will give Londoners as a whole better opportunities of securing work across several sectors.

The move towards greater focus on completion, quality and sustainability of any opportunities created via s106 processes is very welcome as often agreements are more concerned with volume and miss on meaningful collaboration with developers and their supply chains to enable sustainable positive impact on local communities; it is also encouraging to see that cross-borough working and the sharing of apprenticeship opportunities (depending on the type of development and the length of build), is also included as very often this is a barrier to completing apprenticeships and skills opportunities if limited to one site in a particular borough. We would like to see more 2-year apprenticeships at levels 3 & 4 in both construction and non-construction, linked to employment opportunities with contractors working on other sites in London. With the already chronic skills shortage in London that could potentially worsen with the advent of Brexit. Developers and contractors should work with boroughs to evolve systems of retention for qualified apprentices. There should be strong policy encouragement of local procurement opportunities from developments especially where SMEs are concerned.

Chapter 7 Heritage and Culture

Greater emphasis should be given to the overriding context that London's heritage assets make a significant contribution to the City's culture and that they should be conserved. Greater weight should be given to their preservation with wording consistent with the NPPF.

Policy HC1 Heritage conservation and growth

Under C – the phrase ‘should conserve their significance, by being sympathetic to the assets’ significance’ is not compatible with the NPPF or current legislation. In the language of the NPPF a heritage asset can only be conserved if it is protected from harm. The term ‘sympathetic’ is poorly chosen and ‘by being sympathetic to the assets’ significance’ should be removed since it is unnecessary.

Under C – the phrase ‘and appreciation within their surroundings’ is poorly chosen and should be replaced by ‘including their setting’. The setting of a heritage asset may not simply relate to its immediate surroundings but also a wider setting including longer views. In addition, in the case of a listed building or conservation area the significance of a heritage asset can be appreciated from inside it as well as from its surroundings.

Policy HC6 Supporting the night-time economy

We support the ambition of this policy to promote the growth and diversification of the night time economy. London is an extremely vibrant city, with world-class entertainment, restaurants, and nightlife covering a variety of locations and addressing a wide selection of audiences. The existing night time economy is thriving and the introduction of the night tube has ensured that both Londoners and visitors alike can enjoy the city for longer at the weekend and have a relatively secure mode of transportation.

Late night public transport should be extended and the frequency improved to facilitate safer and more attractive night time activity.

All night and late-night stores are increasing across the capital, addressing changing consumer and working habits together with flexible lifestyles. Twenty-four hour businesses should be to the benefit of the local community, and not a nuisance. As such, the mayor should ensure there is a market demand for this and that any changes reflect the feel of the local community and their wishes. We should also work to improve existing opening/operating times.

Chapter 8 Green Infrastructure and Natural Environment

Policy G2 London’s Green Belt

We object to the Mayor’s approach to Green Belt is not in conformity with national planning policy. National planning policy allows authorities to review and amend Green Belt boundaries, including removing sites from Green Belt designation. The Mayor’s approach does not allow any de-designation, going further than the NPPF. The continued restriction upon London Green Belt places additional pressure for inner London boroughs to deliver high density housing where open space, employment facilities, community facilities are already under pressure. This inevitably further perpetuates high land values across London.

Policy G4 Local green and open space

The ambition of this policy is welcomed especially with regards to opposing the loss of green and open spaces in areas of deficiency. The policy also promotes the creation of new areas of publicly accessible green and open space in areas of deficiency. Green and open spaces provide a wide range of positive benefits in relation to the social, health and environmental well-being of people and places and we support the fact that the Mayor recognises that they are a vital component of London's infrastructure.

Chapter 9 Sustainable Infrastructure

There are two areas where policies in the Draft London Plan have not been carried forward from the current adopted Plan, Contaminated Land and Sustainable Design and Construction. These policies are vital for the continued proper assessment and mitigation of contamination on development sites and for ensuring major developments achieve the highest possible levels of sustainability in their design, construction and operation. We are surprised that these issues are not covered in the Draft London Plan and we recommend that these policies are reinstated as they play an important role in achieving environmental objectives.

Policy S11 Improving air quality: 9.1.11 –

“Further **guidance** will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts”.

Guidance should be expanded to provide information on what design solutions would be considered appropriate to utilise for developments where air quality is a concern/ restriction on development: This will ensure a consistent approach throughout London.

Additional guidance is welcomed and should also include guidance on appropriate design solutions that are specifically geared towards the London air quality environment. This will ensure a consistent approach throughout London and proportionate to the air quality environment. These design solutions could incorporate more technologically advanced solutions, there should be further detail on how the sensors detailed in 9.1.4 could drive technological solutions to improving air quality. In areas that exceed air quality legal standards, sensors could be utilised to inform residents to close windows at times of poor air quality. The additional guidance should signpost Freight and Servicing Policy T7 which discusses impact of personal deliveries by new developments. Facilities required to prevent missed deliveries etc.

Suggested text to change

Revised text included in 9.1.11

Further guidance will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts

and suitable design solutions development proposals can utilise when air quality is identified as a concern.

Underline represents recommended change to text

Policy SI1 Improving air quality: 9.1.8 –

Air Quality Focus Areas (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO₂) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. There are currently 187 AQFAs across London (Figure 9.1). The list of Air Quality Focus Areas is updated from time to time as the London Atmospheric Inventory is reviewed and the latest list in the London Datastore should always be checked.

The council would welcome the opportunity to be involved in future revision of Air Quality Focus Areas.

Suggested change to text

Revised wording to text

Air Quality Focus Areas (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO₂) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. There are currently 187 AQFAs across London (Figure 9.1). The list of Air Quality Focus Areas is updated from time to time as the London Atmospheric Inventory is reviewed *and London boroughs consulted* and the latest list in the London Datastore should always be checked.”

Policy SI1 Improving air quality: 9.1.4

“For major developments, a **preliminary AQA** should be carried out before designing the development to inform the design process. The aim of a preliminary assessment is to assess: The most significant sources of pollution in the area
Constraints imposed on the site by poor air quality
Appropriate land uses for the site
Appropriate design measures that could be implemented to ensure that development reduces exposure and improves air quality.”

This is welcomed, and supports a much-improved approach to development in areas of poor air quality. Frequently, still, the design is at an advanced stage before any consideration of a poor air quality environment, which constricts design solutions available.

Policy SI1 Improving air quality: 9.1.3

“For larger-scale development areas such as Opportunity Areas, or those large enough to already require an Environmental Impact Assessment, there should be an

aim to be Air Quality Positive by implementing measures across the area that will actively reduce air pollution. This could be achieved, for example, by the provision of low or zero-emission heating and energy, or improvements to public transport, walking and cycling infrastructure, and designing out features such as street canyons that prevent effective dispersion of pollutants. Data from the use of smart

infrastructure such as sensors could contribute to beneficial design solutions. “

Welcome the inclusion of air quality positive and designing out street canyons. This would support a statement on benefits of improving air quality further than to meet the air quality legal standards discussed previously with regard to point 9.1.2.

Revised wording

For larger-scale development areas such as Opportunity Areas, *and major developments* or those large enough to already require an Environmental Impact Assessment there should be an aim to be Air Quality Positive by implementing measures across the area that will actively reduce air pollution. This could be achieved, for example, by the provision of low or zero-emission heating and energy, or improvements to public transport, walking and cycling infrastructure, and designing out features such as street canyons that prevent effective dispersion of pollutants. Data from the use of smart infrastructure such as sensors could contribute to beneficial design solutions.

Policy SI1 Improving air quality: 9.1.2

“For major developments, a **preliminary AQA** should be carried out before designing the development to inform the design process. The aim of a preliminary assessment is to assess: The most significant sources of pollution in the area
Constraints imposed on the site by poor air quality
Appropriate land uses for the site
Appropriate design measures that could be implemented to ensure that development reduces exposure and improves air quality.”

This is welcomed, and supports a much-improved approach to development in areas of poor air quality. Frequently, still, the design is at an advanced stage before any consideration of a poor air quality environment, which constricts design solutions available.

Policy SI1 Improving air quality: SI1

Policy SI1 5)

The council has concerns about this section of the policy:

“Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use. “

Section 5) of the policy could lead to detrimental air quality impacts, building emissions may be reduced by a new development, but new configuration of building/ building density may result in

emissions which lead to greater human exposure to air quality, that is not fully considered/investigated. Section 5 should be removed. Air Quality assessments are essential to ensure other aspects of the policy are complied with.

This section of policy would not be in accordance with the new local plan policy CC10 or widely accepted air quality guidance by Institute of Air Quality Management.

Remove section 5) of the policy.

Policy SI1 Improving air quality: SI1

Policy SI1 (3)

The council welcomes the inclusion of

“The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral. “

Typically, these are areas for which large increases in population are proposed and such as major developments and has the potential to substantially improve exposure to and impact upon poor air quality. It is recommended that major developments should be also be included within this policy

Suggested change to text

Revised wording for SI1 (3)

The development of large-scale redevelopment areas, such as Opportunity Areas, *Major Developments* and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral.

Policy SI1 Improving air quality: SI1

Policy SI1 (4)

Development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance”.

The council welcomes the inclusion of NRMM requirements in the air quality policy.

Suggested change to text

Insertion of text into SI1 (4)

Development sites should explore the use of ultra-low emission technology for NRMM as it becomes available.

Underline represents recommended additional text to be added

Policy SI1 Improving air quality: 9.1.11

‘Further **guidance** will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts.’

Guidance should be expanded to provide information on what design solutions would be considered appropriate to utilise for developments where air quality is a concern/ restriction on development: This will ensure a consistent and proportionate approach throughout London.

Suggested text to change

Recommended revised text for 9.1.11:

Further **guidance** will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts and suitable design solutions, development proposals can utilise when air quality is identified as a concern.

Underline represents recommended change to text

The Mayor’s approach is welcomed as exploration for and use of shales gas is not consistent with the Plan’s policy approach to reducing climate change emissions and minimising environmental impacts of development.

Policy SI1 Improving air quality: SI1

Policy SI1 (A) 2

“Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people.”

The design proposals for air quality should not be restricted to GLA Air Quality Focus Area’s. As there are many areas of exceedance of the air quality objectives and areas of high exposure to poor air quality in the borough wide AQMA for Hammersmith and Fulham that are not currently located within the current GLA air quality focus areas.

Recommended revised text:

Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Developments should be designed so that at a time when

local air quality improves any impact from the development will not be significant to local air quality Particular care should be taken with developments that are in Air Quality Management Area (AQMA) and areas of poor air quality or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people.

Underline represents recommended additional text to be added.

Policy SI1 Improving air quality: SI1 –

Policy SI1

“London’s air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced”

The current opening policy statement does not assert the severity of the air quality challenge posed in London.

Suggested change to text

Recommended revised text

London’s air quality should be significantly improved to as a minimum to comply with current National Air Quality Objectives and where applicable adopt the World Health Organisation (WHO) standards, notably PM10 and PM2.5 this will ensure protection from exposure to poor air quality for all especially for vulnerable people.

Underline represents recommended text for addition.

Policy SI2 Minimising greenhouse gas emissions

The Policy heading refers to “greenhouse gas emissions” but the policies only refer to “carbon” emissions which seems to be an inconsistency.

Suggested change to text

Either the Policy heading should be amended to refer to “Minimising carbon emissions” or the policy should relate to all greenhouse gases not just carbon emissions. Otherwise this could be confusing and be difficult to implement consistently.

Policy SI2 Minimising greenhouse gas emissions

(Section A) - The new target for major developments of being “net zero-carbon” is assumed to provide greater emissions reductions than the current London Plan “zero carbon” approach, so on that basis it is supported. However, we note that the Energy Hierarchy that is used to support the current target has essentially been reproduced – with minor changes – in the new Plan to support the new target. Further

amendments to the Hierarchy should be considered to make it more relevant to the “net zero-carbon” approach.

The current and proposed energy hierarchy of Be Lean-Be Clean-Be Green is currently resulting in the fossil fuelled based energy plant emission sources i.e. CHP being introduced into borough wide air quality management areas. This is resulting in a cumulative impact on background NO2 concentrations.

A key recommendation from the resident lead from H & F commission Air Quality report, 2016 was:

“The Mayor of London to review London’s Climate Change and Energy Strategy to reconcile the potential conflict between decentralised energy and air pollution and cease promoting combined heat and power installations in its energy hierarchy above air quality neutral technologies”.

The new H&F Local Plan Policy CC10 part (e) refers to:

“requiring all decentralised energy schemes to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be prioritised over other air quality neutral technologies”.

The energy hierarchy needs to be revised to encourage and incentivise:

- the uptake of air quality neutral energy technologies
- air quality positive developments
- higher thermal efficiency fabric standards such as Passivhaus, WELL Building Standards, Association of Environment Conscious Building
- Reduction on the reliance of fossil fuelled combustion based energy plant.

Suggested change to text

We request that the Energy Hierarchy needs modifying to better promote the requirements of the new carbon reduction and air quality policies particularly the ‘air quality positive approach’ as stated in part 3 of Policy SI1 Improving Air Quality.

Managing demand to minimise energy use and associated carbon/greenhouse gas emissions during construction and operation of developments (“Be Lean”) should still remain as the number 1 priority, but from that point on, changes are required which reflect the requirements of the new air quality policy SI1 which can be done by prioritising use of low/zero polluting, locally generated non-combustion energy sources. This could be through use of locally available sustainable sources such as secondary heat or on-site low/zero emission non-combustion renewable technologies. Once energy demand has been minimised and use of zero/low emission, on-site energy generation options have been maximised, then the third tier of the Hierarchy could then allow the use of other, clean generation energy technologies.

Also, consideration could also be given to introducing a 4th element to the Hierarchy that reflects the option that is available to major developers to use “negative emissions technologies” to help meet the “net zero-carbon” requirement”.

Policy SI2 Minimising greenhouse gas emissions

(Section B) - This requires major developments to provide a detailed Energy Strategy which demonstrates how the zero-carbon target will be met in line with the Energy Hierarchy requirements. It also refers to the expectation that energy performance will be monitored and reported on.

We consider that there is a difference between “net zero-carbon” and “zero carbon”, so this needs to be reflected in the wording of the Policy. Also, if this policy is dealing with greenhouse gas emissions, then this also needs to be clear – otherwise these emissions are not being captured by referring just to carbon.

In the context of setting more stringent targets, the “expectation” that energy use would be monitored is considered to be too weak and monitoring of energy use and emissions should be set as a requirement.

Suggested change to text

Amend the text as follows: “Major development should include a detailed energy strategy to demonstrate how the net zero-carbon and greenhouse gas emissions target will be met within the framework of the energy hierarchy and will be required to monitor and report on energy performance and associated greenhouse gas emissions”.

Policy SI2 Minimising greenhouse gas emissions

(Section C) - This part of the policy refers to minimum targets in relation to meeting the zero-carbon target through on-site measures, including energy efficiency related targets.

As commented for other aspects of the Policy, it needs to be clarified that net zero carbon approach is being taken.

This target only relates to the operational phase of development. The policy has been widened to also cover emissions during construction, however there isn’t really anything of note to show how this is to be dealt with. It is difficult to know how to do this though as to our knowledge there is no standard way to assess greenhouse gas emissions for the construction phase of developments and no targets have been set in the policy. This requires further consideration.

The continued use of an offset payment approach to help fund carbon/ greenhouse emissions reductions measures is supported.

Suggested change to text

Amend the text as follows: “In meeting the net zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected”.

Consider how the issue of construction phase emissions should be managed and whether targets should be set. “Where it is clearly demonstrated that the net zero-carbon target cannot be fully achieved on-site...”

Policy SI2 Minimising greenhouse gas emissions

(Section D) - Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.

Should this be a greenhouse gas offset fund? “Carbon” and “greenhouse gas” seem to be used interchangeably here, but they are different and it needs to be clear what the policy is covering.

Suggested change to text

Boroughs must establish and administer a greenhouse gas emissions offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.

The council already works closely with Thames Water in relation to local wastewater infrastructure requirements.

Paragraph 9.2.1

It is stated that if London is to achieve its objective of becoming a zero-carbon city by 2050, new development needs to meet the requirements of this policy.

If it is essential that all new developments achieve net zero carbon/greenhouse gas emissions performance, does the Policy need to include wording that relates to the non-major developments, as at the moment it is only these that are covered.

This paragraph also says that development involving major refurbishment should also aim to meet this policy. If that’s the case, this needs to be stated within the Policy, not just in the supporting text.

There is a footnote in this paragraph which states that “‘Carbon’ is used in the London Plan as a shorthand term for all greenhouse gases. London’s carbon accounting is measured in carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions”. This should be stated at the beginning of the Chapter, not in a footnote part way through as it impacts on the interpretation of the main Policy.

Suggested change to text

Consider also adding a requirement for all other developments – not just major refurbishments – to aim to meet this Policy.

Move the text that explains the use of “Carbon” as a catchall term for all greenhouse gases to the beginning of the Chapter.

Paragraph 9.2.2

This paragraph references the Energy Hierarchy. As outlined in our comments about the Hierarchy above, there may be a case to revise this.

Suggested change to text

If any amendments are made in the Policy text to the Energy Hierarchy, these will need to be reflected here as well.

Paragraph 9.2.3

This Paragraph states that “Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies and use innovative building materials and smart technologies”.

This applies to all developments it seems, not just majors? The requirement is very specifically about getting solar panels included in new developments wherever possible, which is no doubt a good idea and one we would support, but such a requirement would be better off being included in the Policy.

Suggested change to text

It would lend weight to this requirement if the relevant text was included in the Policy itself, not just the supporting text.

Paragraph 9.2.4

States that the zero-carbon target for major residential developments in the current London Plan will be extended to include major non-residential developments on final publication of the new Plan (expected 2019). This move is welcomed.

Paragraph 9.2.5

The approach outlined in this Paragraph is noted and welcomed in terms of setting the minimum CO2 emission improvement target which will be increased over time.

Paragraph 9.2.6

This Paragraph sets out an expectation that residential developments should aim to achieve 10% and non-residential development 15% improvements over minimum requirements of the Building Regs 2013 in relation to CO2 emissions. These targets appear to be achievable although challenging and are therefore supported.

There is also a reference to BREEAM, including a recommendation that Boroughs are encouraged to include BREEAM targets in their Local Plans where appropriate. BREEAM Assessments are not used to assess residential developments. The BRE

has development a new Home Quality Mark (HQM) to replace the Code for Sustainable Homes. It may be worth considering including a reference to this.

Suggested change to text

Consider adding a reference to the Home Quality Mark (HQM) scheme to complement the text on BREEAM.

Paragraph 9.2.7

Agree with this Paragraph's point about the need to continue to review the price for offsetting carbon as offset fund payments do have the scope to unlock carbon savings from the existing building stock through energy efficiency programmes etc. It is noted that a price of £95/tonne has been tested as part of the viability assessment for the London Plan. The price does need to be set at a suitable level though that does not encourage developers to prefer to go down the 'offset' route when they should be installing emissions reduction measures on-site.

Suggested change to text

No changes, although if there is scope to consider that the price of offsetting carbon should be increased – perhaps closer to £120/tonne – in order to encourage more investment in on-site measures, then this should be done.

Paragraph 9.2.8

Details that the Mayor provides support and advice to boroughs on how to set up and use carbon offsetting funds.

This advice/support is welcomed.

Paragraph 9.2.9

We welcome the stipulation that energy demand and emissions should be monitored to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC) and reporting to the Mayor for at least five years via an online portal to enable the GLA.

Suggested change to text

No changes, but we recommend that where monitoring of energy use and emissions identifies good practice that this is highlighted and made available to help inform developers and Boroughs in their approach to reducing carbon/greenhouse gas emissions.

Paragraph 9.2.10

This Paragraph notes that the Mayor may publish further planning guidance on sustainable design and construction and will continue to regularly update the guidance on preparing energy strategies for major development. This is welcomed as the SPGs and other GLA guidance documents are very good sources of information and advice that council officers use regularly.

The remainder of this Paragraph sets out a checklist of minimum requirements that should be covered in Energy Strategies.

The checklist is considered to be very helpful and could even work as a standalone Policy to emphasise the importance of providing the right information with applications on energy and greenhouse gas emissions. More could be said on how the construction phase should contribute to the net zero carbon/greenhouse gas emissions requirements.

Suggested change to text

Consider developing the Energy Strategy checklist requirements into a stand alone Policy.

Consider including more information on how the construction phase should contribute to the net zero carbon/greenhouse gas emissions requirements.

Policy SI3 Energy Infrastructure

Section A of the Policy requires boroughs and developers to work with the energy companies to establish future energy requirements as a result of large-scale development proposals. This is acknowledged and welcomed as it is sensible for all parties to have early discussions on these issues for major development proposals, especially at Opportunity Area etc scale. This could also include reference to major developments.

Section B sets out requirements for Energy Masterplans which should be developed for large-scale development locations. The checklist covers a number of logical and relevant areas such as determining heat loads, identifying preferred approaches etc that would be the most efficient ways of using and distributing heat. We note the inclusion of “energy from waste” on the list, which we have some potential concerns about in terms of whether or not such processes can be suitable in dense inner London Borough such as H&F, but accept that this might be capable of being utilised in some boroughs without creating undesirable impacts.

Suggested change in text

Suggest amending the Policy as follows: “Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, Major Developments and other growth areas or clusters of significant new development”.

Section C sets out Development Plan requirements in relation to identifying the need and suitable sites for any necessary energy infrastructure and also requires existing heating/cooling networks and opportunities for expanding existing or establishing new networks to be identified.

This is useful guidance for LPAs, although on a matter of consistent formatting, SI2 also includes guidance for the Boroughs but it has not been presented as a separate “Development Plan requirements” section. This format, which mirrors that used in the

current London Plan is useful is easily identifying requirements for the Boroughs and is an approach that should continue to be used.

Suggested change to text

No changes here – but possibly in other sections in order to provide a consistent way of presenting Policy requirements, particularly where requirements are set out for the boroughs to follow or implement.

Section D sets out the requirement that major development proposals within specific Heat Network Priority Areas should have a communal heating system and that the heat source for the communal heating system should be selected in accordance with the hierarchy set out in the Policy.

This approach is generally supported although within the hierarchy, we suggest requiring heat and/or power to be generated from zero-emission sources should refer to low or zero carbon/greenhouse gas emissions sources. The first part of the hierarchy (a) connecting into to an existing or planned heat network could presumably lead to increased emissions of pollutants such as NO_x which would not be desirable so some thought has to be given to this scenario. Also, the ‘qualifying’ text in brackets for fuel cells and CHP (bullet points (d) and (e)) may be better off being presented outside of the Policy text box. Also, as currently worded, text refers to areas that are exceeding the air quality objectives but there are many areas of poor air quality that are close to exceeding within air quality management areas. The wording should be amended to relate to areas that are just meeting the air quality national objectives because the cumulative impact of increased combustion point sources could result in a failure to meet the air quality objectives.

The emphasis in this Policy on the need for CHP and gas boiler systems to be designed to ensure that there is no significant impact on local air quality is welcomed, as is the need new heat networks to be designed for connection at a later date which is also covered in this section of the Policy. However, the wording in terms of the impacts on local air quality needs to be consistent with the wording in Policy SI1.

It is not clear what the GLA wants to happen in areas that are not identified as being Heat Network Priority Areas. (Not relevant for H&F as the whole borough is a Priority Area, but may be useful for other boroughs).

Suggested change to text

Amend the text to D(2) as follows: “CHP and ultra-low NO_x gas boiler communal or district heating systems should be designed to ensure that they do not lead to a further deterioration of existing poor air quality“. there is no significant impact on local air quality.

Paragraph 9.3.1

Welcome the commitment given here that the Mayor will work with boroughs, etc to promote the development of London’s energy system.

Paragraph 9.3.2

Agree with the position of the GLA explained here that there need to be changes to the way we use and supply energy so that power and heat for buildings and transport is generated from clean, low-carbon and renewable sources.

We note the argument made here that London will need to shift from its reliance on using natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources.

We are not 100% clear how the drive to reduce use of gas can work in a consistent manner with the emphasis on using decentralised energy systems, which are invariably (for now at least) run on gas, so this is an area where it would be good to provide more supporting information to show that these aims can work together and are capable of both being achieved and are not contradictory.

Suggested change to text

Include a better explanation of how London can increase its use of communal decentralised heating systems whilst also reducing its reliance on gas.

Paragraph 9.3.3

This paragraph states that developments should connect to existing heat networks and that the delivery of new district heating infrastructure should be stimulated where feasible.

The whole of H&F has been identified by the Mayor as a Heat Network Priority Area which is agreed given the nature of the borough – i.e. it is one of a number of boroughs where the heat density is sufficient for heat networks to provide a solution for supplying heat to buildings and consumers.

Paragraph 9.3.4

We agree with the sentiments of this paragraph that where developments are proposed within Heat Network Priority Areas but are beyond existing heat networks, the heating system should be designed to facilitate future connection.

Paragraph 9.3.5

This paragraph notes that the Mayor supports standards such as the CIBSE CP1 Heat Networks: Code of Practice for the UK and the Heat Trust standard to help in delivering well designed heat networks.

Suggested change to text

No change, but recommend that these industry standards are referenced again in any revised GLA SPD/guidance documents.

Paragraph 9.3.6

This paragraph states that further information about the relevance of CHP in developments of various scales will be provided in the Energy Planning Guidance document, which is welcomed.

It is also clearly stated that “it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available”. This is actually a very important point, and one that should be given more emphasis.

Suggested change to text

With regards to the point about gas CHP not being suitable in air quality exceedance areas, this a point that should be made more clearly in the Policy.

Paragraph 9.3.7

This paragraph’s support for increasing the amount of new renewable energy generation in new developments is welcomed. However, we note that the list of example technologies given in this section does not mention heat pumps which we would have thought would play a major part in providing London’s future energy requirements.

Suggested change to text

Amend the text as follows: “Increasing the amount of new renewable energy sources in London developments is supported. This includes the use of energy from waste schemes that are connected to a heat network, as well as heat pumps, solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind and hydropower-based renewable energy in some locations within London.

Paragraph 9.3.8

This paragraph notes that the Mayor will work with the electricity industry, boroughs and developers to ensure that appropriate infrastructure is in place to meet London’s electricity needs. This is welcomed.

Electricity supply and demand is likely to become a key topic in terms of London’s future energy strategy. Demand is expected to rise in London in part as a result to the move over to widespread use of electric vehicles and electrically driven heating systems in buildings.

We note the concerns raised here about the fact the electricity network and substations are at or near to capacity in a number of areas, especially in central London and urge the Mayor to develop a strategy outside of the London Plan process to manage these infrastructure requirements.

Suggested change to text

No change, but urge the Mayor to look at the issue of electricity infrastructure in London separately outside of the London Plan process in partnership with energy companies and boroughs.

Paragraph 9.3.9

The points raised in this section in relation to gas supply infrastructure and the need to cover this issue in Energy Masterplans are supported.

Paragraph 9.3.10

This paragraph just notes that the gas supply companies in London are implementing significant gasholder de-commissioning programmes, replacing them with smaller gas pressure reduction stations, often releasing brownfield sites for redevelopment. This is supported, as shown by the proposed redevelopment of the Fulham Gasworks site.

Paragraph 9.3.11

We note the issue raised in this paragraph regarding the need for land being required for energy supply infrastructure including energy centres.

Policy S14 Managing Heat Risk

This section states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems in accordance with a cooling hierarchy set out in the policy.

This approach is agreed although there is scope for a cross reference to the earlier policy SI2 in relation to using waste heat.

Suggested change to text

Suggest an amendment to the bullet points of the hierarchy to insert the following point between points 3 and 4: read as follows:

- “Where feasible, use any residual heat as a local energy resource”.

Paragraph 9.4.1

Agree with this Paragraph - London must manage heat risk in new developments, using the cooling hierarchy set out above.

Paragraph 9.4.2

Agree with this section on the problem of the urban heat island effect and the need to ensure London does not overheat. We are also supportive of the use of green roofs to help provide some mitigation of this problem, although it is not just green roofs that can do this, all kinds of green infrastructure will help regulate temperature through evapotranspiration and can provide much needed shading.

Suggested change to text

Amend the text as follows: “Green roofs and other green infrastructure measures can provide some mitigation of this effect by shading roof surfaces and buildings and as well as through evapo-transpiration.

Paragraph 9.4.3

Agree with this paragraph that many aspects of building design can lead to increases in overheating risk and that measures should be implemented to mitigate overheating risk.

Paragraph 9.4.4

Agree that the increased use of air conditioning systems is not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect.

Paragraph 9.4.5

Agree with the advice provided here about using CIBSE guidance on assessing and mitigating overheating risk in new developments.

Policy SI7 – Reducing waste and supporting the circular economy

The council supports this policy which seeks to reduce waste and promote circular economy principles. The requirement for referable applications to produce a Circular Economy Statement is supported, but further guidance on this will be needed. For example, are these intended to replace the requirement in the current London Plan (2016) for developers to produce a Site Waste Management Plan for managing construction, demolition & excavation waste?

Policy SI8 – Waste capacity and net waste self-sufficiency

As part of preparing the draft London Plan, the Mayor has reviewed the apportionment methodology and boroughs have been given new apportionment targets. As outlined in Table 9.2 of the draft London Plan, Hammersmith and Fulham's revised apportionment target for years 2021-2041 is 210,000t for 2021 and 222,000t for 2041. This remains similar to the target allocated to us in the current London Plan (199,000t for 2021 and 247,000t for 2036). However, all of the boroughs existing waste sites and remaining industrial land now lies within the boundary of the OPDC (a Mayoral Development Corporation). With much of this land proposed for redevelopment as part of the Mayor's plans to regenerate this area for delivery of housing and jobs, this should be reflected when determining Hammersmith & Fulham's apportionment in the draft London Plan. The Mayor should recognise that there are limited options for Hammersmith & Fulham to meet its apportionment within its own boundaries and we must rely on cooperation with the OPDC to ensure they safeguard a site to manage our apportionment.

If the OPDC is not given its own apportionment target in the new draft London Plan, it is important that Mayoral Development Corporations (MDC's) such as OPDC share the responsibility of meeting apportionments with the host borough. The London Plan should therefore recognise the unique relationship MDC's such as OPDC have with

the host borough as its priority. The Council therefore supports the following text in the draft London Plan which states:- “Mayoral Development Corporations should cooperate with boroughs to ensure the boroughs apportionment requirements are met”.

The Mayor should also play a more active role in helping boroughs to manage apportionments and also in helping to facilitate the suitable relocation of waste sites which may be lost to other uses.

Policy SI15 Water transport:

(C) Development proposals to facilitate an increase in the amount of freight transported by river should be supported.

(F) Development proposals which increase the use of safeguarded wharves for waterborne freight transport, especially on wharves which are currently not handling freight by water, will be supported.

(G) Development proposals that include the provision of a water freight use on a safeguarded wharf, with other land uses above or alongside, will need to ensure that the development is designed so that there are no conflicts of use and that the freight-handling capacity of the wharf is not reduced.

(H) Development proposals adjacent to or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle.

All the above is welcomed and supported to maximise the air quality benefits of transferring a greater proportion of transport of freight from road vehicles to river vessels

River vessel transport is usually diesel fuelled with its associated Particulate and NOx emissions and hence has an impact on air quality. A reduction in emissions from Tidal Thames will contribute to reduced background levels of air pollutants in London for residents in LBHF.

The insertion of the following points into the policy:

j. Emissions from river vessels near to sensitive receptors should be mitigated, such as when vessels are docked for material transfer.

k. Development proposals which provide for the provision of on-shore power facilities including renewable energy sources e.g. Solar for use at mooring locations for house boats, and safeguarded wharves for waterborne freight transport including consolidation centres will be supported.

l. Support and continue to review and improve the discounts and standards within the green tariff PLA scheme to encourage voluntary reduction of emissions beyond what is legally prescribed and apply the scheme for inland river vessels

Policy SI15 – Water transport

(Section A and B) - Agree fully that in order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner (Section A). Note that Section B states that Development Plans should promote improvements to water supply infrastructure.

Policy SI15 – Water transport

(Section C) - Agree that development proposals should: 1) minimise the use of mains water, achieving mains water consumption of 105 litres or less per head per day (excluding external water consumption allowance); 2) achieve at least the BREEAM excellent standard (commercial development) and 3) be encouraged to incorporate measures such as smart metering etc. to help to achieve lower water consumption rates.

Policy SI15 – Water transport

(Section D) - In terms of water quality, agree that Development Plans should: 1) promote the protection and improvement of the water environment; 2) support strategic wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. H&F support the regular review of safeguarded wharves in bullet D and the opportunity afforded to consolidate wharves as part of strategic land use change. This is something Hammersmith and Fulham have regularly requested in previous London Plan iterations and such acknowledgement and flexibility is welcomed.

Policy SI15 – Water transport

(Section E) - This section sets out similar requirements to Section D, but for development proposals this time rather than for Development Plans.

Agree with these requirements.

Policy SI5 Water Infrastructure

Paragraph 9.5.1

We note that London has higher than average water consumption and that London is also considered to be seriously water-stressed. A severe drought would have major implications for Londoners' health and wellbeing, the environment and London's economy.

Paragraph 9.5.2

Pleased to see in this paragraph that there is recognition that an important aspect of avoiding the most severe water restrictions is to ensure that leakage is reduced and water used as efficiently as possible.

We agree that the Optional Requirement set out in part G of the Building Regulations should be applied across London to help improve water efficiency

Paragraph 9.5.3

Note the issues raised in this paragraph that even with increased water efficiency and reduced leakage, water companies are forecasting an increasing demand for water. Without additional sources of supply, the increased demand will increase the risk of requiring water restrictions during drought periods. Security of supply should be ensured.

Paragraph 9.5.4

Note that variations of the four strategic water supply options to serve London are under consideration through Thames Water's Water Resource Management Plan process and one or a combination of some of these are expected to be proposed to serve parts of the Wider South East including London.

Note that variations of the four strategic water supply options to serve London are under consideration through Thames Water's Water Resource Management Plan process and one or a combination of some of these are expected to be proposed to serve parts of the Wider South East including London.

We have no particular preferences to express.

Paragraph 9.5.6

Note that infrastructure investment is constrained by the short-term nature of water companies' investment plans and agree that in order to facilitate the delivery of development it is important that investment in water supply infrastructure is provided ahead of need.

Also agree that to minimise wastage, water supply infrastructure improvements should give consideration to the replacement of ageing trunk mains.

Paragraph 9.5.7

In the context of the significant investment needed, measures to protect and support vulnerable customers in particular from rising water bills are important.

This is agreed, although we are not sure what can be done in the context of the London Plan to provide this protection.

If the GLA are aware of any actions that could be implemented via the planning process to protect and support vulnerable customers, inclusion of some additional guidance here would help.

Paragraph 9.5.8

Agree that the Water Framework Directive requirements should be maintained through the Thames River Basin Management Plan and the Catchment Plans.

Paragraph 9.5.9

We note that additional land may be required for upgrades or improvements at some wastewater treatment plants during the Plan period. This does not affect H&F as there are no such facilities in the borough.

Paragraph 9.5.10

We note in this section that reference is made to Thames Water planning a major sewer tunnel in the Counters Creek catchment of west London.

This needs updating because Thames Water has now postponed this project.

We agree that sustainable drainage measures are of particular importance in areas with sewer capacity limitations and their widespread implementation over the coming decades will help the resilience of London and avoid the need for further major sewer tunnel projects.

Suggested change to text

The text needs amending to reflect the fact that Thames Water no longer plan to upgrade the sewer network in the Counters Creek catchment.

The Regional Flood Risk Appraisal document also needs updating in the same way.

Paragraph 9.5.11

Note the issues raised in this section regarding misconnected sewers etc and agree that development proposals should be designed to ensure that the potential for misconnections is eliminated.

Paragraph 9.5.12

Integrated Water Management Strategies should be considered for major development locations such as Opportunity Areas, where particular flood risk and water-related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and management of risk.

This approach is supported, and one that was followed for the OPDC with input from the council and other stakeholders.

Paragraph 9.5.13

A water advisory group has been established to advise the Mayor on strategic water and flood risk management issues.

This is welcomed.

Policy SI12 Flood Risk Management

(Section A)

This section of the Policy requires that current and expected flood risk from all sources across London should be managed in a sustainable and cost effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

This is supported.

Policy SI11 Hydraulic Fracturing

(Fracking) - This policy of advocating refusal of development proposals that involve exploration, appraisal or production of shale gas via fracking is supported.

Paragraph 9.11.1

The Mayor's approach is welcomed as exploration for and use of shales gas is not consistent with the Plan's policy approach to reducing climate change emissions and minimising environmental impacts of development.

Paragraph 9.11.2

We note the evidence presented that the British Geological Survey has previously concluded that "there is no significant Jurassic shale gas potential in the Weald Basin" and that it is highly unlikely that there is any site that is geologically suitable for a fracking development in London.

Paragraph 9.11.3

This paragraph notes that should any fracking proposal come forward in London then it is highly likely that it would be located on Green Belt or Metropolitan Open Land. It is agreed that this seems to be the most likely scenario and this is one of the reasons why the council does not want to see policies in the London Plan that encourage fracking.

The OPDC has previously proposed a policy in their Local Plan on Oil & Gas Development in the OPDC Area which we raised concerns about.

Paragraph 9.11.4

This paragraph outlines a range of issues that would need to be considered if a proposal for fracking came forward. Given that the Policy directs refusal of fracking proposals, the presentation of the information here should be amended to change the emphasis as the Policy does not envisage any circumstances where fracking would be acceptable in London.

Paragraph 9.11.5

Similar comment as for 9.11.4. This paragraph provides guidance on community engagement where a proposal comes forward for fracking. The Policy completely discourages this, so it seems contradictory to provide guidance on how to facilitate fracking proposals compliance with the Community Engagement Charter.

Policy SI13 Sustainable drainage: 9.13.4

The London Sustainable Drainage Action Plan complements this policy. It contains a series of actions to make the drainage system work in a more natural way with a particular emphasis on retrofitting.

The LSDAP is supported.

Policy SI13 Sustainable drainage: 9.13.3

For many sites, it may be appropriate to use more than one form of drainage, for example a proportion of rainwater can be managed by more sustainable methods, with residual rainwater managed lower down the hierarchy. In some cases, direct discharge into the watercourse is an appropriate approach, for example rainwater discharge into the tidal

Thames or a dock. This should include suitable pollution prevention measures. However, in other cases direct discharge will not be appropriate, for example discharge into a small stream at the headwaters of a catchment, which may cause flooding. This will need to be assessed on a case-by-case basis, taking into account the location, scale and quality of the discharge and the receiving watercourse. The maintenance of identified drainage measures should also be considered in development

This approach is supported and one that is implemented in H&F where direct discharges to the Thames are encouraged where possible for riverside developments.

We note there is no supporting text explaining the benefits of above ground measures as such, which may be a useful addition to this section.

Suggested change to text

No change required, although consideration could be given to including some text on highlighting the benefits of above ground measures over below ground tank solutions.

Policy SI13 Sustainable drainage: 9.13.2

Development proposals should aim to get as close to greenfield run-off rates as possible depending on site conditions. The well-established drainage hierarchy set out in this policy helps to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible and there should be a preference for green over grey features. A blue roof is an attenuation tank at roof or podium level; the combination of a blue and green roof is particularly beneficial as the attenuated water is used to irrigate the green roof.

Generally these points are supported, although could be toughened up slightly. The Drainage Hierarchy is a useful tool in guiding developers and LLFAs in designing and assessing SuDS Strategies for sites.

Suggested change in text

Amend the text as follows: “Development proposals should aim to get as close to greenfield run-off rates as possible”. depending on site conditions.

Policy SI13 Sustainable drainage: 9.13.1

London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as maintenance arrangements. Local Flood Risk Management Strategies and Surface Water Management Plans should ensure they address flooding from sewers, drains and groundwater, and run-off from land and small watercourses that occurs as a result of heavy rainfall.

The point about LLFA’s managing maintenance arrangements could be potentially misunderstood to mean that LLFA’s carry out the maintenance which is not the case. This point needs clarification.

Suggested change to text

Amend the text as follows: “Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as ensuring that appropriate maintenance arrangements are put in place.”

Policy SI13 Sustainable drainage: SI13

(Section D)

Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, biodiversity, amenity and recreation.

This is supported although it could be expanded slightly to indicate how this should be achieved – ie. By maximising use of above ground measures.

Suggested change in text

Amend the text as follows: “Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, biodiversity, amenity and recreation, in particular by prioritising above ground measures where these can be implemented”.

Policy SI13 Sustainable drainage: SI13

(Section C)

Development proposals for impermeable paving should be refused where appropriate, including on small surfaces such as front gardens and driveways.

Support this aspect of the policy as we have a similar policy in our Local Plan (although worded such that it encourages use of permeable paving rather than discouraging impermeable surfaces).

Policy SI13 Sustainable drainage: SI13

(Section B)

Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

- 1) rainwater harvesting (including a combination of green and blue roofs)
- 2) infiltration techniques and green roofs
- 3) rainwater attenuation in open water features for gradual release
- 4) rainwater discharge direct to a watercourse (unless not appropriate)
- 5) rainwater attenuation above ground (including blue roofs)
- 6) rainwater attenuation below ground
- 7) rainwater discharge to a surface water sewer or drain
- 8) rainwater discharge to a combined sewer.

The revisions to the Drainage Hierarchy compared to the one in the currently London Plan are supported although green roofs should probably only be referenced in relation to infiltration.

Suggest the following changes to the hierarchy text:

“1) rainwater harvesting (including a combination of green and blue roofs)”

Strikethrough the words "a combination of green and blue roofs"

Policy SI13 Sustainable drainage: SI13

(Section A)

Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks.

This approach is agreed and is already being implemented in H&F.

Policy SI12 Flood risk management: 9.12.7

Development adjacent to flood defences will be required to protect the integrity of existing flood defences. Wherever possible it should be set back from the banks of watercourses and flood defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost-effective way.

This approach is in line with the requirements of the TE2100 Plan and is agreed.

Suggested change to text

No change required, although could consider moving this paragraph of text so it runs on from para 9.12.4 which is related?

Policy SI12 Flood risk management: 9.12.6

In terms of mitigating residual risk, it is important that a strategy for safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services. In the case of a severe flood, especially a tidal flood, many thousands of properties could be affected. This will make rescue and the provision of temporary accommodation challenging. Designing buildings such that people can remain within them and be safe and comfortable in the unlikely event of such a flood, will improve London's resilience to such an event.

Agreed and this is an approach H&F takes in ensuring mitigation of flood risks in new developments.

Suggested change to text

No changes required, although consideration could be given in this section to acknowledging that there are some types of developments that may be regarded as unsuitable in locations at the highest risks of flooding (e.g. self contained basements in the Rapid Inundation Zone where there may be no way to remain safe or evacuate in the event of a flood).

Policy SI12 Flood risk management: 9.12.5

The Environment Agency's Thames River Basin District Flood Risk Management Plan is part of a collaborative and integrated approach to catchment planning for water. Making space for water when considering development proposals is particularly important where there is significant exposure to flood risk along tributaries and at the tidal-fluvial interface. The Flood Risk Management Plan should inform the boroughs' Strategic Flood Risk Assessments.

Noted and agreed.

Policy SI12 Flood risk management: 9.12.4

The concept of Lead Local Flood Authorities producing Riverside Strategies was introduced through the TE2100 Plan to improve flood risk management in the vicinity of the river, create better access to and along the riverside, and improve the riverside environment. The Mayor will support these strategies.

Noted and support from the Mayor welcomed.

Policy SI12 Flood risk management: 9.12.3

The Environment Agency's Thames Estuary 2100 Plan (TE2100) focuses on tidal flood risk management. It requires the ability to maintain and raise some tidal walls and embankments. The Environment Agency estimates that a new Thames Barrier is likely to be required towards the end of the century. Potential sites will be needed

in Kent and/or Essex requiring close partnership working with the relevant local authorities.

This is agreed and reflected in our own Local Plan

Policy SI12 Flood risk management: 9.12.2

The Regional Flood Risk Appraisal (RFRA) considers all sources of flood risk including tidal, fluvial, surface water, sewer, groundwater and reservoir flooding and has been updated in collaboration with the Environment Agency. The RFRA provides a spatial analysis of flood risk including consideration of risks at major growth locations such as Opportunity Areas and Town Centres and key infrastructure assets. The Government's updated allowances for climate change are reflected in the expected sea level rise and increased flood risks considered in the RFRA. The updated allowances consider the lifetime, vulnerability and location of a development.

If there is scope to update the RFRA, then this should be done to reflect the fact that Thames Water's plans regarding Counters Creek have changed since it was drafted.

Suggested change to text

The Regional Flood Risk Appraisal text needs amending to reflect the fact that Thames Water no longer plan to upgrade the sewer network in the Counters Creek catchment.

Policy SI12 Flood risk management: 9.12.1

In London, the boroughs are Lead Local Flood Authorities (LLFAs) and are responsible, in particular, for local surface water flood risk management and for maintaining a register of flood risk. They identify areas of flood risk to help inform appropriate locations for development. LLFAs should cooperate on strategic and cross-boundary issues.

Agreed

Policy SI12 Flood risk management: SI12

(Section F)

Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Where possible, development proposals should set permanent built development back from flood defences to allow for any foreseeable future upgrades.

This is agreed but there would appear to be a lot of overlap between Part F of the Policy and Part D on Thames Estuary 2100. This section could be removed or the 2 sections could be merged together.

Policy SI12 Flood risk management: SI12

(Section E)

Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

This is agreed.

Policy SI12 Flood risk management: SI12

(Section D)

1. Development Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The
2. Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.

This is supported.

Policy SI12 Flood risk management: SI12

(Section C)

Development proposals which require specific flood risk assessments should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

This approach is agreed and is in line with the Policies in the H&F Local Plan.

Policy SI12 Flood risk management: SI12

(Section B)

Section B requires that Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

This approach is agreed.

Chapter 10 Transport

Given the Mayor's policy to support and promote major transport infrastructure proposals across London we consider it is important that there should be reference to the proposal to replace Hammersmith flyover with a flyunder which will facilitate major regeneration, new housing and environmental benefits to the wider area.

Policy T1 Strategic approach to transport and Policy T2 Healthy Streets

We support the Draft London Plan’s policy approach on these topics.

Policy T3 transport capacity, connectivity and safeguarding

Section B1 – As the policy is currently written, it would restrict us building on a car park.

Suggested change to text - *In first line, insert “sustainable” between “used for” and “transport”*

Section D and Table 10.1 – should include reference to the importance of increasing the frequency and capacity on the West London Overground Line, particularly through Sands End in South Fulham.

Supporting paragraphs should also advise that South Fulham Riverside is a major regeneration area with at least 4,000 new homes and 500 new jobs targeted. Not only would a Crossrail 2 station enable a major uplift in these new homes and job numbers but there is also a clear need to improve the current service at Imperial Wharf station to support the regeneration that is taking place now and in the longer term.

Table 10.1

Reference to “Highway Decks” should also include tunnelling highways and include improving pedestrian and cycling connectivity and air quality as well as releasing land for housing.

Suggested change to text

Reword to “Highway decks and/or tunnelling at key locations (such as Hammersmith Town Centre) to release land for housing, improve air quality and ambience and improve pedestrian and cyclist connectivity”

Table 10.1

Heathrow Western and Southern Access “required for Heathrow expansion”. Implies support for Heathrow expansion, which is not Mayoral policy.

Suggested change to text

Re-word to “required to increase public transport modal share for Heathrow”

Table 10.1

River services extensions to east.

Suggested change to text

Should be extensions to west as well.

Para 10.3.4 Crossrail 2

Suggested change to text

Add new sentence at end: The Mayor will review the route of Crossrail 2 with a view to ensuring that it enables maximum regeneration opportunities, e.g. with a station at South Fulham which can help secure the provision of up to 10,000 new homes and 3,000 new jobs.

Policy T6 Car parking: T6 –

(E) Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.

(F) Adequate provision should be made for efficient deliveries and servicing.

(G) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for

London guidance on car parking management and car parking design.

The above parts of the policy are welcome and supported. As the amount of car parking has a direct impact on number of vehicle journeys and hence the associated Particulate (PM10, PM2.5) and NO2 emissions

A change in the text to point F:

Adequate provision should be made for efficient deliveries and servicing. A Delivery and Servicing Plan (DSP) should be submitted alongside all applications indicating how the DSP will incentivise and prioritise the use of Ultra Low Emission Vehicles for Servicing and deliveries to the site during the operational phase.

A change in the text of point G to:

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision, *indicating how it will*

i incentivise and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site. e.g. fiscally by means of differentiated parking fees

ii will be designed and managed, with reference to Transport for London guidance on car parking management and car parking design

Policy T6.1 Residential parking:

(C) All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

The above policy point can be made more ambitious for sites in areas of poor air quality by increasing the percent of spaces with active charging facilities. This will further encourage the uptake of Ultra Low Emission Vehicles

A change in the text to point C:

All residential car parking spaces must provide infrastructure for Electric or Ultra-Low Emission vehicles. A minimum of 50 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces *in areas of poor air quality.*

Underline denotes additional text which is recommended to be included in the policy.

Policy T6.2 Office parking:

(G) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision.

The above policy point can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

A change in the text to point G:

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality.*

Policy T6.3 Retail parking:

(D) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision

The policy can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

The insertion of the following text into point D

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise e.g. fiscally by means of differentiated parking fees and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality.*

Policy T6.4 Hotel and leisure uses parking:

(E) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision

The policy can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

The insertion of the following policy point E

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise e.g. fiscally by means of differentiated parking fees and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality.*

Policy T7 Freight and servicing

‘Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.’

*Conventional diesel transport refrigeration systems are lightly regulated and can emit up to **29** times as much particulate matter and **6** times as much **NOx** as a modern truck engine.*

LBHF would support more guidance and policy on how provision can be provided to reduce the use of highly polluting red diesel based Transport Refrigeration Units (TRU).

Revision of text in policy T7 (F) to:

Development proposals should facilitate sustainable freight and servicing, including *the provision of on-site mains charging for transport refrigeration systems* and adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Paragraph 10.7.5 –

*“Delivery and Servicing Plans should demonstrate how the requirements of the site are met, including **addressing missed deliveries**. Appropriate measures include large letter or parcel boxes and concierges accepting deliveries. Car-free developments should consider facilitation of home deliveries in a way that does not compromise the benefits of creating low-car or car-free environments.”*

Further air quality guidance, which should include design solutions for air quality shall highlight design aspects included in transport sections of London plan that may benefit air quality.

Policy GC3 Creating a Healthy City

A Contaminated Land section is missing from the Draft London Plan. Comments here are relevant for all development, particularly issues covered in chapters 1, 2, 3, 4, 5 and 8.

There is no policy addressing the health impacts of contaminated land in the draft new London Plan. The existing London Plan has a policy, 5.21, covering this and should be brought forward into the new Plan.

The Integrated Impact Assessment (IIA) as well as its Scoping Report state that the Health Impact Assessment identifies the need to 'minimise the risk of health impacts through contamination.' However, this was not then addressed in the Objectives which form the basis for the Policies in the draft new Plan. Without this policy, Londoners' health and the wider environment are put at risk from potential contamination.

Further, in London Boroughs where the Mayor has direct control over development such as the OPDC, not having a contaminated land policy could lead to redevelopment not complying with the borough's local plans nor their responsibilities under Part IIA of the Environment Act 1990.

Add a contaminated land policy to the new Plan similar to the current one:

Policy Strategic

A The Mayor supports the remediation of contaminated sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use.

Planning decisions

B Appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.

LDF preparation

C LDFs should encourage the remediation of contaminated sites and set out policy to deal with contamination.

Supporting text

5.95 In a city where space is increasingly at a premium, it is essential that wherever practicable, brownfield sites – including those affected by contamination – should be recycled into new uses. This also provides an opportunity to deal with any threats to health and the environment posed by contamination. Any land that is affected by contamination, whether or not identified under the regulations, may require

measures to prevent contamination being activated or spread when building takes place.

5.95A Where potentially contaminating activities are proposed, development should include appropriate measures to mitigate any potential harmful effects.

Integrated Impact Assessment (IIA) Consultation Document (including the IIA Scoping Report)

Contaminated land

The IIA Scoping Report states that developments need to assess and remediate contaminated land in order to address health risks and risks to the wider environment. Section 5.22.8 states: “An assessment of the risks associated with developing contaminated or potentially contaminated land is therefore essential to inform decisions about the appropriate level of treatment, clean up or remediation that may be required.” This should have been picked up by the objectives identified in the IIA Framework, but this has not happened.

There is an Objective (22) in the IIA Framework, under ‘Geology and Soils,’ which is associated with the Health Impact Assessment’s guide question: “Will the strategy minimise the risk of health impacts through contamination,” but this Objective does not address human health, it only concerns the conservation and protection of soil; the Objective is: “To conserve London’s geodiversity and protect soils from development and over intensive use.”

The result of Objective 22 not addressing the HIA’s guide question is that the health and environmental risks from contaminated land identified in the Scoping Report have not led to the creation (or in this case carry-forward) of a human health and environment specific contaminated land policy in the draft new London Plan.

Further, reference to NPPF policies on contaminated land and remediation have also been omitted from the Scoping Report in Appendix D’s list of most relevant plans and programmes.

The IIA document needs to be updated with an Objective which addresses the need to assess and remediate land contamination to ensure it does not pose an unacceptable risk to health and the environment.

The London Plan: The Spatial Development Strategy for Greater London, Draft for public consultation,

Contaminated land

A policy, such as Policy 5.21 (Contaminated Land) in the current London Plan, is absent from this draft Plan. Although there are references in the supporting text for Policy D9 (basements), Policy G8 (food growing) and Policy SI11 (hydraulic fracking) in this draft, there is no overarching policy which addresses how the health and environmental impacts from contaminated land should be dealt with through the planning process. The London Plan has always had such a policy and this omission is a significant departure which appears to have occurred due to an oversight (see comments above on IIA and its Scoping Report).

In order to address the concerns identified here, the new London Plan must contain a policy to address how the health and wider environmental impacts of contaminated and potentially contaminated land is to be dealt with through the planning process. It is recommended that the current policy and supporting text is reinstated.

Policy D12 Agent of Change

This policy measure is strongly supported as it complements the NPPF and addresses the long-standing issue of existing, well run, noise-generating premises being adversely affected by poorly planned new development or changes of use.

Policy D13 Noise

Suggested additions to the policy: to minimise creeping ambient and background noise levels from fixed plant on new developments, and to prevent nuisance and adverse impacts, developers should be encouraged to achieve the lowest possible noise emissions. Unless robust justification is provided, developers should demonstrate that noise levels from new plant do not increase existing background noise levels. This policy has been highly effective in reducing complaints from fixed plant over the last 20 years.

In addition, some clarity should be provided as to whether policy D13 applies (as we think it should) to the construction and demolition phases, and not just the finished development.

Policy S12 Minimising Greenhouse gas emissions

The current London Plan includes Policy 5.3 on Sustainable Design and Construction, but there is no similar policy proposed in the draft new London Plan. We consider that the current policy is useful and serves an important role in ensuring that sustainability issues are given full consideration for major developments.

If the requirements of sustainable design and construction had been distributed throughout policies in the draft London Plan such as Policy D2 on Delivering Good Design then this would be less of an issue, but it is felt that sustainability requirements are less integrated than they should be if there is not a stand-alone policy.

Removal of the policy from the draft new London Plan is considered to be a negative move and that the policy and associated supporting text should be reinstated.

As a minimum, the current Sustainable Design & Construction policy and supporting text should be updated where necessary and included in the new Plan as follows:

Policy

A The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

Planning decisions

B Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:

a minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)

b avoiding internal overheating and contributing to the urban heat island effect

c efficient use of natural resources (including water), including making the most of natural systems both within and around buildings

d minimising pollution (including noise, air and urban runoff)

e minimising the generation of waste and maximising reuse or recycling

f avoiding impacts from natural hazards (including flooding)

g ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions

h securing sustainable procurement of materials, using local supplies where feasible, and

i promoting and protecting biodiversity and green infrastructure.

Local Plan preparation

D Within Local Plans, boroughs should consider the need to develop more detailed policies and proposals based on the sustainable design principles outlined above and those which are outlined in the Mayor's supplementary planning guidance that are specific to their local circumstances.

Supporting text

The principles underlying sustainable design and construction reflect a number of policies in this Plan. In particular they seek to improve the environmental performance of buildings, including consideration of climate change mitigation and adaptation. The Policy is intended to ensure that buildings minimise carbon dioxide emissions; are efficient in resource use; protect the environment; recognise the uniqueness of locations; are healthy and adaptable; and make the most of natural systems including, for example, the use of passive solar design or local ecosystems. It should be considered alongside policies dealing with architecture and design.

Design features such as green roofs can enhance biodiversity, absorb rainfall, improve the performance of the building, reduce the urban heat island effect and

improve the appearance of a development. Use of appropriate materials is also key, and where practicable those with a high embodied energy (see glossary) should be avoided. The Mayor's supplementary planning guidance on Sustainable Design and Construction and on Housing reflect key sustainable design principles and outlines the standards that are applicable to all developments. These standards should be considered early in the design process and should be addressed in the design and access statement to show how they have been integrated into the development proposal.

In support of the London Housing Strategy the Mayor has produced a Housing Design Guide[1], which provides further guidance on the standards outlined in the Mayor's Housing Supplementary Planning Guidance.

Sustainable construction is also a key consideration. The Mayor's supplementary planning guidance on Sustainable Design and Construction outlines key principles and standards that are applicable to the construction phase of new development. It suggests developers refer to the Mayor and London Councils' best practice guidance on the control of dust and emissions during demolition and construction. This addresses the environmental impact of construction[2], including minimising emissions of dust and construction plant and vehicles emissions. The Mayor also encourages the use of the Demolition Protocol[3] developed by London Remade to support recycling and reuse of construction materials.

[1] Mayor of London. London Housing Supplementary Planning Guidance 2016.

[2] Mayor of London and London Councils. The Control of Dust and Emissions from Construction and Demolition. Best Practice Guide. London Councils and GLA, 2006.

[3] ICE. Demolition protocol –implementation document. ICE and London Remade, 2003.

London Borough of Hammersmith and Fulham comments

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [1.0.1](#)

We are supportive of the general approach of the Good Growth vision of the Plan. It incorporates many of the objectives that we are seeking to deliver in our own Local Plan.

Page: [Policy GG3 Creating a healthy city](#)

Section: [N/A](#)

A Contaminated Land section is missing from the Draft London Plan. Comments here are relevant for all development, particularly issues covered in chapters 1, 2, 3, 4, 5 and 8.

There is no policy addressing the health impacts of contaminated land in the draft new London Plan. The existing London Plan has a policy, 5.21, covering this and should be brought forward into the new Plan.

The Integrated Impact Assessment (IIA) as well as its Scoping Report state that the Health Impact Assessment identifies the need to 'minimise the risk of health impacts through contamination.' However, this was not then addressed in the Objectives which form the basis for the Policies in the draft new Plan. Without this policy, Londoners' health and the wider environment are put at risk from potential contamination.

Further, in London Boroughs where the Mayor has direct control over development such as the OPDC, not having a contaminated land policy could lead to redevelopment not complying with the borough's local plans nor their responsibilities under Part IIA of the Environment Act 1990.

Add a contaminated land policy to the new Plan similar to the current one:

Policy Strategic

A The Mayor supports the remediation of contaminated sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use.

Planning decisions

B Appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.

LDF preparation

C LDFs should encourage the remediation of contaminated sites and set out policy to deal with contamination.

Supporting text

5.95 In a city where space is increasingly at a premium, it is essential that wherever practicable, brownfield sites – including those affected by contamination – should be recycled into new uses. This also provides an opportunity to deal with any threats to health and the environment posed by contamination. Any land that is affected by contamination, whether or not identified under the regulations, may require measures to prevent contamination being activated or spread when building takes place.

5.95A Where potentially contaminating activities are proposed, development should include appropriate measures to mitigate any potential harmful effects.

Integrated Impact Assessment (IIA) Consultation Document (including the IIA Scoping Report)

Contaminated land

The IIA Scoping Report states that developments need to assess and remediate contaminated land in order to address health risks and risks to the wider environment. Section 5.22.8 states: “An assessment of the risks associated with developing contaminated or potentially contaminated land is therefore essential to inform decisions about the appropriate level of treatment, clean up or remediation that may be required.” This should have been picked up by the objectives identified in the IIA Framework, but this has not happened.

There is an Objective (22) in the IIA Framework, under ‘Geology and Soils,’ which is associated with the Health Impact Assessment’s guide question: “Will the strategy minimise the risk of health impacts through contamination,” but this Objective does not address human health, it only concerns the conservation and protection of soil; the Objective is: “To conserve London’s geodiversity and protect soils from development and over intensive use.”

The result of Objective 22 not addressing the HIA’s guide question is that the health and environmental risks from contaminated land identified in the Scoping Report have not led to the creation (or in this case carry-forward) of a human health and environment specific contaminated land policy in the draft new London Plan.

Further, reference to NPPF policies on contaminated land and remediation have also been omitted from the Scoping Report in Appendix D’s list of most relevant plans and programmes.

The IIA document needs to be updated with an Objective which addresses the need to assess and remediate land contamination to ensure it does not pose an unacceptable risk to health and the environment.

The London Plan: The Spatial Development Strategy for Greater London, Draft for public consultation,

Contaminated land

A policy, such as Policy 5.21 (Contaminated Land) in the current London Plan, is absent from this draft Plan. Although there are references in the supporting text for Policy D9 (basements), Policy G8 (food growing) and Policy SI11 (hydraulic fracking) in this draft, there is no overarching policy which addresses how the health and environmental impacts from contaminated land should be dealt with through the planning process. The London Plan has always had such a policy and this omission is a significant departure which appears to have occurred due to an oversight (see comments above on IIA and its Scoping Report).

In order to address the concerns identified here, the new London Plan must contain a policy to address how the health and wider environmental impacts of contaminated and potentially contaminated land is to be dealt with through the planning process. It is recommended that the current policy and supporting text is reinstated.

Page: [Policy SD1 Opportunity Areas](#)

Section: [SD1](#)

We support the ambition of this policy to ensure that Opportunity areas fully realise their growth and regeneration potential. We welcome the fact that the Old Oak Park Royal Opportunity Area has been highlighted on Figure 2.8 – High Speed 2/Thameslink diagram and that the Old Oak Common Station (which will be a major transport hub for the area). We also welcome the accompanying text in paragraphs 2.1.57 – 2.1.59 that outline the fact that the area has been recognised by the Mayor for its regeneration potential. The map on Figure 2.8 is useful in identifying the fact that the Old Oak Park Royal Opportunity Area will generate 25,500 homes and 65,000 jobs. One criticism of the Figure 2.8 map is that the key seems to be incomplete. There is no explanation of what the dark blue hashed lines actually represent, therefore the map key should clarify what this symbol represents.

Page: [Policy SD1 Opportunity Areas](#)

Section: [SD1](#)

Fig. 2.19

The Strategic Areas for regeneration based on deprivation are confusing as they do not correspond with the council's designated regeneration areas.

We recommend that references are added to the map to indicate the name of the designated regeneration areas.

Page: [Policy SD6 Town centres](#)

Section: [SD6](#)

H&F object to the rather ambiguous reference to higher density development being specifically encouraged in town centre locations (bullet C). London's town centres vary in their characteristics and many have heritage assets, conservation areas and other sensitivities such as proximity to the river Thames and protected views. This is certainly the case in H&F. On this basis such a blanket approach is un-helpful and the emphasis should be on optimising development sites rather than the emphasis being on seeking higher density development. Particularly as there is no explanation of what higher density is. Surely it varies depending on the make-up of particular centres. This lack of clarity is a concern in town centres that already have high density development as the London Plan is essentially promoting even higher/taller developments.

We recommend that bullet point C is reworded.

Page: [Policy SD6 Town centres](#)

Section: [2.6.2](#)

H&F support the acknowledgement that town centres need to be flexible and adaptable to future trends and technologies. Whilst this is difficult to quantify and predict in retail studies, it is something that needs to be considered. The supporting text to this policy is however disproportionately weighted in favour of future trends rather than providing explanation for other aspects of the policy.

H&F support the reference to a diverse offer in smaller centres whilst protecting a core of retail. This is the approach that H&F have taken in its local centre policies. It is important however that such diversification is proportionate to the size of the 'smaller centre'. In more isolated, small centres such as neighbourhood centres, the retail element may be the only accessible/walkable retail for certain residents and an over concentration of non-retail in such locations could lead to a lack of amenities for elderly or disabled residents.

We recommend that the GLA address the balance in the supporting text. They should also introduce a reference to the importance of neighbourhood centres in providing accessible retail.

Page: [Policy D1 London's form and characteristics](#)

Section: [3.1.7](#)

Para 3.1.7 refers to the new issue of managing deliveries – We are concerned about what this would mean for the design of buildings, in particular in dense urban contexts.

Policy D1 (A)

Development Plans, area-based strategies and development proposals should address the following:

A The form and layout of a place should:

9) help prevent or mitigate the impacts of noise and poor air quality

The design of building in areas of poor air quality can minimise the exposure of future residential occupiers to poor air quality.

Suggested change to text

Recommended revised text of point A (9):

Help prevent or mitigate the impacts of noise and poor air quality *by ensuring the habitable rooms (Bedrooms, Living Rooms) and external amenity area's including balconies are orientated away from the main sources of poor air quality and noise e.g. busy roads.*

Underline represents additional text that is recommended to be added.

Page: [Policy D1 London's form and characteristics](#)

Section: [D1](#)

Under A *The form and layout of a place should*: there is no mention of the impact on townscape. We suggest inserting an additional point near the top: “positively contribute to the townscape character”

Under A 7): add “environmental benefits” of green and open spaces

Under A 9): add “adverse wind conditions”, also in para 3.1.3

Page: [Policy D1 London's form and characteristics](#)

Section: [D1](#)

There is more emphasis on safety, security, emergency, fire safety and noise to ensure that measures that address this are integrated into the design of a development and not retrofitted - this is considered beneficial.

However, given that the plan is meant to provide strategic direction there is too much emphasis and detail on the process local authorities should follow in terms of plan-making, management and delivery compared to the current plan. There is great variety across London’s many boroughs and each one should be allowed to exercise some degree of discretion in respect of what processes would work best for them and their residents. For example, in Policy D2 the text under criteria E to H is too prescriptive and strays from strategic advice.

Page: [Policy D2 Delivering good design](#)

Section: [D2](#)

Neutral - Under H *Maintaining design quality*: how would this affect outline applications? The policy should either discourage outline applications, or emphasise the need to agree detailed design codes with the council before approving outline applications.

H1 - The reference to “construction details” should be clarified, particularly in relation to outline schemes where such details might not be available.

Page: [Policy D6 Optimising housing density](#)

Section: [D6](#)

In general, the scrapping of the density matrix is welcomed as it places emphasis on a design-led approach that takes account of new or proposed infrastructure links that is more appropriate to local contexts.

Under A 1) in respect of ‘site context’ the constraint on optimising density will nearly always be the impact of increased massing on the local townscape and any impacts on heritage assets. It is suggested that the bullet point should be expanded to reference this. 1) the site context, add: “in particular the local townscape character and heritage assets”.

This new policy omits reference to the benefits of clusters of tall buildings in areas which are identified as being appropriate for tall buildings.

In terms of tall buildings supporting legibility, the previous plan was useful in identifying the central activity zone, opportunity areas and town centres as the types of locations which could support tall buildings. The previous plan also made reference to points of “civic or visual significance” which again is useful in encouraging tall only on those sites where there are good townscape arguments for doing so. These points have not been carried through to the new plan.

The draft policy makes reference to stand alone towers which should rarely occur if councils have identified areas of their borough for tall buildings.

The concept of “wayfinding” in the new policy needs to be clarified.

D8 C 2 b): relating to building servicing. It should be added that building servicing should be fully integrated into the building to avoid harm to the relationship between the building and external spaces and to the characteristic urban grain.

D8 D: Publicly accessible areas within the buildings are still encouraged but there is no reference to the upper floors. It should include to integrate publicly accessible areas at ground and roof levels so that the public also has a benefit from a building form that has such a high impact on surrounding public and private spaces and buildings.

Page: [Policy D9 Basement development](#)

Section: [D9](#)

H&F welcome support from the Mayor on the issue of basements, but question whether there is any need for this brief policy given that London boroughs will be applying and developing their own policies on this matter. If the Mayor is keen on reducing the size of the London Plan and focussing on key strategic issues across London then this is one such policy that could be removed from the plan.

We recommend that this policy should be deleted. However, if the policy is retained we comment as follows:

Under A – this policy only deals with the negative impacts of large-scale basement development beneath existing buildings, however large-scale basement development as part of new build schemes can have similar impacts on the local environment and residential amenity. This policy should also deal with large-scale basement excavation beneath gardens and open space, which can have an especially harmful impact on biodiversity and the local environment.

Page: [Policy D9 Basement development](#)

Section: [3.9.2](#)

Para 3.9.2 should include reference to potential impact of basements on the historic environment and local townscape character.

Page: [Policy D9 Basement development](#)

Section: [3.9.3](#)

The reference to 'affordable' in para 3.93 should be removed, it is inappropriate and unnecessary and no definition of 'affordable' has been provided. Our experience suggests that basement excavation is not an affordable option for most Londoners.

Page: [Policy D9 Basement development](#)

Section: [3.9.4](#)

Para 3.9.4 refers to large-scale basements as potentially including those which extend significantly beyond the existing building footprint, if this is the intention then the wording of A should be amended in order to include it within the scope of the policy.

Page: [Policy D11 Fire safety](#)

Section: [D11](#)

There seems to be a lack of information regarding how the Fire safety policy will be regulated. We appreciate that with the advent of the tragedy at Grenfell that fire safety standards need to be tightened but we do not feel that it should be the responsibility of Planning officers to check fire safety standards as they do not possess the necessary expertise or knowledge. This requirement puts added stress on already stretched resources at local authorities. What resources and expertise will the Mayor offer as it shouldn't be left to individual council planning departments to resource?

Page: [Policy D12 Agent of Change](#)

Section: [D12](#)

This policy measure is strongly supported as it complements the NPPF and addresses the long-standing issue of existing, well run, noise-generating premises being adversely affected by poorly planned new development or changes of use.

Page: [Policy D13 Noise](#)

Section: [D13](#)

Suggested additions to the policy: to minimise creeping ambient and background noise levels from fixed plant on new developments, and to prevent nuisance and adverse impacts, developers should be encouraged to achieve the lowest possible noise emissions. Unless robust justification is provided, developers should demonstrate that noise levels from new plant do not increase existing background noise levels. This policy has been highly effective in reducing complaints from fixed plant over the last 20 years.

In addition, some clarity should be provided as to whether policy D13 applies (as we think it should) to the construction and demolition phases, and not just the finished development.

Page: [Policy H1 Increasing housing supply](#)

Section: [H1](#)

The London Plan proposes an annual housing target of 1,638 homes for LBHF. This is an uplift from previous years. Officers are concerned that the higher housing target is unachievable, despite having an ambitious housing and regeneration strategy, and will impact the Council's ability to negotiate for larger sized dwellings across all tenures.

Another concern regarding this policy is the fact that the Government has now introduced its Housing delivery test. This will be used as a measure to ensure that local authorities are held accountable to delivering new homes in their areas. The Housing delivery test will also highlight whether the number of homes being built by an authority is below target, put into place mechanisms to establish why this is the case and then if necessary create a policy approach that would ensure that further land will become available to accommodate new homes.

The main problem with the Housing Delivery test is where local authorities are deemed to be under delivering in terms of building new homes, there are penalties imposed on them such as placing the presumption in favour of sustainable development in an area. This places additional emphasis on the need to for planning permission to be granted.

We would like assurances from the GLA that themselves and the Government will work collaboratively with each other to ensure that if local authorities miss their yearly housing targets that the GLA has set, then there will be no penalties imposed on them.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

This is an acceptable position, but London wide guidance should be provided on how best to calculate the off-site calculation – to avoid inconsistencies between boroughs and to avoid any ‘race to the bottom’ in setting of contributions.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

Although it is appreciated that utilising small sites more effectively is necessary to make provision for more homes in London, Hammersmith and Fulham are concerned that the methodology in relation to small sites policy was not consulted on. This has major implications as our borough had a small sites target imposed upon it and have no method of challenging the assumptions made with regards to the target as they do not know how those figures were calculated. As the small sites figure forms such an integral part of the overall housing target for boroughs, we feel that it is important that boroughs are consulted on its methodology, even if this is done retrospectively. We urge the GLA to look at this request urgently as we feel that it undermines the “Soundness” of the Draft London Plan overall as a key segment of the policy was not consulted upon. Officers are concerned that whilst a large proportion of housing delivery outside of the Regeneration Areas is from conversions; by introducing a specific policy on this, this may put greater pressure on conversions to come forward, and the borough may lose existing larger dwellings.

Also of concern is the site selection process for the Strategic Housing Land Availability Assessment (SHLAA), and the restriction on the ability of London boroughs to be able to delete sites that had nil possibility of being brought forward. Instead, the option of applying a low probability cumulatively over the large quantity of sites has inflated the overall targets for the Borough.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

Twenty-five units is too large a threshold, and a presumption in favour wouldn't respect the complexity and neighbourliness of developing in a dense urban environment. A specific or more detailed design code will be needed for designated conservation areas otherwise they should be added to F as an exclusion.

We recommend that the threshold is reduced to 10 units for presumption in favour of development.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.7](#)

How boroughs choose to account for this funding should be at the discretion of each borough. Nominations arrangements will need to be reciprocal for offsite out of borough pooling of contributions.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.8](#)

How boroughs choose to account for this funding should be at the discretion of each borough. Nominations arrangements will need to be reciprocal for offsite out of borough pooling of contributions.

Page: [Policy H6 Threshold approach to applications](#)

Section: [H6](#)

Policy H6 Threshold approach to applications

The London Plan proposes a 50% Affordable Housing target with a 35% threshold approach whereby applications that achieve 35% or above, meet the relevant tenure mix, and infrastructure requirements are not required to provide a viability assessment. Officers generally support this approach. However, policy should stress affordable means accessible to local residents and it should acknowledge that affordable thresholds at local level should prevail.

Page: [Policy H6 Threshold approach to applications](#)

Section: [H6](#)

The 50% threshold for public sector land is supported, however the need for grant or not, needs to be contextualised by the ‘in the round’ ask of social infrastructure on particular sites – there may be other drivers alongside affordable housing, including, civic, health schools, that may place demand on use of land value and where additional grant may be required to deliver the appropriate level of affordable housing.

Page: [Policy H10 Redevelopment of existing housing and estate regeneration](#)

Section: [H10](#)

Paragraph 4.10.05

H&F object to the lack of distinction in this paragraph between estate regeneration schemes where complete redevelopment is being considered and estate renewal projects where estates are retained, uplifted and improved. The London Plan should be looking to lend support for estate renewal projects in addition to or instead of complete redevelopment projects.

H&F support the emphasis in this paragraph on making sure that the housing is being genuinely re-provided and that no better option is available. We agree that the impact of estate regeneration schemes on existing residents is particularly important and that information about the viability of schemes is available to the public even where a high level of affordable housing is being delivered. However, the paragraph should be encouraging boroughs to scrutinise development proposals for estates carefully rather than relying on the Mayor to do so

Suggested change to text:

Introduce distinction between estate regeneration and estate renewal and should provide encouragement of estate renewal projects.

Page: [Policy H12 Housing size mix](#)

Section: [H12](#)

Policy H12 Housing size mix

There is a lack of a family housing target in the Plan, and the Housing Mix policy does not support boroughs identifying a housing split for market and intermediate housing. This does not align with the Council's objective to provide a range of housing opportunities for families in the borough. We therefore believe that this policy is unhelpful as it undermines the council's ability to set up a housing mix that will meet its housing needs.

Page: [Policy H13 Build to Rent](#)

Section: [H13](#)

Policy H13 Build to Rent

A stronger protection of affordable units within BTR schemes is needed beyond the mayor's strong preference for London living rent and must explicitly rule out discounts set by reference to the market rent elsewhere in the block. Setting by reference to incomes is preferred. Recent experience of market rent 20% below market has not been adequate to meet the needs of those requiring intermediate products.

Affordable housing must be at a discount to the market rent which will be set at a maximum of London Living Rent, and which also must include rents at a discount greater than London Living Rent.

Suggested change to text Policy H13 Build to Rent Part C:

"For Build to Rent schemes to follow the fast track route they must deliver at least 35% affordable housing, of which at least 30 % should be at a London Living Rent level, with the remainder being at a range of discounts below market rent agreed with the borough, but which must be below London Living Rent and affordable to households on incomes of £60,000 or less".

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [S1](#)

Policy S1 Developing London's social infrastructure

The London Plan policy, S1, is the broad policy on all social infrastructure types with dedicated policies on Education and Health. S1, however, does not have any regard to future need or demand for these types of social infrastructure. Officers consider this an important consideration and should apply to all social infrastructure.

Page: [Policy S2 Health and social care facilities](#)

Section: [S2](#)

Policy S2 (C)

“New facilities should be easily accessible by public transport, cycling and walking.”

The design of building in areas of poor air quality can minimise the exposure of future vulnerable users of health facilities to poor air quality.

Recommended text for point (C)

New facilities should be easily accessible by public transport, cycling and walking. To Help prevent or mitigate the impacts of noise and poor air quality on these health and social care facilities any habitable rooms and external amenity areas are orientated away from the main sources of poor air quality and noise e.g. busy roads

Underline represents additional text that is recommended to be added.

Page: [Policy S2 Health and social care facilities](#)

Section: [S2](#)

Please refer to the council's PDF response submitted by email for comments on this policy.

Page: [Policy S2 Health and social care facilities](#)

Section: [5.2.2](#)

Please refer to the council's PDF response submitted by email for comments on this paragraph.

Page: [Policy S2 Health and social care facilities](#)

Section: [5.2.4](#)

Amend Paragraph 5.2.4 as follows:

Sustainability and Transformation Plans (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area. LBHF and Ealing Councils did not agree with the NWL STP plans for reductions in local acute hospital capacity and challenged the evidence submitted in the Strategic Outline Case Part 1 (SOC1) business case. The NHSI rejected the business case because of its unrealistic estimates of achieving reduced hospital admissions.

Page: [Policy S2 Health and social care facilities](#)

Section: [5.2.7](#)

Amend Paragraph 5.2.7 as follows:

Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of **efficiency savings, service reconfiguration and small adjustments in capacity**, for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that **new primary and community facilities or acute capacity will need to be provided**. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions.

Page: [Policy S2 Health and social care facilities](#)

Section: [5.2.9](#)

Amend Paragraph 5.2.9 as follows:

Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved capacity, facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies). Whilst the London Estates Board provides a single forum for discussions it cannot override the local democratic accountability and engagement required in decisions about local borough NHS estates and hospitals.

Our main objective is to safeguard Charing Cross hospital and its facilities for the foreseeable future. We feel that this paragraph undermines our ability to achieve this ambition

Page: [Policy S3 Education and childcare facilities](#)

Section: [S3](#)

Policy S3 (B) and 5.3.10

B Development proposals for education and childcare facilities should:

- 1) locate facilities in areas of identified need
- 2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling
- 3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances
- 4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling.
- 5) maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures.
- 6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities
- 7) ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach.
- 8) ensure that facilities incorporate suitable, accessible outdoor space
- 9) locate facilities next to parks or green spaces, where possible
- 10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand

Poor Air Quality has a major impact to the health of the most sensitive child receptors. The design of educational building in areas of poor air quality can minimise the exposure of users of the facilities to poor air quality.

Revised text for Point B (3):

Help prevent or mitigate the impacts of noise and poor air quality on the Classrooms, Playgrounds (and other external amenity areas), Entrances by ensuring they are orientated away from the main sources of poor air quality and noise e.g. busy roads.

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.12](#)

Policy S3 – Education and childcare facilities

Paragraph 5.3.12

The introduction of the last sentence at the very end of this paragraph: '*Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities*' is not reflected within the policy wording itself and seems to have been dropped in. Without fuller explanation and qualification it is open to abuse and could help facilitate the net loss of potential social infrastructure via the redevelopment of school sites with housing and schools on a reduced site. This sentence should therefore be qualified to clearly establish the requirement that there should be no net loss of the education and childcare facilities.

Page: [Policy S5 Sports and recreation facilities](#)

Section: [S5](#)

Policy S5 (B)

B Development proposals for sports and recreation facilities should:

- 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling.
- 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities.
- 3) support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.
- 4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

Poor Air Quality has a major impact to the health of the users of sports and recreational facilities. The design of these facilities in areas of poor air quality can minimise the exposure of users of the facilities to poor air quality.

Suggested text for change

Insertion of text for new point B (5)

Help prevent or mitigate the impacts of noise and poor air quality by ensuring they are orientated away from the main sources of poor air quality and noise e.g. busy roads

Page: [Policy E3 Affordable workspace](#)

Section: [E3](#)

Policy E3 Affordable workspace

Safeguarding and growing the supply of low cost work space is a positive move that will benefit small businesses and entrepreneurs as it gives them the opportunity to compete in a diverse economy and will enable them to use affordable workspace to achieve this.

Officers support the inclusion of policies on low cost business space as well as affordable workspace into the Draft London Plan as they should support the council's own aspirations.

The commitments on affordable workspace, however, are in the main too vague and passed down to boroughs. We expect to see this and related policy backed up by an SPG that gives weight to borough needs and consistency so individual councils aren't played off against each other. An obvious area to promote affordable workspace and new co-working space in particular would be around commercial and transport hubs like Hammersmith town centre.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [E4](#)

Policy E4 Land for industry, logistics and services to support London's economic function

Criteria C seeking no net loss of industrial floorspace within designated SIL and LSIS – the supporting text should highlight that land capacity and land values will prevent new industrial floorspace in more central areas like H&F and intensification and co-location is likely to be the most feasible and viable option to securing no net loss in SIL and LSIS. And that practical strategies will be needed to overcome the challenges of land assembly given the fragmented ownership in many SIL and LSIS and varying lengths of leases.

Policy E11 Skills and opportunities for all

We agree with the ambition of this policy to develop an effective and responsive skills system through the Skills for Londoners Taskforce. The overall objective will be to equip Londoners with the skills that employers require and give them access to jobs and other opportunities that will enable them to contribute to London's economy. The intention of this policy is to address low pay in work and to create apprenticeships and other education and training initiatives which will especially tackle youth unemployment and will give Londoners as a whole better opportunities of securing work across several sectors.

The move towards greater focus on completion, quality and sustainability of any opportunities created via s106 processes is very welcome as often agreements are more concerned with volume and miss on meaningful collaboration with developers and their supply chains to enable sustainable positive impact on local communities; it is also encouraging to see that cross-borough working and the sharing of apprenticeship opportunities (depending on the type of development and the length of build), is also included as very often this is a barrier to completing apprenticeships and skills opportunities if limited to one site in a particular borough. We would like to see more 2-year apprenticeships at levels 3 & 4 in both construction and non- construction, linked to employment opportunities with contractors working on other sites in London. With the already chronic skills shortage in London that could potentially worsen with the advent of Brexit. Developers and contractors should work with boroughs to evolve systems of retention for qualified apprentices. There should be strong policy encouragement of local procurement opportunities from developments especially where SMEs are concerned.

Page: [Chapter 7 Heritage and Culture](#)

Section: [N/A](#)

Chapter 7 Heritage and Culture

Greater emphasis should be given to the overriding context that London's heritage assets make a significant contribution to the City's culture and that they should be conserved. Greater weight should be given to their preservation with wording consistent with the NPPF.

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [HC1](#)

Policy HC1 Heritage conservation and growth

Under C – the phrase 'should conserve their significance, by being sympathetic to the assets' significance' is not compatible with the NPPF or current legislation. In the language of the NPPF a heritage asset can only be conserved if it is protected from harm. The term 'sympathetic' is poorly chosen and 'by being sympathetic to the assets' significance' should be removed since it is unnecessary.

Under C – the phrase 'and appreciation within their surroundings' is poorly chosen and should be replaced by 'including their setting'. The setting of a heritage asset may not simply relate to its immediate surroundings but also a wider setting including longer views. In addition, in the case of a listed building or conservation area the significance of a heritage asset can be appreciated from inside it as well as from its surroundings.

Page: [Policy HC6 Supporting the night-time economy](#)

Section: [HC6](#)

Policy HC6 Supporting the night-time economy

We support the ambition of this policy to promote the growth and diversification of the night time economy. London is an extremely vibrant city, with world-class entertainment, restaurants, and nightlife covering a variety of locations and addressing a wide selection of audiences. The existing night time economy is thriving and the introduction of the night tube has ensured that both Londoners and visitors alike can enjoy the city for longer at the weekend and have a relatively secure mode of transportation.

Late night public transport should be extended and the frequency improved to facilitate safer and more attractive night time activity.

All night and late-night stores are increasing across the capital, addressing changing consumer and working habits together with flexible lifestyles. Twenty-four hour businesses should be to the benefit of the local community, and not a nuisance. As such, the mayor should ensure there is a market demand for this and that any changes reflect the feel of the local community and their wishes. We should also work to improve existing opening/operating times.

Page: [Policy G2 London's Green Belt](#)

Section: [G2](#)

Policy G2 London's Green Belt

We object to the Mayor's approach to Green Belt is not in conformity with national planning policy. National planning policy allows authorities to review and amend Green Belt boundaries, including removing sites from Green Belt designation. The Mayor's approach does not allow any de-designation, going further than the NPPF. The continued restriction upon London Green Belt places additional pressure for inner London boroughs to deliver high density housing where open space, employment facilities, community facilities are already under pressure. This inevitably further perpetuates high land values across London.

Page: [Policy G4 Local green and open space](#)

Section: [G4](#)

Policy G4 Local green and open space

The ambition of this policy is welcomed especially with regards to opposing the loss of green and open spaces in areas of deficiency. The policy also promotes the creation of new areas of publicly accessible green and open space in areas of deficiency. Green and open spaces provide a wide range of positive benefits in relation to the social, health and environmental well-being of people and places and we support the fact that the Mayor recognises that they are a vital component of London's infrastructure.

Policy SI1

“London’s air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced”

The current opening policy statement does not assert the severity of the air quality challenge posed in London.

Suggested change to text

Recommended revised text

London’s air quality should be significantly improved to as a minimum to comply with current National Air Quality Objectives and where applicable adopt the World Health Organisation (WHO) standards, notably PM10 and PM2.5 this will ensure protection from exposure to poor air quality for all especially for vulnerable people.

Underline represents recommended text for addition.

Policy SI1 (A) 2

“Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people.”

The design proposals for air quality should not be restricted to GLA Air Quality Focus Area's. As there are many areas of exceedance of the air quality objectives and areas of high exposure to poor air quality in the borough wide AQMA for Hammersmith and Fulham that are not currently located within the current GLA air quality focus areas.

Recommended revised text:

Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Developments should be designed so that at a time when local air quality improves any impact from the development will not be significant to local air quality Particular care should be taken with developments that are in *Air Quality Management Area (AQMA) and areas of poor air quality* or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people.

Underline represents recommended additional text to be added.

Page: Policy S11 Improving air quality

Section: S11

Policy S11 (4)

Development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance”.

The council welcomes the inclusion of NRMM requirements in the air quality policy.

Suggested change to text

Insertion of text into S11 (4)

Development sites should explore the use of ultra-low emission technology for NRMM as it becomes available.

Underline represents recommended additional text to be added

Policy SI1 (3)

The council welcomes the inclusion of

“The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral. “

Typically, these are areas for which large increases in population are proposed and such as major developments and has the potential to substantially improve exposure to and impact upon poor air quality. It is recommended that major developments should be also be included within this policy

Suggested change to text

Revised wording for SI1 (3)

The development of large-scale redevelopment areas, such as Opportunity Areas, *Major Developments* and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral.

Policy SI1 5)

The council has concerns about this section of the policy:

“Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use. “

Section 5) of the policy could lead to detrimental air quality impacts, building emissions may be reduced by a new development, but new configuration of building/ building density may result in

emissions which lead to greater human exposure to air quality, that is not fully considered/investigated. Section 5 should be removed. Air Quality assessments are essential to ensure other aspects of the policy are complied with.

This section of policy would not be in accordance with the new local plan policy CC10 or widely accepted air quality guidance by Institute of Air Quality Management.

Remove section 5) of the policy.

“The aim of this policy is to ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits. Where limit values are already met, or are predicted to be met at the time of completion, new developments must endeavour to maintain the best ambient air quality compatible with sustainable development principles.”

Inclusion of compliance with air quality legal standards is important and welcomed, however benefits to health can be seen by further reduction below legal standards. Indeed, current air quality legal standards do not reflect the World Health organisation guidelines for Particulate Matter for example. This should be included within the air quality section. It should encourage filtration of air for particulate matter even if meeting legal standards, if filtration is necessary for nitrogen dioxide already for example. (This could be included in design solutions guidance required)

Recommended revised text for 9.1.2

The aim of this policy is to ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits. Where limit values are already met, or are predicted to be met at the time of completion, new developments must endeavour to maintain the best ambient air quality compatible with sustainable development principles. Improvements to health continue where concentrations of air pollutants are reduced below limit values, therefore developers should work towards complying with World Health Organisation Air Quality Guidelines for PM10 and PM2.5

Underline represents recommended additional text to add.

“For larger-scale development areas such as Opportunity Areas, or those large enough to already require an Environmental Impact Assessment, there should be an aim to be Air Quality Positive by implementing measures across the area that will actively reduce air pollution. This could be achieved, for example, by the provision of low or zero-emission heating and energy, or improvements to public transport, walking and cycling infrastructure, and designing out features such as street canyons that prevent effective dispersion of pollutants. Data from the use of smart

infrastructure such as sensors could contribute to beneficial design solutions. “

Welcome the inclusion of air quality positive and designing out street canyons. This would support a statement on benefits of improving air quality further than to meet the air quality legal standards discussed previously with regard to point 9.1.2.

Revised wording

For larger-scale development areas such as Opportunity Areas, *and major developments* or those large enough to already require an Environmental Impact Assessment there should be an aim to be Air Quality Positive by implementing measures across the area that will actively reduce air pollution. This could be achieved, for example, by the provision of low or zero-emission heating and energy, or improvements to public transport, walking and cycling infrastructure, and designing out features such as street canyons that prevent effective dispersion of pollutants. Data from the use of smart infrastructure such as sensors could contribute to beneficial design solutions.

Page: [Policy SI1 Improving air quality](#)

Section: [9.1.4](#)

“For major developments, a **preliminary AQA** should be carried out before designing the development to inform the design process. The aim of a preliminary assessment is to assess: The most significant sources of pollution in the area Constraints imposed on the site by poor air quality Appropriate land uses for the site Appropriate design measures that could be implemented to ensure that development reduces exposure and improves air quality.”

This is welcomed, and supports a much-improved approach to development in areas of poor air quality. Frequently, still, the design is at an advanced stage before any consideration of a poor air quality environment, which constricts design solutions available.

Page: [Policy SI1 Improving air quality](#)

Section: [9.1.8](#)

Air Quality Focus Areas (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO₂) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. There are currently 187 AQFAs across London (Figure 9.1). The list of Air Quality Focus Areas is updated from time to time as the London Atmospheric Inventory is reviewed and the latest list in the London Datastore should always be checked.

The council would welcome the opportunity to be involved in future revision of Air Quality Focus Areas.

Suggested change to text

Revised wording to text

Air Quality Focus Areas (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO₂) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. There are currently 187 AQFAs across London (Figure 9.1). The list of Air Quality Focus Areas is updated from time to time as the London Atmospheric Inventory is reviewed *and London boroughs consulted* and the latest list in the London Datastore should always be checked.”

Page: [Policy SI1 Improving air quality](#)

Section: [9.1.11](#)

‘Further **guidance** will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts.’

Guidance should be expanded to provide information on what design solutions would be considered appropriate to utilise for developments where air quality is a concern/ restriction on development: This will ensure a consistent and proportionate approach throughout London.

Suggested text to change

Recommended revised text for 9.1.11:

Further **guidance** will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts *and suitable design solutions, development proposals can utilise when air quality is identified as a concern.*

Underline represents recommended change to text

The Mayor's approach is welcomed as exploration for and use of shales gas is not consistent with the Plan's policy approach to reducing climate change emissions and minimising environmental impacts of development.

Page: [Policy SI1 Improving air quality](#)

Section: [9.1.11](#)

“Further **guidance** will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts”.

Guidance should be expanded to provide information on what design solutions would be considered appropriate to utilise for developments where air quality is a concern/ restriction on development: This will ensure a consistent approach throughout London.

Additional guidance is welcomed and should also include guidance on appropriate design solutions that are specifically geared towards the London air quality environment. This will ensure a consistent approach throughout London and proportionate to the air quality environment. These design solutions could incorporate more technologically advanced solutions, there should be further detail on how the sensors detailed in 9.1.4 could drive technological solutions to improving air quality. In areas that exceed air quality legal standards, sensors could be utilised to inform residents to close windows at times of poor air quality. The additional guidance should signpost Freight and Servicing Policy T7 which discusses impact of personal deliveries by new developments. Facilities required to prevent missed deliveries etc.

Suggested text to change

Revised text included in 9.1.1

Further guidance will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts and suitable design solutions development proposals can utilise when air quality is identified as a concern

Underline represents recommended change to text

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [N/A](#)

Supporting text to comment ID 586

The principles underlying sustainable design and construction reflect a number of policies in this Plan. In particular they seek to improve the environmental performance of buildings, including consideration of climate change mitigation and adaptation. The Policy is intended to ensure that buildings minimise carbon dioxide emissions; are efficient in resource use; protect the environment; recognise the uniqueness of locations; are healthy and adaptable; and make the most of natural systems including, for example, the use of passive solar design or local ecosystems. It should be considered alongside policies dealing with architecture and design.

Design features such as green roofs can enhance biodiversity, absorb rainfall, improve the performance of the building, reduce the urban heat island effect and improve the appearance of a development. Use of appropriate materials is also key, and where practicable those with a high embodied energy (see glossary) should be avoided. The Mayor's supplementary planning guidance on Sustainable Design and Construction and on Housing reflect key sustainable design principles and outlines the standards that are applicable to all developments. These standards should be considered early in the design process and should be addressed in the design and access statement to show how they have been integrated into the development proposal.

In support of the London Housing Strategy the Mayor has produced a Housing Design Guide^[1], which provides further guidance on the standards outlined in the Mayor's Housing Supplementary Planning Guidance.

Sustainable construction is also a key consideration. The Mayor's supplementary planning guidance on Sustainable Design and Construction outlines key principles and standards that are applicable to the construction phase of new development. It suggests developers refer to the Mayor and London Councils' best practice guidance on the control of dust and emissions during demolition and construction. This addresses the environmental impact of construction[2], including minimising emissions of dust and construction plant and vehicles emissions. The Mayor also encourages the use of the Demolition Protocol[3] developed by London Remade to support recycling and reuse of construction materials.

[1] Mayor of London. London Housing Supplementary Planning Guidance 2016.

[2] Mayor of London and London Councils. The Control of Dust and Emissions from Construction and Demolition. Best Practice Guide. London Councils and GLA, 2006.

[3] ICE. Demolition protocol –implementation document. ICE and London Remade, 2003.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [SI2](#)

The current London Plan includes Policy 5.3 on Sustainable Design and Construction, but there is no similar policy proposed in the draft new London Plan. We consider that the current policy is useful and serves an important role in ensuring that sustainability issues are given full consideration for major developments.

If the requirements of sustainable design and construction had been distributed throughout policies in the draft London Plan such as Policy D2 on Delivering Good Design then this would be less of an issue, but it is felt that sustainability requirements are less integrated than they should be if there is not a stand-alone policy.

Removal of the policy from the draft new London Plan is considered to be a negative move and that the policy and associated supporting text should be reinstated.

As a minimum, the current Sustainable Design & Construction policy and supporting text should be updated where necessary and included in the new Plan as follows:

Policy

A The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

Planning decisions

B Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:

a minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)

b avoiding internal overheating and contributing to the urban heat island effect

c efficient use of natural resources (including water), including making the most of natural systems both within and around buildings

d minimising pollution (including noise, air and urban runoff)

e minimising the generation of waste and maximising reuse or recycling

f avoiding impacts from natural hazards (including flooding)

g ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions

h securing sustainable procurement of materials, using local supplies where feasible, and

i promoting and protecting biodiversity and green infrastructure.

Local Plan preparation

D Within Local Plans, boroughs should consider the need to develop more detailed policies and proposals based on the sustainable design principles outlined above and those which are outlined in the Mayor’s supplementary planning guidance that are specific to their local circumstances.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [SI2](#)

The Policy heading refers to “greenhouse gas emissions” but the policies only refer to “carbon” emissions which seems to be an inconsistency.

Suggested change to text

Either the Policy heading should be amended to refer to “Minimising carbon emissions” or the policy should relate to all greenhouse gases not just carbon emissions. Otherwise this could be confusing and be difficult to implement consistently.

Policy SI2 (A)

The new target for major developments of being “net zero-carbon” is assumed to provide greater emissions reductions than the current London Plan “zero carbon” approach, so on that basis it is supported. However, we note that the Energy Hierarchy that is used to support the current target has essentially been reproduced – with minor changes – in the new Plan to support the new target. Further amendments to the Hierarchy should be considered to make it more relevant to the “net zero-carbon” approach.

The current and proposed energy hierarchy of Be Lean-Be Clean-Be Green is currently resulting in the fossil fuelled based energy plant emission sources i.e. CHP being introduced into borough wide air quality management areas. This is resulting in a cumulative impact on background NO2 concentrations.

A key recommendation from the resident lead from H & F commission Air Quality report, 2016 was:

“The Mayor of London to review London’s Climate Change and Energy Strategy to reconcile the potential conflict between decentralised energy and air pollution and cease promoting combined heat and power installations in its energy hierarchy above air quality neutral technologies”.

The new H&F Local Plan Policy CC10 part (e) refers to:

“requiring all decentralised energy schemes to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be prioritised over other air quality neutral technologies”.

The energy hierarchy needs to be revised to encourage and incentivise:

- the uptake of air quality neutral energy technologies
- air quality positive developments

- higher thermal efficiency fabric standards such as Passivhaus, WELL Building Standards, Association of Environment Conscious Building
- Reduction on the reliance of fossil fuelled combustion based energy plant.

Suggested change to text

“We consider that the Energy Hierarchy needs modifying to better promote the requirements of the new carbon reduction and air quality policies particularly the ‘air quality positive approach’ as stated in part 3 of Policy SI1 Improving Air Quality.

Managing demand to minimise energy use and associated carbon/greenhouse gas emissions during construction and operation of developments (“Be Lean”) should still remain as the number 1 priority, but from that point on, changes are required which reflect the requirements of the new air quality policy SI1 which can be done by prioritising use of low/zero polluting, locally generated non-combustion energy sources. This could be through use of locally available sustainable sources such as secondary heat or on-site low/zero emission non-combustion renewable technologies. Once energy demand has been minimised and use of zero/low emission, on-site energy generation options have been maximised, then the third tier of the Hierarchy could then allow the use of other, clean generation energy technologies.

Also, consideration could also be given to introducing a 4th element to the Hierarchy that reflects the option that is available to major developers to use “negative emissions technologies” to help meet the “net zero-carbon” requirement”.

Policy SI2 (B)

This requires major developments to provide a detailed Energy Strategy which demonstrates how the zero-carbon target will be met in line with the Energy Hierarchy requirements. It also refers to the expectation that energy performance will be monitored and reported on.

We consider that there is a difference between “net zero-carbon” and “zero carbon”, so this needs to be reflected in the wording of the Policy. Also, if this policy is dealing with greenhouse gas emissions, then this also needs to be clear – otherwise these emissions are not being captured by referring just to carbon.

In the context of setting more stringent targets, the “expectation” that energy use would be monitored is considered to be too weak and monitoring of energy use and emissions should be set as a requirement.

Suggested change to text

Amend the text as follows: “Major development should include a detailed energy strategy to demonstrate how the net zero-carbon and greenhouse gas emissions target will be met within the framework of the energy hierarchy and will be required to monitor and report on energy performance and associated greenhouse gas emissions”.

Policy SI2 (C)

This part of the policy refers to minimum targets in relation to meeting the zero-carbon target through on-site measures, including energy efficiency related targets.

As commented for other aspects of the Policy, it needs to be clarified that net zero carbon approach is being taken.

This target only relates to the operational phase of development. The policy has been widened to also cover emissions during construction, however there isn't really anything of note to show how this is to be dealt with. It is difficult to know how to do this though as to our knowledge there is no standard way to assess greenhouse gas emissions for the construction phase of developments and no targets have been set in the policy. This requires further consideration.

The continued use of an offset payment approach to help fund carbon/ greenhouse emissions reductions measures is supported.

Suggested change to text

Amend the text as follows: "In meeting the net zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected".

Consider how the issue of construction phase emissions should be managed and whether targets should be set. "Where it is clearly demonstrated that the net zero-carbon target cannot be fully achieved on-site..."

Policy SI2 (D)

Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.

Should this be a greenhouse gas offset fund? "Carbon" and "greenhouse gas" seem to be used interchangeably here, but they are different and it needs to be clear what the policy is covering.

Suggested change to text

Boroughs must establish and administer a greenhouse gas emissions offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.1](#)

It is stated that if London is to achieve its objective of becoming a zero-carbon city by 2050, new development needs to meet the requirements of this policy.

If it is essential that all new developments achieve net zero carbon/greenhouse gas emissions performance, does the Policy need to include wording that relates to the non-major developments, as at the moment it is only these that are covered.

This paragraph also says that development involving major refurbishment should also aim to meet this policy. If that's the case, this needs to be stated within the Policy, not just in the supporting text.

There is a footnote in this paragraph which states that “‘Carbon’ is used in the London Plan as a shorthand term for all greenhouse gases. London’s carbon accounting is measured in carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions”. This should be stated at the beginning of the Chapter, not in a footnote part way through as it impacts on the interpretation of the main Policy.

Suggested change to text

Consider also adding a requirement for all other developments – not just major refurbishments – to aim to meet this Policy.

Move the text that explains the use of “Carbon” as a catchall term for all greenhouse gases to the beginning of the Chapter.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.2](#)

This paragraph references the Energy Hierarchy. As outlined in our comments about the Hierarchy above, there may be a case to revise this.

Suggested change to text

If any amendments are made in the Policy text to the Energy Hierarchy, these will need to be reflected here as well.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.3](#)

This Paragraph states that “Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies and use innovative building materials and smart technologies”.

This applies to all developments it seems, not just majors? The requirement is very specifically about getting solar panels included in new developments wherever possible, which is no doubt a good idea and one we would support, but such a requirement would be better off being included in the Policy.

Suggested change to text

It would lend weight to this requirement if the relevant text was included in the Policy itself, not just the supporting text.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.4](#)

States that the zero-carbon target for major residential developments in the current London Plan will be extended to include major non-residential developments on final publication of the new Plan (expected 2019). This move is welcomed.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.5](#)

The approach outlined in this Paragraph is noted and welcomed in terms of setting the minimum CO2 emission improvement target which will be increased over time.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.6](#)

This Paragraph sets out an expectation that residential developments should aim to achieve 10% and non-residential development 15% improvements over minimum requirements of the Building Regs 2013 in relation to CO2 emissions. These targets appear to be achievable although challenging and are therefore supported.

There is also a reference to BREEAM, including a recommendation that Boroughs are encouraged to include BREEAM targets in their Local Plans where appropriate. BREEAM Assessments are not used to assess residential developments. The BRE has development a new Home Quality Mark (HQM) to replace the Code for Sustainable Homes. It may be worth considering including a reference to this.

Suggested change to text

Consider adding a reference to the Home Quality Mark (HQM) scheme to complement the text on BREEAM.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.7](#)

Agree with this Paragraph's point about the need to continue to review the price for offsetting carbon as offset fund payments do have the scope to unlock carbon savings from the existing building stock through energy efficiency programmes etc. It is noted that a price of £95/tonne has been tested as part of the viability assessment for the London Plan. The price does need to be set at a suitable level though that does not encourage developers to prefer to go down the 'offset' route when they should be installing emissions reduction measures on-site.

Suggested change to text

No changes, although if there is scope to consider that the price of offsetting carbon should be increased – perhaps closer to £120/tonne – in order to encourage more investment in on-site measures, then this should be done.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.8](#)

Details that the Mayor provides support and advice to boroughs on how to set up and use carbon offsetting funds.

This advice/support is welcomed.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.9](#)

We welcome the stipulation that energy demand and emissions should be monitored to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC) and reporting to the Mayor for at least five years via an online portal to enable the GLA.

Suggested change to text

No changes, but we recommend that where monitoring of energy use and emissions identifies good practice that this is highlighted and made available to help inform developers and Boroughs in their approach to reducing carbon/greenhouse gas emissions.

This Paragraph notes that the Mayor may publish further planning guidance on sustainable design and construction and will continue to regularly update the guidance on preparing energy strategies for major development. This is welcomed as the SPGs and other GLA guidance documents are very good sources of information and advice that council officers use regularly.

The remainder of this Paragraph sets out a checklist of minimum requirements that should be covered in Energy Strategies.

The checklist is considered to be very helpful and could even work as a standalone Policy to emphasise the importance of providing the right information with applications on energy and greenhouse gas emissions. More could be said on how the construction phase should contribute to the net zero carbon/greenhouse gas emissions requirements.

Suggested change to text

Consider developing the Energy Strategy checklist requirements into a stand alone Policy.

Consider including more information on how the construction phase should contribute to the net zero carbon/greenhouse gas emissions requirements.

Section A of the Policy requires boroughs and developers to work with the energy companies to establish future energy requirements as a result of large-scale development proposals. This is acknowledged and welcomed as it is sensible for all parties to have early discussions on these issues for major development proposals, especially at Opportunity Area etc scale. This could also include reference to major developments.

Section B sets out requirements for Energy Masterplans which should be developed for large-scale development locations. The checklist covers a number of logical and relevant areas such as determining heat loads, identifying preferred approaches etc that would be the most efficient ways of using and distributing heat. We note the inclusion of “energy from waste” on the list, which we have some potential concerns about in terms of whether or not such processes can be suitable in dense inner London Borough such as H&F, but accept that this might be capable of being utilised in some boroughs without creating undesirable impacts.

Suggested change in text

Suggest amending the Policy as follows: “Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, Major Developments and other growth areas or clusters of significant new development”.

Section C sets out Development Plan requirements in relation to identifying the need and suitable sites for any necessary energy infrastructure and also requires existing heating/cooling networks and opportunities for expanding existing or establishing new networks to be identified.

This is useful guidance for LPAs, although on a matter of consistent formatting, SI2 also includes guidance for the Boroughs but it has not been presented as a separate “Development Plan requirements” section. This format, which mirrors that used in the current London Plan is useful is easily identifying requirements for the Boroughs and is an approach that should continue to be used.

Suggested change to text

No changes here – but possibly in other sections in order to provide a consistent way of presenting Policy requirements, particularly where requirements are set out for the boroughs to follow or implement.

Section D sets out the requirement that major development proposals within specific Heat Network Priority Areas should have a communal heating system and that the heat source for the communal heating system should be selected in accordance with the hierarchy set out in the Policy.

This approach is generally supported although within the hierarchy, we suggest requiring heat and/or power to be generated from zero-emission sources should refer to low or zero carbon/greenhouse gas emissions sources. The first part of the hierarchy (a) connecting into to an existing or planned heat network could presumably lead to increased emissions of pollutants such as NOx which would not be desirable so some thought has to be given to this scenario. Also, the 'qualifying' text in brackets for fuel cells and CHP (bullet points (d) and (e)) may be better off being presented outside of the Policy text box. Also, as currently worded, text refers to areas that are exceeding the air quality objectives but there are many areas of poor air quality that are close to exceeding within air quality management areas. The wording should be amended to relate to areas that are just meeting the air quality national objectives because the cumulative impact of increased combustion point sources could result in a failure to meet the air quality objectives.

The emphasis in this Policy on the need for CHP and gas boiler systems to be designed to ensure that there is no significant impact on local air quality is welcomed, as is the need new heat networks to be designed for connection at a later date which is also covered in this section of the Policy. However, the wording in terms of the impacts on local air quality needs to be consistent with the wording in Policy SI1.

It is not clear what the GLA wants to happen in areas that are not identified as being Heat Network Priority Areas. (Not relevant for H&F as the whole borough is a Priority Area, but may be useful for other boroughs).

Suggested change to text

Amend the text to D(2) as follows: “CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they do not lead to a further deterioration of existing poor air quality“. there is no significant impact on local air quality.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.1](#)

Welcome the commitment given here that the Mayor will work with boroughs, etc to promote the development of London's energy system.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.2](#)

Agree with the position of the GLA explained here that there need to be changes to the way we use and supply energy so that power and heat for buildings and transport is generated from clean, low-carbon and renewable sources.

We note the argument made here that London will need to shift from its reliance on using natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources.

We are not 100% clear how the drive to reduce use of gas can work in a consistent manner with the emphasis on using decentralised energy systems, which are invariably (for now at least) run on gas, so this is an area where it would be good to provide more supporting information to show that these aims can work together and are capable of both being achieved and are not contradictory.

Suggested change to text

Include a better explanation of how London can increase its use of communal decentralised heating systems whilst also reducing its reliance on gas.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.3](#)

This paragraph states that developments should connect to existing heat networks and that the delivery of new district heating infrastructure should be stimulated where feasible.

The whole of H&F has been identified by the Mayor as a Heat Network Priority Area which is agreed given the nature of the borough – i.e. it is one of a number of boroughs where the heat density is sufficient for heat networks to provide a solution for supplying heat to buildings and consumers.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.4](#)

We agree with the sentiments of this paragraph that where developments are proposed within Heat Network Priority Areas but are beyond existing heat networks, the heating system should be designed to facilitate future connection.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.5](#)

This paragraph notes that the Mayor supports standards such as the CIBSE CP1 Heat Networks: Code of Practice for the UK and the Heat Trust standard to help in delivering well designed heat networks.

Suggested change to text

No change, but recommend that these industry standards are referenced again in any revised GLA SPD/guidance documents.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.6](#)

This paragraph states that further information about the relevance of CHP in developments of various scales will be provided in the Energy Planning Guidance document, which is welcomed.

It is also clearly stated that “it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available”. This is actually a very important point, and one that should be given more emphasis.

Suggested change to text

With regards to the point about gas CHP not being suitable in air quality exceedance areas, this a point that should be made more clearly in the Policy.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.7](#)

This paragraph’s support for increasing the amount of new renewable energy generation in new developments is welcomed. However, we note that the list of example technologies given in this section does not mention heat pumps which we would have thought would play a major part in providing London’s future energy requirements.

Suggested change to text

Amend the text as follows: “Increasing the amount of new renewable energy sources in London developments is supported. This includes the use of energy from waste schemes that are connected to a heat network, as well as heat pumps, solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind and hydropower-based renewable energy in some locations within London.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.8](#)

This paragraph notes that the Mayor will work with the electricity industry, boroughs and developers to ensure that appropriate infrastructure is in place to meet London’s electricity needs. This is welcomed.

Electricity supply and demand is likely to become a key topic in terms of London’s future energy strategy. Demand is expected to rise in London in part as a result to the move over to widespread use of electric vehicles and electrically driven heating systems in buildings.

We note the concerns raised here about the fact the electricity network and substations are at or near to capacity in a number of areas, especially in central London and urge the Mayor to develop a strategy outside of the London Plan process to manage these infrastructure requirements.

Suggested change to text

No change, but urge the Mayor to look at the issue of electricity infrastructure in London separately outside of the London Plan process in partnership with energy companies and boroughs.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.9](#)

The points raised in this section in relation to gas supply infrastructure and the need to cover this issue in Energy Masterplans are supported.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.10](#)

This paragraph just notes that the gas supply companies in London are implementing significant gasholder de-commissioning programmes, replacing them with smaller gas pressure reduction stations, often releasing brownfield sites for redevelopment. This is supported, as shown by the proposed redevelopment of the Fulham Gasworks site.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.11](#)

We note the issue raised in this paragraph regarding the need for land being required for energy supply infrastructure including energy centres.

Page: [Policy SI4 Managing heat risk](#)

Section: [SI4](#)

This section states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems in accordance with a cooling hierarchy set out in the policy.

This approach is agreed although there is scope for a cross reference to the earlier policy SI2 in relation to using waste heat.

Suggested change to text

Suggest an amendment to the bullet points of the hierarchy to insert the following point between points 3 and 4: read as follows:

- “Where feasible, use any residual heat as a local energy resource”.

Page: [Policy SI4 Managing heat risk](#)

Section: [9.4.1](#)

Agree with this Paragraph - London must manage heat risk in new developments, using the cooling hierarchy set out above.

Page: [Policy SI4 Managing heat risk](#)

Section: [9.4.2](#)

Agree with this section on the problem of the urban heat island effect and the need to ensure London does not overheat. We are also supportive of the use of green roofs to help provide some mitigation of this problem, although it is not just green roofs that can do this, all kinds of green infrastructure will help regulate temperature through evapotranspiration and can provide much needed shading.

Suggested change to text

Amend the text as follows: “Green roofs and other green infrastructure measures can provide some mitigation of this effect by shading roof surfaces and buildings and as well as through evapo-transpiration.

Page: [Policy SI4 Managing heat risk](#)

Section: [9.4.3](#)

Agree with this paragraph that many aspects of building design can lead to increases in overheating risk and that measures should be implemented to mitigate overheating risk.

Page: [Policy SI4 Managing heat risk](#)

Section: [9.4.4](#)

Agree that the increased use of air conditioning systems is not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect.

Page: [Policy SI4 Managing heat risk](#)

Section: [9.4.5](#)

Agree with the advice provided here about using CIBSE guidance on assessing and mitigating overheating risk in new developments.

Page: [Policy SI5 Water infrastructure](#)

Section: [SI15](#)

(Section C) - Agree that development proposals should: 1) minimise the use of mains water, achieving mains water consumption of 105 litres or less per head per day (excluding external water consumption allowance); 2) achieve at least the BREEAM excellent standard (commercial development) and 3) be encouraged to incorporate measures such as smart metering etc.to help to achieve lower water consumption rates.

(Section D) - In terms of water quality, agree that Development Plans should: 1) promote the protection and improvement of the water environment; 2) support strategic wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. H&F support the regular review of safeguarded wharves in bullet D and the opportunity afforded to consolidate wharves as part of strategic land use change. This is something Hammersmith and Fulham have regularly requested in previous London Plan iterations and such acknowledgement and flexibility is welcomed.

(Section E) - This section sets out similar requirements to Section D, but for development proposals this time rather than for Development Plans.

Page: [Policy SI5 Water infrastructure](#)

Section: [SI15](#)

(Section A and B)

Agree fully that in order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner. (Section A).

Note that Section B states that Development Plans should promote improvements to water supply infrastructure.

(Section C)

Agree that development proposals should: 1) minimise the use of mains water, achieving mains water consumption of 105 litres or less per head per day (excluding external water consumption allowance); 2) achieve at least the BREEAM excellent standard (commercial development) and 3) be encouraged to incorporate measures such as smart metering etc. to help to achieve lower water consumption rates.

(Section D)

In terms of water quality, agree that Development Plans should: 1) promote the protection and improvement of the water environment; 2) support strategic wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. H&F support the regular review of safeguarded wharves in bullet D and the opportunity afforded to consolidate wharves as part of strategic land use change. This is something Hammersmith and Fulham have regularly requested in previous London Plan iterations and such acknowledgement and flexibility is welcomed.

The council already works closely with Thames Water in relation to local wastewater infrastructure requirements.

(Section E)

This section sets out similar requirements to Section D, but for development proposals this time rather than for Development Plans.

Agree with these requirements.

Page: [Policy S15 Water infrastructure](#)

Section: [S115](#)

(Section A and B) - Agree fully that in order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner (Section A). Note that Section B states that Development Plans should promote improvements to water supply infrastructure.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.1](#)

We note that London has higher than average water consumption and that London is also considered to be seriously water-stressed. A severe drought would have major implications for Londoners' health and wellbeing, the environment and London's economy.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.2](#)

Pleased to see in this paragraph that there is recognition that an important aspect of avoiding the most severe water restrictions is to ensure that leakage is reduced and water used as efficiently as possible.

We agree that the Optional Requirement set out in part G of the Building Regulations should be applied across London to help improve water efficiency

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.3](#)

Note the issues raised in this paragraph that even with increased water efficiency and reduced leakage, water companies are forecasting an increasing demand for water. Without additional sources of supply, the increased demand will increase the risk of requiring water restrictions during drought periods. Security of supply should be ensured.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.4](#)

Note that variations of the four strategic water supply options to serve London are under consideration through Thames Water's Water Resource Management Plan process and one or a combination of some of these are expected to be proposed to serve parts of the Wider South East including London.

Note that variations of the four strategic water supply options to serve London are under consideration through Thames Water's Water Resource Management Plan process and one or a combination of some of these are expected to be proposed to serve parts of the Wider South East including London.

We have no particular preferences to express.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.6](#)

Note that infrastructure investment is constrained by the short-term nature of water companies' investment plans and agree that in order to facilitate the delivery of development it is important that investment in water supply infrastructure is provided ahead of need.

Also agree that to minimise wastage, water supply infrastructure improvements should give consideration to the replacement of ageing trunk mains.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.7](#)

In the context of the significant investment needed, measures to protect and support vulnerable customers in particular from rising water bills are important.

This is agreed, although we are not sure what can be done in the context of the London Plan to provide this protection.

If the GLA are aware of any actions that could be implemented via the planning process to protect and support vulnerable customers, inclusion of some additional guidance here would help.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.8](#)

Agree that the Water Framework Directive requirements should be maintained through the Thames River Basin Management Plan and the Catchment Plans.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.9](#)

We note that additional land may be required for upgrades or improvements at some wastewater treatment plants during the Plan period. This does not affect H&F as there are no such facilities in the borough.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.10](#)

We note in this section that reference is made to Thames Water planning a major sewer tunnel in the Counters Creek catchment of west London.

This needs updating because Thames Water has now postponed this project.

We agree that sustainable drainage measures are of particular importance in areas with sewer capacity limitations and their widespread implementation over the coming decades will help the resilience of London and avoid the need for further major sewer tunnel projects.

Suggested change to text

The text needs amending to reflect the fact that Thames Water no longer plan to upgrade the sewer network in the Counters Creek catchment.

The Regional Flood Risk Appraisal document also needs updating in the same way.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.11](#)

Note the issues raised in this section regarding misconnected sewers etc and agree that development proposals should be designed to ensure that the potential for misconnections is eliminated.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.12](#)

Integrated Water Management Strategies should be considered for major development locations such as Opportunity Areas, where particular flood risk and water-related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and management of risk.

This approach is supported, and one that was followed for the OPDC with input from the council and other stakeholders.

Page: [Policy SI5 Water infrastructure](#)

Section: [9.5.13](#)

A water advisory group has been established to advise the Mayor on strategic water and flood risk management issues.

This is welcomed.

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [SI7](#)

The council supports this policy which seeks to reduce waste and promote circular economy principles. The requirement for referable applications to produce a Circular Economy Statement is supported, but further guidance on this will be needed. For example, are these intended to replace the requirement in the current London Plan (2016) for developers to produce a Site Waste Management Plan for managing construction, demolition & excavation waste?

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [SI7](#)

The council supports this policy which seeks to reduce waste and promote circular economy principles. The requirement for referable applications to produce a Circular Economy Statement is supported, but further guidance on this will be needed. For example, are these intended to replace the requirement in the current London Plan (2016) for developers to produce a Site Waste Management Plan for managing construction, demolition & excavation waste?

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [SI7](#)

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Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: [SI8](#)

As part of preparing the draft London Plan, the Mayor has reviewed the apportionment methodology and boroughs have been given new apportionment targets. As outlined in Table 9.2 of the draft London Plan, Hammersmith and Fulham's revised apportionment target for years 2021-2041 is 210,000t for 2021 and 222,000t for 2041. This remains similar to the target allocated to us in the current London Plan (199,000t for 2021 and 247,000t for 2036). However, all of the boroughs existing waste sites and remaining industrial land now lies within the boundary of the OPDC (a Mayoral Development Corporation). With much of this land proposed for redevelopment as part of the Mayor's plans to regenerate this area for delivery of housing and jobs, this should be reflected when determining Hammersmith & Fulham's apportionment in the draft London Plan. The Mayor should recognise that there are limited options for Hammersmith & Fulham to meet its apportionment within its own boundaries and we must rely on cooperation with the OPDC to ensure they safeguard a site to manage our apportionment.

If the OPDC is not given its own apportionment target in the new draft London Plan, it is important that Mayoral Development Corporations (MDC's) such as OPDC share the responsibility of meeting apportionments with the host borough. The London Plan should therefore recognise the unique relationship MDC's such as OPDC have with the host borough as its priority. The Council therefore supports the following text in the draft London Plan which states:- "Mayoral Development Corporations should cooperate with boroughs to ensure the boroughs apportionment requirements are met".

The Mayor should also play a more active role in helping boroughs to manage apportionments and also in helping to facilitate the suitable relocation of waste sites which may be lost to other uses.

Page: [Policy SI11 Hydraulic fracturing \(fracking\)](#)

Section: [SI11](#)

(Fracking) - This policy of advocating refusal of development proposals that involve exploration, appraisal or production of shale gas via fracking is supported.

Page: [Policy SI11 Hydraulic fracturing \(fracking\)](#)

Section: [9.11.1](#)

The Mayor's approach is welcomed as exploration for and use of shales gas is not consistent with the Plan's policy approach to reducing climate change emissions and minimising environmental impacts of development.

Page: [Policy SI11 Hydraulic fracturing \(fracking\)](#)

Section: [9.11.2](#)

We note the evidence presented that the British Geological Survey has previously concluded that “there is no significant Jurassic shale gas potential in the Weald Basin” and that it is highly unlikely that there is any site that is geologically suitable for a fracking development in London.

Page: [Policy SI11 Hydraulic fracturing \(fracking\)](#)

Section: [9.11.2](#)

We note the evidence presented that the British Geological Survey has previously concluded that “there is no significant Jurassic shale gas potential in the Weald Basin” and that it is highly unlikely that there is any site that is geologically suitable for a fracking development in London.

Page: [Policy SI11 Hydraulic fracturing \(fracking\)](#)

Section: [9.11.3](#)

This paragraph notes that should any fracking proposal come forward in London then it is highly likely that it would be located on Green Belt or Metropolitan Open Land. It is agreed that this seems to be the most likely scenario and this is one of the reasons why the council does not want to see policies in the London Plan that encourage fracking.

The OPDC has previously proposed a policy in their Local Plan on Oil & Gas Development in the OPDC Area which we raised concerns about.

Page: [Policy SI11 Hydraulic fracturing \(fracking\)](#)

Section: [9.11.4](#)

This paragraph outlines a range of issues that would need to be considered if a proposal for fracking came forward. Given that the Policy directs refusal of fracking proposals, the presentation of the information here should be amended to change the emphasis as the Policy does not envisage any circumstances where fracking would be acceptable in London.

Page: [Policy SI11 Hydraulic fracturing \(fracking\)](#)

Section: [9.11.5](#)

Similar comment as for 9.11.4. This paragraph provides guidance on community engagement where a proposal comes forward for fracking. The Policy completely discourages this, so it seems contradictory to provide guidance on how to facilitate fracking proposals compliance with the Community Engagement Charter.

Page: [Policy SI12 Flood risk management](#)

Section: [SI12](#)

(Section F)

Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Where possible, development proposals should set permanent built development back from flood defences to allow for any foreseeable future upgrades.

This is agreed but there would appear to be a lot of overlap between Part F of the Policy and Part D on Thames Estuary 2100. This section could be removed or the 2 sections could be merged together.

Page: [Policy SI12 Flood risk management](#)

Section: [SI12](#)

(Section A)

This section of the Policy requires that current and expected flood risk from all sources across London should be managed in a sustainable and cost effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

This is supported.

Page: [Policy SI12 Flood risk management](#)

Section: [SI12](#)

(Section B)

Section B requires that Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

This approach is agreed.

Page: [Policy SI12 Flood risk management](#)

Section: [SI12](#)

(Section C)

Development proposals which require specific flood risk assessments should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

This approach is agreed and is in line with the Policies in the H&F Local Plan.

(Section D)

1. Development Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The
2. Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.

This is supported.

(Section E)

Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

This is agreed.

Page: [Policy SI12 Flood risk management](#)

Section: [9.12.1](#)

In London, the boroughs are Lead Local Flood Authorities (LLFAs) and are responsible, in particular, for local surface water flood risk management and for maintaining a register of flood risk. They identify areas of flood risk to help inform appropriate locations for development. LLFAs should cooperate on strategic and cross-boundary issues.

Agreed

Page: [Policy SI12 Flood risk management](#)

Section: [9.12.2](#)

The Regional Flood Risk Appraisal (RFRA) considers all sources of flood risk including tidal, fluvial, surface water, sewer, groundwater and reservoir flooding and has been updated in collaboration with the Environment Agency. The RFRA provides a spatial analysis of flood risk including consideration of risks at major growth locations such as Opportunity Areas and Town Centres and key infrastructure assets. The Government's updated allowances for climate change are reflected in the expected sea level rise and increased flood risks considered in the RFRA. The updated allowances consider the lifetime, vulnerability and location of a development.

If there is scope to update the RFRA, then this should be done to reflect the fact that Thames Water's plans regarding Counters Creek have changed since it was drafted.

Suggested change to text

The Regional Flood Risk Appraisal text needs amending to reflect the fact that Thames Water no longer plan to upgrade the sewer network in the Counters Creek catchment.

Page: [Policy SI12 Flood risk management](#)

Section: [9.12.3](#)

The Environment Agency's Thames Estuary 2100 Plan (TE2100) focuses on tidal flood risk management. It requires the ability to maintain and raise some tidal walls and embankments. The Environment Agency estimates that a new Thames Barrier is likely to be required towards the end of the century. Potential sites will be needed in Kent and/or Essex requiring close partnership working with the relevant local authorities.

This is agreed and reflected in our own Local Plan

Page: [Policy SI12 Flood risk management](#)

Section: [9.12.4](#)

The concept of Lead Local Flood Authorities producing Riverside Strategies was introduced through the TE2100 Plan to improve flood risk management in the vicinity of the river, create better access to and along the riverside, and improve the riverside environment. The Mayor will support these strategies.

Noted and support from the Mayor welcomed.

Page: [Policy SI12 Flood risk management](#)

Section: [9.12.5](#)

The Environment Agency's Thames River Basin District Flood Risk Management Plan is part of a collaborative and integrated approach to catchment planning for water. Making space for water when considering development proposals is particularly important where there is significant exposure to flood risk along tributaries and at the tidal-fluvial interface. The Flood Risk Management Plan should inform the boroughs' Strategic Flood Risk Assessments.

Noted and agreed.

Page: [Policy SI12 Flood risk management](#)

Section: [9.12.6](#)

In terms of mitigating residual risk, it is important that a strategy for safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services. In the case of a severe flood, especially a tidal flood, many thousands of properties could be affected. This will make rescue and the provision of temporary accommodation challenging. Designing buildings such that people can remain within them and be safe and comfortable in the unlikely event of such a flood, will improve London's resilience to such an event.

Agreed and this is an approach H&F takes in ensuring mitigation of flood risks in new developments.

Suggested change to text

No changes required, although consideration could be given in this section to acknowledging that there are some types of developments that may be regarded as unsuitable in locations at the highest risks of flooding (e.g. self contained basements in the Rapid Inundation Zone where there may be no way to remain safe or evacuate in the event of a flood).

Page: [Policy SI12 Flood risk management](#)

Section: [9.12.7](#)

Development adjacent to flood defences will be required to protect the integrity of existing flood defences. Wherever possible it should be set back from the banks of watercourses and flood defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost-effective way.

This approach is in line with the requirements of the TE2100 Plan and is agreed.

Suggested change to text

No change required, although could consider moving this paragraph of text so it runs on from para 9.12.4 which is related?

Page: [Policy SI13 Sustainable drainage](#)

Section: [SI13](#)

(Section A)

Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks.

This approach is agreed and is already being implemented in H&F.

Page: [Policy SI13 Sustainable drainage](#)

Section: [SI13](#)

(Section B)

Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

- 1) rainwater harvesting (including a combination of green and blue roofs)
- 2) infiltration techniques and green roofs
- 3) rainwater attenuation in open water features for gradual release
- 4) rainwater discharge direct to a watercourse (unless not appropriate)
- 5) rainwater attenuation above ground (including blue roofs)
- 6) rainwater attenuation below ground
- 7) rainwater discharge to a surface water sewer or drain
- 8) rainwater discharge to a combined sewer.

The revisions to the Drainage Hierarchy compared to the one in the currently London Plan are supported although green roofs should probably only be referenced in relation to infiltration.

Suggest the following changes to the hierarchy text:

“1) rainwater harvesting (including a combination of green and blue roofs)”

Strikethrough the words "a combination of green and blue roofs"

(Section C)

Development proposals for impermeable paving should be refused where appropriate, including on small surfaces such as front gardens and driveways.

Support this aspect of the policy as we have a similar policy in our Local Plan (although worded such that it encourages use of permeable paving rather than discouraging impermeable surfaces).

(Section D)

Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, biodiversity, amenity and recreation.

This is supported although it could be expanded slightly to indicate how this should be achieved – ie. By maximising use of above ground measures.

Suggested change in text

Amend the text as follows: “Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, biodiversity, amenity and recreation, in particular by prioritising above ground measures where these can be implemented”.

Page: [Policy SI13 Sustainable drainage](#)

Section: [9.13.1](#)

London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as maintenance arrangements. Local Flood Risk Management Strategies and Surface Water Management Plans should ensure they address flooding from sewers, drains and groundwater, and run-off from land and small watercourses that occurs as a result of heavy rainfall.

The point about LLFA’s managing maintenance arrangements could be potentially misunderstood to mean that LLFA’s carry out the maintenance which is not the case. This point needs clarification.

Suggested change to text

Amend the text as follows: “Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as ensuring that appropriate maintenance arrangements are put in place.”

Development proposals should aim to get as close to greenfield run-off rates as possible depending on site conditions. The well-established drainage hierarchy set out in this policy helps to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible and there should be a preference for green over grey features. A blue roof is an attenuation tank at roof or podium level; the combination of a blue and green roof is particularly beneficial as the attenuated water is used to irrigate the green roof.

Generally these points are supported, although could be toughened up slightly. The Drainage Hierarchy is a useful tool in guiding developers and LLFAs in designing and assessing SuDS Strategies for sites.

Suggested change in text

Amend the text as follows: “Development proposals should aim to get as close to greenfield run-off rates as possible”. depending on site conditions.

For many sites, it may be appropriate to use more than one form of drainage, for example a proportion of rainwater can be managed by more sustainable methods, with residual rainwater managed lower down the hierarchy. In some cases, direct discharge into the watercourse is an appropriate approach, for example rainwater discharge into the tidal

Thames or a dock. This should include suitable pollution prevention measures. However, in other cases direct discharge will not be appropriate, for example discharge into a small stream at the headwaters of a catchment, which may cause flooding. This will need to be assessed on a case-by-case basis, taking into account the location, scale and quality of the discharge and the receiving watercourse. The maintenance of identified drainage measures should also be considered in development

This approach is supported and one that is implemented in H&F where direct discharges to the Thames are encouraged where possible for riverside developments.

We note there is no supporting text explaining the benefits of above ground measures as such, which may be a useful addition to this section.

Suggested change to text

No change required, although consideration could be given to including some text on highlighting the benefits of above ground measures over below ground tank solutions.

Page: [Policy SI13 Sustainable drainage](#)

Section: [9.13.4](#)

The London Sustainable Drainage Action Plan complements this policy. It contains a series of actions to make the drainage system work in a more natural way with a particular emphasis on retrofitting.

The LSDAP is supported.

(C) Development proposals to facilitate an increase in the amount of freight transported by river should be supported.

(F) Development proposals which increase the use of safeguarded wharves for waterborne freight transport, especially on wharves which are currently not handling freight by water, will be supported.

(G) Development proposals that include the provision of a water freight use on a safeguarded wharf, with other land uses above or alongside, will need to ensure that the development is designed so that there are no conflicts of use and that the freight-handling capacity of the wharf is not reduced.

(H) Development proposals adjacent to or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle.

All the above is welcomed and supported to maximise the air quality benefits of transferring a greater proportion of transport of freight from road vehicles to river vessels

River vessel transport is usually diesel fuelled with its associated Particulate and NOx emissions and hence has an impact on air quality. A reduction in emissions from Tidal Thames will contribute to reduced background levels of air pollutants in London for residents in LBHF.

The insertion of the following points into the policy:

j. Emissions from river vessels near to sensitive receptors should be mitigated, such as when vessels are docked for material transfer.

k. Development proposals which provide for the provision of on-shore power facilities including renewable energy sources e.g. Solar for use at mooring locations for house boats, and safeguarded wharves for waterborne freight transport including consolidation centres will be supported.

l. Support and continue to review and improve the discounts and standards within the green tariff PLA scheme to encourage voluntary reduction of emissions beyond what is legally prescribed and apply the scheme for inland river vessels

Page: [Chapter 10 Transport](#)

Section: [N/A](#)

Given the Mayor's policy to support and promote major transport infrastructure proposals across London we consider it is important that there should be reference to the proposal to replace Hammersmith flyover with a flyunder which will facilitate major regeneration, new housing and environmental benefits to the wider area.

Page: [Policy T1 Strategic approach to transport](#)

Section: [T1](#)

We support the Draft London Plan's policy approach on these topics.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [T3](#)

(Section B1) – As the policy is currently written, it would restrict us building on a car park.

Suggested change to text - *In first line, insert “sustainable” between “used for” and “transport”*

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [T3](#)

Section D and Table 10.1 – should include reference to the importance of increasing the frequency and capacity on the West London Overground Line, particularly through Sands End in South Fulham.

Should also advise that South Fulham Riverside is a major regeneration area with at least 4,000 new homes and 500 new jobs targeted. Not only would a Crossrail 2 station enable a major uplift in these new homes and job numbers but there is also a clear need to improve the current service at Imperial Wharf station to support the regeneration that is taking place now and in the longer term.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [Table 10.1](#)

River services extensions to east.

Suggested change to text

Should be extensions to west as well.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [Table 10.1](#)

River services extensions to east.

Suggested change to text

Should be extensions to west as well.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [Table 10.1](#)

Reference to “Highway Decks” should also include tunnelling highways and include improving pedestrian and cycling connectivity and air quality as well as releasing land for housing.

Suggested change to text

Reword to “Highway decks and/or tunnelling at key locations (such as Hammersmith Town Centre) to release land for housing, improve air quality and ambience and improve pedestrian and cyclist connectivity”

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [Table 10.1](#)

Heathrow Western and Southern Access “required for Heathrow expansion”. Implies support for Heathrow expansion, which is not Mayoral policy.

Re-word to “required to increase public transport modal share for Heathrow”

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [10.3.4](#)

Suggested change to text

Add new sentence at end: The Mayor will review the route of Crossrail 2 with a view to ensuring that it enables maximum regeneration opportunities, e.g. with a station at South Fulham which can help secure the provision of up to 10,000 new homes and 3,000 new jobs.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [10.3.4](#)

Add new sentence at end: The Mayor will review the route of Crossrail 2 with a view to ensuring that it enables maximum regeneration opportunities, e.g. with a station at South Fulham which can help secure the provision of up to 10,000 new homes and 3,000 new jobs.

Page: [Policy T6 Car parking](#)

Section: [T6](#)

(E) Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.

(F) Adequate provision should be made for efficient deliveries and servicing.

(G) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for

London guidance on car parking management and car parking design.

The above parts of the policy are welcome and supported. As the amount of car parking has a direct impact on number of vehicle journeys and hence the associated Particulate (PM10, PM2.5) and NO2 emissions

A change in the text to point F:

Adequate provision should be made for efficient deliveries and servicing. A Delivery and Servicing Plan (DSP) should be submitted alongside all applications indicating how the DSP will incentivise and prioritise the use of Ultra Low Emission Vehicles for Servicing and deliveries to the site during the operational phase.

A change in the text of point G to:

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how it will

i incentivise and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site. e.g. fiscally by means of differentiated parking fees

ii will be designed and managed, with reference to Transport for London guidance on car parking management and car parking design

Page: [Policy T6.1 Residential parking](#)

Section: [T6.1](#)

(C) All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

The above policy point can be made more ambitious for sites in areas of poor air quality by increasing the percent of spaces with active charging facilities. This will further encourage the uptake of Ultra Low Emission Vehicles

A change in the text to point C:

All residential car parking spaces must provide infrastructure for Electric or Ultra-Low Emission vehicles. A minimum of 50 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces *in areas of poor air quality*.

Underline denotes additional text which is recommended to be included in the policy.

Page: [Policy T6.2 Office parking](#)

Section: [T6.2](#)

(G) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision.

The above policy point can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

A change in the text to point G:

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality.*

Page: [Policy T6.3 Retail parking](#)

Section: [T6.3](#)

(D) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision

The policy can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

The insertion of the following text into point D

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise e.g. fiscally by means of differentiated parking fees and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality.*

Page: [Policy T6.4 Hotel and leisure uses parking](#)

Section: [T6.4](#)

(E) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision

The policy can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

The insertion of the following policy point E

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise e.g. fiscally by means of differentiated parking fees and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality.*

Page: [Policy T7 Freight and servicing](#)

Section: [T7](#)

'Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.'

*Conventional diesel transport refrigeration systems are lightly regulated and can emit up to **29** times as much particulate matter and **6** times as much **NOx** as a modern truck engine.*

LBHF would support more guidance and policy on how provision can be provided to reduce the use of highly polluting red diesel based Transport Refrigeration Units (TRU).

Revision of text in policy T7 (F) to:

Development proposals should facilitate sustainable freight and servicing, including *the provision of on-site mains charging for transport refrigeration systems* and adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Page: [Policy T7 Freight and servicing](#)

Section: [10.7.5](#)

*“Delivery and Servicing Plans should demonstrate how the requirements of the site are met, including **addressing missed deliveries** . Appropriate measures include large letter or parcel boxes and concierges accepting deliveries. Car-free developments should consider facilitation of home deliveries in a way that does not compromise the benefits of creating low-car or car-free environments.”*

Further air quality guidance, which should include design solutions for air quality shall highlight design aspects included in transport sections of London plan that may benefit air quality.

Page: [Annex One Town Centre Network](#)

Section: [AN1](#)

Support - Table A1.1 on Town Centre Networks proposes that the current town centre designation for Shepherds Bush which is a Metropolitan centre should be re-designated as an International centre. We welcome this proposed change in classification as we feel that it accurately represents the current scale and operation in which the town centre currently operates.

Page: [Multi-policy response](#)

Section: [N/A](#)

see attachment