

Integrated Impact Assessment for the Hammersmith & Fulham Local Plan

Scoping Report

Hammersmith & Fulham
Council

June 2025



Quality information

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Cover image: Hammersmith Bridge

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1. Introduction

1.1. Background

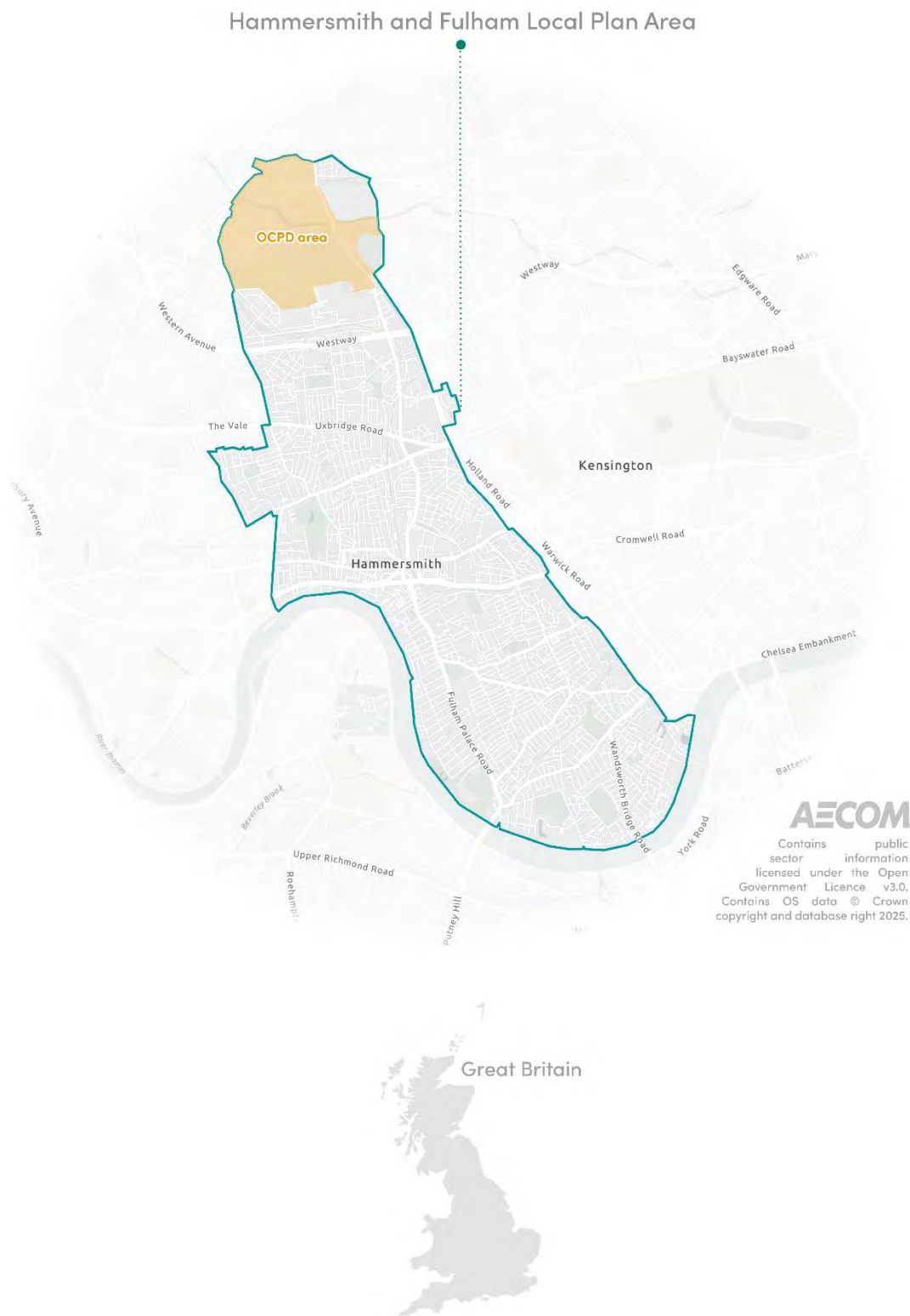
- 1.1.1. AECOM has been commissioned to undertake an independent Integrated Impact Assessment (IIA) in support of the emerging Hammersmith & Fulham Local Plan (HFLP).
- 1.1.2. The HFLP is being prepared under the Localism Act 2011¹ and the Local Planning (General) Regulations 2012.² These acts and regulations provide the legal framework for local planning authorities to develop and implement their local plans.
- 1.1.3. Hammersmith & Fulham is a London borough, situated in the western part of the city. Historically, it comprised two separate Metropolitan Boroughs, which were merged in 1965.
- 1.1.4. Within Hammersmith & Fulham borough lies part of the Old Oak and Park Royal Development Corporation (OPDC). This is a Mayoral Development Corporation (MDC), established by the Mayor of London to secure the regeneration of the Old Oak Opportunity area.³ The OPDC area has its own Local Plan (adopted in 2022); therefore, the HFLP will not include detailed policies for the OPDC area but will ensure strategic coordination on cross-boundary matters such as infrastructure, transport, and housing delivery.
- 1.1.5. The Borough boundary and OPDC area boundary is depicted in **Figure 1-1**.

¹ UK Government (2011) 'Localism Act 2011' can be accessed through [this link](#).

² UK Government (2012) 'The Local Planning (General) Regulations 2012' can be accessed through [this link](#).

³ Mayor of London (no date). 'Old Oak and Park Royal Development Corporation (OPDC)' can be accessed through [this link](#).

Figure 1-1: Hammersmith & Fulham Borough Boundary



1.2. Planning Policy Context

- 1.2.1. The National Planning Policy Framework (NPPF) provides an overarching framework for development in England. It sets out the Government's planning policies for England and how these are expected to be applied. It is supported by planning practice guidance, which is a suite of policy papers covering a broad range of topics, including SEA.
- 1.2.2. The revised NPPF has now been published following the consultation period that ended in September 2024. The new framework includes significant reforms aimed at boosting housing supply and supporting sustainable growth. One of the key changes is the reintroduction of mandatory housing targets, which now require an increased number of dwellings in Hammersmith & Fulham.
- 1.2.3. The current Local Plan for Hammersmith & Fulham was adopted in 2018.⁴ The Hammersmith & Fulham Local Plan will be updated to address growing housing demands, align with the Mayor of London's higher housing targets, and ensure sustainable development in response to climate change and planning reforms. Additionally, this is needed to reflect the change in the borough's Strategic Housing Requirement, which has risen from 1,609 homes per annum to approximately 2,500 homes per annum, following the 2024 update to the National Planning Policy Framework (NPPF).⁵

1.3. IIA Explained

- 1.3.1. Integrated Impact Assessment (IIA) is a mechanism for assessing and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to achieving sustainable development. IIA fulfils the requirements for Strategic Environmental Assessment (SEA) and discharges the duties for Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA).
- 1.3.2. The aim of the IIA will be to inform plan-making both directly (i.e. through structured, systematic and evidence-based analysis), and indirectly (through providing stakeholders with information on potential plan impacts and so facilitating effective consultation).
- 1.3.3. The use of an IIA approach will help ensure consistency in the development and evaluation of the HFLP, and is considered best practice.
- 1.3.4. Undertaken through an SEA-led methodology, the IIA will incorporate an HIA and EqIA. In addition, a parallel Habitats Regulations Assessment (HRA) process will be undertaken to support the development of the HFLP and reported on separately.

⁴ Hammersmith & Fulham Council (2018). '*Hammersmith & Fulham Local Plan (2018)*' can be accessed through [this link](#).

⁵ Hammersmith & Fulham Council (2024). '*Local Plan review – timetable, resourcing and community involvement*' can be accessed through [this link](#).

- 1.3.5. A discussion of the different elements to be integrated within the IIA process is presented below.

Strategic Environmental Assessment (SEA)

- 1.3.6. SEA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').⁶ It also widens the scope of the assessment from focusing on environmental issues to further consider social and economic issues. The SEA Regulations only formally apply to plans and programmes for which there is a statutory requirement; this includes Local Plans.
- 1.3.7. Two key procedural requirements of the SEA Regulations are that:
- When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - A report (the 'Environmental Report') is published for consultation alongside the draft plan for consultation that presents an assessment of the draft plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

Equalities Impact Assessment (EqIA)

- 1.3.8. As a public sector organisation, Hammersmith & Fulham Council has a duty under the Equality Act 2010⁷ and the associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the District eliminate unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with a protected characteristics⁸ and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.
- 1.3.9. The Equality Act 2010 legally protects people from discrimination both in the workplace and in wider society. It replaces previous anti-discrimination laws which include the Sex Discrimination Act 1975, Race Relations Act 1976 and the Disability Discrimination Act 1995. The Act ensures that individuals with certain 'protected characteristics' are not indirectly or directly discriminated against. The protected characteristics include:
- **Age:** this refers to persons defined by either a particular age or a range of ages;

⁶ UK Government (2004). '*The Environmental Assessment of Plans and Programmes Regulations 2004*' can be accessed through [this link](#).

⁷ UK Government (2010). '*Equality Act 2010*' can be accessed through [this link](#).

⁸ Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.

- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities;
- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- **Marriage and civil partnership:** marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favourably than married couples;
- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- **Gender:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
- **Socio-economic status:** a person's socio-economic status referring to combined economic and sociological measure of a person's work experience and economic and social position in relation to others, based on income, education, and occupation.

Health Impact Assessment (HIA)

- 1.3.10. There are numerous links between planning and health highlighted throughout the NPPF.⁹ For example, Paragraph 96 of the NPPF states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities and the NPPG states that Local Planning Authorities should ensure that health and wellbeing, and health infrastructure are considered in plans and in planning decision-making.¹⁰ In this context, Health Impact Assessment (HIA) is a process which seeks to ensure that the effect of proposals on both health and health inequalities are considered and responded to during the plan's development process.
- 1.3.11. An HIA identifies the positive impacts, and minimise the negative impacts, of a project or plan, with a view to informing decision making.

Integrated Impact Assessment

- 1.3.12. As previously explained, the IIA seeks to fulfil the requirement for SEA and addresses the duty to undertake an EqlA and HIA. The approach is to fully integrate these to provide a single assessment process to inform the development of the HFLP. This reflects the process undertaken for the IIA for the HFLP.

1.4. IIA Steps

SEA Screening

- 1.4.1. SEA screening is the process for determining whether a plan or programme is likely to require an SEA process. The screening process is based upon consideration of standard criteria¹¹ to determine whether the HFLP is likely to have 'significant environmental effects', and subsequently whether there is a need for SEA. The SEA regulations do not specify whether these significant effects must be beneficial or adverse, allowing for both types of impacts to be considered in the assessment.

⁹ UK Government (2024). '*National Planning Policy Framework*' can be accessed through [this link](#).

¹⁰ UK Government (2022). '*Healthy and safe communities*' can be accessed through [this link](#).

¹¹ These criteria include potential impacts on biodiversity, flora, and fauna; population and human health; soil, water, and air quality; climatic factors; material assets; cultural heritage; landscape; and the interrelationships between these factors.

- 1.4.2. A Local Plan requires SEA where it is likely to have significant environmental effects. In this respect, Local Plans are more likely to be screened in as requiring an SEA if both the following apply:
- the Local Plan is being prepared within an area with significant environmental constraints, such as, for example, sites of international or national importance for biodiversity conservation, or large concentrations of heritage assets; and
 - the Local Plan is likely to allocate sites for development.¹²
- 1.4.3. In this respect, the HFLP has been ‘screened in’ due to the potential for significant environmental effects arising from the Plan. This relates to the significant environmental sensitivities present within and around the borough, including its landscape, biodiversity, and historic environment, along with its intention to allocate sites for development.
- 1.4.4. The comprehensive policy proposals within the HFLP have the potential to impact these sensitive assets, and it is important to consider the full range of these values to ensure their protection and sustainable management.
- 1.4.5. In addition, initial screening has suggested that an HRA process is required due to the presence of sensitive European sites designated for their nature conservation interest present in the vicinity of the borough.
- 1.4.6. The HRA process is being undertaken alongside the IIA process and will be reported separately. However, the conclusions of the HRA will be taken into account in the IIA process.

Scoping

- 1.4.7. This Scoping Report seeks to establish a suggested scope for the IIA. A key procedural requirement of the SEA Regulations is to present this scope for the IIA, so that the designated authorities (Historic England, Natural England and the Environment Agency) can provide timely comment.
- 1.4.8. Developing the draft scope for the IIA as presented in this report has involved the following steps:
- Exploring the policy context for the Plan and IIA to summarise the key messages arising;
 - Establishing the baseline for the IIA (i.e., the current and future situation in the area in the absence of the Plan) to help identify the Plan’s likely significant effects;
 - Identifying particular problems or opportunities (‘issues’) that should be a particular focus of the IIA; and

¹² DLUHC (February 2022): Chief Planner’s Newsletter, February 2022. ‘*Strategic Environmental Assessment for Local Plans: Timely and effective screening*’ is available through [this link](#).

- Considering this information, developing an IIA framework comprising IIA Objectives and assessment questions, which can then be used as a guiding framework for the subsequent assessment.
- 1.4.9. The scope is explored and presented under a series of key environmental themes as follows:
- Air quality
 - Biodiversity and Green/Blue Infrastructure
 - Climate Change Adaptation
 - Climate Change Mitigation
 - Communities 1: Accessibility
 - Communities 2: Equality
 - Communities 3: Health, Wellbeing and Safety
 - Economy and Employment
 - Historic Environment
 - Housing
 - Landscape
 - Resources
 - Transportation
 - Water
- 1.4.10. The selected IIA themes incorporate the 'SEA topics' suggested by Schedule 2(6) of the SEA Regulations.¹³ These were refined to reflect a broad understanding of the anticipated scope of plan effects. The discussion of the scoping information for each theme is presented in **Chapters 2 to 15**, and the proposed IIA framework is brought together as a whole at **Appendix A**. Each proposal within the HFLP will be assessed consistently using this Framework.

¹³ UK Government (2004). 'The Environmental Assessment of Plans and Programmes Regulations 2004' can be accessed through [this link](#).

2. Air Quality

2.1. Focus of Theme

- 2.1.1. This theme focuses on air pollution, in particular: sources of air pollution, air quality hotspots, and areas known to exceed objectives for air quality.

2.2. Policy Context

- 2.2.1. **Table 2-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 2-1: Plans, Policies and Strategies Reviewed in Relation to Air Quality

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>The Environmental Targets (Fine Particular Matter) (England) Regulations 2023</u>	2023
<u>Environment Act</u>	2021
<u>The Clean Air Strategy</u>	2019
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
<u>UK plan for tackling roadside nitrogen dioxide concentrations</u>	2017
Local	
<u>Air Quality Action Plan (2025-2030)</u>	2024
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

- 2.2.2. The key messages emerging from the review are summarised below:

- The HFLP will be required to be in general conformity with the NPPF, which seeks early planning to reduce/ mitigate air quality impacts in development and to improve air quality. Measures to improve air quality include traffic and travel management and green infrastructure provision. Strategic development is expected to be focused on locations that have or will be provided with high levels of accessibility; supporting both a reduced need to travel and offering a genuine choice of transport modes. Smaller-scale development should consider the potential for cumulative effects in relation to air quality;

- The HFLP will also be required to be in general conformity with the Environment Act 2021, which introduces the need for the Secretary of State to set an annual mean particulate matter (PM2.5) level target. This links to the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, which sets out to ensure annual PM2.5 concentrations are equal to or less than 10 micrograms per cubic metre by the 31 December 2040;
- The Clean Air Strategy outlines how the government will tackle all sources of air pollution. The strategy proposes goals to cut public exposure to particulate matter pollution and outlines required action to meet these goals. Furthermore, it seeks to recognise wider sources that cause poor air quality, such as diffuse sources and smaller contributors. The proposed measures include new legislation and local powers to act in areas with air pollution issues. The Air Quality Action Plan for Hammersmith & Fulham (2025-2030) seeks to go far beyond the legal requirements for councils on air quality, by committing Hammersmith & Fulham to more ambitious WHO (2021) air quality standards and including actions to tackle pollution from new sources not usually addressed by local authorities, such as indoor air pollution;
- The 25 Year Environment Plan establishes how the government will expand net gain approaches to include air quality improvements, such as planting more trees in urban areas and changing fuel supplies. In particular, 'Goal 1 Clean air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' directly relate to the air quality SEA theme;
- The UK plan for tackling roadside nitrogen dioxide is an air quality plan focused on bringing nitrogen dioxide (NO₂) within statutory limits in the quickest time possible. The plan identifies that improving air quality and reducing carbon emissions is also important and wants to position the UK at the forefront of vehicle innovation by making motoring cleaner; and
- Local authorities are required to monitor air quality across the district, report regularly to Defra and act where nationally set levels and limits of pollutants are likely to be exceeded under Section 82 of the Environment Act (1995). Monitoring is undertaken to assess levels of nitrogen dioxide, sulphur dioxide, ozone, benzene, and particulates. Where exceedances exist, areas are declared as air quality management areas (AQMAs) and local authorities are required to produce an air quality action plan (AQAP) to improve air quality in the area. Under Schedule 11 in the Environment Act (2021), a local authority must identify any parts of its area in which it appears air quality standards or objectives are not likely to be achieved within the relevant period. Additionally, local authorities must also identify relevant sources of emissions that are considered partly or wholly responsible for failing to achieve air quality standards or objectives in the area. As such, the London Borough of Hammersmith & Fulham Air Quality Annual Status Report (ASR) for 2023

is the last available report for the borough; fulfilling the requirements of the local air quality management (LAQM) as set out in Section 82 of the Environment Act (1995).

2.3. Baseline Summary

Current Baseline

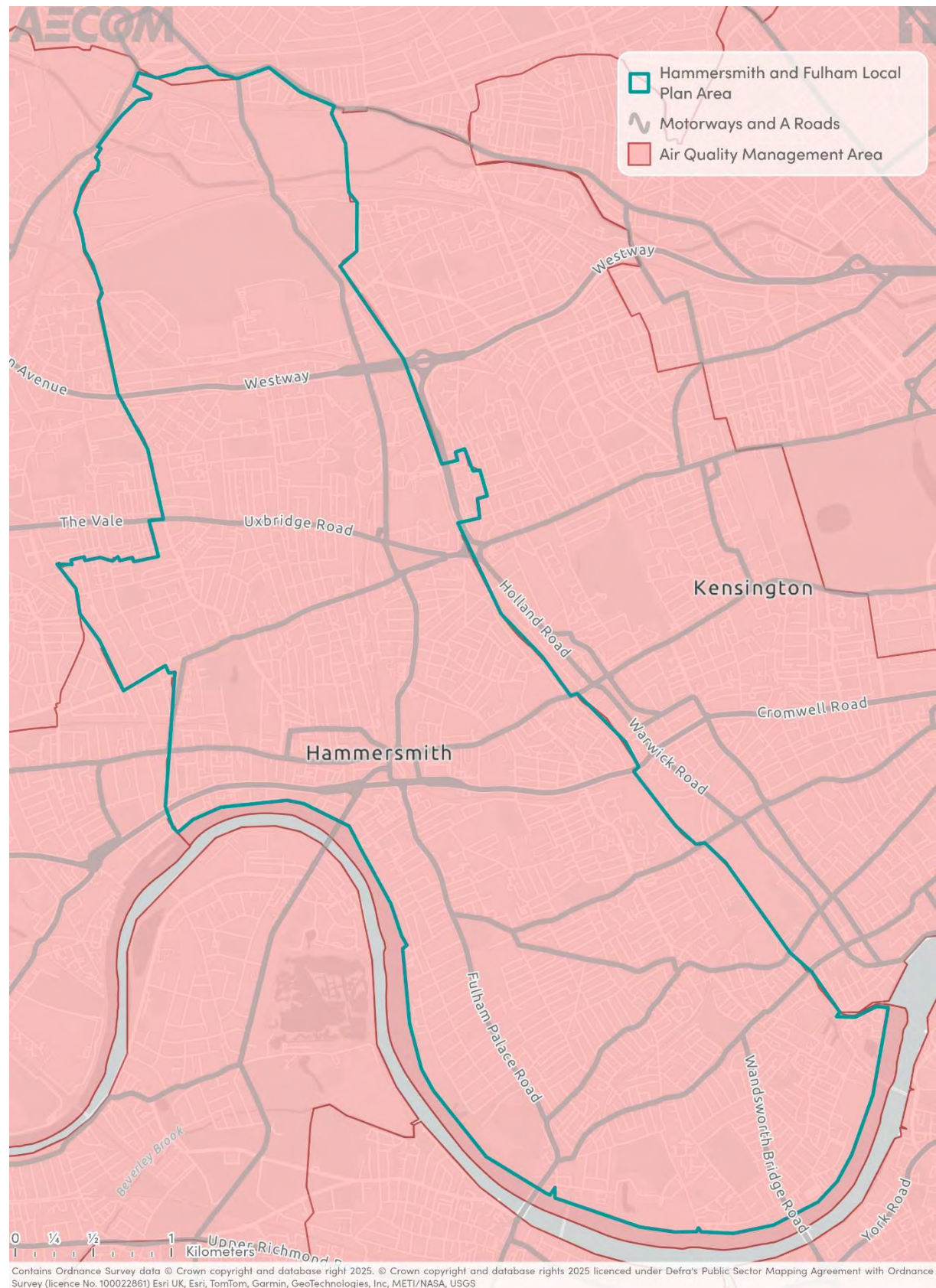
Air Quality Management Areas

- 2.3.1. Air Quality Management Areas (AQMAs) are declared by councils in areas which exceed national objectives for levels of particulates, nitrogen dioxide, sulphur dioxide, ozone, benzene, polycyclic aromatic hydrocarbons, butadiene, carbon monoxide, lead and/ or nitrogen oxides.
- 2.3.2. The entire borough lies within the Hammersmith & Fulham AQMA, which was declared in 2000 for exceedances to nitrogen dioxide (NO₂) and particulate matter (PM_{2.5} and PM₁₀) targets (see **Figure 2-1**). There are two continuous automatic Air Quality Monitoring Stations (AQMS), four roadside Air Quality Monitoring Stations, 57 Breath London air quality sensors, and over 100 Vortex air quality sensors installed across the borough.¹⁴
- 2.3.3. The latest Air Quality Annual Status Report for Hammersmith & Fulham (2022)¹⁵ indicates that PM₁₀ concentrations remained within the annual mean objective of 40 µg/m³ between 2016 and 2022. However, since 2019 there has been a gradual increase in levels, reaching 38.8 µg/m³ in 2022 - just below the target threshold.
- 2.3.4. The available data for PM_{2.5} emissions in the borough (beginning in 2019) suggests that there were no exceedances of the annual mean target of 20 µg m⁻³, and that levels have been on a downward trend since 2019.
- 2.3.5. Data for PM_{2.5}, available from 2019 onwards, shows that concentrations have consistently remained below the annual mean objective of 20 µg/m³, with a downward trend observed since monitoring began.
- 2.3.6. For NO₂, two exceedances of the annual mean objective (40 µg/m³) were recorded in 2022. However, this represents an improvement compared to 12 exceedances in 2021, suggesting a possible positive trend in air quality.

¹⁴ Hammersmith & Fulham Council (2023). 'Air Quality Monitoring Networks in Hammersmith & Fulham' can be accessed through [this link](#).

¹⁵ Hammersmith & Fulham Council (2023). 'Hammersmith & Fulham Council Air Quality Annual Status Report for 2022' can be accessed through [this link](#).

Figure 2-1: Air Quality Management Areas in Hammersmith & Fulham



- 2.3.7. The borough's road network comprises a combination of residential streets, local roads, and major routes. Key transport corridors such as the A4, A40, A219, and A3220 carry substantial through traffic volumes and are identified as significant contributors to local air pollution.
- 2.3.8. As noted in the 2024 Borough Profile,¹⁶ the rate of car ownership in Hammersmith & Fulham is 43%, which is notably lower than the London average of 58%. While this may help reduce overall emissions and support better air quality, localised congestion remains an issue in parts of the borough.
- 2.3.9. Hammersmith & Fulham is served by several train lines, including the District, Piccadilly, Central and Hammersmith & City lines of the London Underground, as well as sections of the London Overground. These lines also have an impact on local air quality.
- 2.3.10. Heathrow Airport, located just outside the borough to the west, also has an impact on air quality in Hammersmith & Fulham. While the borough isn't directly under the airport's main flight paths, emissions from planes can still contribute to background levels of air pollution. In addition, Heathrow generates a high volume of road traffic, with many people travelling through Hammersmith & Fulham to access the airport. This adds to congestion and increases vehicle emissions on key roads like the A4 and A40.

Ultra Low Emission Zones

- 2.3.11. London's Ultra Low Emission Zone (ULEZ) was introduced in 2008 to reduce air pollution and improve air quality by charging vehicles that do not meet strict emission standards.
- 2.3.12. With fewer high-polluting vehicles entering the ULEZ zone as a result of the charges, Hammersmith & Fulham has benefitted from reduced levels of nitrogen dioxide (NO₂) and particulate matter, which contribute to improved air quality. As traffic patterns shift due to these restrictions, there is less vehicle congestion and lower emissions, leading to cleaner air for local residents.

Future Baseline

- 2.3.13. The growth associated with future development within the borough has the potential for adverse effects on air quality in the short to medium term, due to increased levels of traffic and associated pollutants. Although, in line with higher level planning policy, future development should contribute towards improving air quality, supporting opportunities to improve accessibility, particularly in terms of the use of sustainable modes of transport, including active travel modes, working from home and electric vehicle use.

¹⁶ Hammersmith & Fulham Council (2024). 'Borough profile 2024 - Where we live' can be accessed through [this link](#).

- 2.3.14. The adoption of low-emission vehicles and policies to reduce car dependency are expected to play a significant role in improving air quality over the long term.
- 2.3.15. Changing weather patterns due to climate change could influence air quality in the borough. For example, increased temperatures may exacerbate ozone formation, while changes in precipitation and wind patterns could alter the dispersion of pollutants. The potential for hotter, drier summers may also result in more frequent periods of poor air quality.
- 2.3.16. The addition of a third runway to Heathrow Airport is currently being considered.¹⁷ If the airport is expanded, including the potential addition of a third runway, it could have an adverse effect on local air quality. More flights would mean more aircraft emissions, and the extra passengers, staff, and freight would lead to more vehicles on the road. For Hammersmith & Fulham, this may undermine efforts to improve air quality, especially in areas that already experience higher pollution levels.

2.4. Key Issues

- 2.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to the Air Quality SEA theme:
- The entire borough of Hammersmith & Fulham is designated as an AQMA due to exceedances of national air quality objectives for NO₂ and PM_{2.5} / PM₁₀, highlighting long-term concerns about pollutant levels and public health;
 - The latest AST identifies that there are certain areas in Hammersmith & Fulham that still exceed national air quality objectives NO₂, while PM₁₀ has seen an upward since 2019;
 - Major road corridors such as the A4, A40, A219 and A3220 remain significant sources of air pollution. Although car ownership is relatively low, these routes continue to experience high volumes of traffic;
 - Future development (from the HFLP, or in neighbouring boroughs) in Hammersmith & Fulham could lead to increased traffic and associated air pollution if not managed sustainably. It will be important to integrate air quality considerations into planning and development processes to mitigate potential adverse effects; and
 - Encouraging the use of low-emission vehicles, including electric vehicles, will play an important role in reducing air pollution in the borough.

¹⁷ UK Parliament (2025). 'Heathrow airport expansion: 2025 proposals' can be accessed through [this link](#).

2.5. IIA Objective

- 2.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Air Quality:

Improve air quality and reduce exposure to air pollution.

3. Biodiversity and Green/Blue Infrastructure

3.1. Focus of Theme

- 3.1.1. This theme focuses on nature conservation designations, habitats, and species within and surrounding the borough.

3.2. Policy Context

- 3.2.1. **Table 3-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 3-1: Plans, Policies and Strategies Reviewed in Relation to Biodiversity and Green/Blue Infrastructure

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Natural England Green Infrastructure Framework</u>	2023
<u>Environment Act 2021</u>	2021
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
<u>UK Post-2010 Biodiversity Infrastructure Framework</u>	2012
<u>The Natural Choice: securing the value of nature (Natural Environment White Paper)</u>	2011
<u>Biodiversity Infrastructure 2020 Strategy</u>	2011
<u>The Natural Environment and Rural Communities Act</u>	2006
<u>UK Biodiversity Infrastructure Action Plan</u>	1994
Local	
<u>Hammersmith & Fulham Climate and Ecology Strategy</u>	2021
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018
<u>Local Nature Recovery Strategy</u>	emerging

3.2.2. The key messages emerging from the review are summarised below:

- The HFLP will need to consider the principles set out in the NPPF, which indicate that planning policies and decisions should protect and enhance sites of value for biodiversity. Plans should also identify, map, and safeguard components of wider ecological networks, promote positive action for priority habitats and species, and pursue opportunities to secure biodiversity net gains. The NPPF also states that if development causes substantial harm and cannot be avoided, adequately mitigated, or compensated, then planning permission should be refused;
- The Natural England Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. The framework's ultimate goal aims to help increase the amount of green cover in England to 40% in urban residential areas;
- The Environment Act makes provision for biodiversity net gain to be a condition of planning permission in England, in addition to creating biodiversity net gain site registers and biodiversity credits. It recognises there is a duty to conserve and enhance biodiversity and encourages the identification of suitable areas through biodiversity reports and local nature recovery strategies. Furthermore, habitat maps are expected to include recovery and enhancement areas which are currently, or could become, important for biodiversity;
- The NPPF also supports the establishment and enhancement of habitat networks and green infrastructure to allow for more resilience to current and future pressures for biodiversity;
- Over the past decade, policy (for example, The Natural Environment White Paper: Biodiversity 2020) has demonstrated a move away from the traditional approach of protecting biodiversity, to a wider landscape approach to enhancing biodiversity, as part of the overall aims to halt biodiversity loss. The 25 Year Environment Plan places emphasis on improvements to the natural environment; identifying the need to *"replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats"*. Working at a landscape scale transformation is expected to connect habitats into corridors for wildlife;
- The UK Biodiversity Action Plan (BAP) is a response to the Convention on Biological Diversity, which calls for the development and enforcement of national strategies and associated action plans to identify, conserve and protect existing biological diversity, and to enhance it wherever possible. In particular, the BAP identifies priority species and habitats that are most threatened and require conservation action. The UK BAP

is succeeded by the UK Post-2010 Biodiversity Framework, which aims to ensure that biodiversity is valued, conserved, restored, and wisely used, and ecosystem services are maintained. This helps to sustain a healthy planet that delivers essential benefits for everyone;

- Hammersmith & Fulham's Climate and Ecology Strategy (to 2030) sets out the route to net zero greenhouse gas emissions by 2030 for the borough. Its goal is a clean and sustainable future in which human activity works to the benefit of all people and the environment; and
- Hammersmith & Fulham Council are co-producing a Local Nature Recovery Strategy for London, which will set out strategic biodiversity priorities for the borough and a comprehensive spatial habitat map with London's strategic Nature Recovery Network.

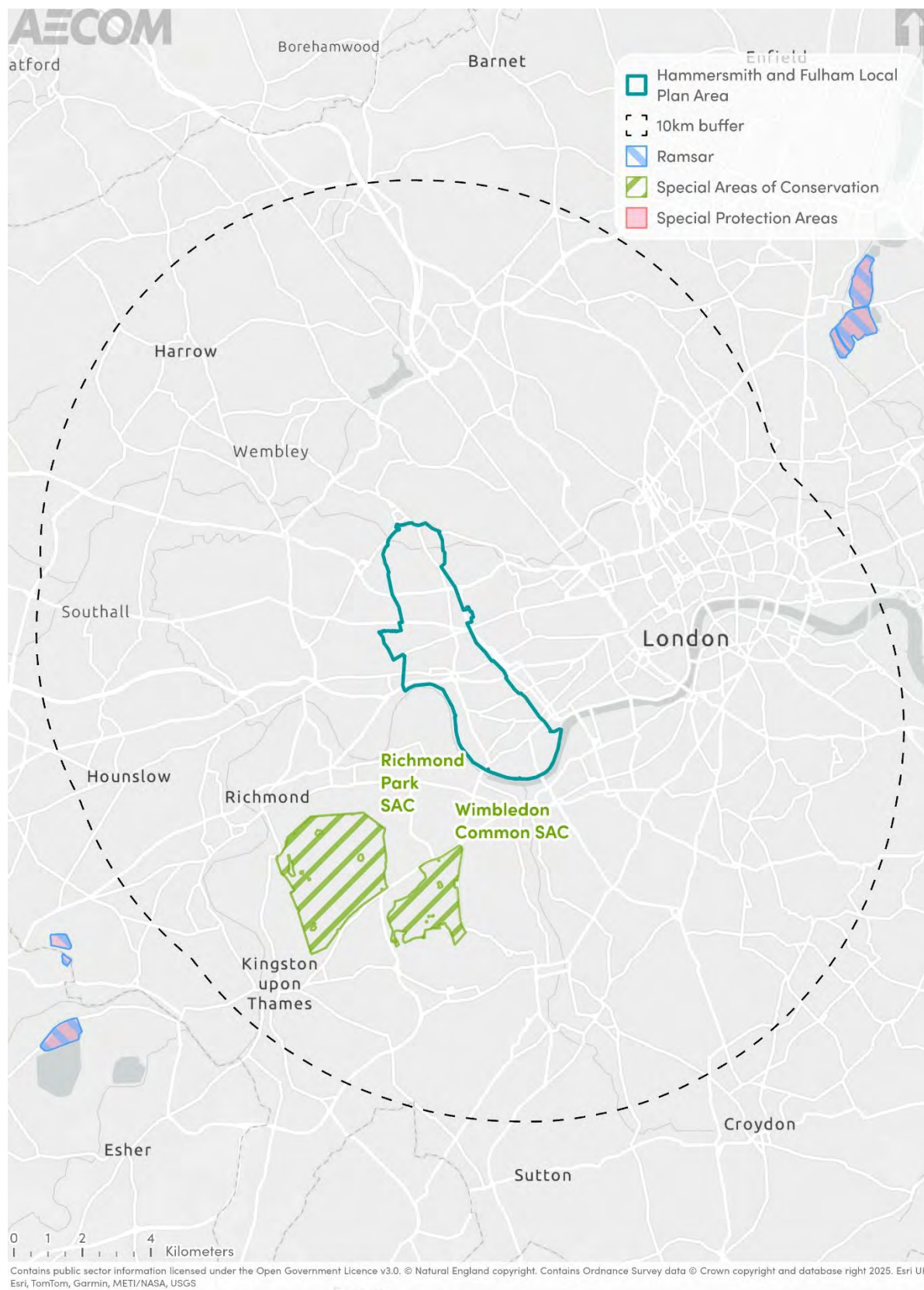
3.3. Baseline Summary

Current Baseline

Internationally Important Sites

- 3.3.1. There are no internationally designated biodiversity sites within or adjacent to the borough. However, there are two internationally designated biodiversity sites within 10 km (see **Figure 3-1**):
- Wimbledon Common Special Area of Conservation (SAC), located approximately 2.2 km south-west of the borough. Designated for its population of stag beetles (*Lucanus cervus*), supported by extensive deadwood habitats; and
 - Richmond Park SAC, located approximately 3 km south-west of the borough. Also designated for its significant population of stag beetles (*Lucanus cervus*), supported by numerous ancient trees with decaying timber that are a habitat for this species.

Figure 3-1: International Designations for Biodiversity Conservation in Hammersmith & Fulham



Nationally Important Sites

- 3.3.3. Sites of Special Scientific Interest (SSSI) are nationally important sites for wildlife and / or geological conservation.
- 3.3.4. While there are no SSSIs or NNRs within Hammersmith & Fulham, there are five of these designations within 5 km of the borough boundary (see **Figure 3-2**). These are:
- Barn Elms Wetland Centre SSSI, approximately 0.09 km west;
 - Wimbledon Common SSSI, approximately 2.2 km south-west;
 - Richmond Park SSSI and NNR, approximately 3 km south-west;
 - Brent Reservoir SSSI, approximately 3.8 km north; and
 - Syon Park SSSI, approximately 4.2 km west.
- 3.3.5. SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset that map zones around each SSSI according to their sensitivities. They specify the types of development that have the potential to have adverse impacts at a given location, and thresholds of development which indicate a need to consult Natural England. In this respect, there are areas of the borough that overlap with IRZs for development types expected to be brought forward in the emerging Local Plan; therefore, consultation with Natural England may be required for any applications that come forward in these locations.

Locally Important Sites

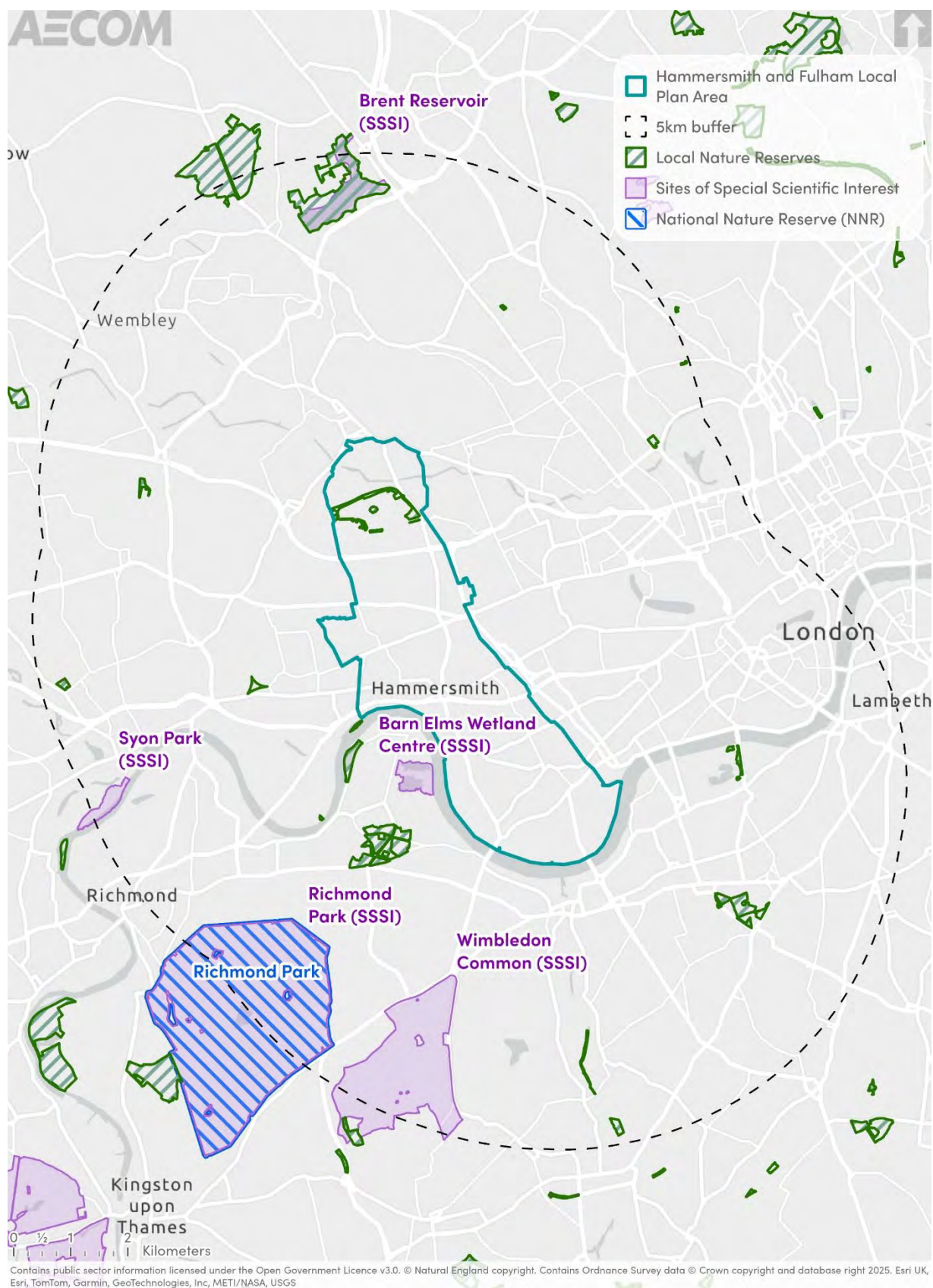
- 3.3.6. Local Nature Reserves (LNRs) are designated to conserve locally significant natural habitats, species, and geological features. They provide accessible green spaces for community enjoyment, education, and engagement, while also serving as valuable sites for local ecological research and conservation efforts.
- 3.3.7. There is one LNR within 2 km of the borough (see **Figure 3-2**). This is Wormwood Scrubs LNR, located in the north of the borough. The LNR is designated for its woodland (plantation), scrub and grassland habitats, which are home to common lizards, over 100 species of bird, and 20 species of butterfly.
- 3.3.8. There are also seven LNRs within 2 km of the borough:
- Chiswick Eyot, 0.03 km west;
 - Leg Of Mutton Reservoir, 0.4 km south-west;
 - Barnes Common, 0.8 km west;
 - Gunnerybury Triangle, 1.4 km west;
 - Battersea Park Nature Areas, 1.8 km east;

- Duke's Hollow, 1.8 km south-west; and
- Clapham Common, 2.0 km south-east.

3.3.9. London's most valuable and special places for wildlife are recognised by the London borough councils as Sites of Importance for Nature Conservation (SINCs). Over 1500 SINCs have been identified across the capital. These designations may overlap with higher priority designations. Hammersmith & Fulham Council's mapping shows that there are over 20 SINCs found across Hammersmith & Fulham, which are distributed evenly throughout the borough.¹⁸

¹⁸ GIGL (2025). 'Wildlife Sites' can be accessed through [this link](#).

Figure 3-2: SSSI, NNR, and LNR Designations in Hammersmith & Fulham



Priority Habitats and Species

- 3.3.10. The Borough is interspersed with patches of Biodiversity Action Plan (BAP) Priority Habitats, as shown in **Figure 3-3**.
- 3.3.11. To the south of the borough, aquatic habitats are prevalent due to the presence of the River Thames, featuring intertidal substrate foreshore and mudflats. Elsewhere, the borough supports several sites of deciduous woodland, as well as wood-pasture and parkland habitats, with the largest Biodiversity Action Plan (BAP) site located at Wormwood Scrubs, which contains both of these habitat types. Additionally, a few smaller sites with traditional orchards are found in the central and northern parts of the borough.
- 3.3.12. The BAP Priority Habitats and ecological designations within and surrounding the borough are likely to support populations of protected species. The Greenspace Information for Greater London CIC (GIGL)¹⁹ contains archives of protected and notable species within Hammersmith & Fulham, including those species protected by the Wildlife and Countryside Act 1981²⁰ and under Section 41 of the Natural Environment and Rural Communities Act 2006.

National Habitat Network

- 3.3.13. The National Habitat Network (NHN) is a set of maps that work to help identify areas for future habitat creation and restoration at a landscape scale (see **Figure 3-4**).²¹
- 3.3.14. According to the NHN, there is only a small area of Network Enhancement Zone 2 (most suitable for new habitats and green infrastructure) found in the south-west, by the River Thames, in Hammersmith & Fulham.

¹⁹ The Greenspace Information for Greater London CIC website can be accessed through [this link](#).

²⁰ UK Government (1981) '*The Wildlife and Countryside Act 1981*' can be accessed through [this link](#).

²¹ Natural England (2020). '*National Habitat Network Maps*' can be accessed through [this link](#).

Figure 3-3: Habitats in Hammersmith & Fulham

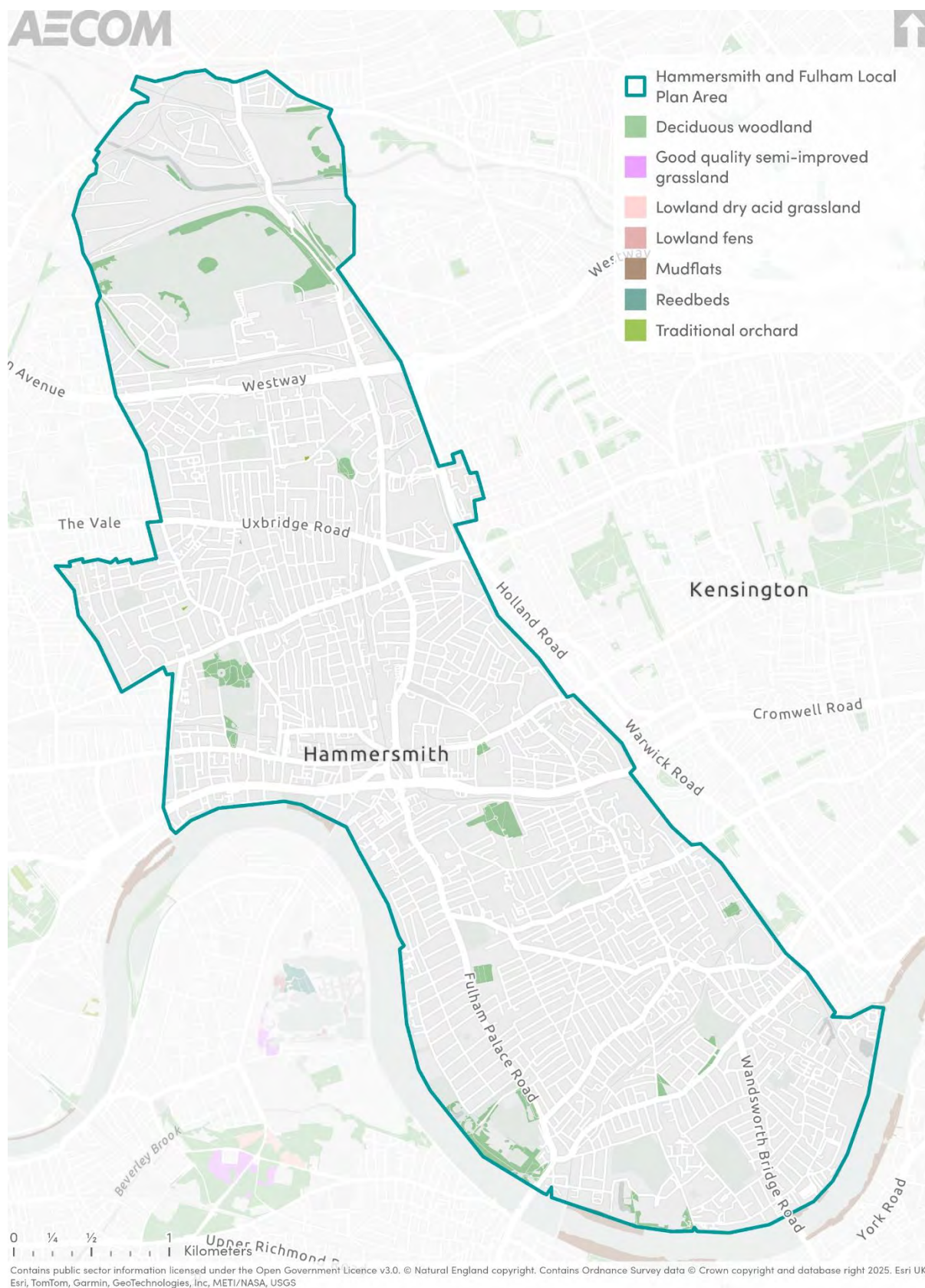
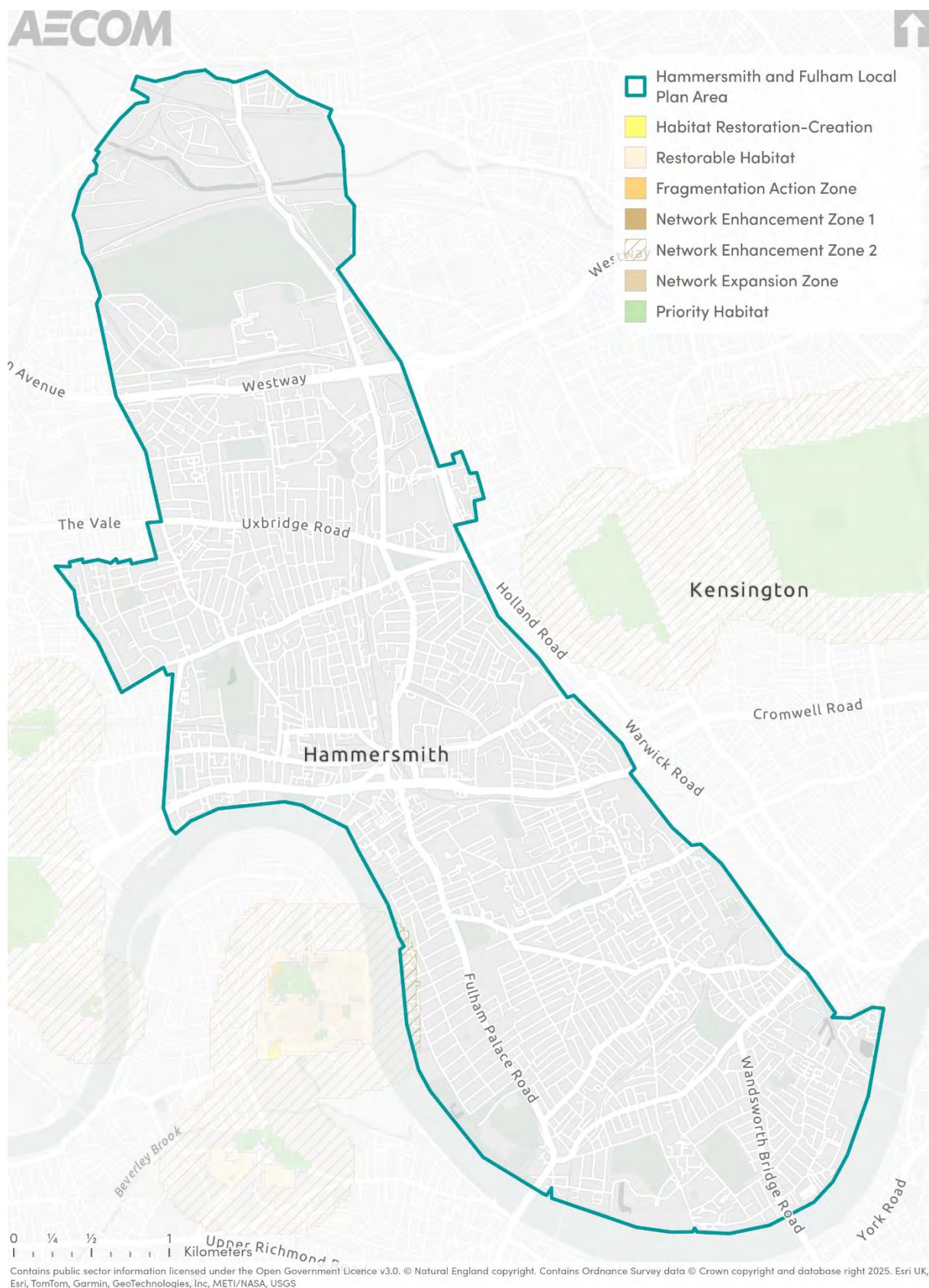


Figure 3-4: National Habitat Network in Hammersmith & Fulham



Hammersmith & Fulham Tiny Forests

- 3.3.16. Tiny Forests are innovative urban woodlands that help connect people with nature while creating new habitats for wildlife. Each forest contains 600 native trees in an area the size of a tennis court.
- 3.3.17. Hammersmith & Fulham is home to London's largest network of Tiny Forests, with six dense, fast-growing woodlands across the borough. These are found at Hammersmith Park, Norland Open Space, Normand Park, Eelbrook Common, Frank Banfield Park, and Wormholt Park.²²

Future Baseline

- 3.3.18. Habitats and species will potentially face increasing pressures from future development within the borough, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.
- 3.3.19. The HFLP presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats, but also the connections between them. It will be crucial to effectively coordinate the delivery of new development to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the borough.

3.4. Key Issues

- 3.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Biodiversity and Green/Blue Infrastructure:
- New development through the HFLP may result in indirect adverse impacts to the integrity of biodiversity conservation sites of international importance within 10 km of the borough. Development proposals should assess and mitigate potential impacts on these designations, including Wimbledon Common SAC and Richmond Park SAC;
 - There are several SSSI within 5 km of the borough. New development through the HFLP may adversely impact the integrity of these SSSIs if brought forward within their proximity. The entire borough overlaps with SSSI IRZ for development that may come forward through the HFLP, indicating a potential need for consultation with Natural England for proposed developments;

²² Hammersmith & Fulham Council (no date). '*Tiny Forests*' can be accessed through [this link](#).

- New development also has the potential for direct adverse effects on Hammersmith & Fulham's LNRs and SINCs;
- The borough contains various BAP Priority Habitats, such as deciduous woodland and intertidal substrate foreshore. These habitats support protected species, requiring careful planning to avoid habitat loss and fragmentation. Ecological networks, including BAP Priority Habitats, may be adversely impacted by new development, potentially resulting in the fragmentation of important natural corridors; and
- The HFLP presents an opportunity to improve biodiversity in the borough by encouraging development to incorporate biodiversity net-gain techniques and features. Furthermore, the emerging HFLP could encourage the creation, better connectivity and / or recovery of habitats, which will bring biodiversity ecological benefits to the borough and the surrounding environment.

3.5. IIA Objective

- 3.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Biodiversity and Green/Blue Infrastructure:

Maintain and enhance the extent and quality of biodiversity habitats and networks within and surrounding the borough.

4. Climate Change Adaptation

4.1. Focus of Theme

- 4.1.1. This theme focuses on the effects of climate change, including flood risk, overheating, and climate change adaptation.

4.2. Policy Context

- 4.2.1. **Table 4-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 4-1: Plans, Policies and Strategies Reviewed in Relation to Climate Change and Flood Risk

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>UK Climate Change Risk Assessment</u>	2022
<u>The National Design Guide</u>	2021
<u>National Model Design Code</u>	2021
<u>National Infrastructure Assessment</u>	2021
<u>Net Zero Strategy: Build Back Greener</u>	2021
<u>UK Sixth Carbon Budget</u>	2020
<u>National Flood and Coastal Erosion Risk Management Strategy</u>	2020
<u>Heat Networks: Building a Market Framework</u>	2020
<u>The Clean Air Strategy</u>	2019
<u>Clean Growth Strategy</u>	2019
<u>25-Year Environment Plan</u>	2019
<u>UK (second) National Adaptation Programme 2018 to 2023</u>	2018
<u>How Local Authorities Can Reduce Emissions and Manage Climate Change Risk</u>	2012
<u>Flood and Water Management Act</u>	2010
<u>UK Climate Change Act</u>	2008
Local	
<u>Climate and Ecology Strategy (to 2030)</u>	2021

Document Title	Year of Publication
<u>Local Flood Risk Management Strategy</u>	2017
<u>Hammersmith & Fulham Strategic Flood Risk Assessment Update Level 1</u>	2016
<u>Updated Surface Water Management Plan</u>	2015
<u>Hammersmith & Fulham Local Plan 2018</u>	2018
<u>The London Plan</u>	2021

4.2.2. The key messages emerging from the review are summarised below:

- The HFLP will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that deliver long-term resilience, including through reuse, regeneration, and conversion;
- The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action between 2017 and 2022, see below:
 - Flooding and coastal change risks to communities, businesses, and infrastructure.
 - Risks to health, well-being, and productivity from high temperatures.
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry.
 - Risks to natural capital, including terrestrial, coastal, marine, and freshwater ecosystems, soils, and biodiversity.
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants, and animals.

- Following the publication of each Change Risk Assessment, the Government must lay out its objectives, policies, and proposals to address the climate change risks and opportunities. The second National Adaptation Programme (NAP2, 2018-2023), setting out these objectives, policies, and proposals, was published in 2018. The ASC is required by the Act to assess the NAP and present progress reports. The most recent report was published in 2019, concluding that climate change adaptation needs to be addressed at a national scale and the Government's response to date has not been successful;
- The National Design Guide (NDG) and the National Design Code address how the Government recognises "well-designed places" including opportunities for climate change measures. Notably the NDG defines what constitutes a well-designed place using ten characteristics under three themes of climate, character, and community. Under the climate theme, homes and buildings should be functional, healthy, and sustainable, resources should be efficient and resilient, and buildings should be made to last;
- The National Infrastructure Assessment is published every five years and analyses the UK's long-term economic infrastructure needs to create a strategic vision and recommendations. The baseline report states that climate change will increase pressures on all sectors, including economic infrastructure;
- The Clean Growth Strategy, Clean Air Strategy, Net Zero Strategy, and the 25-year Environment Plan are a suite of documents which seek to progress the government's commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25-year Environment Plan, which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents also interlink with the government's commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK's National Adaptation Programme;
- The Flood and Water Management Act was introduced in 2010 as a response to the need to develop better resilience to climate change. The Act requires better management of flood risk, creating safeguards against rises in surface water drainage charges, and protecting water supplies for consumers. Good flood and coastal risk management is further outlined through the National Flood and Coastal Erosion Risk Management Strategy (2020). At a local scale, the Hammersmith &

Fulham Strategic Flood Risk Assessment Update Level 1 (2016) provides understanding of flood risk within the borough to inform planning decisions and ensure sustainable development;

- The Committee of Climate Change's 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk' emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities;
- Hammersmith & Fulham's Climate and Ecology Strategy (to 2030) sets out the route to net zero greenhouse gas emissions by 2030 for the borough. Its goal is a clean and sustainable future in which human activity works to the benefit of all people and the environment;
- The London Borough of Hammersmith & Fulham's Local Flood Risk Management Strategy (2017) outlines how flood risks will be managed in the borough. The strategy includes five objectives: understanding flood risk, collaborating with partners, reducing flood risks through planning and other methods, and raising public awareness; and
- Hammersmith & Fulham's Updated Surface Water Management Plan (2015) outlines the preferred surface water management strategy for the borough including consideration of flooding from sewers, drains, groundwater, and runoff from land, small watercourses and ditches that occurs as a result of heavy rainfall.

4.3. Baseline Summary

Current Baseline

Flood Risk

- 4.3.1. As shown in **Figure 4-1**, most of the central and southern regions of Hammersmith & Fulham fall within Flood Zones 2 or 3, primarily due to the proximity of the River Thames. However, the borough benefits from flood defences along the river, meaning the likelihood of flooding remains low (see the Flood map for planning).²³
- 4.3.2. Surface water flood risk is a significant issue in the borough, with areas of 'high' risk found across the entirety of Hammersmith & Fulham's built up areas. This is heavily influenced by the presence of impermeable surfaces, such as roads and buildings, which prevent effective drainage (see **Figure 4-2**). High surface flood risk is also caused by a lack of capacity in the local sewer system, which can be overwhelmed during storm events. It is noted that the recent opening of the Thames Tideway Tunnel (see **Chapter 15** for more information) may help to mitigate some of this risk.

²³ Gov.uk (no date). 'Flood map for planning' can be accessed through [this link](#).

Figure 4-1: Fluvial / Coastal Flood Risk in Hammersmith & Fulham

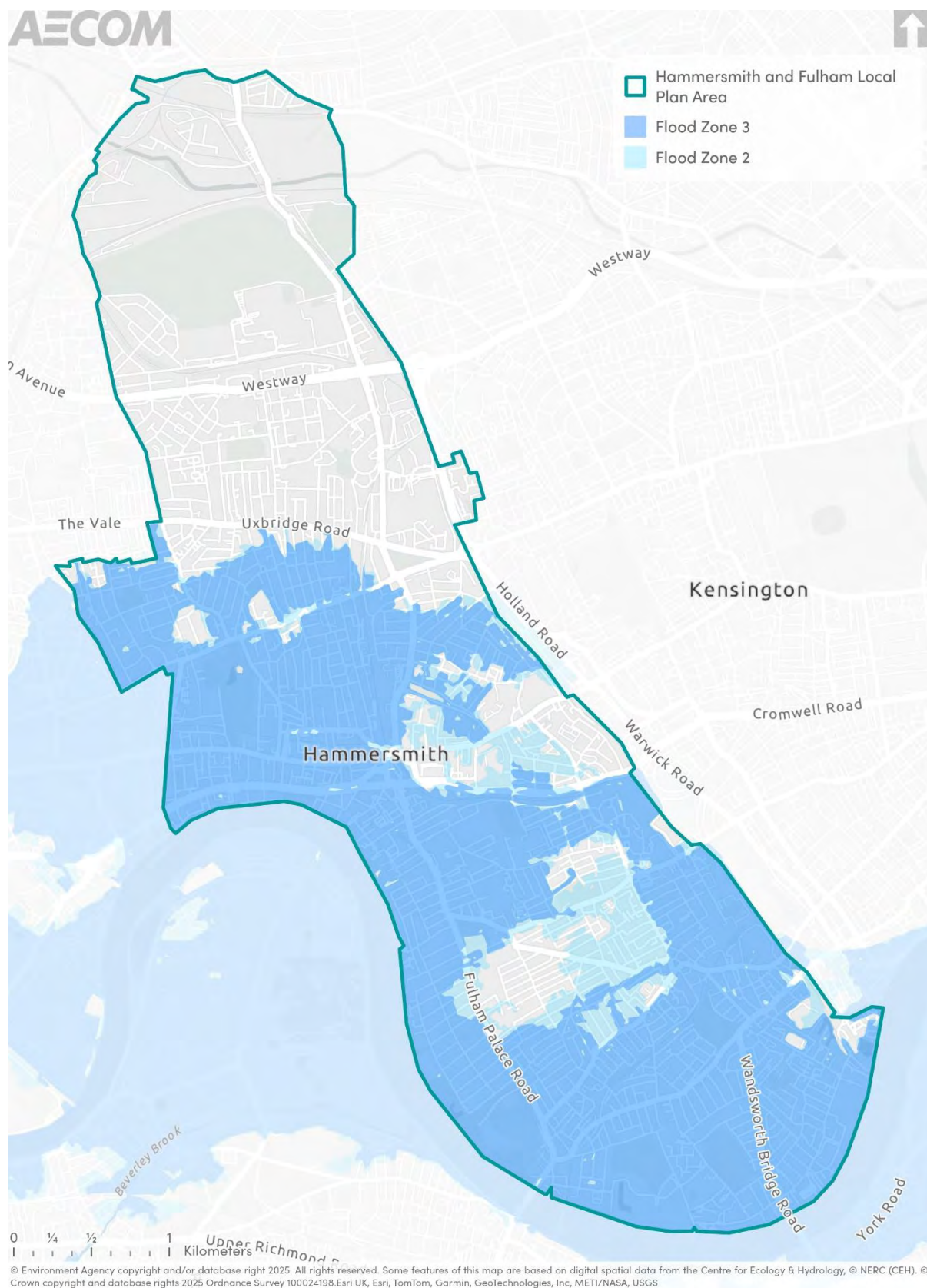
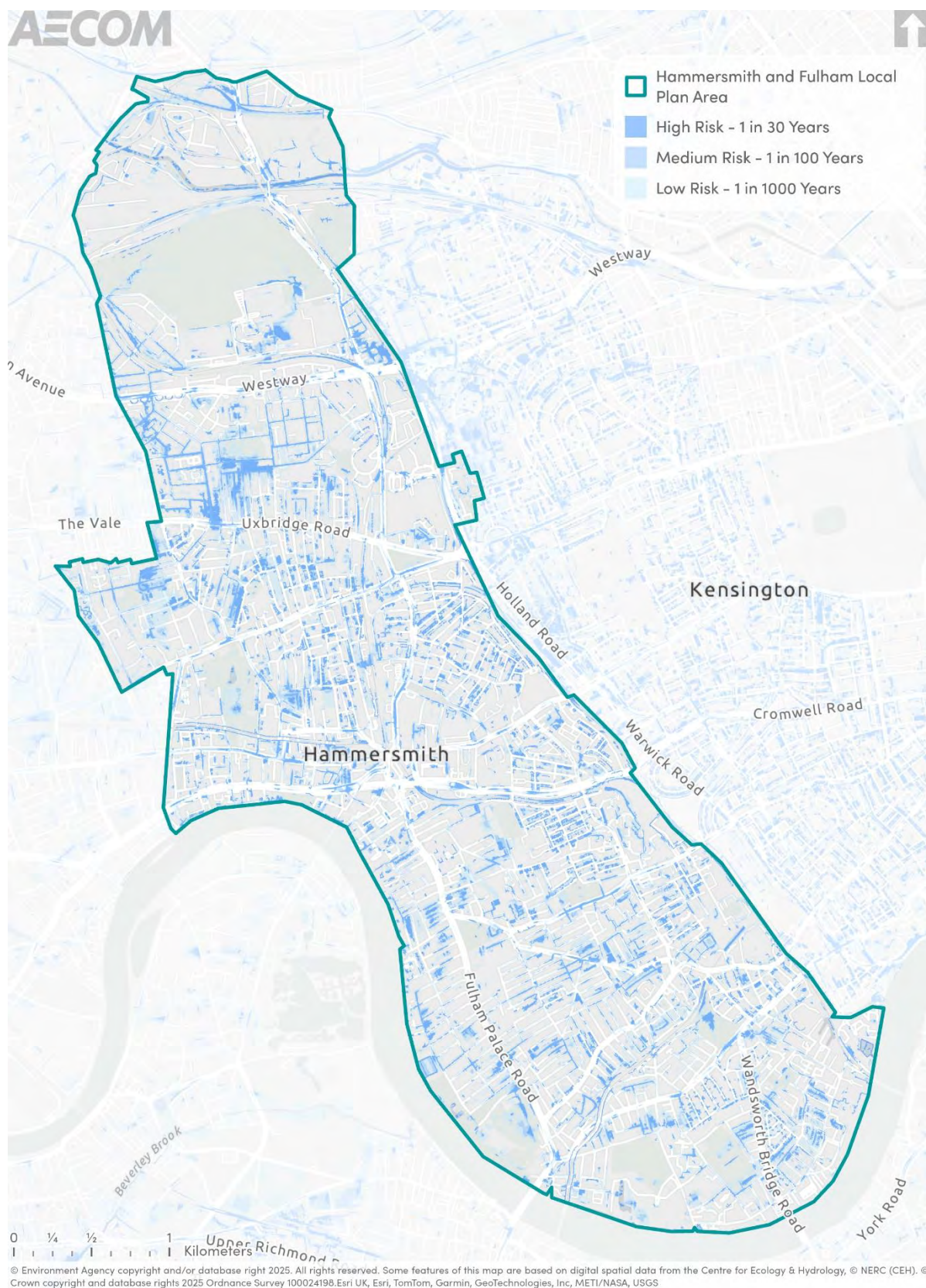


Figure 4-2: Surface Water Flood Risk in Hammersmith & Fulham



Overheating

- 4.3.3. Overheating refers to situations where indoor temperatures exceed comfortable and healthy levels, often resulting in discomfort, health risks, and increased energy consumption. In the context of climate change, overheating is becoming an increasingly significant issue, particularly in urban areas like Hammersmith & Fulham, where the combined effects of higher temperatures, reduced green spaces, and increasing urban density can exacerbate the problem. Urban heat islands (UHI) are particularly evident in areas with high population density, where concrete, asphalt, and other materials absorb and retain heat. The high density of buildings in the borough creates a UHI that can be up to 10°C hotter than outside London.²⁴ As Hammersmith & Fulham continues to develop, the expansion of built-up areas with more impermeable surfaces, such as roads and pavements, has the potential to contribute to the rise in urban temperatures, leading to further overheating.
- 4.3.4. Recent weather events have caused issues in Hammersmith & Fulham. For example, during a heatwave in 2020 Hammersmith Bridge was closed to all traffic after the bridge fractures were aggravated by extreme heat. Such heatwaves are expected every other year in the borough by mid-century.²⁵

Future Baseline

Impacts of Climate Change

- 4.3.5. Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and level of confidence in each prediction.
- 4.3.6. As highlighted by the research, the effects of climate change for the London by 2040 in a 'medium emissions' (RCP4.5) scenario are likely to be as follows:²⁶
- An increase in winter mean temperature of 1°C and an increase in summer mean temperature of 2°C; and
 - A change in winter mean precipitation up to +10% and summer mean precipitation up to -10%.

²⁴ Hammersmith & Fulham Council (no date). 'What is the climate and ecological emergency?' can be accessed through [this link](#).

²⁵ Hammersmith & Fulham Council (no date). 'What is the climate and ecological emergency?' can be accessed through [this link](#).

²⁶ Met Office (2019) 'Climate change projections over land' can be accessed through [this link](#).

4.3.7. Resulting from these changes, a range of risks exist for the borough, including:

- Effects on water resources, such as a reduction in availability of groundwater for extraction and a need to increase capacity of wastewater treatment plants and sewers;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding and a need to upgrade flood defences;
- Loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
- Health impacts, including increased risk of respiratory and cardiovascular illnesses during heatwaves, higher vulnerability among elderly and low-income populations, and mental health impacts associated with extreme weather events;
- Increased demand for air-conditioning; and
- Heat stress related issues with infrastructure due to increased temperature.

4.4. Key Issues

4.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Climate Change Mitigation:

- Parts of the borough face a high risk from flooding, including surface water flooding, tidal flooding from the River Thames, and sewer flooding. These risks represent significant constraints for future development, especially in Hammersmith & Fulham's main urban areas. Development must consider these risks and include flood mitigation measures;
- Climate change may increase surface water flooding, stressing drainage systems and water quality. Effective water management solutions, like sustainable drainage systems, will be needed to mitigate these risks;
- Increases in the built footprint of the borough has the potential to exacerbate flood risk issues;
- Following national trends, extreme heat events are likely to occur more frequently in the future in Hammersmith & Fulham. In addition to this, drought is likely to become an increasing issue in summer. In this respect, climate change resilience strategies should form an integral part of the emerging HFLP policy framework; and

- Higher temperatures and flooding increase risks to public health, particularly in dense urban areas. Vulnerable populations will need better access to cooling and flood protection.

4.5. IIA Objective

- 4.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Climate Change Mitigation:

Support resilience to the potential effects of climate change, including flood risk.

5. Climate Change Mitigation

5.1. Focus of Theme

- 5.1.1. This theme focuses on activities in the borough that contribute to climate change mitigation, including the borough's emissions, and renewable energy infrastructure.

5.2. Policy Context

- 5.2.1. **Table 6-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 5-1: Plans, Policies and Strategies Reviewed in Relation to Climate Change Mitigation

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>UK Climate Change Risk Assessment</u>	2022
<u>The National Design Guide</u>	2021
<u>National Model Design Code</u>	2021
<u>National Infrastructure Assessment</u>	2021
<u>Net Zero Strategy: Build Back Greener</u>	2021
<u>UK Sixth Carbon Budget</u>	2020
<u>Heat Networks: Building a Market Framework</u>	2020
<u>The Clean Air Strategy</u>	2019
<u>Clean Growth Strategy</u>	2019
<u>25-Year Environment Plan</u>	2019
<u>UK National Adaptation Programme 2018 to 2023</u>	2018
<u>How Local Authorities Can Reduce Emissions and Manage Climate Change Risk</u>	2012
<u>UK Climate Change Act</u>	2008
Local	
<u>London Net Zero 2030: An Updated Pathway</u>	2022
<u>Climate and Ecology Strategy (to 2030)</u>	2021
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

5.2.2. The key messages emerging from the review are summarised below:

- The HFLP will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas emissions, and deliver long-term resilience, including through reuse, regeneration, and conversion;
- The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action between 2017 and 2022, see below:
 - Flooding and coastal change risks.
 - Risks to health, well-being, and productivity from high temperatures.
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry.
 - Risks to natural capital, including terrestrial, coastal, marine, and freshwater ecosystems, soils, and biodiversity.
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants, and animals.
- Following the publication of each Change Risk Assessment, the Government must lay out its objectives, policies, and proposals to address the climate change risks and opportunities. The second National Adaptation Programme (NAP2, 2018-2023), setting out these objectives, policies, and proposals, was published in 2018. The ASC is required by the Act to assess the NAP and present progress reports. The most recent report was published in 2019, concluding that climate change adaptation needs to be addressed at a national scale and the Government's response to date has not been successful. The Sixth Carbon Budget, required under the Climate Change Act, is the legal limit of UK net greenhouse gas emissions and requires the country to reduce emissions by 78% by 2035 relative to 1990 levels. This puts the country on track to achieve net-zero emissions by 2050 at the latest;

- The National Design Guide (NDG) and the National Design Code address how the Government recognises “well-designed places” including opportunities for climate change measures. Notably the NDG defines what constitutes a well-designed place using ten characteristics under three themes of climate, character, and community. Under the climate theme, homes and buildings should be functional, healthy, and sustainable, resources should be efficient and resilient, and buildings should be made to last;
- The National Infrastructure Assessment is published every five years and analyses the UK’s long-term economic infrastructure needs to create a strategic vision and recommendations. The baseline report states that climate change will increase pressures on all sectors, including economic infrastructure;
- The Clean Growth Strategy, Clean Air Strategy, Net Zero Strategy, and the 25-year Environment Plan are a suite of documents which seek to progress the government’s commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25-year Environment Plan, which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents also interlink with the government’s commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK’s National Adaptation Programme;
- The Department for Business, Energy and Industrial Strategy released a framework for heat networks which includes proposals to increase access to renewable heat sources and achieve a net zero target by 2050;
- The Committee of Climate Change’s 2012 report entitled ‘How Local Authorities Can Reduce Emissions and Manage Climate Change Risk’ emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities;
- Net Zero 2030: An Updated Pathway sets a target to achieve net-zero carbon emissions in London by 2030, with an emphasis on reducing building emissions, expanding heat pump installations, and cutting car travel by 27%. The preferred strategy, ‘Accelerated Green’, aims to drive

significant emissions reductions while supporting a sustainable and equitable transition; and

- Hammersmith & Fulham's Climate and Ecology Strategy (to 2030) sets out the route to net zero greenhouse gas emissions by 2030 for the borough. Its goal is a clean and sustainable future in which human activity works to the benefit of all people and the environment.

5.3. Baseline Summary

Current Baseline

Climate Emergency

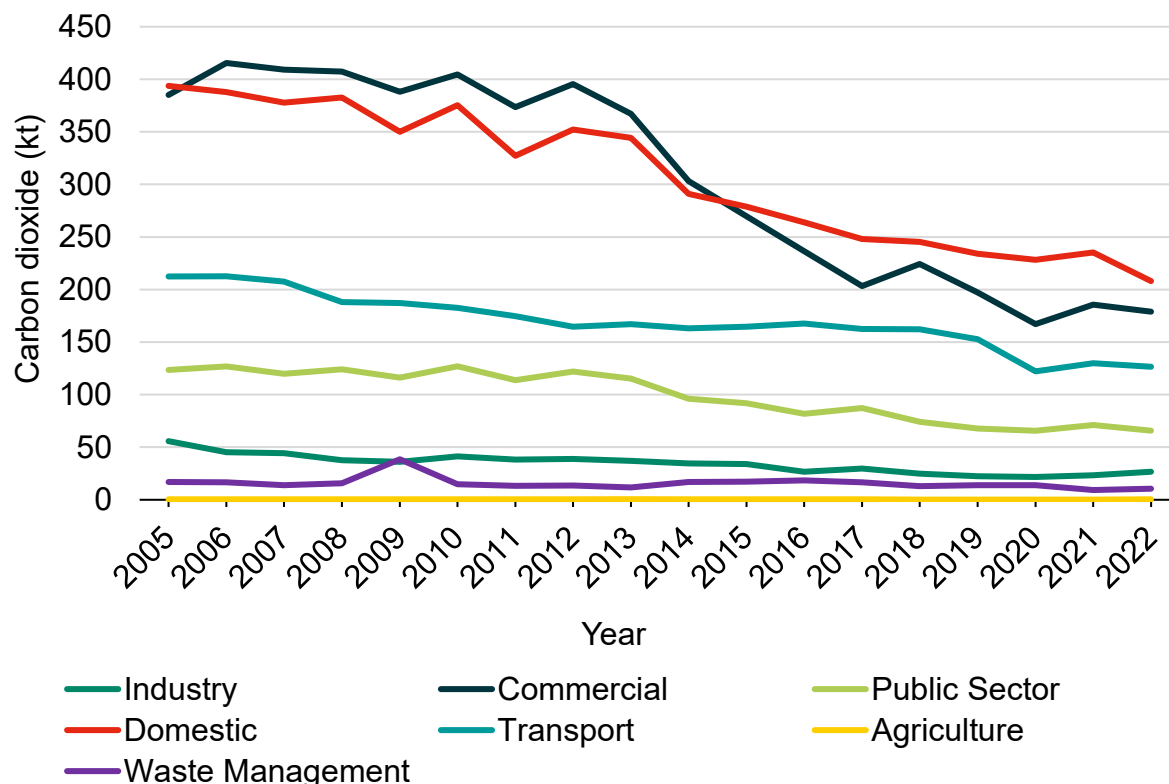
- 5.3.1. Hammersmith & Fulham Council declared a climate emergency in July 2019, setting the district on a pathway towards becoming a net zero borough by 2030. Since the climate emergency was confirmed in Hammersmith & Fulham, a Climate and Ecology Strategy has been adopted to enable the Council to meet these commitments.

Contribution to Climate Change

- 5.3.2. The Climate Change Act 2008 (2050 Target Amendment) Order of 2019 requires carbon dioxide (CO₂) emissions from the built environment to be monitored and recorded at the local authority level. The CO₂ emissions shown in **Figure 5-1** and **Figure 5-2** are derived from data supplied by the Department for Business, Energy, and Industrial Strategy.²⁷
- 5.3.3. **Figure 5-1** shows an overall decline in CO₂ emissions in Hammersmith & Fulham from 2005 to 2022. This trend was especially evident for the commercial and domestic sectors, which both halved their emissions over the observed period. Transport and public sector emissions declined more gradually, while waste management and agriculture remained consistently low. Overall, the data reflects a steady reduction in emissions across most sectors.
- 5.3.4. In 2022, the main sources of carbon dioxide emissions in Hammersmith & Fulham were the commercial and domestic sectors, followed by transport and the public sector. Emissions from industry, waste management, and agriculture were comparatively low. Therefore, the data indicates that commercial and domestic activities remain the key areas for targeted emission reduction, while other sectors contribute relatively little to the borough's overall carbon footprint.

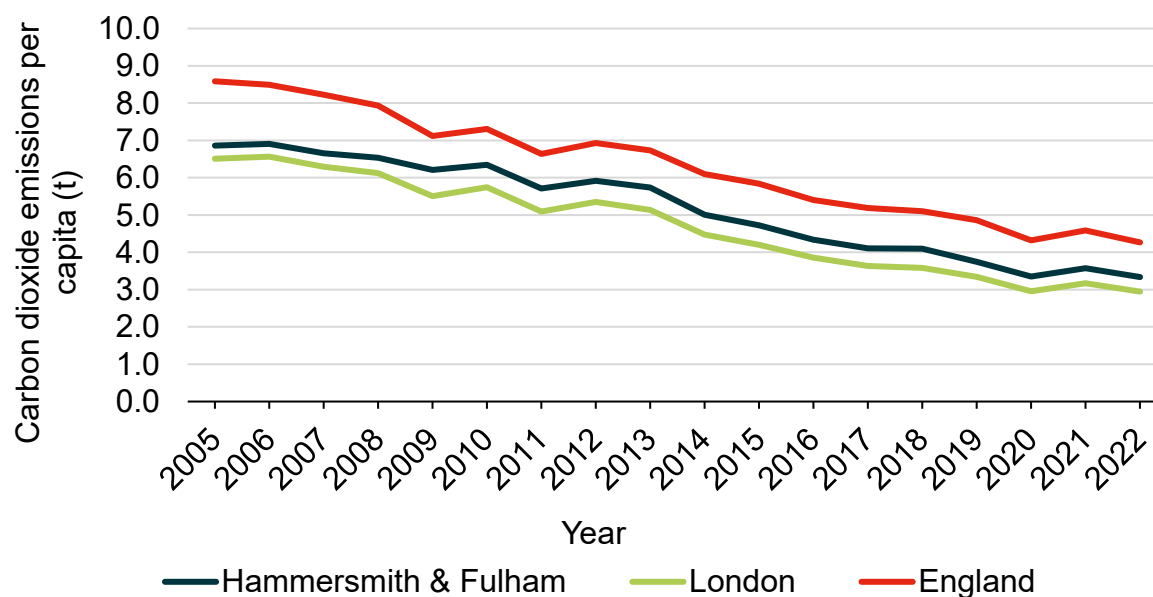
²⁷ Department for Business, Energy and Industrial Strategy (2024). 'UK local authority and regional carbon dioxide emissions national statistics: 2005-2022' can be accessed through [this link](#). Table 1.2.

Figure 5-1: Local Authority territorial carbon dioxide emissions estimates within the scope of influence of Hammersmith & Fulham 2005-2021 (kt CO₂e)



5.3.5. **Figure 5-2** indicates that since 2015, CO₂ emissions per capita were slightly higher in Hammersmith & Fulham than the London average, but lower than that of England. The rate of reduction in emissions during this period was similar across all three geographies.

Figure 5-2: Territorial carbon dioxide emissions CO₂ emissions per capita (in tons) for Hammersmith & Fulham, and the whole of England (2005-2021)



Renewable Energy

- 5.3.6. Electric Vehicles (EVs) do not burn fuel and create almost no noise. They are battery powered and have the potential to be 'zero-emission vehicles' (ZEVs) if powered by renewable electricity. As of July 2024, there were 2,662 public electric charging devices in Hammersmith & Fulham.²⁸ This figure is the second highest of all the London boroughs.
- 5.3.7. In terms of renewable energy, the Department for Business, Energy and Industrial Strategy publishes annual statistics on renewable energy generation, disaggregated by Local Authority.²⁹ The most recent data (to 2023) shows that Hammersmith & Fulham has a total of 656 renewable energy (electricity) installations (all photovoltaics), amounting to a total renewable electricity capacity of 3.1 MW. This figure is the third lowest of all the London boroughs.

Fuel Poverty and Energy Efficiency

- 5.3.8. In Hammersmith & Fulham, 10.2% of households were estimated to be fuel poor in 2022, based on the Low Income Low Energy Efficiency (LILEE) definition.³⁰ Under this measure, a household is considered fuel poor if it has a low income (below the poverty line after housing costs) and lives in a property with an energy efficiency rating of band D or below. Households in more efficient homes (rated EPC C or above) are excluded, even if their income is low, on the basis that their energy costs are likely to be more manageable. The rate of 10.2% places Hammersmith & Fulham as the borough with the 15th highest fuel poverty rate out of London's 33 boroughs, highlighting a notable level of deprivation compared to other London boroughs.
- 5.3.9. In 2023, a multi-consultancy group published 'Delivering Net Zero' (DNZ), a comprehensive report outlining key strategies for achieving Net Zero carbon emissions across London.³¹ The DNZ notes that energy efficiency is a key pillar of achieving net zero and must be prioritised in future developments. Reducing the Energy Use Intensity (EUI) of buildings will be important to achieving Net Zero goals, ensuring that homes are designed and constructed to minimise energy demand from the outset. High-performance building standards are also needed to bridge the gap between designed and actual energy performance. Aligning with London's Net Zero

²⁸ HM Gov (2025) '*Electric vehicle charging infrastructure statistics: July 2025*' can be accessed through [this link](#) Table 1a.

²⁹ DBEIS (2024) '*Renewable electricity by local authority, 2014 to 2023*' can be accessed through [this link](#). LA-Sites 2023. LA-Capacity 2023.

³⁰ ONS (2024). '*Sub-regional fuel poverty data 2024 (2022 data)*' can be accessed through [this link](#). [Table 2]

³¹ Levitt Bernstein, Inkling, Introba, Currie and Brown and Etude (2023). '*Delivering Net Zero*' can be accessed through [this link](#).

pathway,³² Hammersmith & Fulham should aim for at least a 40% reduction in heat demand across buildings by 2030 (compared to 2020 levels).

- 5.3.10. To support Hammersmith & Fulham's Net Zero ambitions, local policies should aim to enforce assured energy performance standards. This means that new developments should demonstrate compliance with clear energy performance targets through predictive energy modelling, followed by post-construction monitoring for at least five years. Setting a fixed absolute energy performance target (e.g., 15-20 kWh/m²/year for space heating demand) can help ensure accountability and reduce future retrofit burdens. The borough should also seek to require solar PV installation on all new developments where feasible, and encourage community-led renewable energy projects to enhance local sustainability. These more ambitious requirements should be subject to viability testing to ensure they are deliverable and proportionate, particularly in the context of other planning obligations.

Heat Networks

- 5.3.11. District Heat Networks are systems that distribute heat through underground pipes from central sources to multiple buildings, utilising low or zero-carbon energy sources such as environmental heat (air, river, underground), waste heat from data centres, the sewer system, and industrial processes.
- 5.3.12. The Cross-Borough Energy Masterplan is a collaborative initiative between Hammersmith & Fulham and Kensington & Chelsea councils, supported by the Mayor of London's Local Energy Accelerator Programme.³³ The Masterplan aims to develop net zero-compatible district heat networks to decarbonise heating systems across both boroughs, aligning with H&F's goal of achieving net zero carbon emissions by 2030.
- 5.3.13. The masterplan outlines five key areas (mapped on the Hammersmith & Fulham website)³⁴ for potential heat network development across the two boroughs:
- Earl's Court
 - Chelsea & Westminster Hospital and World's End
 - White City
 - Notting Dale and North Kensington

³² Greater London Authority (2022). 'London Net Zero 2030: An Updated Pathway' can be accessed through [this link](#).

³³ Centre for Sustainable Energy (2023). 'Cross-Borough Energy Masterplan' can be accessed through [this link](#).

³⁴ Hammersmith and Fulham Council (2023). 'Cross-borough energy masterplan' can be accessed through [this link](#).

- Hammersmith Town Centre and Olympia
- 5.3.14. The plan emphasises that large-scale heat networks can be more cost-effective and environmentally friendly than individual heat pumps, especially in densely populated urban areas.

Low-carbon Energy Developments

- 5.3.15. London's Net Zero pathway recommends the transition away from fossil fuel heating systems, such as gas boilers, in new developments. Therefore, the HFLP should promote the widespread adoption of low-carbon heating systems in new developments, such as heat pumps.
- 5.3.16. Additionally, integrating renewable energy into new developments will be important. The borough should contribute to London's target of 1.5GW of solar photovoltaic (PV) generation by 2030, ensuring that new homes generate as much renewable energy as they consume annually. This shift will significantly reduce reliance on fossil fuels and improve local energy security.

Future Baseline

- 5.3.17. In line with UK trends and national commitments, the borough's emissions are likely to continue to fall as energy efficiency measures, renewable energy take-up and new technologies, such as EVs and solar PV, become more widely adopted.
- 5.3.18. With regard to transport emissions, the uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' Report (2018)³⁵, it is assumed that ULEV uptake will increase rapidly in the coming decade and aside from Heavy Goods Vehicles (HGVs), many more vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

5.4. Key Issues

- 5.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Climate Change Mitigation:
- Hammersmith & Fulham Council declared a climate emergency in 2019, with the aspiration of becoming a net zero borough by 2030. This commitment underscores the importance of integrating climate action into the HFLP;

³⁵ HM Gov (2018) '*The Road to Zero – Next steps towards cleaner road transport and delivering our Industrial Strategy*' can be accessed through [this link](#).

- Despite a steady decline in emissions since 2005, Hammersmith & Fulham's per capita CO₂ emissions remain slightly above the London average, highlighting an ongoing need for targeted mitigation efforts;
- The commercial and domestic sectors are the borough's highest emitters and must be prioritised in decarbonisation strategies, particularly in building energy efficiency and operational performance;
- Renewable energy generation capacity in the borough is among the lowest in London, indicating scope to expand solar PV installations and support community-led energy projects;
- Fuel poverty affects over 10% of households in the borough, highlighting the importance of addressing energy efficiency in existing housing stock to reduce inequality and meet Net Zero targets; and
- Although EV infrastructure is strong, with one of the highest numbers of public charging points in London, further promotion of ULEVs and low-emission transport options is needed to reduce road-related emissions.

5.5. IIA Objectives

- 5.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Climate Change Mitigation:

Mitigate climate change by supporting decarbonisation, with a focus on both transport and the built environment.

6. Communities 1: Accessibility

6.1. Focus of Theme

- 6.1.1. This theme focuses on directing growth to accessible locations with sustainable transport links, essential services, and inclusive infrastructure.

6.2. Policy Context

- 6.2.1. **Table 6-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 6-1: Plans, Policies and Strategies Reviewed in Relation to Accessibility

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
Building for Life / Building for a Healthy Life	2020
<u>Planning Practice Guidance</u>	various
<u>10-Year Infrastructure Strategy</u>	emerging
<u>Planning and Infrastructure Bill</u>	emerging
Local	
<u>London Borough of Hammersmith & Fulham Local Implementation Plan 2</u>	2010
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

- 6.2.2. The key messages emerging from the review are summarised below:

- The HFLP will need to have regard for the principles set out in the NPPF, which seek to retain and enhance access to community services and facilities such as educational facilities and open spaces. The NPPF recognises the benefits of having a range of local provision to support community needs, in addition to the benefits of creating cohesive communities in safe environments where the fear of crime (and crime itself) does not undermine resident quality of life. This contributes to ensuring settlement and community identities are protected. The NPPF is complimented by Planning Policy Guidance, which offers practical guidance on how local planning authorities should implement the NPPF's policies;

- The Government's Levelling Up and Regeneration Act seeks to reduce regional inequalities and promote economic growth and opportunities in less prosperous areas. It has been designed to address regional disparities, stimulate economic development, and enhance infrastructure and community well-being in order to create a more balanced and inclusive nation;
- The emerging Planning and Infrastructure Bill is designed to speed up planning approvals and infrastructure delivery, particularly for housing and transport projects. It includes provisions to encourage brownfield redevelopment and to ensure that new housing developments are supported by necessary infrastructure, such as roads, schools, and healthcare facilities;
- The emerging 10-Year Infrastructure Strategy will provide a long-term vision for national infrastructure planning, with a focus on economic growth, environmental sustainability, and social well-being. It emphasises the integration of housing, transport, digital connectivity, and public services to create more resilient and accessible communities;
- Building for a Healthy Life is a design framework that promotes high-quality housing developments with a focus on connectivity, community integration, and sustainability. It encourages developments that prioritise pedestrian-friendly streets, access to public transport, and the inclusion of green and blue infrastructure (such as parks and waterways). The framework also emphasises the importance of social spaces and local facilities, ensuring that new housing developments foster a sense of community; and
- The London Borough of Hammersmith & Fulham Local Implementation Plan 2 outlines the Hammersmith & Fulham Council's strategies for improving transportation and mobility across the borough in line with the Mayor of London's transport objectives.

6.3. Baseline Summary

Current Baseline

Facilities and Services

- 6.3.1. Hammersmith & Fulham is an Inner London borough located in west London, characterised by a dense urban environment with a mix of residential and commercial areas. The borough is home to a wide range of services and facilities, including hospitals such as Charing Cross Hospital, numerous schools and further education institutions, parks and open spaces like Ravenscourt Park and Bishop's Park, as well as a variety of community and leisure amenities.

6.3.2. Hammersmith & Fulham Council's website provide a map showing the location of the borough's hospitals, town halls, police stations, underground stations, fire stations, libraries, and schools.³⁶ Generally, these are spread across the borough, ensuring that most residents can access them within a reasonable distance.

6.3.3. Hammersmith & Fulham also has a wide array of other services and facilities, including 51 parks/open spaces,³⁷ leisure centres, shops, eateries, and entertainment (e.g., cinemas).

Barriers to Essential Services

6.3.4. The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation, combining seven different domains. These domains will be explored in this Scoping Report (see also **Chapters 8 and 9**). Of particular relevance to the Accessibility SEA theme is the Barriers to Housing and Services domain, which addresses the physical and financial accessibility of housing and local services.

6.3.5. Lower Super Output Areas (LSOAs) are standardised geographic units intended to be as consistent as possible, with each LSOA typically containing between 1,000 and 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of 32,844 in England and Wales, with a rank of 1 indicating the most deprived area. Within this context, the borough spans 150 LSOAs.

6.3.6. **Figure 6-1** shows the ranking of Hammersmith & Fulham's LSOAs for the Barriers to Housing and Services domain, while **Table 6-2** provides additional details on the LSOAs within Hammersmith & Fulham that fall within the 50% most deprived, or worse, areas.

6.3.7. An analysis of this data reveals that almost 90% Hammersmith & Fulham's LSOAs are ranked within the 50% most deprived, or worse, LSOAs for the Barriers to Housing and Services domain. This includes eight LSOAs in the 10% most deprived areas of England and Wales for this domain. Higher levels of deprivation are found in the central and northern areas of the borough, particularly around West Kensington and Shepherd's Bush.

6.3.8. As Hammersmith & Fulham continues to grow, ensuring that residents can easily access essential services such as healthcare, education, and retail will remain a priority. While southern areas of the borough generally experience fewer accessibility issues, higher levels of deprivation in most of the borough's LSOAs highlight challenges in reaching services, particularly in more peripheral areas. Addressing these disparities through targeted improvements in public transport coverage, digital accessibility, affordable housing, and local service provision will help reduce barriers and improve overall accessibility across the borough.

³⁶ Hammersmith & Fulham Council (2022). 'Ward boundaries with street names' can be accessed through [this link](#).

³⁷ Hammersmith & Fulham Council (2024). 'Parks and open spaces' can be accessed through [this link](#).

Figure 6-1: Barriers to Housing and Services IMD Domain³⁸

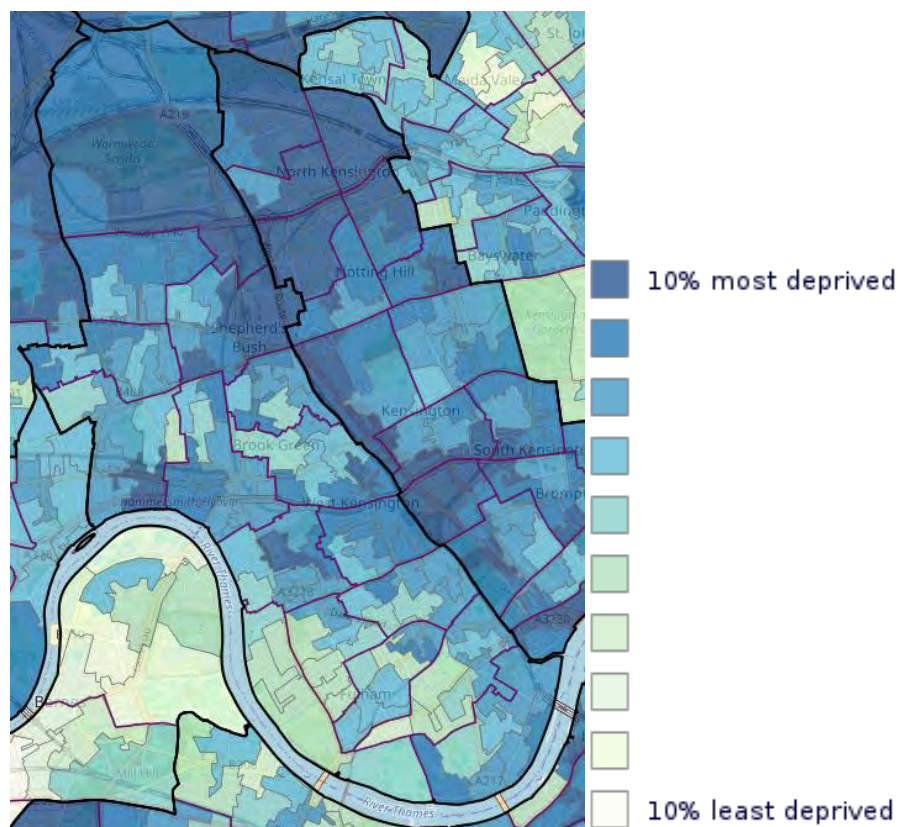


Table 6-2: LSOAs in Hammersmith & Fulham Ranked Within 50% Most Deprived or Worse for the Barriers to Housing and Services IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	13
40% Most Deprived	18
30% Most Deprived	32
20% Most Deprived	30
10% Most Deprived	8 (Hammersmith & Fulham 012C; Hammersmith & Fulham 001A; Hammersmith & Fulham 001C; Hammersmith & Fulham 016C; Hammersmith & Fulham 011C; Hammersmith & Fulham 005B; Hammersmith & Fulham 004A; Hammersmith & Fulham 004B)
Total	101 (out of 113 in Hammersmith & Fulham)

³⁸ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

Transport and Connectivity

- 6.3.9. Hammersmith & Fulham benefits from strong transport connectivity, with key road links such as the A4 and A40 providing access into central London and westwards towards the M25. The borough is well served by public transport, including London Underground lines such as the District, Piccadilly, Hammersmith & City, and Central lines, as well as extensive bus networks. There is a growing emphasis on sustainable transport, with initiatives to promote walking and cycling, in line with the Mayor's Transport Strategy, which aims to reduce car dependency and increase active and public transport use.
- 6.3.10. For further detail on transport infrastructure in Hammersmith & Fulham, see **Chapter 14**.

Future Baseline

- 6.3.11. Following the UK government's target for a carbon-neutral future, Hammersmith & Fulham is likely to see further expansion in EV charging points to accommodate the growing number of electric vehicles. This includes potential initiatives to enhance the availability of charging infrastructure in both public and private spaces.
- 6.3.12. As digital infrastructure improves, ensuring equal access to digital services (e.g., online healthcare appointments, remote education) will become increasingly important. Addressing digital accessibility, especially for older residents and those with disabilities, will be a priority.

6.4. Key Issues

- 6.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Accessibility:
- There are high levels of deprivation in many parts of Hammersmith & Fulham, particularly in central and northern regions, which creates barriers to housing and services. Targeted interventions in these areas, such as improved transport and service provision, may help address these challenges;
 - The borough should continue to prioritise sustainable transport options, such as walking, cycling, and electric vehicle infrastructure, to reduce car dependency and improve access to essential services;
 - With increasing reliance on digital services (e.g., online healthcare, remote education), ensuring equal access to digital infrastructure for all residents, including older and disabled groups, is important for reducing inequality in service access; and

- New housing and employment developments should be well-integrated with existing transport and service networks, reducing travel distances and enhancing accessibility for residents.

6.5. IIA Objective

- 6.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Accessibility:

Improve accessibility to essential services and facilities across the borough.

7. Communities 2: Equality

7.1. Focus of Theme

- 7.1.1. This theme focuses on groups with protected characteristics, addressing concentrations of relative deprivation, and inequalities.

7.2. Policy Context

- 7.2.1. **Table 7-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 7-1: Plans, Policies and Strategies Reviewed in Relation to Equality

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
<u>Equality Act 2010</u>	2010
<u>Planning Practice Guidance</u>	various
Local	
<u>Equalities Plan 2021-2025</u>	2021
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

- 7.2.2. The key messages emerging from the review are summarised below:

- The HFLP will need to have regard for the principles set out in the NPPF, which emphasises the need for sustainable development that delivers inclusive communities, affordable housing, and accessible employment opportunities. Key chapters relevant to equality include:
 - Chapter 5 – Ensures a sufficient supply of homes, including affordable housing and housing for people with specific needs;
 - Chapter 8 – Promotes healthy and safe communities, encouraging inclusive design and social cohesion; and
 - Chapter 11 – Focuses on making effective use of land to meet diverse housing and employment needs.
- The NPPF is supported by planning practice guidance, which is a suite of policy papers covering a broad range of topics;

- The Levelling Up and Regeneration Act 2023 aims to reduce regional inequalities by improving local economic opportunities, housing supply, and infrastructure. It supports policies that direct investment to disadvantaged areas and promote balanced growth;
- The Equality Act 2010 provides the legal framework to protect individuals from discrimination based on protected characteristics, including age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. This Act ensures that planning policies and decisions do not disadvantage any group and promote equal access to opportunities. Local planning authorities must consider how developments support inclusivity, accessibility, and fairness in housing and employment provision; and
- Hammersmith & Fulham's Equalities Plan (2021-2025) outlines the council's commitment to tackling inequality and creating opportunities by working collaboratively with residents. The Plan is guided by five key objectives:
 - Everyone in our borough feels valued and that they belong.
 - Removing barriers to inclusion.
 - Ensuring that our services tackle the disproportionate impact on young people (including those at risk of street crime and exploitation by gangs).
 - Improving opportunities for all.
 - Becoming an employer of choice and fostering greater inclusion.

7.3. Baseline Summary

Current Baseline

Ethnicity

- 7.3.1. The 2021 Census data, presented in **Table 7-2**, shows that 63% of the population within Hammersmith & Fulham identify as White. The population comprised of people identifying as Black and Asian are 12% and 11%, respectively. People identifying as Mixed (7%), Arab (3%), and Other ethnicities (4%) represent smaller proportions.
- 7.3.2. While the majority of Hammersmith & Fulham's population identifies as White, the borough has become increasingly diverse in recent years. The proportion of White residents declined by five percentage points between 2011 and 2021, while all other groups grew by up to two percentage points, reflecting broader migration trends and demographic shifts.

Table 7-2: Ethnic groups within Hammersmith & Fulham³⁹

Ethnic Group	% 2011	% 2021	Change (% points)
Asian, Asian British or Asian Welsh	9.1	10.5	+1.4
Black, Black British, Black Welsh, Caribbean or African	11.8	12.3	+0.5
Mixed or Multiple ethnic groups	5.5	6.7	+1.2
White	68.1	63.2	-4.9
Arab	2.9	3.0	+0.1
Any other ethnic group	2.7	4.3	+1.6

Religion

- 7.3.3. The 2021 Census data on religious communities, shown in **Table 7-3**, indicates that just under half of the population (46%) within Hammersmith & Fulham identify as Christian. Approximately 31% of the borough's population stated they had no religion or no declared religion. Among the minority religious groups, the most common in Hammersmith & Fulham is Muslim, accounting for 12% of the population. Hindu, Buddhist, Jewish, Sikh, and Other all accounted for around 1% of the borough's population.
- 7.3.4. Hammersmith & Fulham is becoming more secular, exemplified by a significant drop in Christian communities, falling eight percentage points since the 2011 Census, while those with no religion grew by seven percentage points.

Table 7-3: Religious communities within Hammersmith & Fulham⁴⁰

Religion	% 2011	% 2021	Change (% points)
Christian	54.1	45.7	-8.4
Buddhist	1.1	0.9	-0.2
Hindu	1.1	1.2	+0.1
Jewish	0.6	0.7	+0.1
Muslim	10.0	11.6	+1.6
Sikh	0.2	0.2	no change
Other religion	0.5	0.7	+0.2
No religion	23.8	30.6	+6.8
Religion not stated	8.4	8.5	+0.1

³⁹ Nomis (2011 and 2021). 'Query Data' can be accessed through [this link](#). See Tables TS021 and KS201EW.

⁴⁰ Nomis (2011 and 2021). 'Query Data' can be accessed through [this link](#). See Tables TS030 and KS209EW.

Disability

- 7.3.5. The 2021 Census data, shown in **Table 7-4**, 13% of residents in Hammersmith & Fulham report that their day-to-day activities are limited in some way (split 6% to 'limited a lot' and 7% to 'limited a little'). This figure has not changed since 2011, although there was a 1% shift within the subcategories, from 'limited a lot' to 'limited a little'.
- 7.3.6. The ageing population in Hammersmith & Fulham suggests that demand for accessible housing, healthcare services, and public transport adaptations will likely increase. Additionally, disability prevalence is often linked with economic inactivity, reinforcing the importance of inclusive employment opportunities.

Table 7-4: Long Term Health Problem or Disability⁴¹

Long Term Health Problem or Disability	% 2011	% 2021	Change (% points)
Day-to-day activities limited a lot	6.3%	5.5%	-0.8
Day-to-day activities limited a little	6.3%	7.0%	+0.7
Day-to-day activities not limited	87.4%	87.5%	+0.1

Age Structure

- 7.3.7. In 2023, the age structure of Hammersmith & Fulham shows a relatively balanced distribution across age groups, with the largest proportion of the population falling into the 25-49 age bracket at 44.0%, indicating a working-age majority. The 50-64 group makes up 16.6%, followed by children aged 0-15 at 15.2%, young adults aged 16-24 at 13.4%, and older residents aged 65 and over at 10.8%.
- 7.3.8. Compared to the 2011 Census, the most notable trend is the decline in the 25-49 group by six percentage points, suggesting either a demographic shift or movement of this cohort out of the borough. In contrast, there has been significant growth in the 50-64 group (+4 points) and a smaller increase in the 65+ group (+2 points), highlighting an ageing population. Overall, the borough is experiencing a gradual demographic shift towards older age groups, which may have implications for service provision and future planning.

⁴¹ Nomis (2023). 'Query Data' can be accessed through [this link](#). See Tables RM208 and QS303EW.

Table 7-5: Age Structure in Hammersmith & Fulham in 2023⁴²

Age Bracket	2011 Census (% of Population)	ONS 2023 mid-year estimate (% of Population)	Change (% points)
0-15	16.2%	15.2%	-1.0
16-24	13.0%	13.4%	+0.4
25-49	49.5%	44.0%	-5.5
50-64	12.3%	16.6%	+4.3
65+	9.0%	10.8%	+1.8

Gender Identity

- 7.3.9. The Equalities Act requires the assessment to investigate different barriers to, and potential for, advancing equality of opportunities across genders. The Equalities Act also requires the public authority to protect the rights of and advance equality of opportunity for those who have undergone gender reassignment.
- 7.3.10. As shown in **Table 7-6**, the 2021 Census suggests that in Hammersmith & Fulham, the majority of the population have the same gender identity as their sex registered at birth. Approximately 0.2% of Hammersmith & Fulham's population identify as either a trans man or trans woman (214 and 211 individuals, respectively).

Table 7-6: Gender Identity in Hammersmith & Fulham in 2021 (Population Aged 16 and Over)⁴³

Gender Identity	% 2021
Gender identity the same as sex registered at birth	91.5%
Gender identity different from sex registered at birth but no specific identity given	0.3%
Trans woman	0.1%
Trans man	0.1%
All other gender identities	0.1%
Not answered	7.8%

⁴² ONS (2023). 'Estimates of the population for England and Wales' can be accessed through [this link](#).

⁴³ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Tables TS078.

Sexual Orientation

- 7.3.11. The HFLP will also need to consider equalities effects on the lesbian, gay, bisexual population of Hammersmith & Fulham. The 2021 Census data, shown in **Table 7-7**, shows that 5% of the borough's population identify as Gay and Lesbian, Bisexual, or another minority sexual orientation. Of these, Gay or Lesbian is the most common, accounting for 3% of the total population.

Table 7-7: Sexual Orientation in Hammersmith & Fulham (Population Aged 16 and Over)⁴⁴

Sexual Orientation	% 2021
Straight or Heterosexual	85.0%
Gay or Lesbian	3.1%
Bisexual	1.8%
Pansexual	0.1%
Asexual	0.1%
Queer	<0.1%
All other sexual orientations	0.2%
Not answered	9.7%

Socio-Economic Status

- 7.3.12. At the time of the 2021 Census, 32% of Hammersmith & Fulham's adult population was economically inactive. This is slightly lower than the rate for London, and significantly lower than the rate for England. In a relatively affluent borough such as Hammersmith & Fulham, economic inactivity may also reflect a higher proportion of early retirees or individuals who are not in paid employment due to sufficient household income.

Table 7-8: Economic Activity Status in Hammersmith & Fulham in 2021 (Population Aged 16 and Over)⁴⁵

Economic Activity Status	Hammersmith & Fulham	London	England
Economically active (excluding full-time students)	65.7%	63.5%	58.6%
Economically active and a full-time student	2.7%	2.7%	2.3%
Economically inactive	31.6%	33.8%	39.1%

⁴⁴ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Tables TS079.

⁴⁵ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Tables TS066.

Marriage

- 7.3.13. The 2021 census indicated that 33% of Hammersmith & Fulham's population are married (including in a civil partnership), which is much lower than the proportion of married couples for England and Wales (47%). The divorce rate in Hammersmith & Fulham is slightly lower than England and Wales (7% compared to 9%, respectively).⁴⁶

Pregnancy

- 7.3.14. The total fertility rate (TFR) in Hammersmith & Fulham has followed regional and national trends, having fallen in recent years from 1.3 in 2013 to 1.1 in 2023.⁴⁷ Hammersmith & Fulham's TFR in 2023 was slightly lower than the rate for London (1.4) and England (1.4).

Future Baseline

- 7.3.15. Projections presented in the borough's Older People's Needs Assessment (OPNA) 2024 suggest continued population growth in Hammersmith & Fulham.⁴⁸ The borough's population is also expected to age over time, with the proportions of those aged 64-84 and 85+ projected to grow by 34% and 48%, respectively. In contrast, the 20-64 age group is expected to grow by just 1%, while the 0-19 age group is projected to decline by 5%. This will have implications on the types of housing, facilities, and infrastructure needed in the borough as the average age of Hammersmith & Fulham's population grows older into the future (see **Chapter 11** for more detail).
- 7.3.16. Ethnic and religious diversity is expected to increase, reflecting broader national trends. Meanwhile, Hammersmith & Fulham is likely to become more secular, but ethnic diversity and religious diversity (among those who do identify with a faith) may continue to expand.
- 7.3.17. Socio-economic changes, including shifts in employment sectors, housing affordability, and the cost of living, will influence inequalities in Hammersmith & Fulham. Planning for inclusive employment, accessible housing, and social mobility will be important considerations for the HFLP.

⁴⁶ Nomis (2021). 'Legal partnership status by age, sex and local authority Census 2021' can be accessed through [this link](#).

⁴⁷ Nomis (2021). 'Query Data' can be accessed through [this link](#). See 'Live births in England and Wales : birth rates down to local authority areas'

⁴⁸ London Borough of Hammersmith & Fulham (2024). 'Older People's Needs Assessment 2024' can be accessed through [this link](#).

7.4. Key Issues

7.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Equality:

- The borough's increasing ethnic and religious diversity requires inclusive planning for housing, education, and community services to promote social cohesion and equal opportunities;
- With 13% of residents reporting disabilities, and an aging population, there is a need for accessible housing, transport, and employment opportunities;
- The projected increase in older residents will drive demand for healthcare, age-friendly housing, and adapted infrastructure;
- Policies should support gender-neutral facilities, inclusive public spaces, and equal access to services for LGBTQ+ residents; and
- Population growth and socio-economic shifts will require policies that promote equal access to housing, employment, and community services for all residents.

7.5. IIA Objective

7.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Equality:

Promote equality, social inclusion, and opportunities for all, ensuring that diverse needs are met across Hammersmith & Fulham's communities.

8. Communities 3: Health, Wellbeing and Safety

8.1. Focus of Theme

- 8.1.1. This theme focuses on promoting health, wellbeing, and safety by addressing healthcare access, health inequalities, road safety, crime prevention, and the quality of the living environment.

8.2. Policy Context

- 8.2.1. **Table 13-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 8-1: Plans, Policies and Strategies Reviewed in Relation to Health, Wellbeing and Safety

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
<u>Streets for a Healthy Life</u>	2022
<u>Building for a Healthy Life</u>	2020
<u>Health Equity in England: The Marmot Review</u>	2020
<u>Planning for Sport Guidance</u>	2019
<u>The 25 Year Environment Plan</u>	2018
<u>Healthy High Streets</u>	2018
<u>Spatial Planning for Health: An evidence resource for planning and designing healthier places</u>	2017
<u>Health and Social Care Act</u>	2012
<u>Planning Practice Guidance</u>	various
Local	
<u>Community Safety Plan 2024/25</u>	2024
<u>Health and Wellbeing Strategy (2024 to 2029)</u>	2024
<u>The Public Health Strategy For The London Borough Of Hammersmith & Fulham (2015 – 2025)</u>	2015
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

8.2.2. The key messages emerging from the review are summarised below:

- The Government's Levelling Up and Regeneration Bill seeks to reduce regional inequalities and promote economic growth and opportunities in less prosperous areas. It has been designed to address regional disparities, stimulate economic development, and enhance infrastructure and community well-being in order to create a more balanced and inclusive nation;
- The HFLP will need to have regard for the principles set out in the NPPF, which seek to retain and enhance access to community services and facilities such as educational facilities and open spaces. The NPPF recognises the benefits of having a range of local provision to support community needs, in addition to the benefits of creating cohesive communities in safe environments where the fear of crime (and crime itself) does not undermine resident quality of life. This contributes to ensuring settlement and community identities are protected;
- As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. The Design Guide and Model code illustrate how well-designed places that are beautiful, healthy, greener, enduring, and successful can be achieved in practice;
- The NPPF highlights the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity, therefore contributing to the health and wellbeing of communities. The health benefits of access to nature, green spaces and green infrastructure are further reiterated in the 25-year Environment Plan, which has a particular focus on the physical and mental wellbeing benefits that the environment provides.;
- The 2020 Health Equity in England Report identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined for the poorest 10% of women;
- The Planning for Sport Guidance seeks to help the planning system provide formal and informal opportunities for everyone to take part in sport and be physically active. The Guidance outlines 12 'planning-for-sport' principles;
- Public Health England (PHE) has a key role in shaping health policy and practice across the country. In 2017 the organisation published '*Spatial Planning for Health: An evidence resource for planning and designing healthier places*'. The review provides guidance on the role of the built and natural environment in shaping health impacts. The review also

explores the impacts of neighbourhood design, provision of housing, transport and the natural environment on public health;

- In 2018 PHE produced a 'Healthy High Streets' briefing which highlights how health inequalities can be addressed in the design of the built environment. Additionally, 'Building for a Healthy Life' guidance (and its companion 'Streets for a Healthy Life') helps local council applications focus more on active travel, air quality and biodiversity;
- The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions;
- The Health and Wellbeing Strategy 2024-2029 aims to improve health and care services in Hammersmith & Fulham by making them equitable and accessible for all residents. It focuses on reducing health inequalities by enhancing access to good housing, quality education, and a safe environment, with the overall goal of creating a stronger, safer, and kinder borough; and
- The Public Health Strategy 2015-2025 for Hammersmith & Fulham focusses on improving residents' health and wellbeing by targeting key issues such as deprivation, isolation, air quality, and digital inclusion. It aims to deliver long-term, positive outcomes through coordinated efforts across partners and communities, while implementing recommendations from local commissions on poverty, disability, and rough sleeping. The strategy promotes innovative, joined-up approaches to enhance public health and secure the best services for residents.

8.3. Baseline Summary

Current Baseline

Population Growth

- 8.3.1. As of the 2021 Census, the London Borough of Hammersmith & Fulham's population was 183,157, marking a small increase of 0.4% from 182,493 in 2011. This growth rate is significantly lower than both the London average of 7.7% and the England average of 6.6%.

- 8.3.2. The latest mid-year ONS estimates (from 2023) for population suggest further population growth has occurred in Hammersmith & Fulham in the years since the 2021 Census, rising to 186,176 (2% growth since 2021).⁴⁹
- 8.3.3. According to the Greater London Authority (GLA) Local authority housing-led population projections from 2022,⁵⁰ Hammersmith & Fulham's population is projected to increase from 183,157 in 2021 to:
- 191,900 in 2026 (5%);
 - 199,700 in 2031 (9%); and
 - 209,300 in 2036 (14%).

Health

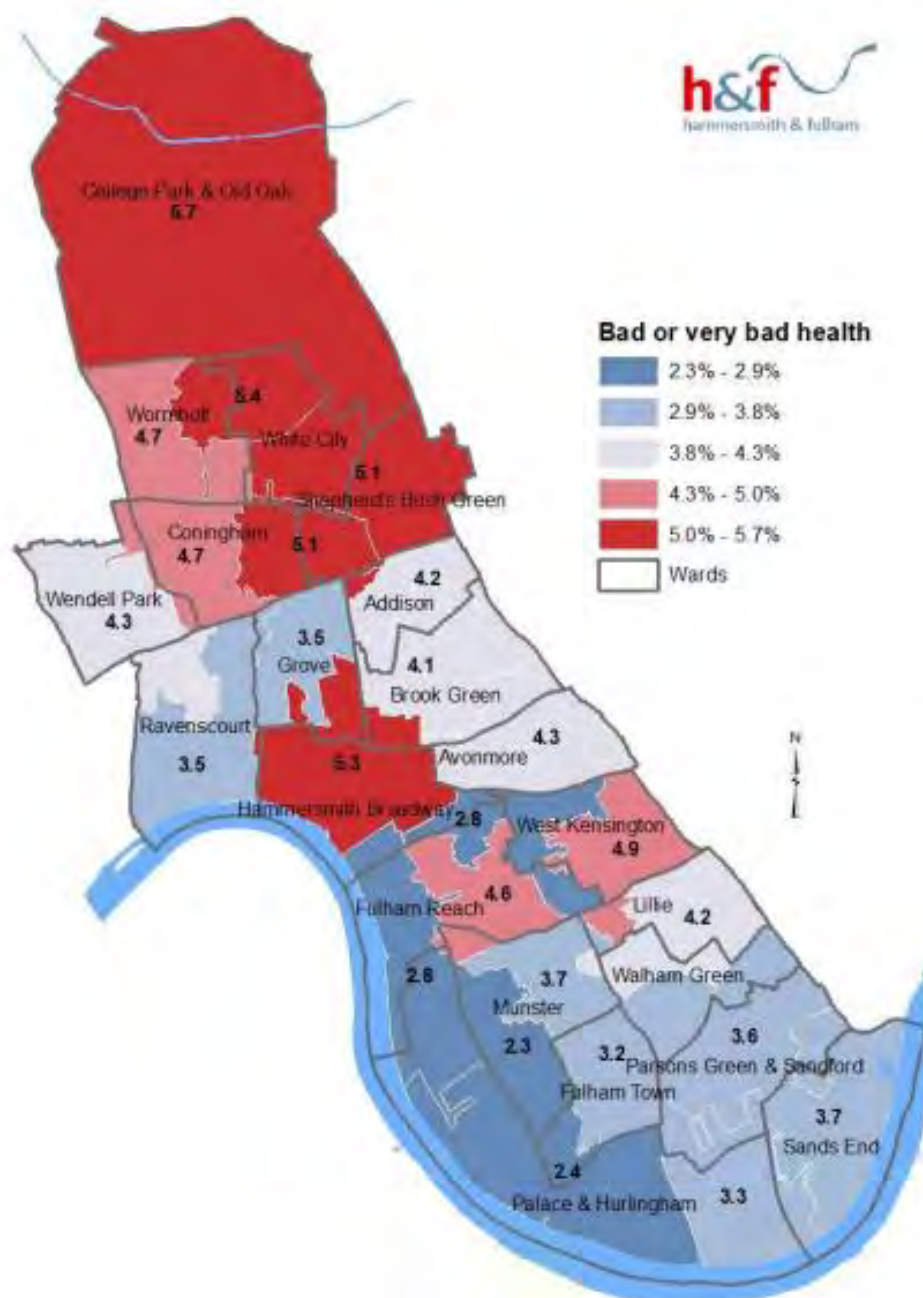
- 8.3.4. The following section on the health of Hammersmith and Borough's population is based on insights from the borough's Joint Strategic Needs Assessment health profile.⁵¹
- 8.3.5. In 2021, 87% of the Borough's population reported very good or good health; this is 1.3 percentage points higher than 10 years ago.
- 8.3.6. Residents in Hammersmith & Fulham have better general health compared to London (85%) and England (82%).
- 8.3.7. The borough ranked the fourth highest in England in term of people in very good health (59%) as a percentage of the total population.
- 8.3.8. In Hammersmith & Fulham, the proportion of people reporting their health as 'fair' decreased (from 9.4% in 2011, to 8.9% in 2021), and there were decreases in the proportion of people reporting bad health (from 3.6% in 2011, to 3.1% in 2021) and very bad health (from 1.3% in 2011, to 1.1% in 2021).
- 8.3.9. Residents living in the most deprived areas (in the north) in Hammersmith & Fulham have higher probabilities of reporting poor health than others. Shepherd's Bush Green, College Park & Old Oak, and Hammersmith Broadway wards have the highest proportions of residents who reported their health as 'bad' or 'very bad' (see **Figure 8-1**).

⁴⁹ ONS (2023). 'Estimates of the population for England and Wales' can be accessed through [this link](#).

⁵⁰ GLA (2022). 'London's Population Projections Explorer' can be accessed through [this link](#).

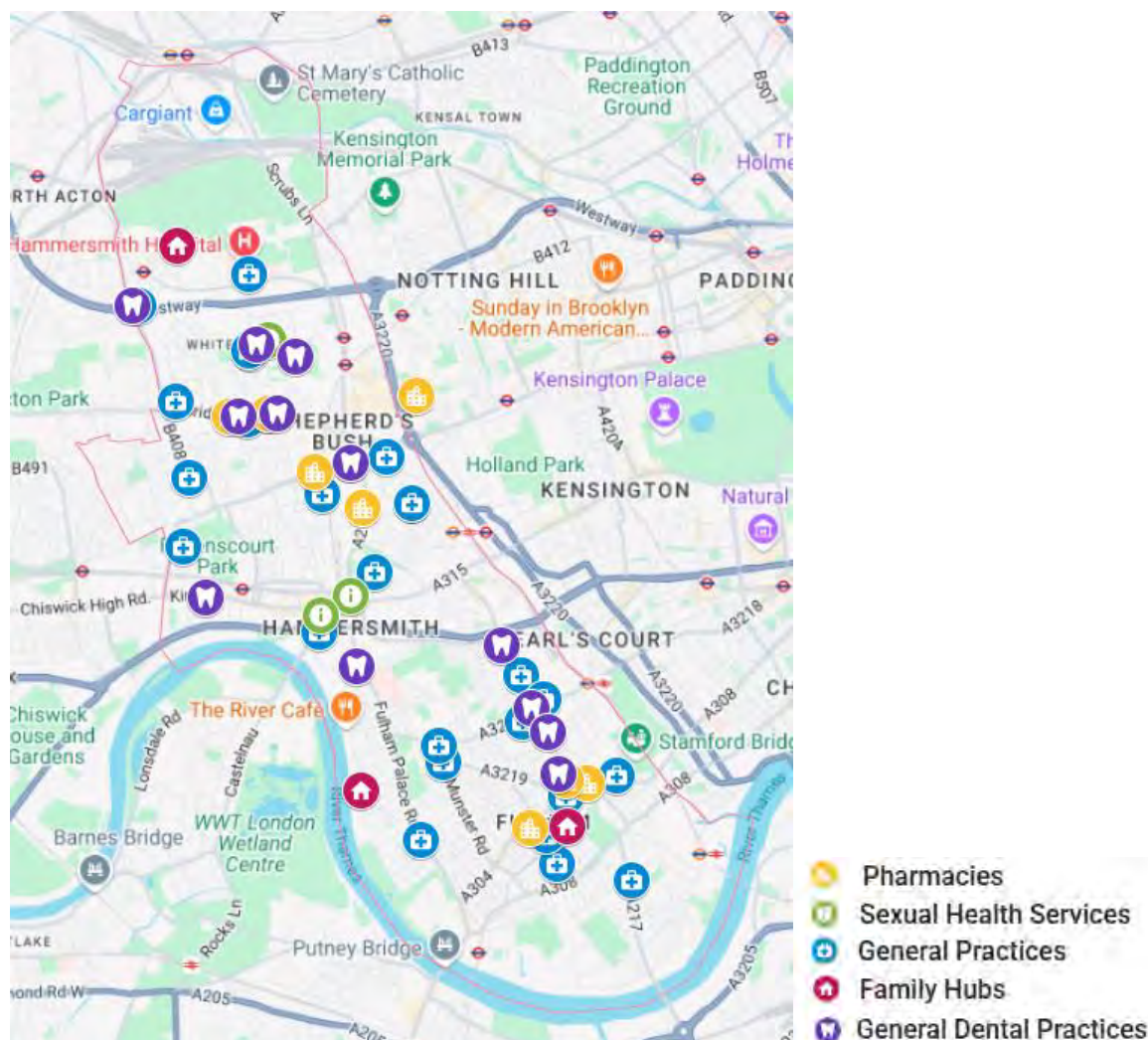
⁵¹ LBHF (2024). '2021 Census: Health in Hammersmith & Fulham: Facts and figures' can be accessed through [this link](#).

Figure 8-1: Proportion of Hammersmith & Fulham's Ward Population with Bad or Very Bad Health (2021)



- 8.3.10. Hammersmith & Fulham is well-served by healthcare facilities, with the Health Services Map (see **Figure 8-2**) showing that there are many GPs and general dental practices found throughout the borough. Hammersmith & Fulham also has three family hubs and three facilities offering sexual health services. Charing Cross Hospital and Queen Charlotte's and Chelsea Hospital are also located within the borough.

Figure 8-2: Healthcare Services in Hammersmith & Fulham



Life Expectancy

- 8.3.11. The latest borough-level data for life expectancy in Hammersmith & Fulham (covering the period from 2020 to 2022) indicates the figure was 77.6 years for males and 83.1 for females. These figures are lower than the equivalent figures for the period 2017 to 2019 (79.1 and 84.1, respectively). However, it is worth noting that the lower figures may be influenced by the Covid-19 pandemic.
- 8.3.12. Public Health England have released Health Profiles, for each local authority area in England, including Hammersmith & Fulham. The latest of these for Hammersmith & Fulham summarises data from up to 2024. **Table 8-2** provides a high-level review of the borough's performance compared to England for 32 health indicators (see the LHP for further detail).⁵²

⁵² Public Health England (2019). 'Hammersmith & Fulham Local Authority Health Profile' can be accessed through [this link](#).

8.3.13. Hammersmith & Fulham generally performed the same as, or better than the national average for the majority of indicators (see **Table 8-2**). However, the borough performed worse than England for the following eight indicators:

- Killed and seriously injured casualties on England's roads;
- Estimated diabetes diagnosis rate;
- Households owed a duty under the Homelessness Reduction Act;
- Violent crime - hospital admissions for violence (including sexual violence);
- Winter mortality index;
- New STI diagnoses (excluding chlamydia aged under 25) per 100,000;
- TB incidence (three year average).

Table 8-2: Health Summary for Hammersmith & Fulham⁵³

Indicator Category (Number of Indicators)	Significantly Better than England (Better 95%)	Not Significantly Different (Similar)	Significantly Worse (Worse 95%)
Life expectancy and causes of death (8)	2	6	0
Injuries and ill health (6)	2	1	3
Behavioural risk factors (5)	2	3	0
Child health (5)	3	2	0
Inequalities (4)	0	4	0
Wider determinants of health (6)	3	1	2
Health protection (3)	0	0	3
Total	12	17	8

⁵³ Public Health England (2019). 'Hammersmith & Fulham Local Authority Health Profile' can be accessed through [this link](#). [April 2025]

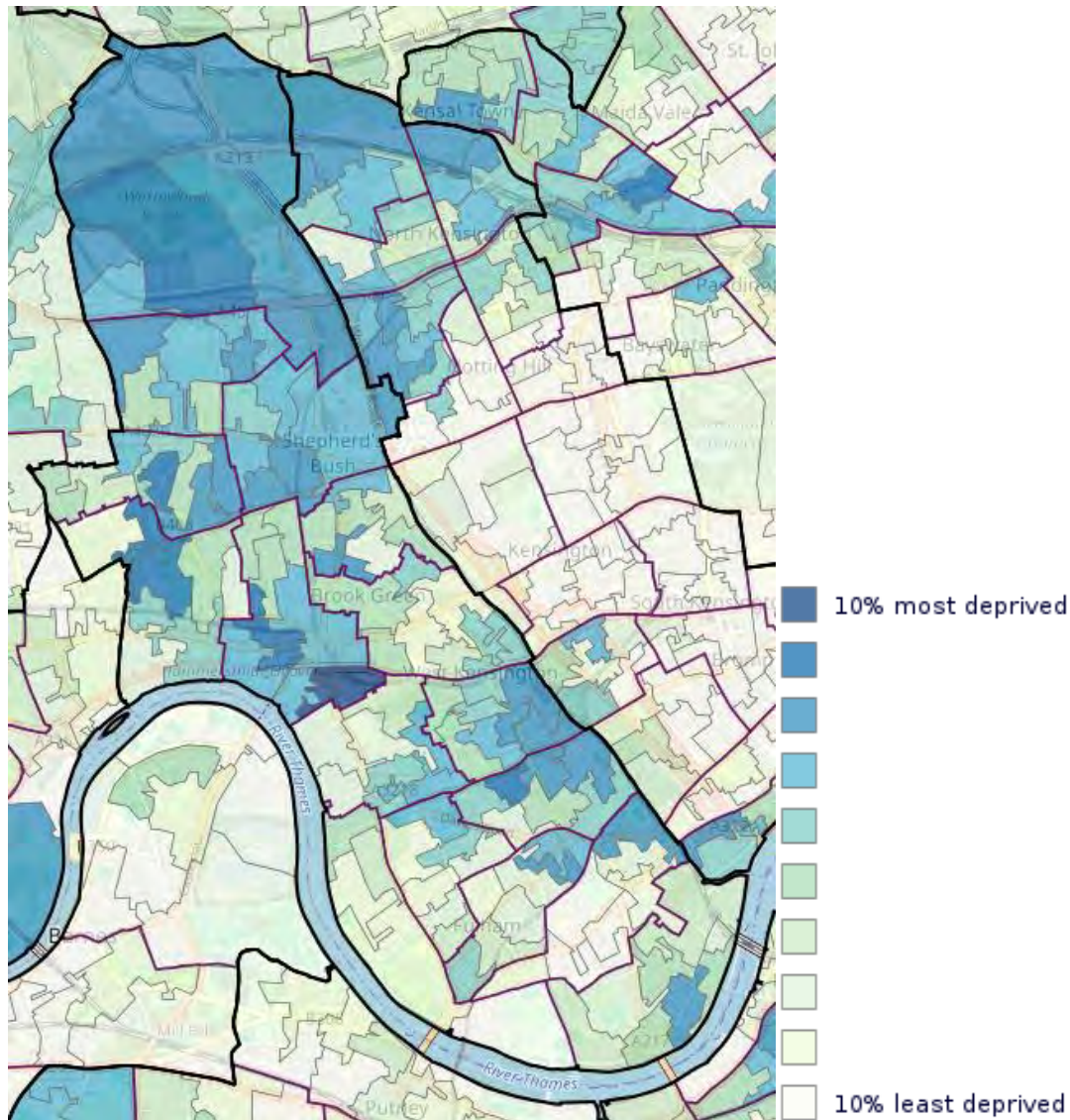
- 8.3.14. In 2016 Hammersmith & Fulham, Kensington & Chelsea and Westminster published a Joint Strategic Needs Assessment (JSNA) Report on childhood obesity in the three boroughs.⁵⁴ The report identifies that obesity is an issue in Hammersmith & Fulham, with rates of excess weight slightly higher in the borough's child population than London and England. The report reveals that high levels of obesity are associated with high levels of deprivation in the three boroughs.
- 8.3.15. It is also noted that the rate of children having lower participation rates in high quality PE and school sport for at least two hours in a typical week was lower in Hammersmith & Fulham (70%) when compared with their peers in London (84%) and England (86%).
- 8.3.16. Solutions to the issue of obesity include the creation of 'healthy streets' (streets that are inviting for people to walk through), improving public transport offer, maintain/improving high quality green space, improving the 'cyclability' of Hammersmith & Fulham, and improving road design (e.g. introducing 20mph zones).
- 8.3.17. The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation, combining seven different domains. These domains will be explored in this Scoping Report (see also **Chapters 6 and 9**). Of particular relevance to the Health, Wellbeing and Safety SEA theme are:
- **Health deprivation and disability:** the risk of premature death and the impairment of quality of life through poor physical or mental health;
 - **Crime:** the risk of personal and material victimisation at the local level; and
 - **Living environment:** the quality of the local environment, categorised into 'indoors living environment' to measure the quality of housing and 'outdoors living environment' to measure indicators like air quality and road traffic accidents.
- 8.3.18. Lower Super Output Areas (LSOAs)⁵⁵ are designed to improve the reporting of small-area statistics in England and Wales. These are standardised geographic units intended to be as consistent as possible, with each LSOA typically containing between 1,000 and 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of 32,844 in England and Wales, with a rank of 1 indicating the most deprived area. Within this context, the borough spans 150 LSOAs.
- 8.3.19. **Figure 8-3** shows the ranking of Hammersmith & Fulham's LSOAs for the Health and Disability domain, while **Table 8-3** provides additional details on the LSOAs within Hammersmith & Fulham that fall within the 50% most deprived, or worse, areas.

⁵⁴ JSNA (2016). 'Childhood Obesity in Hammersmith & Fulham, Kensington & Chelsea and Westminster' can be accessed through [this link](#).

⁵⁵ The Indices of Deprivation Explorer can be accessed through [this link](#).

- 8.3.20. An analysis of the data indicates that deprivation with regard to health and disability exists within Hammersmith & Fulham, with almost half of its LSOAs falling within the 50% most deprived LSOAs in England and Wales. This includes an LSOA ranked in the 10% most deprived LSOAs. Higher levels of deprivation are generally found in the northern and central areas of the borough, while the south is relatively less deprived.

Figure 8-3: Health and Disability IMD Domain⁵⁶



⁵⁶ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

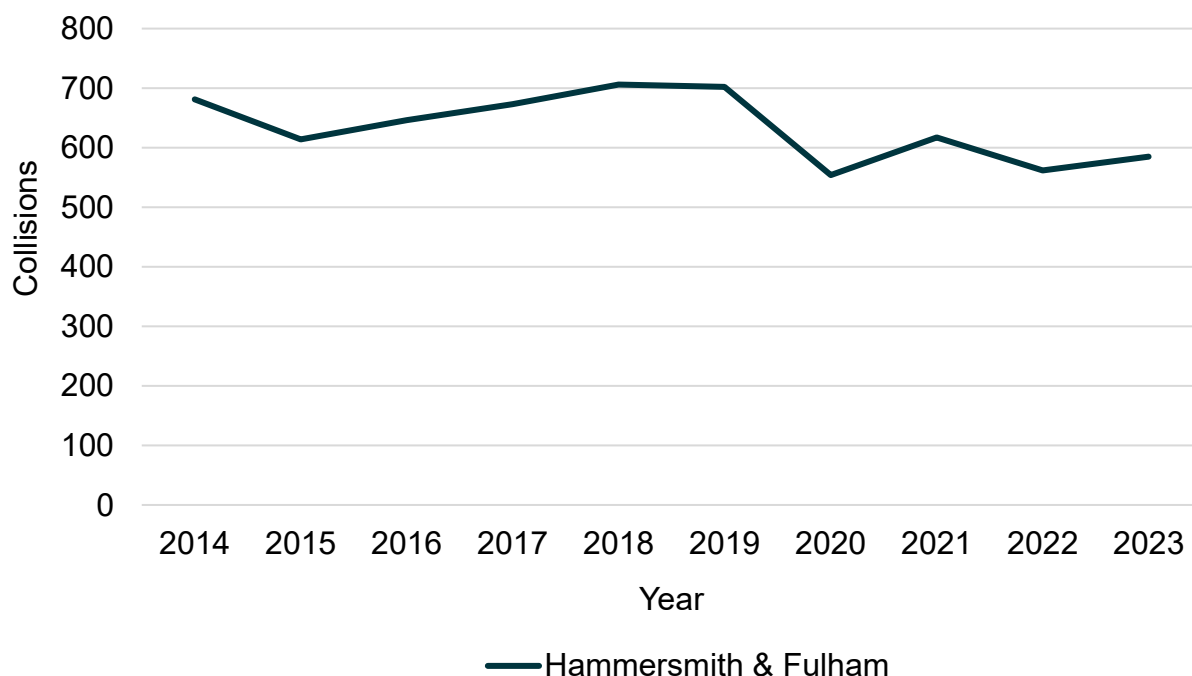
Table 8-3: LSOAs in Hammersmith & Fulham Ranked Within 50% Most Deprived or Worse for the Health and Disability IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	13
40% Most Deprived	18
30% Most Deprived	18
20% Most Deprived	5
10% Most Deprived	1 (Hammersmith & Fulham 013E)
Total	55 (out of 113 in Hammersmith & Fulham)

Road Safety

- 8.3.21. The Department for Transport provides information on the number and nature of casualties sustained as a result of road traffic accidents reported in Great Britain's roads, with the latest available data from 2023.⁵⁷
- 8.3.22. Over the last 10 years, there has been a general downward trend in reported collisions in Hammersmith & Fulham (see **Figure 8-4**), reflecting a wide range of factors (including road improvement schemes, improved vehicle safety, and national and local measures to improve the training and skills of road users and their compliance with traffic laws).

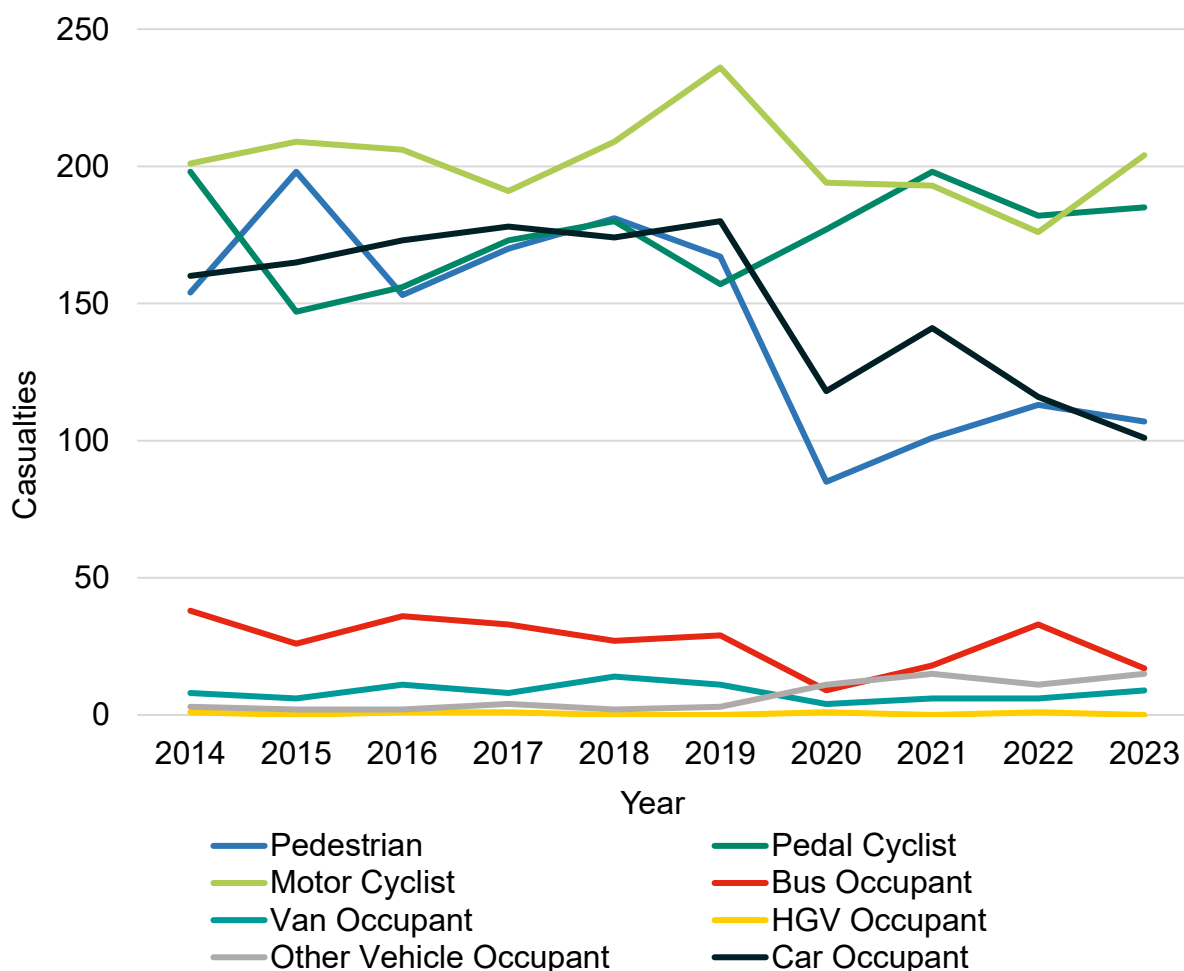
Figure 8-4: Collisions in Hammersmith & Fulham (All Severities) (2014-2023)



⁵⁷ Department for Transport (2023). 'Number and rates of reported road collisions by severity and local authority, Great Britain, 10 years up to 2023' can be accessed through [this link](#). [See Sheet RAS0403]

- 8.3.23. As shown in **Figure 8-5**, reductions in the number of casualties are being seen among most of the road user groups in Hammersmith & Fulham between 2014 and 2023. The exception to this is the motor cyclist and 'other vehicle occupant' group, which saw their casualty numbers experiencing a slight upward trend over the observed period.

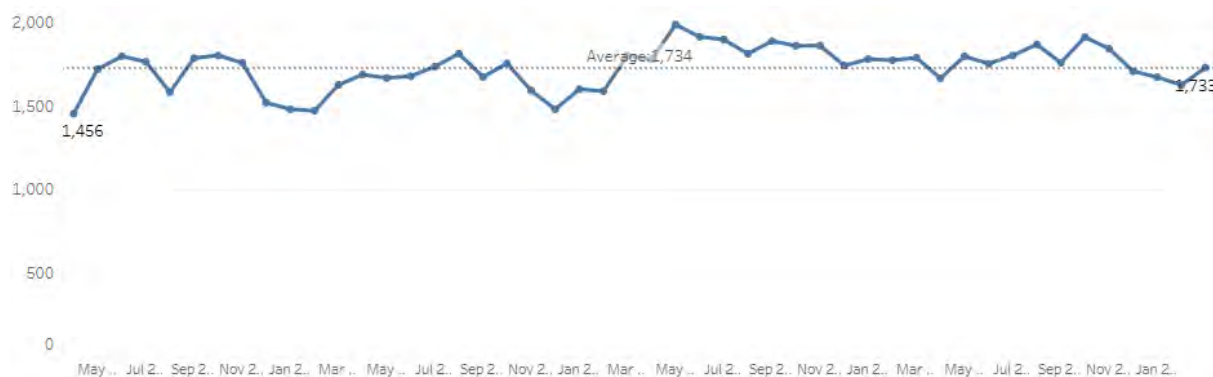
Figure 8-5: Casualties in Hammersmith & Fulham by Road User (2014-2023)



Crime

- 8.3.24. The Metropolitan Police's Crime Data Dashboard⁵⁸ provides an overview of crime statistics Hammersmith & Fulham. Between April 2021 and March 2025, police recorded an average of 1,734 offenses per month in Hammersmith & Fulham. Crime rates have fluctuated during their period; beginning at 1,456 in April 2021, rising to its peak of 1,991 in May 2023, before falling to 1,733 in March 2025.
- 8.3.25. In the past year (March 2024-March 2025) theft and violence against the person were the two most common offenses in Hammersmith & Fulham (see **Table 8-4**).

⁵⁸ Metropolitan Police (no date). 'Crime Data Dashboard' can be accessed through [this link](#).

Figure 8-6: Volume of Offenses (Combined) in Hammersmith & Fulham (Monthly, April 2021-March 2025)**Table 8-4: Offenses in Hammersmith & Fulham (March 2024 - March 2025)**

Offense	Count
Theft	7,359
Violence Against the Person	6,085
Vehicle Offences	2,181
Public Order Offenses	1,722
Burglary	1,414
Arson and Criminal Damage	1,308
Drug Offenses	1,219
Sexual Offences	670
Robbery	634
Miscellaneous Crimes Against Society	238
Possession of Weapons	133
Fraud and Forgery	5
NFIB Fraud	1

8.3.26. **Figure 8-7** shows the ranking of Hammersmith & Fulham's LSOAs for the Crime domain, while **Table 8-5** provides additional details on the LSOAs within Hammersmith & Fulham that fall within the 50% most deprived, or worse, areas.

8.3.27. Over 80% of LSOAs in Hammersmith & Fulham (91 out of 113) fall within the 50% most deprived LSOAs nationally for crime, with seven ranked in the 10% most deprived LSOAs. The high levels of deprivation highlights a clear need for interventions to address crime and its underlying causes throughout much of the borough.

Figure 8-7: Crime IMD Domain⁵⁹

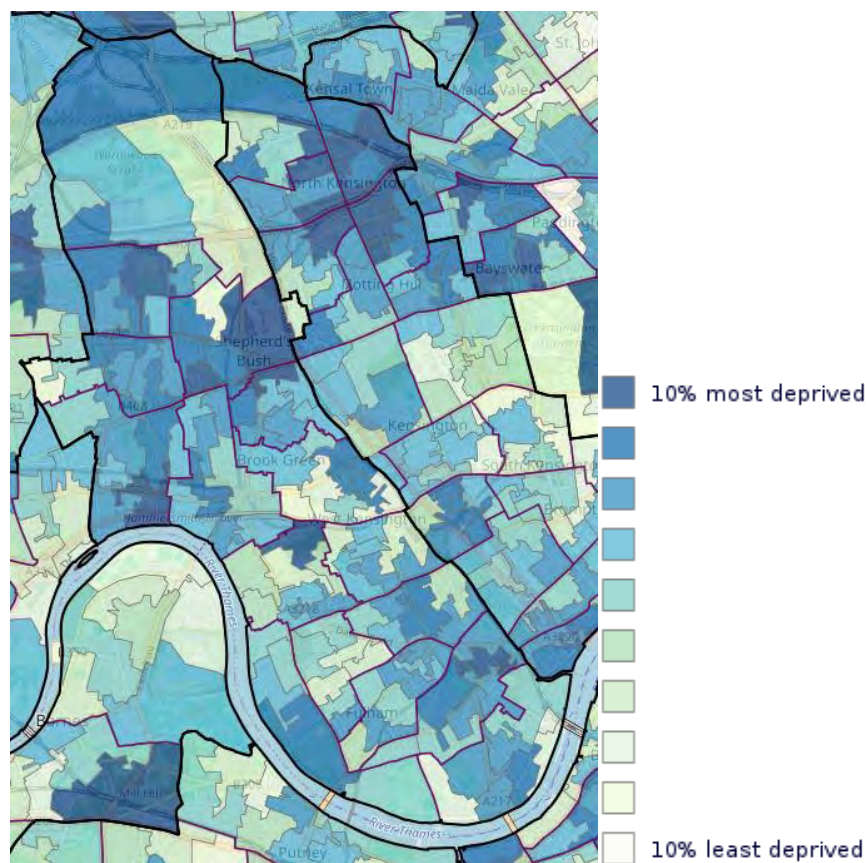


Table 8-5: LSOAs in Hammersmith & Fulham Crime IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	19
40% Most Deprived	18
30% Most Deprived	27
20% Most Deprived	20
10% Most Deprived	7 (Hammersmith & Fulham 005B; Hammersmith & Fulham 007D; Hammersmith & Fulham 002A; Hammersmith & Fulham 004A; Hammersmith & Fulham 011C; Hammersmith & Fulham 014A; Hammersmith & Fulham 020B)
Total	91 (out of 113 in Hammersmith & Fulham)

⁵⁹ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

Living Environment

- 8.3.28. **Figure 8-8** shows the ranking of Hammersmith & Fulham's LSOAs for the Living Environment domain, while **Table 8-6** provides additional details on the LSOAs within Hammersmith & Fulham that fall within the 50% most deprived, or worse, areas.
- 8.3.29. All but one of Hammersmith & Fulham's LSOAs is ranked outside of the 50% most deprived LSOAs in England and Wales (including 16 in the 10% most deprived – these are not concentrated in one area, instead are spread throughout the borough). This makes the borough one of the most deprived Local Authority areas for the Living Environment domain.
- 8.3.30. All but one of Hammersmith & Fulham's LSOAs are ranked outside the 50% most deprived LSOAs in England and Wales. Notably, 16 of these LSOAs fall within the 10% most deprived, though they are dispersed throughout the borough rather than concentrated in a single area. These trends make Hammersmith & Fulham one of the most deprived local authority areas for this domain.

Figure 8-8: Living Environment IMD Domain⁶⁰



⁶⁰ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

Table 8-6: LSOAs in Hammersmith & Fulham Living Environment IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	2
40% Most Deprived	16
30% Most Deprived	35
20% Most Deprived	43
10% Most Deprived	16 (Hammersmith & Fulham 004A; Hammersmith & Fulham 014A; Hammersmith & Fulham 003C; Hammersmith & Fulham 001D; Hammersmith & Fulham 006A; Hammersmith & Fulham 017E; Hammersmith & Fulham 024A; Hammersmith & Fulham 008D; Hammersmith & Fulham 021E; Hammersmith & Fulham 020D; Hammersmith & Fulham 013E; Hammersmith & Fulham 010D; Hammersmith & Fulham 021B; Hammersmith & Fulham 014B; Hammersmith & Fulham 023F; Hammersmith & Fulham 023E)
Total	112 (out of 113 in Hammersmith & Fulham)

Green Infrastructure

- 8.3.31. Improving access to greenspace are increasingly being recognised as an important asset for supporting health and wellbeing. This ‘natural capital’ can help local authorities address local issues that they face, including improving health and wellbeing, managing health and social care costs, reducing health inequalities, improving social cohesion and taking positive action to address climate change.⁶¹
- 8.3.32. There are 51 parks/open spaces across Hammersmith & Fulham (including 19 which have won the Green Flag award),⁶² many of which can be accessed by the local public footpath network (including Public Rights of Way).⁶³ The largest of these is Wormwood Scrubs, found in the north of the borough.

⁶¹ PHE (2020); ‘Improving access to greenspace’ can be accessed through [this link](#).

⁶² Hammersmith & Fulham Council (2024). ‘Explore our award-winning parks and open spaces this Easter’ can be accessed through [this link](#).

⁶³ Hammersmith & Fulham Council (2024). ‘Parks and open spaces’ can be accessed through [this link](#).

Future Baseline

- 8.3.33. As the population of the borough grows due to development driven by the HFLP, it is likely that this will increase pressure on both local and external services. This highlights the need to support the retention of existing community facilities in the borough and seek new (or upgrades to) services and infrastructure where possible.
- 8.3.34. An ageing population will put pressure on social care services, while health inequalities may persist, particularly in more deprived areas of the borough. Life expectancy improvements could slow further without targeted interventions addressing long-term conditions, mental health, and obesity.
- 8.3.35. As development continues, road traffic volumes are expected to rise, increasing the risk of accidents, particularly among vulnerable road users like pedestrians and cyclists. Active travel infrastructure improvements, including better cycling and pedestrian routes, will play an important role in promoting safer and more sustainable transport options.
- 8.3.36. Crime patterns in Hammersmith & Fulham may shift due to population growth and socio-economic factors, with theft and violent crime remaining key concerns. Higher crime rates in hotspot areas such as Shepherd's Bush could persist unless community safety initiatives, youth engagement programmes, and policing strategies effectively address underlying issues.
- 8.3.37. Environmental pressures will grow as Hammersmith & Fulham urbanises, impacting air quality, noise pollution, and access to green space. Maintaining and expanding the borough's parks and open spaces will be vital to supporting public health, social cohesion, and climate resilience. Poorer air quality and heat island effects may become more pronounced in densely developed areas, making sustainable urban planning important.

8.4. Key Issues

- 8.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Health, Wellbeing and Safety:
- Hammersmith & Fulham's growing population will place increasing pressure on the capacity of healthcare services, housing, schools, and community infrastructure;
 - As Hammersmith & Fulham's population ages, there will be growing demand for social care, specialist healthcare services, and support for conditions such as dementia;
 - Despite overall good health levels, disparities exist between the north and south of the borough, with residents in more deprived northern areas reporting higher levels of poor health;

- Crime, particularly theft and violence against the person, is a concern across Hammersmith & Fulham, posing risks to both actual and perceived community safety;
- Road safety is improving overall, but motor cyclist and ‘other vehicle occupant’ casualty rates show a slight upward trend in recent years, highlighting the need for targeted safety interventions and enhanced active travel infrastructure;
- Childhood obesity remains an issue, with lower participation in school sports and physical activity pointing to the need for sustained investment in healthy environments, including parks and active transport routes; and
- The borough is significantly deprived in terms of the living environment, which is likely to continue affecting residents’ health unless mitigated through sustainable development and green infrastructure.

8.5. IIA Objective

- 8.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Health, Wellbeing and Safety:

Promote and protect health, wellbeing, and safety by ensuring access to healthcare, reducing health inequalities, improving road safety, enhancing green infrastructure, and creating safe and sustainable communities.

9. Economy and Employment

9.1. Focus of Theme

- 9.1.1. This theme focuses on improving Hammersmith & Fulham's economic well-being by supporting diverse employment opportunities, enhancing workforce skills, and addressing challenges like qualification gaps and the changing nature of work.

9.2. Policy Context

- 9.2.1. **Table 9-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 9-1: Plans, Policies and Strategies Reviewed in Relation to Economy and Employment

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Get Britain Working White Paper</u>	2024
<u>Planning Practice Guidance</u>	various
<u>Invest 2035: UK Industrial Strategy Green Paper</u>	emerging
Local	
<u>Upstream London: The Innovation Borough: Accelerating Inclusive Growth</u>	2024
<u>The H&F Corporate Plan: 2023-2026</u>	2023
<u>Mayor's Economic Development Strategy</u>	2010
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

- 9.2.2. The key messages emerging from the review are summarised below:

- The National Planning Policy Framework (NPPF) (supported by Planning Practice Guidance) sets out the Government's planning policies for England and how these are expected to be applied. The 2024 revision emphasises the importance of aligning planning policies with economic growth objectives. It encourages local authorities to identify and support sectors crucial for modern economies, such as laboratories, gigafactories, data centres, digital infrastructure, and logistics. By facilitating appropriate development in these areas, the NPPF aims to

stimulate economic activity and create employment opportunities. It requires that Local Plans should:

- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
 - Support existing business sectors;
 - Plan for new or emerging sectors;
 - Flexibility to accommodate needs not anticipated;
 - Identify priority areas for economic regeneration;
 - Facilitate flexible working practices;
 - Policies should avoid protecting land for employment where there is no reasonable prospect of a site being used for the allocated employment use; and
 - Planning policies should support economic growth in rural areas.
- The Get Britain Working White Paper, published in 2024, focusses on policies to increase employment and improve workforce skills. It is aimed at supporting economic recovery and addressing barriers to work, outlining actions to tackle unemployment, promote job creation, and ensure that individuals have the skills needed by industries to boost productivity and workforce participation.
 - The emerging Invest 2035: UK Industrial Strategy Green Paper outlines plans for the future of the UK's industrial base, focusing on innovation, investment, and skills. While still emerging, its goal is to support economic growth by encouraging investment in key sectors such as manufacturing, digital, and green technologies;
 - Hammersmith & Fulham's industrial strategy aims to capitalise on the borough's strong transport links, proximity to Heathrow, and regeneration projects in areas like White City and Shepherds Bush, to drive economic growth as businesses move outward from central London. Already home to international companies and a vibrant cultural scene, the borough offers a thriving environment for work and leisure. With infrastructure developments like Crossrail and HS2 enhancing connectivity, the strategy focuses on four priorities: developing 'West Tech', fostering enterprise, making the borough a standout London location, and ensuring inclusive growth for all residents;
 - The H&F Corporate Plan 2023-2026 outlines the strategy for achieving the ambitions of the H&F Vision, guided by six core organisational values. It presents a wide-ranging set of goals aimed at transforming services, investing wisely, and maintaining high-quality essential support for residents. The plan prioritises inclusivity, accessibility, and effective resource use, while upholding strong governance. Emphasising collaboration, it seeks to harness the borough's diverse communities,

businesses, and in-house expertise to build partnerships that drive meaningful change; and

- The Mayor's Economic Development Strategy 2010 outlines London's vision for creating jobs, supporting businesses, and improving economic growth across the capital. It focusses on boosting key sectors such as technology, finance, and creative industries, ensuring that London remains competitive on the global stage.

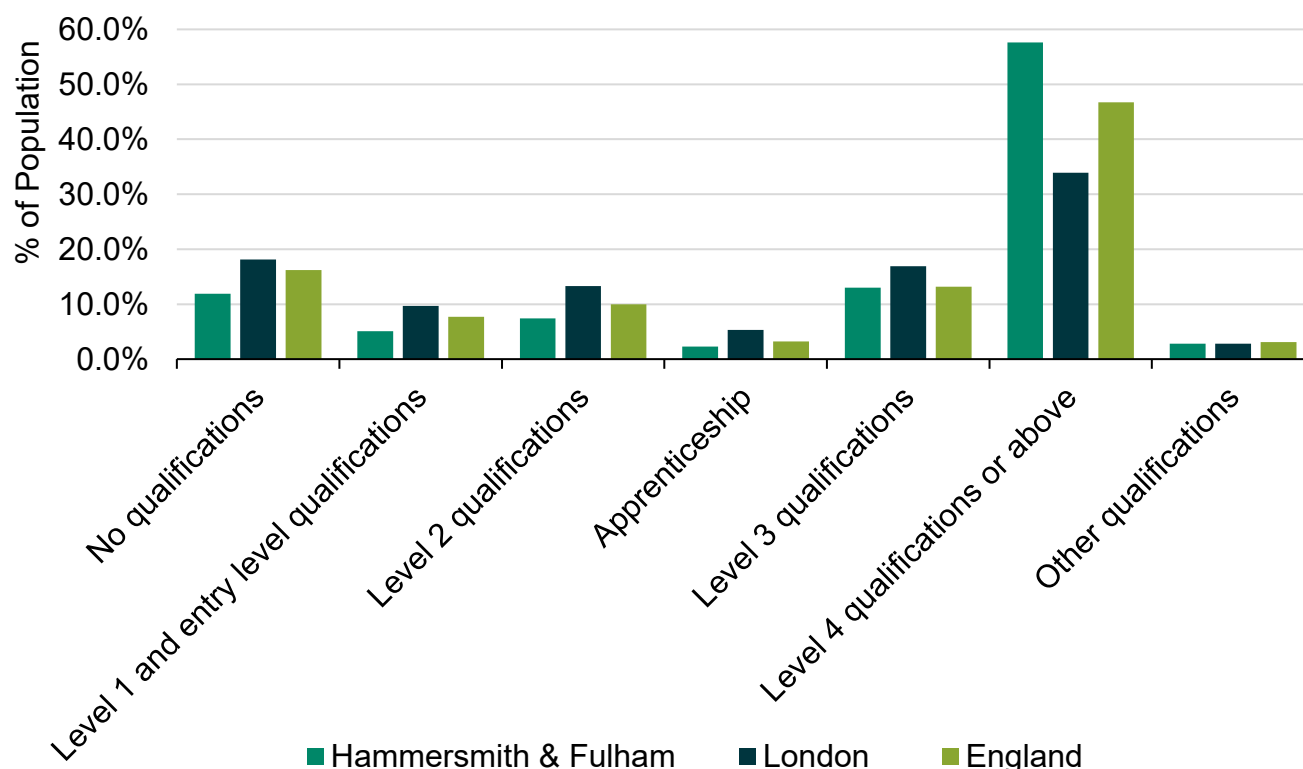
9.3. Baseline Summary

Current Baseline

Qualifications

- 9.3.1. The population of Hammersmith & Fulham is generally more qualified compared to regional and national averages. In the borough, 58% of residents aged 16 and above have at least a Level 4 Qualification, as shown in **Figure 9-1**. This is significantly higher than the regional (34%) and national (47%) comparators.
- 9.3.2. The relatively high levels of qualifications in Hammersmith & Fulham are likely to support local economic growth and attract high-value industries, particularly in knowledge-based sectors such as media, technology, and professional services. A well-qualified workforce enhances the borough's appeal to employers seeking skilled labour and may contribute to higher productivity and innovation. However, this also creates a need to ensure that employment opportunities remain accessible to residents with a broader range of skills, including those in lower-paid or less formalised sectors.

Figure 9-1: Highest Level of Qualification in Hammersmith & Fulham (2021)⁶⁴



9.3.3. The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation, combining seven different domains. These domains will be explored in this Scoping Report (see also **Chapters 6 and 8**). Of particular relevance to the Economy and Employment SEA theme are:

- **Education, skills, and training:** the lack of attainment and skills in the population;
- **Employment:** the proportion of the working-age population involuntarily excluded from the labour market, including those who want to work but cannot; and
- **Income:** the proportion of the population experiencing a deprivation relating to low income.

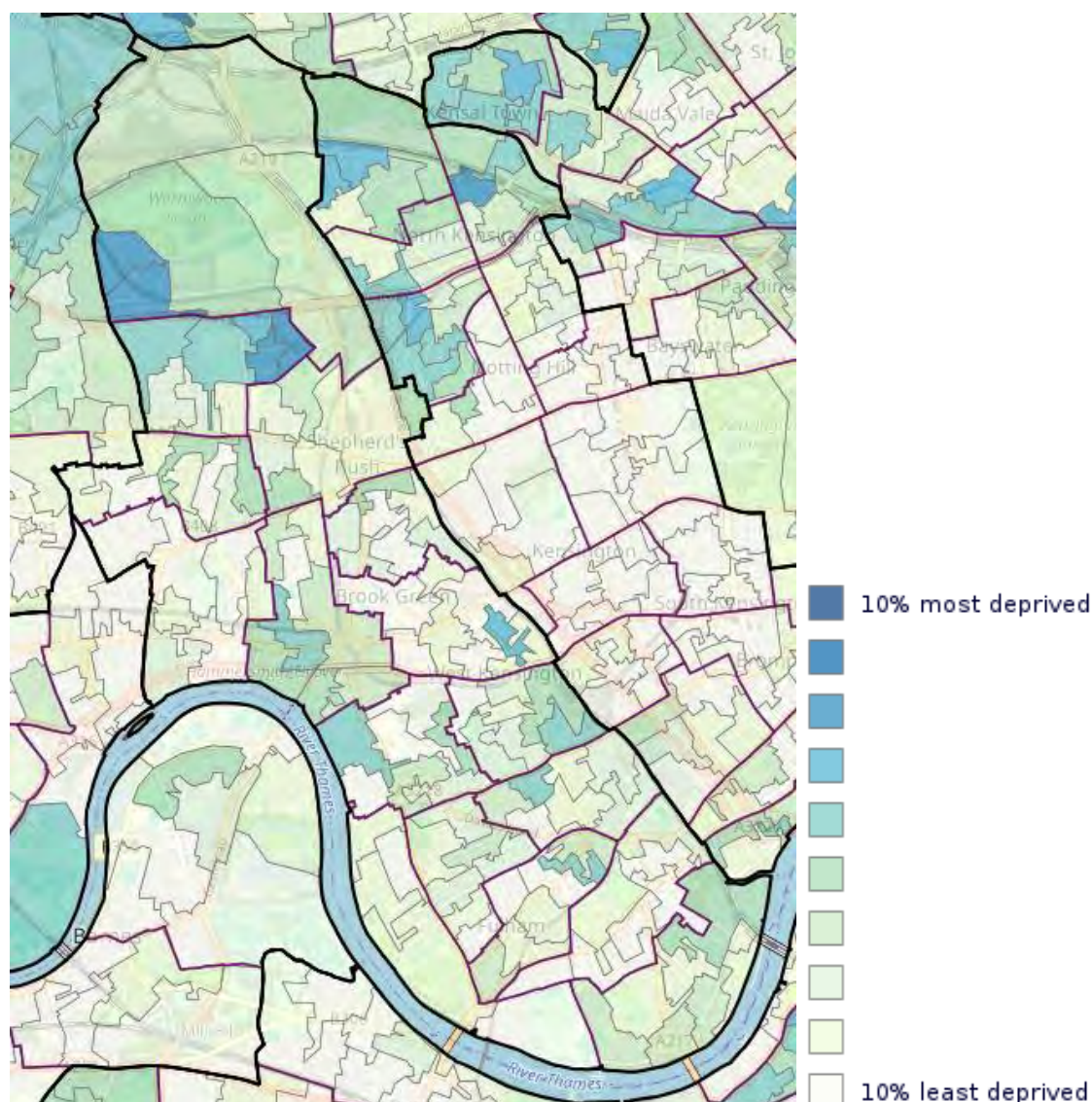
9.3.4. Lower Super Output Areas (LSOAs)⁶⁵ are designed to improve the reporting of small-area statistics in England and Wales. These are standardised geographic units intended to be as consistent as possible, with each LSOA typically containing between 1,000 and 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of 32,844 in England and Wales, with a rank of 1 indicating the most deprived area. Within this context, the borough spans 150 LSOAs.

⁶⁴ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Table TS067.

⁶⁵ The Indices of Deprivation Explorer can be accessed through [this link](#).

- 9.3.5. **Figure 9-2** shows the ranking of Hammersmith & Fulham's LSOAs for the Education, Skills and Training domain, while **Table 9-2** provides additional details on the LSOAs within Hammersmith & Fulham that fall within the 50% most deprived, or worse, areas.
- 9.3.6. An analysis of this data reveals that the borough performs well with regard to the Education, Skills and Training domain, with the majority of its LSOAs falling within the 50% least deprived LSOAs in England and Wales. However, there are pockets of deprivation for this domain, the highest of which are found in the north of the borough. This indicates the potential need for targeted interventions in the most affected areas to support education, skills development and training.

Figure 9-2: Education, Skills and Training IMD Domain⁶⁶



⁶⁶ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

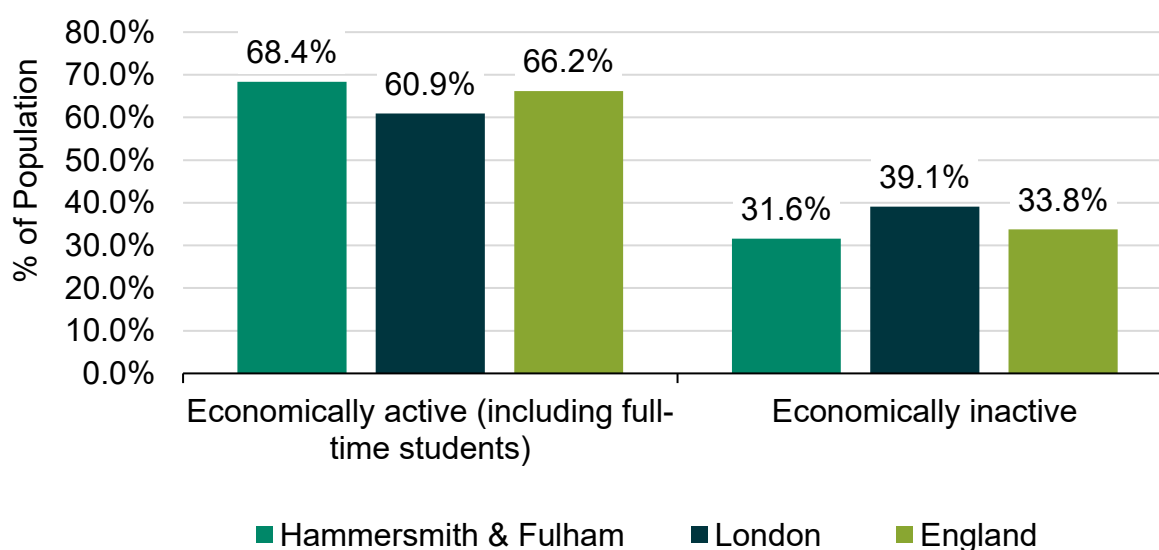
Table 9-2: LSOAs in Hammersmith & Fulham Ranked Within 50% Most Deprived or Worse for the Education, Skills and Training IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	7
40% Most Deprived	2
30% Most Deprived	4 (Hammersmith & Fulham 001B; Hammersmith & Fulham 001E; Hammersmith & Fulham 002B; Hammersmith & Fulham 002D)
20% Most Deprived	-
10% Most Deprived	-
Total	13 (out of 113 in Hammersmith & Fulham)

Economic Activity Rates

- 9.3.7. As **Figure 9-3** illustrates, economic activity rates are higher in the borough (68%) than regional (61%) and national comparators (66%).
- 9.3.8. While economic activity rates are relatively high, there are ongoing challenges in ensuring all residents can access secure, well-paid, and sustainable employment.

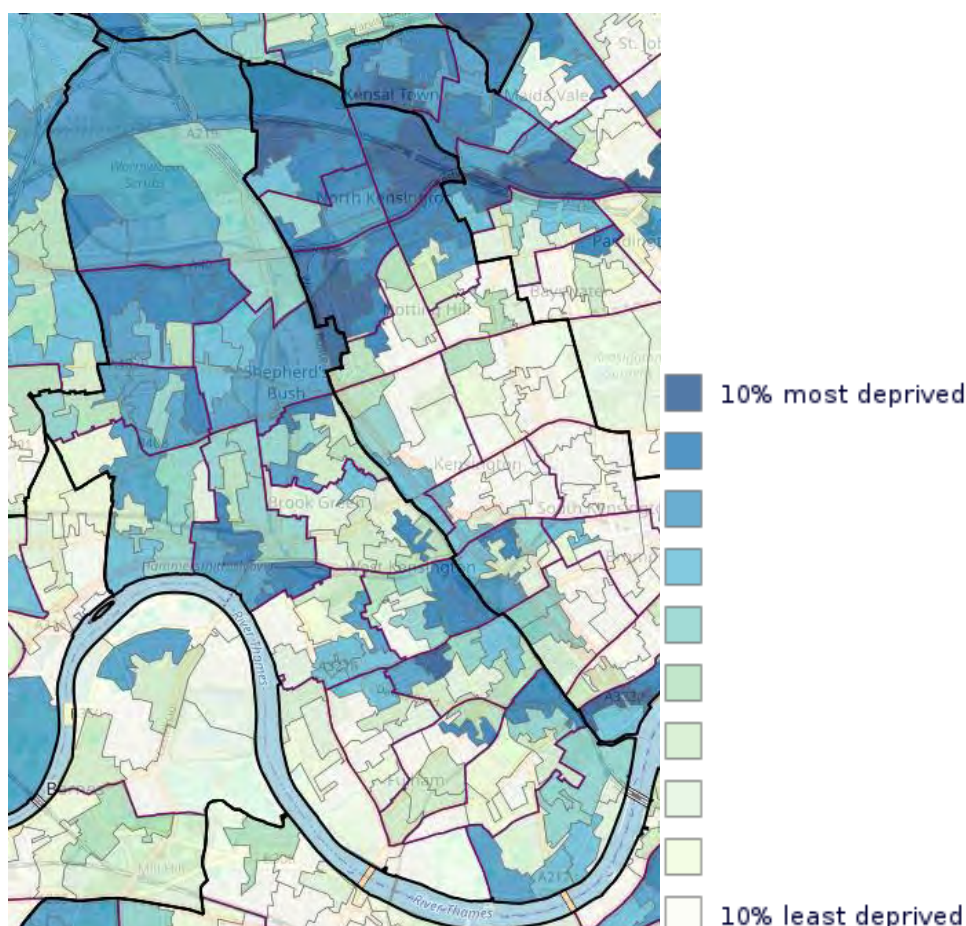
Figure 9-3: Economic Activity Rates in Hammersmith & Fulham (2021) ⁶⁷



⁶⁷ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Table TS066.

- 9.3.9. **Figure 9-4** shows the ranking of Hammersmith & Fulham's LSOAs for the Employment domain, while **Table 9-3** provides additional details on the LSOAs within Hammersmith & Fulham that fall within the 50% most deprived, or worse, areas.
- 9.3.10. Despite Hammersmith & Fulham's high economic activity rates (**Figure 9-3**), employment deprivation is present in Hammersmith & Fulham, with over half of the borough's LSOAs (58%) being ranked within the 50% most deprived areas nationally in the Employment IMD domain. This includes two LSOA within the 10% most deprived areas. Higher levels of deprivation are found throughout the borough, although greater concentrations can be found in northern and central regions.
- 9.3.11. This apparent contradiction between high employment rates but also high employment deprivation may reflect the borough's social and spatial inequalities, where economic participation may be high, but not all residents benefit equally. Employment deprivation measures involuntary exclusion from the labour market, such as long-term illness or disability, rather than employment quality or pay.

Figure 9-4: Employment IMD Domain⁶⁸



⁶⁸ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

Table 9-3: LSOAs in Hammersmith & Fulham Ranked Within 50% Most Deprived or Worse for the Employment IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	15
40% Most Deprived	12
30% Most Deprived	18
20% Most Deprived	15
10% Most Deprived	2 (Hammersmith & Fulham 015A; Hammersmith & Fulham 004B)
Total	63 (out of 113 in Hammersmith & Fulham)

Occupation

9.3.12. **Figure 9-5** highlights the occupation of working-age residents in Hammersmith & Fulham. Overall, the borough's workforce is more heavily concentrated in high-skilled, professional roles than in London or England overall. This aligns with the borough's economic profile, which includes a strong presence of media, tech, and professional services. However, it also underscores the need to ensure opportunities are accessible across the skills spectrum, particularly for residents in more deprived parts of the borough.

Figure 9-5: The Occupation of Residents Aged 16 and Over In Employment (2021) ⁶⁹



⁶⁹ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Table TS063.

Income

- 9.3.13. **Figure 9-6** shows the ranking of Hammersmith & Fulham's LSOAs for the Barriers to Housing and Services domain, while **Table 9-4** provides additional details on the LSOAs within Hammersmith & Fulham that fall within the 50% most deprived, or worse, areas.
- 9.3.14. The IMD reveals spatial inequalities within Hammersmith & Fulham related to income. The northern and eastern parts of the borough, including areas around Wormwood Scrubs, Shepherd's Bush, and West Kensington, contain several LSOAs among the 10% most income-deprived in England. In contrast, southern and riverside areas (such as Fulham) show significantly lower levels of income deprivation, with some LSOAs ranking among the least deprived nationally.

Figure 9-6: Income IMD Domain

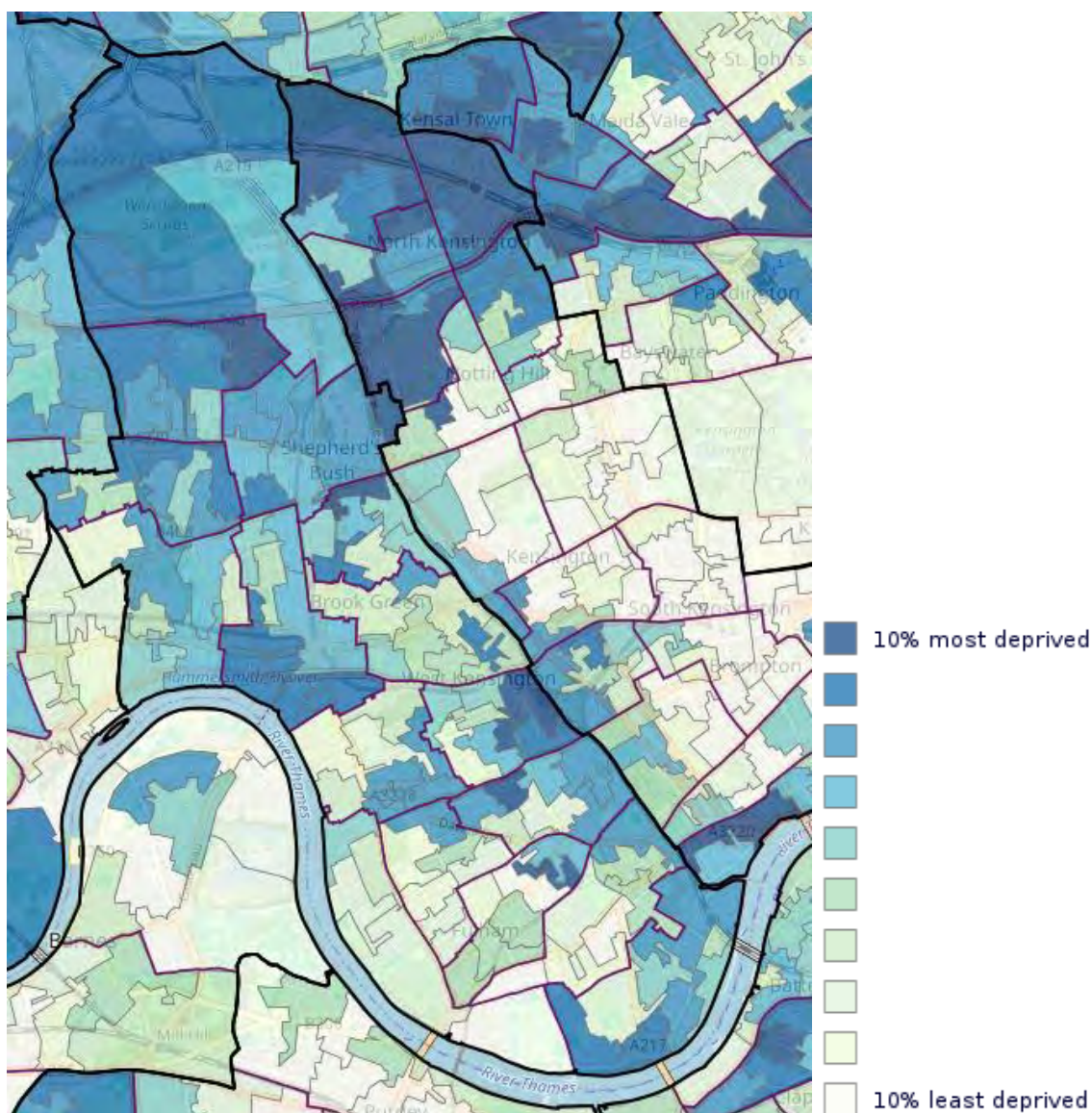


Table 9-4: LSOAs in Hammersmith & Fulham Ranked Within 50% Most Deprived or Worse for the Income IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	13
40% Most Deprived	11
30% Most Deprived	20
20% Most Deprived	19
10% Most Deprived	8 (Hammersmith & Fulham 015A; Hammersmith & Fulham 004B; Hammersmith & Fulham 002B; Hammersmith & Fulham 002D; Hammersmith & Fulham 002C; Hammersmith & Fulham 021A; Hammersmith & Fulham 007D; Hammersmith & Fulham 015D)
Total	65 (out of 113 in Hammersmith & Fulham)

Future Baseline

- 9.3.15. The ongoing shift towards homeworking, self-employment, and home-based businesses is likely to shape Hammersmith & Fulham's economic landscape during the HFLP period. As remote and hybrid working models become more embedded, there may be increased demand for co-working spaces, digital infrastructure, and local business hubs. This trend could provide opportunities for economic diversification and support a more resilient local economy, particularly if emerging industries such as digital services, creative industries, and technology-based enterprises are encouraged.
- 9.3.16. Additionally, as housing and employment land are allocated within the borough, it will be important to ensure that new developments provide access to a variety of job opportunities and skills training initiatives. This could help bridge the qualification gap and support a more balanced, future-proof economy that meets the evolving needs of businesses and residents.

9.4. Key Issues

- 9.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Economy and Employment:
- While Hammersmith & Fulham benefits from a highly qualified population and strong economic activity rates, spatial inequalities exist in the borough, particularly with regard to employment and income deprivation in the north and east of the borough;

- The borough's population records high levels of qualifications, but there is a need to ensure employment opportunities are inclusive of residents with lower qualifications;
- Despite strong economic centres and high levels of professional employment, more than half of the borough's LSOAs fall within the 50% most deprived nationally for employment, highlighting barriers to the labour market for some residents;
- Pockets of educational and skills deprivation exist, particularly in the north of the borough. This may limit long-term employment prospects and require targeted support for training and skills development; and
- The rise of homeworking and self-employment requires investment in digital infrastructure, flexible workspaces, and business support services.

9.5. IIA Objectives

- 9.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Employment and Economy:

Support a productive, diverse and resilient economy that provides opportunities for all.

10. Historic Environment

10.1. Focus of Theme

- 10.1.1. This theme focuses on designated and non-designated heritage assets and features (including archaeology) and their setting.

10.2. Policy Context

- 10.2.1. **Table 10-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 10-1: Plans, Policies and Strategies Reviewed in Relation to Historic Environment

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Historic England: Heritage and Climate Change</u>	2022
<u>Historic England Advice Note 11: Local Planning and the Historic Environment</u>	2022
<u>Historic England Advice Note 4: Tall Buildings Advice Note</u>	2022
<u>The National Design Guide</u>	2019
<u>Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management</u>	2019
<u>The 25 Year Environment Plan</u>	2018
<u>Historic England Good Practice Advice: The Setting of Heritage Assets</u>	2017
<u>Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)</u>	2016
<u>Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans</u>	2015
Local	
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

10.2.2. The key messages emerging from the review are summarised below:

- The key high-level principles for the conservation and enhancement of the historic environment are as follows:
 - The historic environment is a shared resource;
 - Everyone should be able to participate in sustaining the historic environment;
 - Understanding the significance of places is vital;
 - Significant places should be managed to sustain their values;
 - Decisions about change must be reasonable, transparent, and consistent; and
 - Documenting and learning from decisions is essential.⁷⁰
- The significance of places is the key element which underpins the conservation and enhancement of the historic environment. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building an archaeological site or a larger historic area such as a whole village or landscape;
- The HFLP will be required to be in general conformity with the NPPF, which ultimately encourages the conservation and enhancement of historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. The NPPF supports the use of area-based character assessments, design guides and codes and masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places;
- As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations, for example, with heritage considerations, and they can set out specific ways to maintain local character;
- Planning Practice Guidance expands on the NPPF recognising the proactive rather than passive nature of conservation;
- The role of the historic environment, as part of healthy and thriving ecosystems, landscapes and cultural values, including settlement identity, is reiterated through the key messages of the 25 Year Environment Plan and National Design Guide; and

⁷⁰ Historic England: Conservation Principles, Policies and Guidance

- Historic England's Advice Notes, Good Practice Advice, and Climate Change strategy provide further guidance in relation to the conservation and enhancement of the historic environment. Of particular relevance for the HFLP is the emphasis on the importance of:
 - Understanding the different types of special architectural and historic interest which underpin designations, as well as how settings and/ or views contribute to the significance of heritage assets;
 - Advising on mitigating, managing risks, and adapting to challenges posed by climate change;
 - Recognising the value of implementing controls through Local Plans, conservation area appraisals and management plans; and
 - Appropriate evidence gathering, including clearly identifying those issues that threaten an area or assets character or appearance and that merit the introduction of management measures.

10.3. Baseline Summary

Current Baseline

Listed Buildings

- 10.3.1. Listed buildings are designated heritage assets, of national importance, which are protected through the Planning (Listed Buildings and Conservation Areas) Act 1990.⁷¹ To assess the historic environment, the National Heritage List for England, provided by Historic England,⁷² has been utilised. There are a total of 270 listed buildings in the borough: 242 Grade II, 27 Grade II*, and one Grade I.
- 10.3.2. The Grade I listed building is Fulham Palace, located by the borough's southern border. It served as the principal residence of the Bishops of London for over 1,300 years.
- 10.3.3. Listed buildings are shown in **Figure 10-1**.

Scheduled Monuments

- 10.3.4. In England, scheduled monuments are nationally important archaeological sites or historical building designated and protected by Historic England under the Ancient Monuments and Archaeological Areas Act 1979.⁷³

⁷¹ UK Government (1990) '*Planning (Listed Buildings and Conservation Areas) Act*' can be accessed through [this link](#).

⁷² Historic England (no date) '*National Heritage List for England – Search the List – Advanced Search*' can be accessed through [this link](#).

⁷³ Ancient Monuments and Archaeological Areas Act (1979) can be accessed through [this link](#).

- 10.3.5. There is one scheduled monument in Hammersmith & Fulham. This is Fulham Palace Moated Site, adjoining the borough's only Grade I listed building (see **Figure 10-1**). Archaeological studies at the site have revealed a long and active history that goes back at least 6,000 years.⁷⁴

Conservation Areas

- 10.3.6. Conservation areas are places of historical or architectural importance protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. Stricter planning rules apply, requiring permission for demolitions, significant alterations, or new developments to preserve their character.
- 10.3.7. There are 44 conservation areas in Hammersmith & Fulham – see the Council's website for the full list.⁷⁵ Character profiles have been produced for around half of the borough's conservation areas, which describe their special interest, character and appearance. They also include broad design guidelines to help to preserve or enhance each conservation area.

Registered Parks and Gardens

- 10.3.8. Registered parks and gardens are designated areas of special historic interest in the UK, recognised for their significant landscape design, historical associations, or horticultural value. These sites are listed on the Register of Historic Parks and Gardens, maintained by Historic England, to ensure their preservation and protection for future generations.
- 10.3.9. The neighbourhood area has four registered parks and gardens: one Grade I; one Grade II*; and two Grade II (see **Figure 10-1**). These are:
- Kensal Green (All Souls) Cemetery, Grade I;
 - Fulham Palace, Grade II*;
 - St Peter's Square, Grade II; and
 - Bishop's Park, Grade II.

Heritage at Risk

- 10.3.10. According to the latest Heritage at Risk register (2024), 11 of Hammersmith & Fulham's heritage designations are known to be at risk⁷⁶ of being lost due to neglect, decay, or inappropriate development. These are:
- St Mary's, Kensal Green NW10. Conservation area in 'very bad' condition;

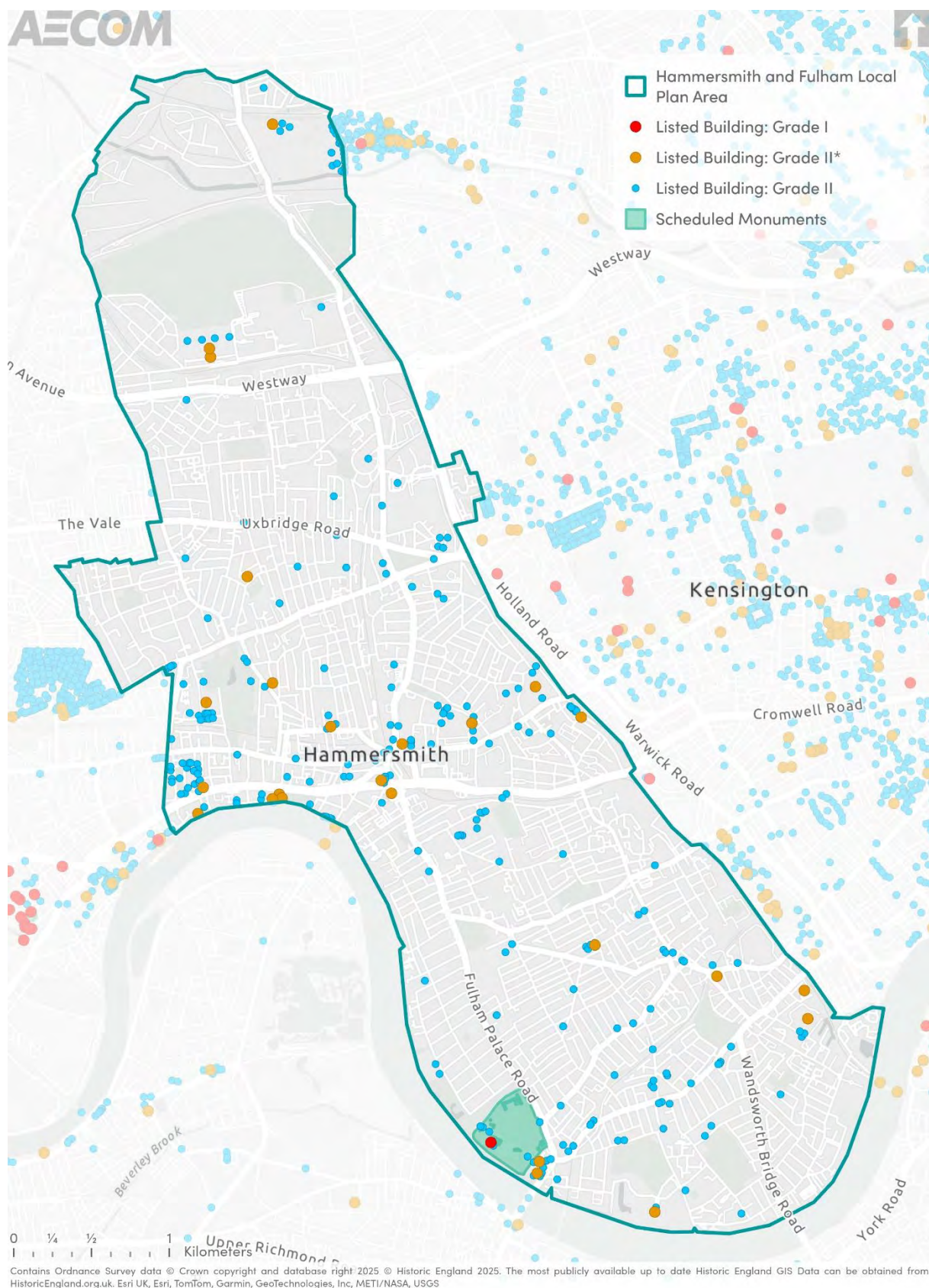
⁷⁴ Fulham Palace House and Garden (no date). '*History of the site*' can be accessed through [this link](#).

⁷⁵ Hammersmith & Fulham Council (no date). '*Conservation areas*' can be accessed through [this link](#).

⁷⁶ Historic England (2024) '*Heritage at Risk 2024 Registers*' can be accessed through [this link](#).

- Church of St John, North End Road, Walham Green SW6. Grade II listed building in 'poor' condition;
- Tomb of Frederick Harold Young, Hammersmith Cemetery, Margravine Road W6. Grade II listed building in 'very bad' condition;
- Former Royal Masonic Hospital, Ravenscourt Park, Hammersmith W6. Grade II* listed building in 'fair' condition;
- Tomb of Abraham Smith, Hammersmith Cemetery, Margravine Road W6. Grade II listed building in 'poor' condition;
- Number 2 Gasholder, Former Fulham Gas Works, Imperial Road SW6. Grade II* listed building in 'very bad' condition;
- Reception House, Hammersmith Cemetery, Margravine Road W6. Grade II listed building in 'poor' condition;
- Harwath Mausoleum, St Thomas Of Canterbury Churchyard SW6. Grade II listed building in 'poor' condition;
- Draped woman sculpture, North Verbena Gardens W6. Grade II listed building in 'poor' condition;
- Circular garden building, boundary wall and railings, formerly to St Paul's School, Hammersmith Road. Grade II listed building in 'very bad' condition; and
- Tomb of Samuel Jones, Queen Caroline Street, St Paul's Churchyard W6. Grade II listed building in 'very bad' condition.

Figure 10-1: Historic Environment Assets in the Borough



Locally Important Heritage Features

- 10.3.11. It is noted that not all of the borough's historic environment features are subject to statutory designations. Despite this, non-designated features still remain as important historic features of the environment for local communities.
- 10.3.12. Since 2000 Hammersmith & Fulham Council have kept a record of local Buildings of Merit (BoM). These are buildings and structures of local townscape, architectural or historic importance and is compiled in consultation with local amenity groups.
- 10.3.13. The latest register (published in 2015) lists hundreds of these BoM. Refer to the latest register for the full list.⁷⁷
- 10.3.14. The Greater London Historic Environment Record (HER) identifies important and distinctive structures or features that positively contribute to the local sense of place and distinctiveness of the county. Following a high-level review of the HER via the Heritage Gateway⁷⁸, there are 45 documented local records within the borough. During the subsequent stages of the SEA process, the HER and the Hammersmith & Fulham's BoM register shall be explored in further detail to consider the potential impacts associated with the HFLP proposals on these assets.

Archaeological Priority Areas

- 10.3.15. Archaeological Priority Area (APAs) in London are designated areas where there is significant potential for uncovering important historical and archaeological remains. These zones, identified by local planning authorities, help ensure that development projects consider and protect the city's heritage, ranging from Roman settlements to medieval structures. Many London boroughs, including Hammersmith & Fulham, particularly those with long histories of urban development, have APAs to safeguard archaeological interests.
- 10.3.16. The latest Hammersmith & Fulham Archaeological Priority Area Appraisal (over 10 years old)⁷⁹ identifies a total of 15 APAs within the borough. The current appraisal does not provide information on the tier or grading of these APAs; however, this is expected to be addressed in the upcoming appraisal review scheduled for 2025.

⁷⁷ Hammersmith & Fulham Council (2024). 'LONDON BOROUGH OF HAMMERSMITH & FULHAM LOCAL REGISTER OF BUILDINGS OF MERIT – As at August 2015' can be accessed through [this link](#).

⁷⁸ Heritage Gateway (2025) 'More Detailed Search' can be accessed through [this link](#). Open the link, change the tab from 'map' to 'admin location', type 'Hammersmith & Fulham' into the administrative location search bar and press the search button at the bottom of the page.

⁷⁹ Historic England (no date). 'Archaeological Priority Areas in Hammersmith & Fulham' can be accessed through [this link](#).

Archaeological Significance

- 10.3.17. Hammersmith & Fulham, a riverine borough, holds considerable archaeological and historical significance due to its continuous human activity over millennia. Evidence of Neolithic settlement along the Fulham riverside dates back to around 3000 BCE, followed by Bronze Age remains and Roman occupation from the 3rd to 4th centuries CE. The area's name origins – 'Fulham' meaning 'settlement by the muddy ford' - highlight its early strategic and geographical importance by the River Thames.⁸⁰
- 10.3.18. Throughout the medieval period and into modern times, the borough evolved as a place of strategic crossing, trade, and settlement. Key historical developments include its division into Hammersmith-side and Fulham-side (recorded in the Domesday Book), the establishment of significant transport links like Fulham Bridge (1729), and cultural milestones such as William Morris' residence and Gustav Holst's musical direction at St Paul's Girls' School. The borough experienced a peak in industrial and population growth in the early 20th century before suffering heavy bombing in WWII.

Future Baseline

- 10.3.19. Whilst designated and non-designated assets will continue to be afforded protection under the provisions of the NPPF and the Local Plan, it is recognised that future development has the potential to adversely impact historic character and settings, detract from historic settlement qualities and disrupt valued viewpoints; being susceptible to insensitive design and layout in new development.
- 10.3.20. Climate change threatens heritage assets through extreme weather, rising sea levels, and erosion. Increased rainfall and humidity can accelerate material decay, while coastal sites risk permanent loss. Sustainable conservation strategies, like improved drainage and digital documentation, are important to protecting historic sites for the future.

10.4. Key Issues

- 10.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Historic Environment:
- Hammersmith & Fulham has a range of designated and non-designated historic assets. These must be protected from inappropriate development that could damage their historic character or settings, ensuring that future developments do not negatively impact these assets;

⁸⁰ The Fulham and Hammersmith Historical Society (no date). '*Background info*' can be accessed through [this link](#).

- It will be important for any new development near to conservation areas to consider their historic context, as set out in the Conservation Area Appraisal;
- Only half of the conservation areas in the borough have a published character profile. Additionally, the latest BoM register is relatively dated, having been last updated 10 years ago. The HFLP presents an opportunity to develop the existing evidence base in relation to the conservation areas and BoMs;
- Development has the potential to disrupt the integrity of historic viewpoints and settlement patterns, which could erode the borough's cultural heritage if not carefully managed;
- Several heritage assets in Hammersmith & Fulham are already at risk, highlighting the need for their preservation;
- Hammersmith & Fulham's rich archaeological significance is reflected in its 15 APAs, which must be considered in development to safeguard key historical sites;
- Climate change, including increased rainfall and extreme weather, poses a significant threat to heritage sites, potentially accelerating deterioration. Development should incorporate sustainable practices that mitigate these risks to protect heritage for future generations;
- Planning for future growth through the HFLP will support the minimisation of impacts on heritage assets. It can also seek opportunities for public realm improvements, and accessibility improvements which can indirectly benefit access to and enjoyment of the historic environment; and
- Sustainable conservation strategies, such as improved drainage systems and digital documentation, are important for safeguarding Hammersmith & Fulham's historic assets amidst future development.

10.5. IIA Objective

- 10.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to the Historic Environment:

Protect, conserve and enhance the historic environment within and surrounding the borough.

11. Housing

11.1. Focus of Theme

- 11.1.1. This theme focuses on meeting housing needs, including affordable housing, housing mix (size, type and tenure), and specialist accommodation needs.

11.2. Policy Context

- 11.2.1. **Table 11-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 11-1: Plans, Policies and Strategies Reviewed in Relation to Housing Environment

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
<u>Homes England Strategic Plan 2023 to 2028</u>	2023
<u>Long-Term Plan for Housing</u>	2023
<u>The National Housing Federation's Vision for a Long-Term Housing Strategy</u>	2023
<u>10-Year Infrastructure Strategy</u>	emerging
Local	
<u>Housing strategy 2021 to 2026</u>	2021
<u>Homelessness and Rough Sleeping Strategy 2021 to 2026</u>	2021
<u>Tenancy Strategy 2021 to 2026</u>	2021
<u>Disabled People's Housing Strategy 2021 to 2026</u>	2021
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

- 11.2.2. The key messages emerging from the review are summarised below:

- The NPPF sets out the government's planning policies for England and provides a framework within which local plans should be prepared. It emphasises sustainable development, efficient use of land, and delivering a sufficient supply of homes. The latest reforms to the NPPF aim to refine planning policies to better support housing supply and

infrastructure needs, contributing to the government's ambition of delivering 1.5 million new homes;

- Levelling-up and Regeneration Act 2023 introduces reforms to accelerate the planning system, strengthen local democracy, and support regeneration. It aims to enable the delivery of new homes and infrastructure, aligning with the government's levelling-up agenda;
- The Homes England Strategic Plan 2023 to 2028 outlines Homes England's mission to increase housing supply, support affordable housing, and ensure sustainable development across England;
- Long-Term Plan for Housing sets out a vision for housing delivery, focusing on regeneration, urban densification, and the provision of high-quality, safe, and affordable homes in areas with high growth potential;
- National Housing Federation's Vision for a Long-Term Housing Strategy presents recommendations from housing experts and associations on delivering a long-term housing strategy, emphasising the importance of affordable housing and community well-being;
- The emerging 10-Year Infrastructure Strategy outlines the government's approach to delivering infrastructure projects over the next decade, ensuring that housing development is supported by necessary transport, utilities, and social infrastructure;
- Hammersmith & Fulham's housing strategy sets out how the Council will create safe, secure, and high-quality homes by working with residents, tackling inequality, improving building safety, reducing carbon emissions, and supporting inclusive, community-led growth;
- The Homelessness and Rough Sleeping Strategy sets out how Hammersmith & Fulham Council will work with residents and partners to prevent homelessness, end rough sleeping for good, and ensure everyone has access to safe, secure housing and high-quality support, driven by compassion, fairness, and co-production;
- The Tenancy Strategy sets out Hammersmith & Fulham's approach to the types and use of social housing tenancies, aiming to ensure consistency across all providers, promote genuinely affordable housing, and support residents through clear guidance on when and how different tenancy types should be used; and
- The Disabled People's Housing Strategy sets out how Hammersmith & Fulham will work in co-production with disabled residents to improve access to suitable, affordable, and accessible housing, support independent living, enhance housing services, and increase the supply of homes that meet the needs of disabled people in the borough.

11.3. Baseline Summary

Current Baseline

Population

- 11.3.1. As noted in **Chapter 8**, the population of Hammersmith & Fulham was 183,157 at the time of the 2021 Census, marking small increase of 0.4% from 182,493 in 2011. The latest ONS mid-year estimates (2023) indicate that the population has since grown to 186,176 (a 2% increase since 2021).

Housing Stock (Type and Size)

- 11.3.2. As of the 2021 Census, there were around 92,893 dwellings in Hammersmith & Fulham. Flats made up the largest share of the housing stock, accounting for 48%. Another 25% were converted or shared houses (such as bedsits). Terraced houses accounted for 19%, semi-detached homes for 5%, and detached houses for just 1%. Compared to both London and the rest of England, the borough has a much higher proportion of high-density housing types.
- 11.3.3. The borough's housing is also dominated by smaller-sized homes, with 33% of dwellings having two bedrooms, and 31% having one bedroom. Three-bedroom dwellings account for 20% of the housing stock, while only 16% have four or more bedrooms. This reflects a broader trend in the borough, where housing is more focused on smaller and denser units compared to the averages for London and England as a whole.

Tenure and Affordability

- 11.3.4. The 2021 Census shows a fairly balanced mix of housing tenures in Hammersmith & Fulham. Private renting is the most common, making up 37% of homes. Owner-occupied housing accounts for 32%, while social rented housing makes up 30%. A small share (2%) is in shared ownership. This reflects the borough's urban nature, where renting is more common than in suburban or rural areas.
- 11.3.5. As reported by Zoopla,⁸¹ the average house price over the past 12 months in Hammersmith & Fulham is £1,129,687 – with detached houses selling for an average of £1,775,427, semi-detached houses selling for an average of £1,981,464, terraced houses selling for an average of £1,738,334, and flats selling for an average of £687,651.
- 11.3.6. The average house prices for this period in Hammersmith & Fulham are significantly higher than London (average price is £684,309) and England (£357,891), highlighting potential affordability concerns.

⁸¹ Zoopla (2025) '*House prices in Hammersmith & Fulham*' can be accessed through [this link](#).

Housing Growth and Planned Development

11.3.7. As noted above, Hammersmith & Fulham has experienced relatively modest population growth since 2011. Despite this, further growth is projected in the coming years, which will require additional housing, services, and infrastructure. The adopted Local Plan identifies four key regeneration areas in Hammersmith & Fulham:

- White City regeneration area;
- Hammersmith town centre regeneration area;
- Fulham regeneration area (including Earls Court and West Kensington opportunity area);
- South Fulham Riverside regeneration area.

11.3.8. Old Oak and Park Royal Development Corporation area is noted to be a key regeneration area in the borough; however, it falls under the planning jurisdiction of the Old Oak and Park Royal Development Corporation (OPDC) and is guided by its own Local Plan.

Infrastructure and Services

11.3.9. Hammersmith & Fulham benefits from a range of infrastructure and services supporting its residential communities. The borough's transport network includes road and rail connections facilitating commuter access to central London and neighbouring areas. Essential services such as a primary school, healthcare facilities, and recreational amenities are distributed throughout the borough, contributing to residents' quality of life.

Homelessness

11.3.10. Homelessness is associated with severe poverty and is a social determinant of health. It often results from a combination of events such as relationship breakdown, debt, and adverse experiences in childhood and through ill health.

11.3.11. According to the Hammersmith & Fulham's Homelessness and Rough Sleeping Strategy (2021 to 2026)⁸², 1 in 50 people in the borough has no home, with residents facing challenges of high rents, high housing prices and a shortage of affordable rented housing.

⁸² Hammersmith & Fulham Council (2021). '*Homelessness and Rough Sleeping Strategy 2021 to 2026*' can be accessed through [this link](#).

Gypsy and Traveller

- 11.3.12. Although now relatively dated, it is worth noting that the latest Joint Gypsy and Traveller Accommodation Needs Assessment (2016),⁸³ which covers the boroughs of Hammersmith & Fulham and Kensington and Chelsea, identifies a need for six additional pitches across the two boroughs between 2020-2030.

Future Baseline

- 11.3.13. Projections presented in the borough's Older People's Needs Assessment (OPNA) 2024 suggest continued population growth in Hammersmith & Fulham.⁸⁴ The borough's population is also expected to age over time, with the proportions of those aged 64-84 and 85+ projected to grow by 34% and 48%, respectively. In contrast, the 20-64 age group is expected to grow by just 1%, while the 0-19 age group is projected to decline by 5%.
- 11.3.14. The OPNA also presents that the percentage of older adults living alone is predicted to increase in the next 10 years. It is estimated that in 2023, 28% of the older adults aged 65 years and over were living alone, of which 4% were aged 85 years and over. These figures are predicted to increase to 35% and 6% respectively, by 2033.
- 11.3.15. The adopted Hammersmith & Fulham Local Plan states that, in line with the London Plan housing target for the borough, an indicative target of 22,000 new homes is expected to be delivered in Hammersmith & Fulham between 2016 and 2035. Meeting this target will require urban intensification and estate regeneration.
- 11.3.16. The construction of new housing developments in Hammersmith & Fulham will put increased pressure on local services, including schools, healthcare facilities, public transport, and emergency services. As the population grows and ages, existing infrastructure may struggle to meet rising demand, leading to overcrowded GP surgeries, longer waiting times at hospitals, and insufficient school places for children. Additionally, increased road traffic and higher usage of public transport could strain an already busy network. To ensure sustainable growth, investment in upgrading and expanding these essential services must accompany new housing developments.

⁸³ Hammersmith & Fulham and Kensington and Chelsea Borough Councils (2016). 'Joint Gypsy and Traveller Accommodation Needs Assessment (GTANA)' can be accessed through [this link](#).

⁸⁴ London Borough of Hammersmith & Fulham (2024). 'Older People's Needs Assessment 2024' can be accessed through [this link](#).

11.4. Key Issues

11.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Housing:

- The borough is experiencing modest but steady population growth, which will increase overall demand for housing, services, and infrastructure in the borough;
- A significant rise in older residents (particularly those living alone) is projected, increasing the need for accessible, age-appropriate, and supportive housing;
- The borough's housing stock is dominated by smaller and high-density dwellings (mostly flats and bedsits), which may not meet future needs for larger family homes or adaptable housing for older people;
- Extremely high property prices and rents, which are well above London and national averages, contribute to affordability pressures and homelessness. More affordable housing options, including shared ownership and low-cost rental properties, are needed;
- A high proportion of private rented housing and limited shared ownership options may reduce long-term housing security and affordability for residents; and
- Planned housing growth must be supported by investment in schools, healthcare, public transport, and other essential services to prevent overcrowding and service strain.

11.5. IIA Objective

11.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to the Housing:

Provide for the full range of housing needs and maximise delivery of affordable housing.

12. Landscape

12.1. Focus of Theme

- 12.1.1. This theme focuses on greenbelt and designated / protected landscapes within or near to the borough, as well as landscape character, landscape quality, and visual amenity.

12.2. Policy Context

- 12.2.1. **Table 12-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 12-1: Plans, Policies and Strategies Reviewed in Relation to Landscape

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>National Model Design Code</u>	2021
<u>The National Design Guide</u>	2019
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
Local	
<u>Hammersmith & Fulham Local Plan 2018</u>	2018
<u>The London Plan</u>	2021

- 12.2.2. The key messages emerging from the review are summarised below:

- The HFLP will be required to be in general conformity with the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land and cultural landscapes. The positive contribution that land remediation can make in terms of addressing despoiled, degraded, derelict, contaminated and unstable land is also recognised; and
- The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring and successful places, which respond to local character and provide a network of high quality green open spaces; and

- The National Model Design Code states that all design codes should include a landscape and open space strategy that incorporates the existing natural features and new structural elements. It recognises that landscapes can be major drivers in the design process.

12.3. Baseline Summary

Current Baseline

Landscape Context

- 12.3.1. The current townscape and landscape structure of the Borough can be clearly traced through the successive layers of development over the past two hundred years. Most of the Borough's earliest buildings are now statutorily listed along with historic parks and gardens, and most of the early patterns of development are recognised in conservation area designations. For example, the small crossroads and village greens that first shaped the borough are now the focus of conservation areas at Parsons Green, Walham Green, Brook Green, Starch Green and Shepherds Bush Green. There are also a number of buildings and artefacts of local importance and interest.⁸⁵

Nationally Protected Landscapes

- 12.3.2. There are no nationally protected landscapes either within the borough or within a 10 km radius of it. The closest National Landscape is Surrey Hills, approximately 21 km south of Hammersmith & Fulham. The NL is characterised by the mosaic of farmland, woodland, heaths, downs and commons.⁸⁶

National Character Areas

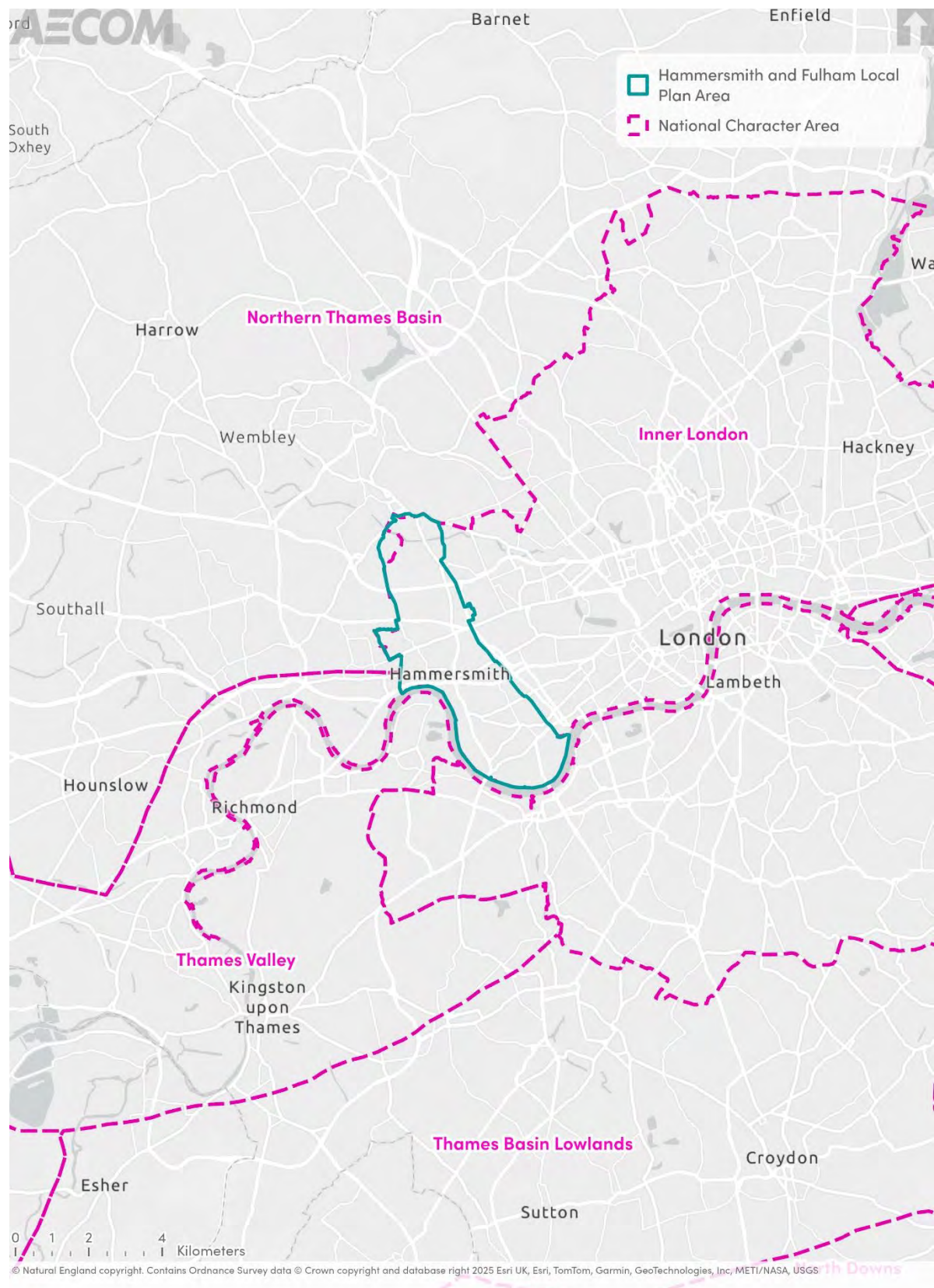
- 12.3.3. Hammersmith & Fulham sits entirely within the Inner London National Character Area (NCA), which lies at the centre of the Thames Basin on a broad flood plain which rises in gentle terraces, providing panoramic views of London's skyline from the clay plateaux and ridges in the north at the border with the Northern Thames Basin (see **Figure 12-1**). The NCA is steeped in both historical and contemporary culture; it is the centre of UK Government and a major international hub for finance, business, tourism, transport and recreation. Owing to its urban nature, Inner London relies heavily on ecosystem services provided by the surrounding NCAs, such as flood alleviation, air temperature regulation and recreational services.⁸⁷

⁸⁵ Hammersmith & Fulham Council (2024). 'Planning Guidance' can be accessed through [this link](#).

⁸⁶ Kent Downs (no date). 'Welcome to your National Landscape' can be accessed through [this link](#).

⁸⁷ Natural England (no date) 'National Character Area 112 Inner London' can be accessed through [this link](#).

Figure 12-1: National Character Areas in Hammersmith & London



12.3.4. Environmental opportunities for this NCA include:

- Protect and enhance the landscape of the River Thames and its tributaries, and the extensive network of associated water environments, celebrating its rich industrial heritage, promoting sense of place, improving water quality and securing the long-term resilience of water resources, flood alleviation, biodiversity, geodiversity and recreation;
- Protect and enhance the network of Inner London's green spaces so that it provides services where people need them, promotes recreational and educational opportunities, supports biodiversity, reinforces local character and is resilient to future challenges such as climate change;
- Protect, manage and plan for expansion of the urban forest as part of the area's green infrastructure strategy to ensure that it meets future needs for climate regulation, supports biodiversity and recreation and strengthens local landscape character; and
- Reconnect people with nature by providing opportunities and access to engage with nature close to where they live, work and play, reinforcing sense of place, improving recreation and providing benefits for biodiversity and climate regulation.

12.3.5. The ecosystem services provided by the NCA should be protected, including food provision, water availability, regulating soil erosion, regulating soil quality, regulating water quality, sense of place / inspiration, sense of history, recreation, biodiversity, and geodiversity.

Local Views

12.3.6. It is useful to note that views of and across the borough are also an important factor to consider in the planning process, as the scale, height, and mass of development can ultimately impact on important views. Changes like development and landscape change can see these important views and vistas degraded overtime. The emerging LWNP may designate locally important viewpoints to provide additional protection to these assets.

Tree Preservation Orders

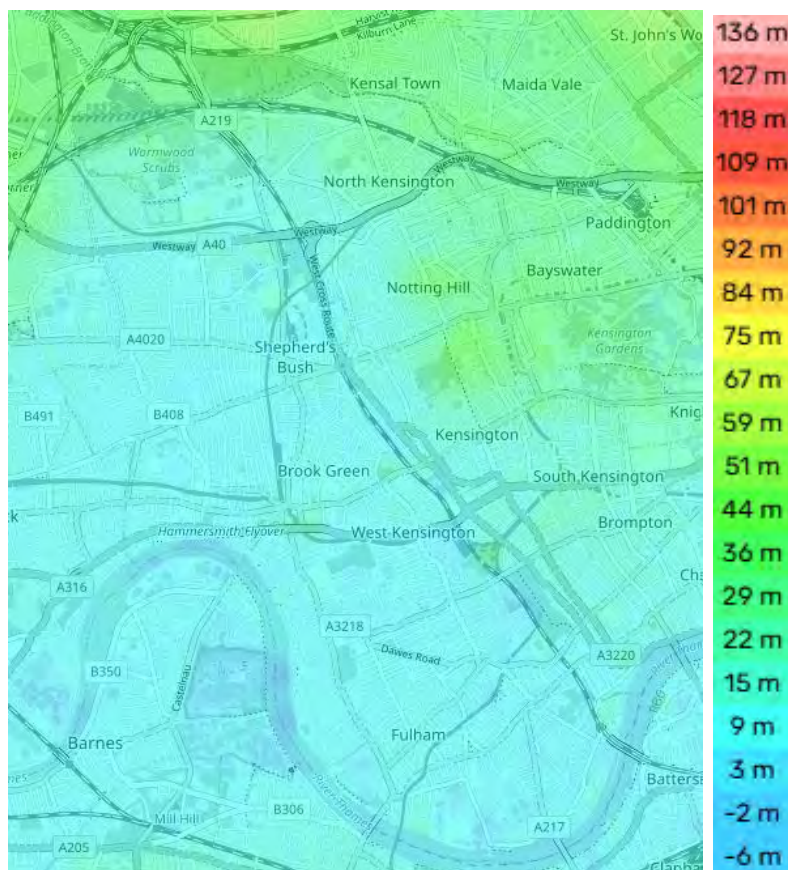
12.3.7. A Tree Preservation Order (TPO) is a legal measure used by local planning authorities to protect specific trees, groups of trees, or woodlands from being cut down, topped, lopped, uprooted, or otherwise damaged without prior consent. TPOs are typically placed on trees that offer significant amenity value to the local environment. Similar protections are afforded trees within designated conservation areas.

- 12.3.8. According to Hammersmith & Fulham Council's website, which keeps a list of TPOs within the borough, there are over 2,000 trees under a TPO designation.⁸⁸ During the subsequent stages of the SEA process, the TPO list shall be explored in further detail to consider the potential impacts associated with the HFLP proposals on these assets.

Topography

- 12.3.9. The borough predominantly lies in a low-lying area. The south of the borough (by Fulham) sits very close to the River Thames and shows some of the lowest elevations borough. Moving to central and northern areas, the borough remains relatively flat, with the exception of central Hammersmith and Shepherd's Bush, which see gradual elevation increases. The borough's highest elevations can be found in its northern extents by Wormwood Scrubs.
- 12.3.10. It is therefore recognised that any future growth by the borough's northern boundary, or in select areas such as central Hammersmith and Shepard's Bush, are likely to be relatively elevated in the landscape in comparison to the surrounding areas.

Figure 12-2: Topography of Hammersmith & Fulham⁸⁹



⁸⁸ Hammersmith & Fulham Council (2018). 'TREE PRESERVATION ORDERS : BY ADDRESS' can be accessed through [this link](#).

⁸⁹ Topographic-map.com (2025). 'Home', available through [this link](#).

Future Baseline

- 12.3.11. New development can lead to incremental changes in the visual quality of the landscape within and around the borough. Development also has the potential to disrupt views to and from Hammersmith & Fulham, especially if built in the north of the borough.
- 12.3.12. Climate change may alter Hammersmith & Fulham's landscape, with potential adverse effects anticipated on its green spaces, historic assets, and local wildlife.
- 12.3.13. Coordinated delivery of green infrastructure, recreational spaces, and any regeneration opportunities could support landscape enhancements in the borough. The HFLP therefore presents an opportunity to plan for development in a way which minimises landscape impacts and maximises improvement/ enhancement to the landscape resource where possible.

12.4. Key Issues

- 12.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to the Landscape SEA theme:
 - Hammersmith & Fulham lies within the Inner Thames NCA, which is a broad flood plain which rises in gentle terraces, and is steeped in both historical and contemporary culture. Careful planning is needed to preserve the distinctive characteristics of both NCAs;
 - Key viewpoints across Hammersmith & Fulham could be disrupted by new developments, particularly in elevated areas. Protecting these views and integrating them into planning is vital for maintaining local landscape character;
 - Expanding urban areas could threaten green spaces and natural features. Protecting and enhancing these areas, particularly those of high environmental value, is important for biodiversity and recreational benefits;
 - Climate change may impact Hammersmith & Fulham's green spaces, historic assets, agricultural land, and biodiversity. Planning for climate resilience, including habitat restoration and green infrastructure, is essential for maintaining landscape quality;
 - Integrating green infrastructure, such as parks, tree planting, and drainage systems, into new developments can enhance the landscape and provide ecological and social benefits, helping to mitigate climate change impacts; and
 - Hammersmith & Fulham's landscape is rich in history. Development should respect and protect cultural heritage sites to preserve the borough's sense of place and identity.

12.5. IIA Objective

- 12.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Landscape:

Protect and enhance the character and quality of the immediate and surrounding landscape, including green infrastructure corridors.

13. Resources

13.1. Focus of Theme

13.1.1. This theme focuses on use of resources and good waste management.

13.2. Policy Context

13.2.1. **Table 13-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 13-1: Plans, Policies and Strategies Reviewed in Relation to Resources

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>The 25 Year Environment Plan</u>	2018
<u>Safeguarding our Soils: A strategy for England</u>	2009
Local	
<u>Hammersmith & Fulham Reduction and Recycling Plan</u>	2023
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

13.2.2. The key messages emerging from the review are summarised below:

- The HFLP will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources; recognising the wider benefits of natural capital and derived from ecosystem services. Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains;
- The NPPF places a requirement on mineral planning authorities to prepare an annual Local Aggregate Assessment (LAA), which reports on the demand for and supply of aggregates in their area. The relevant LAA for Hammersmith & Fulham is the LAA for London (2018);
- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, reduce pollution,

maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably, and degradation threats tackled successfully by 2030, as well as the national waste plan which seeks to identify measures being taken to move towards a zero-waste economy; and

- The Hammersmith & Fulham Reduction and Recycling Plan outlines the strategy for waste management in the borough. To achieve this, the Plan also includes 23 actions, under four key themes: Waste Reduction; Maximising Recycling; Reducing Environmental Impact; and Maximising local waste sites.

13.3. Baseline Summary

Current Baseline

Agricultural Land

- 13.3.1. The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 are of poorer quality.
- 13.3.2. As shown in **Figure 13-1**, the entire borough is classified as non-agricultural land. In this regard, the presence of agricultural land would not be a constraint for development in the borough.

Figure 13-1: Agricultural Land Classification for the borough⁹⁰



⁹⁰ Natural England (2010) 'Agricultural Land Classification map London and the South East (ALC007)' can be accessed through [this link](#).

Mineral Resources

- 13.3.3. Mineral resources are defined as natural concentrations of minerals or bodies of rock that have the potential to be of economic interest in the present or the future due to their inherent properties. As minerals are a non-renewable resource, minerals safeguarding is deployed as the process through which it is ensured that non-minerals development does not needlessly prevent the future extraction of mineral resources.⁹¹
- 13.3.4. The London Plan 2021 identifies four minerals boroughs in London which must maintain London's five million tonne landbank up to 2041. However, Hammersmith & Fulham is not one of these boroughs.

Waste

- 13.3.5. According to the London Boroughs Recycling Scorecard 2024, Hammersmith & Fulham recorded the third smallest volume of waste sent for disposal per person among London's 33 boroughs.⁹² However, regarding the recycling rate, the borough performed poorly, ranking 27th out of 33.
- 13.3.6. According to London's Planning Datamap⁹³ there are seven waste sites in Hammersmith & Fulham. Two of these are found centrally, near Shepard's Bush, while the other five are located in the north of the borough, north of the Grand Union Canal.

Brownfield Sites

- 13.3.7. Brownfield sites are previously developed land that is no longer in use. They are preferred for new developments because they help reduce urban sprawl, make use of existing infrastructure, and regenerate neglected areas.
- 13.3.8. The most recent Hammersmith & Fulham Brownfield Register (2024)⁹⁴ identifies 31 sites within the borough. Nine sites have already been approved, 17 sites are permissioned, and five sites are pending a decision.

Historic Landfill Sites

- 13.3.9. Historic landfill sites (HLS), once used for waste disposal, can create challenges for development due to potential contamination from harmful gases and leachate. Development sites near to HLS must conduct site assessments to check for environmental risks, which may require remediation efforts like soil removal or gas monitoring.

⁹¹ UK Government (2014) '*Guidance: Minerals*' can be accessed through [this link](#).

⁹² CPRE (2024). '*London Boroughs Recycling Scorecard 2024*' can be accessed through [this link](#).

⁹³ Gov.uk (no date). '*Planning Datamap*' can be accessed through [this link](#).

⁹⁴ Hammersmith & Fulham Borough Council (2024). '*Hammersmith & Fulham Brownfield Register*' can be accessed through [this link](#).

- 13.3.10. As the time of writing, the national historic landfill dataset is unavailable to view. Therefore, there remains uncertainty as to whether HLSs are present in Hammersmith & Fulham.

Future Baseline

- 13.3.11. Demand for waste processing is likely to grow alongside population increases and urban expansion. The capacity of existing waste management infrastructure will need to be regularly assessed to ensure it can cope with the increasing demand. Additionally, with the identification of potential sites for new waste facilities, it will be important to assess any potential impacts these facilities might have on nearby communities, as well as any associated environmental risks such as emissions or leachate.

13.4. Key Issues

- 13.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Soils and Resources:
- Prioritising the redevelopment of brownfield sites over greenfield land reduces urban sprawl, maximises existing infrastructure, and promotes sustainable development. This approach helps minimise environmental impact while regenerating neglected areas and supporting sustainable urban growth;
 - The presence of seven identified waste sites and unknown historic landfill locations could pose risks such as soil contamination, ground gas emissions, and water pollution. Development proposals near these areas should require thorough land assessments and, where necessary, mitigation strategies such as soil remediation and gas monitoring; and
 - Population growth and urban expansion will increase the demand for waste processing facilities. It is important to assess the capacity of existing waste management infrastructure and plan for new facilities while ensuring minimal environmental impact and avoiding conflicts with nearby communities.

13.5. IIA Objectives

- 13.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Resources:

Protect mineral resources and manage waste effectively.

14. Transportation

14.1. Focus of Theme

- 14.1.1. This theme focuses on transport infrastructure, transport usage, traffic flows and congestion, and accessibility levels in the borough.

14.2. Policy Context

- 14.2.1. **Table 14-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 14-1: Plans, Policies and Strategies Reviewed in Relation to Transportation

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Decarbonising Transport: A Better, Greener Britain</u>	2021
<u>Decarbonising Transport: Setting the Challenge</u>	2020
<u>The National Design Guide</u>	2019
<u>The Transport Investment Strategy – Moving Britain Ahead</u>	2017
<u>The Department for Transport’s Cycling and Walking Investment Strategy</u>	2016
Local	
<u>London Borough of Hammersmith & Fulham Local Implementation Plan 3</u>	2018
<u>The Mayor’s Transport Strategy 2018</u>	2018
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018
Hammersmith & Fulham Transport Strategy	emerging

- 14.2.2. The key messages emerging from the review are summarised below:

- The HFLP will be required to be in general conformity with the NPPF, which seeks the consideration of transport issues from the earliest stages of plan-making and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport. Larger developments are expected to be delivered in areas which are or can be

made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments;

- National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliability of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of a longer journeys. This includes investment in new and upgraded infrastructure, changing perceptions, and increasing safety; and
- The London Borough of Hammersmith & Fulham Local Implementation Plan 3 outlines Hammersmith & Fulham Council's strategies for improving transportation and mobility across the borough in line with the Mayor of London's transport objectives. The overarching aim of the Mayor's Transport Strategy is to achieve modal shift with the target that by 2041, 89% of trips by residents will be by walking, cycling or public transport. The borough's transport objectives set out in the Third Local Implementation Plan are:
 - To support sustainable population and employment growth in the borough's four regeneration areas and the OPDC area in the borough
 - To improve the efficiency of our road network
 - To improve the quality of our streets
 - To improve air quality in the borough
 - To make it easier for everyone to gain access to transport opportunities
 - To support residents and businesses by controlling parking fairly
 - To reduce the numbers of people killed and injured on our streets

The emerging priorities of the draft Transport Strategy are:

- Safe active travel
 - Transition to cleaner vehicles
 - Enabling climate adaptation and resilience
 - Places for people not traffic
 - Connecting people and places
 - Sustainable growth and development.
- The Council is currently developing its draft Transport Strategy which is intended to be ready for publication in early 2026.

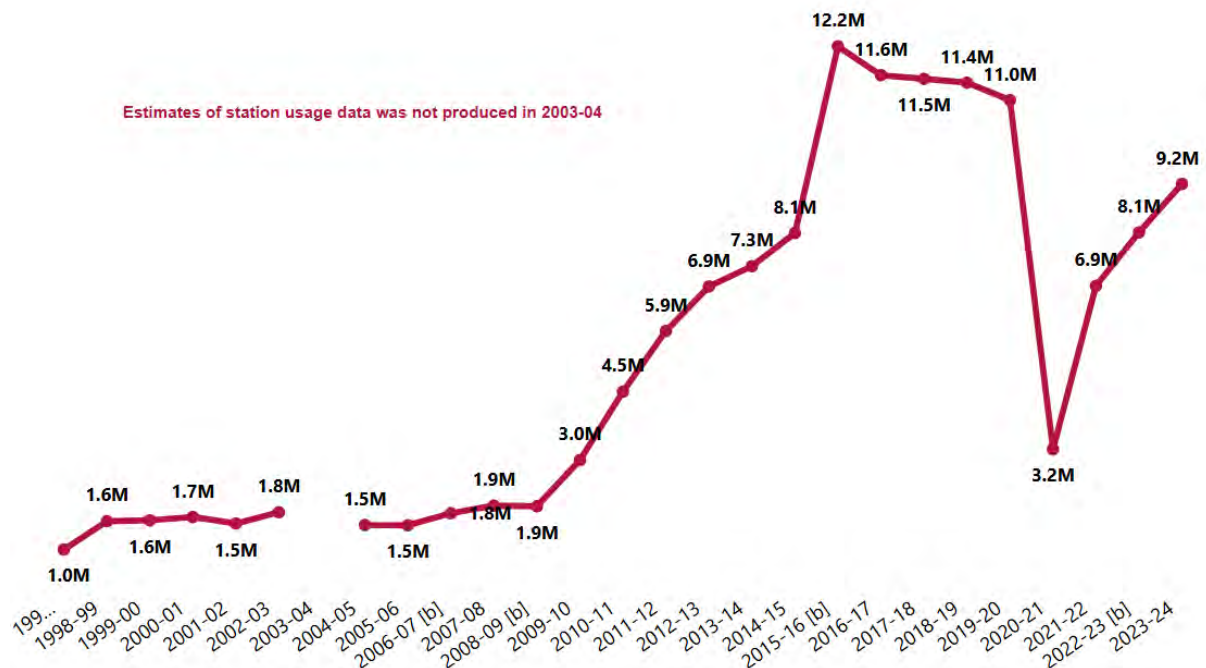
14.3. Baseline Summary

Current Baseline

Rail Network

- 14.3.1. Hammersmith & Fulham is well-connected by rail, with a range of London Underground and National Rail services providing strong links across London and beyond. The borough is served by the London Underground's District, Piccadilly, Hammersmith & City, and Central Lines, offering frequent services to central London, Heathrow Airport, and other key destinations. Services typically run every 10–15 minutes.
- 14.3.2. The London Overground (Mildmay Line) serves stations on the West London Line at Shepherd's Bush, Kensington (Olympia), West Brompton and Imperial Wharf, connecting the area to Clapham Junction, Stratford, and the rest of the Overground network.
- 14.3.3. National Rail services also operate from West Brompton, Shepherd's Bush, and Kensington (Olympia) stations. These provide access to destinations including Clapham Junction, Milton Keynes, and Watford Junction via Southern Rail Services.
- 14.3.4. The London Underground is the borough's main mode of rail transport, with multiple stations on the District, Piccadilly, Central, and Hammersmith & City lines. Key interchanges such as Hammersmith, Barons Court, and Shepherd's Bush ensure fast connections to central London with services running every few minutes.
- 14.3.5. Whilst rail connections are excellent on an east-west alignment the north-south connections lack connectivity and require multiple interchanges.
- 14.3.6. A significant number of the train and tube stations in the borough are not step free or completely accessible and working with TfL and the Mayor to achieve universal step-free accessibility is a priority.
- 14.3.7. The Office of Road and Rail provide annual estimates of station usage across Great Britain. For Hammersmith & Fulham, this includes three stations: Shepherd's Bush, West Brompton, and Imperial Wharf. Their data suggests that since 2008-09, there was a sharp increase in the borough's passenger numbers, peaking at 12.2 million in 2015-16. Usage then slightly declined but remained above 11 million until 2019-20. A significant drop occurred in 2020-21, likely due to the Covid-19 pandemic. Since then, passenger numbers have recovered, reaching 9.2 million in the latest year (see **Figure 14-1**).

Figure 14-1: Passenger Numbers at Hammersmith & Fulham's Train Stations⁹⁵



Bus Network

- 14.3.8. Hammersmith & Fulham's bus services, primarily managed by Transport for London (TfL), provide extensive connectivity within the borough and to surrounding areas. According to TfL the borough is served by 46 daytime bus routes, facilitating travel between the borough's key main settlements and the wider area. Service frequencies vary by route and time of day, with high-frequency routes offering buses every 12 minutes or less, while others may have longer intervals.⁹⁶
- 14.3.9. Some areas of the borough remain underserved and connections between the north and south of the borough are poor. Some bus routes remain on lower frequency since the pandemic and cuts to services and routes by TfL are continuing. Bus journey time reliability and speeds are deteriorating primarily as a result of traffic congestion and queuing traffic on the road network where there are no bus priority measures. Bus patronage has not recovered as well as tube patronage since the Covid-19 pandemic and remains much lower than 2019 levels.

Road Network and Congestion

- 14.3.10. Hammersmith & Fulham benefits from a well-connected road network that provides links to central London and the wider west and southwest London areas. Key routes include the A4 (Great West Road), which runs east-west through the borough and provides direct access to central London and the

⁹⁵ Office of Rail and Road (2024) 'Estimates of station usage' can be accessed through [this link](#).

⁹⁶ TfL (no date). 'Hammersmith & Fulham' can be accessed through [this link](#).

M4 motorway towards Heathrow and the M25, and the A40 Western Avenue/Westway which provides direct access to the M40 and Birmingham. These arterial roads carry vast number of vehicles generating both air and noise pollution and severing the communities either side. Severance is caused to pedestrians and cyclists by busy wide roads with high traffic volumes that are difficult to cross (A4 and A40), making walking and cycling journeys longer than necessary. These forms of severance also significantly reduce the accessibility of communities to local services and facilities.

- 14.3.11. The A219 also runs north-south through the borough, linking Shepherd's Bush and Fulham. The local road network supports access to neighbouring boroughs such as Kensington and Chelsea, Wandsworth, and Ealing.
- 14.3.12. Due to its position in West London where several arterial roads connect, Hammersmith & Fulham experiences significant traffic congestion across the entire road network but particularly on its north-south routes. The borough has some of the most congested roads in London (including the A219, which was the most congested road in the UK in 2022)⁹⁷ and suffers disproportionately from through-traffic. Notably, some of the busiest road junctions in the capital are located within the borough, including Hammersmith Broadway, Shepherd's Bush Green, and Savoy Circus (A40).
- 14.3.13. Hammersmith and Fulham introduced innovative Clean Air Neighbourhoods, restricting through traffic from residential streets in South Fulham. Over the past two years, H&F has successfully worked with residents to reduce pollution and congestion in the streets east of Wandsworth Bridge Road in south Fulham, using smart technology.
- 14.3.14. Now 8,000 fewer cars a day emitting dangerous nitrogen oxide are now entering the area. Carbon dioxide emissions have reduced by one tonne a day. The roads are quieter and safer for pedestrians and cyclists too, because of the 23 per cent reduction in traffic.

Car Ownership

- 14.3.15. Whilst car ownership in the borough is lower than the Inner London average it is higher than immediately adjacent boroughs to the west. The overall number of vehicles owned by H&F residents has also increased in recent years which is opposite to what has happened in most other Inner London boroughs.
- 14.3.16. Two Car Club companies operate in the borough, providing an alternative to car ownership for people who occasionally need to carry out journeys by car. They have a role to play in progress towards the Mayors Transport Strategy target of reduced car ownership.

⁹⁷ INRIX (2022). 'INRIX 2022 Global Traffic Scorecard: London Tops List as Most Congested City, U.S. Cities Inch Closer' can be accessed through [this link](#).

Electric vehicle Charging Infrastructure

- 14.3.17. The borough has the densest network of on-street charging points in the country with a network of 2,800 charging points across the borough that continues to grow. There are over 300 on-street destination charging points offering either a 7 or 22 kWh charge alongside a network of 2,300 lamppost column charging points. The borough also has 10 on street 50 kWh rapid charge points in London with a further nine high-powered, ultra-rapid 175kWh charge points as part of the borough's first all-electric charge hub in Fulham Road.
- 14.3.18. Every home or office in the borough is now within 400 metres of a charging point. There are also electric charging points on private land, including some garage forecourts and in the car park of the Westfield London shopping centre.

Active Travel

- 14.3.19. Hammersmith & Fulham does not have formal public rights of way, such as designated rural footpaths or bridleways, and is not required to maintain a definitive map of rights of way. This exemption applies to all inner London boroughs under the National Parks and Access to the Countryside Act 1949.
- 14.3.20. Nonetheless, the borough contains a network of publicly accessible pedestrian routes, including those through parks, housing estates, and along the River Thames. These are typically maintained either as highways maintainable at public expense or as permissive paths, rather than formally recorded rights of way. The Thames Path National Trail also runs along the borough's southern boundary, providing a continuous, accessible walking route adjacent to the river.
- 14.3.21. Hammersmith & Fulham, is developing a safe cycle route network, which includes national, regional, and local cycle routes. Key routes include Cycleway 9, Cycleway 34 and the National Cycle Network route 4, which follows the Thames through to central London.⁹⁸ Further safe cycle routes particularly ones linking the north and south of the borough are required.
- 14.3.22. To support cyclists, the Hammersmith Cycle Hub offers free, secure parking for up to 82 bicycles, including bays for e-cargo bikes.⁹⁹ There is a comprehensive programme of on-street cycle parking in the borough including the rollout of over 150 cycle parking hangars.
- 14.3.23. Cycling in the Hammersmith & Fulham is also supported by the availability of Santander Cycles, London's public bike-sharing scheme, at 61 docking stations throughout the borough as well the dockless e-bike rental scheme with a network of virtual e-bike parking hubs across the borough.¹⁰⁰

⁹⁸ Opencyclemap (no date) '*Cycle Map*' can be accessed through [this link](#).

⁹⁹ Hammersmith & Fulham Council (no date). '*Hammersmith Cycle Hub*' can be accessed through [this link](#).

¹⁰⁰ TFL (no date). '*Hammersmith & Fulham*' can be accessed through [this link](#).

- 14.3.24. Hammersmith and Fulham is a participating borough in the London E-scooter Rental Trial and there are multiple e-scooter parking hubs across the borough.
- 14.3.25. Hammersmith & Fulham has high levels of active travel (walking, cycling and wheeling) amongst its population; however, it could be much higher and further work is required to promote walking, cycling and wheeling, particularly through the delivery of a safe and continuous network of active travel routes across the borough. In line with the Mayor's Transport Strategy the Council is working to reduce car dependency and increase active and public transport use.
- 14.3.26. The River Thames also plays a role through the provision of transport services via riverboat services stopping at piers and freight being loaded at wharves along the river. There is also a continuous walking and cycling route along the length of the riverside in the borough. The presence of the River Thames also affects the accessibility of areas of the borough by severing areas to the south meaning there is reliance on the limited number of bridges over the river to access services to the south of the Thames.

Future Baseline

- 14.3.27. Hammersmith & Fulham is expected to see continued population growth, driven by new developments such as those in the emerging HFLP. As the population increases, there will be greater demand for transport services and infrastructure.
- 14.3.28. Several planned or proposed transport improvements will have mixed effects on the transport network in Hammersmith & Fulham. These include:
- Investment in sustainable transport networks, such as bus priority schemes and expanded cycle routes, is expected to encourage more active travel and reduce reliance on private car usage. Initiatives outlined in the Mayor's Transport Strategy and the Borough's own Local Plan include the promotion of safer and more accessible cycle infrastructure, especially around urban centres.
 - Proposals for the expansion of neighbourhood improvement schemes, such as those on Rivercourt Road,¹⁰¹ are anticipated to reduce congestion and improve the flow of traffic. However, increased car ownership and travel demand may offset these gains, potentially leading to continued traffic pressure on the road network, particularly during peak times.
 - A new station in the north of the borough (Old Oak Common Station) is currently under construction to serve the High Speed 2 rail link and it will act as a terminus for the route for an interim period. It will have a significant impact on the accessibility of the north of the borough to public transport services with the new station providing access to the

¹⁰¹ Hammersmith & Fulham Council (2024). 'Making Rivercourt Road safer' can be accessed through [this link](#).

Elizabeth Line, HS2 services, GWR services and potentially Chiltern and the Mildmay Overground services. The current proposals for local surface transport connections to the new station by bus, walking and cycling, however, are considered to be underdeveloped and risk undermining the potential benefits the new station may bring.

- The potential reopening of Hammersmith Bridge for active travel users (including a resurfaced cycle lane) would improve the local active travel network.
- Placemaking proposals for the borough's main town centres and growth areas such as Shepherd's Bush Green and Hammersmith Broadway. Currently these locations are dominated by vehicular traffic and the importance of people and place is reduced. There is a need to reduce traffic dominance and flows in these locations and reallocate roadspace to placemaking.

14.3.29. Climate change will impact Hammersmith & Fulham's transport network, with extreme weather increasing risks like flooding, road damage, and public transport disruptions. Heavy rainfall may waterlog roads, while extreme heat could degrade surfaces and affect rail reliability, potentially leading to greater car dependency, congestion, and emissions. To mitigate these risks, the draft Transport Strategy will integrate climate resilience measures and promote sustainable travel options.

14.4. Key Issues

14.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Transportation:

- The existing rail services in Hammersmith & Fulham serve a growing demand, with the borough's stations showing a steady increase in usage since 2020. Continued development in the borough will further strain these services, potentially requiring improvements to capacity and frequency to avoid overcrowding and maintain accessibility;
- Several stations in the borough do not have step free access, creating a barrier for many users and reduced accessibility. Working with TfL and government to secure funding to make these stations step free needs to be a priority;
- Hammersmith & Fulham's bus network is extensive but may also become strained as the population grows. More frequent bus services may be needed (especially north-south links, and access to transport at the edge of neighbourhoods) to ensure that public transport is an attractive option for residents, reducing reliance on private cars. Extensive bus priority measures and general traffic reduction will be required to improve bus speeds and journey time reliability to encourage increased patronage;

- Hammersmith & Fulham has a developing network of cycle routes and footpaths but there is significant need for improvement, particularly if cycling is to become an attractive option for a diverse range of people; further investment in active travel infrastructure will be important to reduce car dependency and to reduce casualties caused by collisions on the highway;
- Access to the new Old Oak Common Station needs to be significantly improved by active travel, bus and rail modes. In particular, accessibility to the station from the east needs to be improved with direct and convenient active travel links to the station identified from Scrubs Lane. Scrubs Lane and the Mitre Bridge also require significant upgrade and improvements to make them safer and more accessible for pedestrians, cyclists and bus users. A direct rail connection on the West London Line linking Clapham Junction with Old Oak Common Station campus would also be beneficial, connecting the growth zones of South Fulham, Earls Court/West Brompton, Kensington Olympia and Shepherd's Bush/White City with the HS2 Old Oak Common Station.
- Hammersmith & Fulham's major roads are vulnerable to congestion, particularly during peak hours. Development in the borough could exacerbate this, and strategies will need to be implemented to manage traffic flow and reduce congestion, such as car free developments, investigating vehicle through-traffic restrictions, freight consolidation, delivery and servicing plans, improved public transport infrastructure and services and improved facilities for active travel promoting alternative transport modes and road upgrades; and
- Increased extreme weather events, such as flooding and heatwaves, pose risks to the transport network. It is important that future transport planning incorporates climate resilience measures to safeguard infrastructure and maintain the reliability of services.

14.5. IIA Objective

- 14.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Transportation:

Promote sustainable transport use and reduce the need to travel.

15. Water

15.1. Focus of Theme

- 15.1.1. This theme focuses on water supply resources and water quality (including wastewater treatment) in Hammersmith & Fulham.

15.2. Policy Context

- 15.2.1. **Table 15-1** presents the most relevant documents identified in the policy review for the purposes of the IIA.

Table 15-1: Plans, Policies and Strategies Reviewed in Relation to Water

Document Title	Year of Publication
National	
National Planning Policy Framework (NPPF)	2024
<u>The 25 Year Environment Plan</u>	2018
<u>Future Water: The government's water strategy for England</u>	2011
<u>Water for Life</u>	2011
Local	
<u>Thames Water: Water Resources Management Plan 2024</u>	2024
<u>The London Plan</u>	2021
<u>Hammersmith & Fulham Local Plan 2018</u>	2018

- 15.2.2. The key messages emerging from the review are summarised below:

- The HFLP will be required to be in general conformity with the NPPF, which seeks to improve the water environment and recognises the wider benefits of natural capital and derived from ecosystem services. Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect;
- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims for clean and plentiful water and reduced risk from environmental hazards. This includes measures to restore and protect peatlands, use water more sustainably, reduce pollution, and minimise environmental impacts. This leads national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies; and

- The Thames Water: Water Resources Management Plan 2024 outlines the company's strategy to ensure a sustainable supply of water for its customers over the next 50 years. The Plan addresses future water demand, the impacts of climate change, population growth, and potential changes in the environment. It proposes measures to maintain water availability, improve efficiency, and reduce the risk of shortages. The Plan includes initiatives such as enhancing infrastructure, exploring new water sources, and promoting water conservation.

15.3. Baseline Summary

Current Baseline

Water Quality

- 15.3.1. The borough is located within the Thames River Basin District, and the London Management Catchment. The borough does not fall within an operational catchment area or any water body areas.
- 15.3.2. The River Thames, on the borough's southern border, falls within its own Thames TraC Management Catchment, Tidal Thames Operational Catchment, and the Thames Upper Water Body, which has a moderate ecological status but a failed chemical status due to the presence of priority hazardous substances.
- 15.3.3. London's rivers are heavily urbanised and consequently are severely modified. London also suffers from significant issues related to urban diffuse pollution. The high population requires large volumes of water to be abstracted from rivers and then returned through Sewage Treatment Works. The scale of issues means that the cost of achieving good status in London is around £400 million.¹⁰² It should be noted that these costs are based on a 2015 report and are therefore likely to have increased significantly to reflect current prices.

Water Resources

- 15.3.4. In England, watercourses can be designated as 'main rivers'. These are usually larger rivers and streams, and are managed by The Environment Agency. The only designated main river in Hammersmith & Fulham is the River Thames, which forms the borough's southern boundary and serves as an important transport and industrial waterway.
- 15.3.5. Rivers that are not designated as main rivers are known as 'ordinary watercourses', and are instead managed by lead local flood authorities, district councils and internal drainage boards. However, these are not present in Hammersmith & Fulham.

¹⁰² Thames21 (2015). 'The London Management Catchment' can be accessed through [this link](#).

- 15.3.6. There are a limited number of waterbodies found in Hammersmith & Fulham, with the most notable being the Paddington Arm of the Grand Union Canal, which passes through the north of the borough.
- 15.3.7. The borough does not overlap with any significant aquifers and has limited reliance on groundwater resources.
- 15.3.8. In relation to water resources, the borough is served by Thames Water. The Environment Agency have published a document entitled 'Water Stressed Areas – 2021 classification' which included a map of England, identifying areas of relative water stress. In this regard, the whole of Thames Water's supply area is shown as an area of 'Serious' water stress, based upon the amount of water available per person both now and in the future.¹⁰³
- 15.3.9. Within their Water Resource Management Plans (WRMPs) water companies refer to their Water Resource Zones (WRZs). WRZs are the largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experience the same risk of supply failure from a resource failure. In this respect, the borough falls within the London WRZ, which experiences pressures due to climate change and population growth.

Combined Sewer Overflows

- 15.3.10. The borough is served by an aging combined sewer system, designed in the Victorian era. This can lead to Combined Sewer Overflows (CSOs) during periods of heavy rainfall. These events can result in untreated wastewater discharging into the River Thames, posing risks to water quality and aquatic ecosystems. CSOs are particularly problematic in urban areas like Hammersmith & Fulham, where the sewer infrastructure is under pressure due to high population density and stormwater runoff.¹⁰⁴
- 15.3.11. The Thames Tideway Tunnel, a major infrastructure project, has now been completed and is fully operational. The tunnel significantly reduces the frequency and volume of CSOs entering the River Thames. As a result, water quality in the Thames and other local watercourses is expected to improve, with the tunnel contributing to enhanced resilience against flooding and wastewater pollution in the borough, while reducing pressure on the existing sewer network.¹⁰⁵

¹⁰³ Environment Agency and DEFRA (2021) '*Water stressed areas – 2021 classification*' can be accessed through [this link](#).

¹⁰⁴ Thames21 (2023). '*Combined sewer overflows, explained*' can be accessed through [this link](#).

¹⁰⁵ Tideway (2025). '*Home*' can be accessed through [this link](#).

Future Baseline

- 15.3.12. Future development has the potential to affect water quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification. Thames Water are likely to maintain adequate water services over the HFLP period; therefore, it will be important for new development to avoid negative impacts on water quality, and instead contribute to reducing consumption and improving efficiency.
- 15.3.13. It is also noted that the requirements of the Water Framework Directive, as transposed into national legislation, are likely to lead to continued improvements to water quality within the HFLP and wider area. However, it will nonetheless be important for new development to avoid impacts on water quality, and support demand management measures by contributing to reduced consumption and improved efficiency.
- 15.3.14. Climate change is expected to have significant implications for water resources in Hammersmith & Fulham, exacerbating existing pressures on both water availability and quality. Rising temperatures and changing rainfall patterns could lead to more frequent droughts, reducing river flows and increasing competition for already scarce water supplies in the area. More intense rainfall events may also result in increased surface water runoff, heightening the risk of pollution in local watercourses.

15.4. Key Issues

- 15.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Water:
- The River Thames currently has a moderate ecological status (2022). Future development must ensure no further deterioration and should contribute to achieving good ecological status as required by the Water Framework Directive;
 - Urban diffuse pollution and the high demand for water in London contribute to significant water quality issues for the River Thames;
 - The borough faces pressures on its sewer system, which can result in Combined Sewer Overflows (CSOs), leading to untreated wastewater entering the River Thames and affecting water quality and ecosystems. However, the risk of CSOs occurring has reduced since the completion of the Thames Tideway Tunnel;
 - Increased housing and associated infrastructure could lead to higher water consumption and wastewater generation, which may place additional pressures on local watercourses and sewers; and
 - The borough is situated within a serious water stress area, with challenges related to both the availability and sustainability of water resources exacerbated by climate change and population growth. New

development should consider sustainable water management, including rainwater harvesting, greywater recycling, and water-efficient appliances.

15.5. IIA Objective

- 15.5.1. Considering the key issues discussed above, it is proposed that the IIA should include the following objective in relation to Water:

Protect and enhance water quality and resources, ensuring sustainable water management to support current and future needs while reducing pollution risks.

16. Next Steps

16.1. SEA Stages

16.1.1. Scoping (the current stage) is the second stage of the SEA process:

- Screening;
- Scoping;
- Assess reasonable alternatives (to inform preparation of the draft plan); and
- Prepare the Environmental Report (to inform consultation and plan finalisation).

16.1.2. The next stage will involve appraising reasonable alternatives for the HFLP. The findings of the appraisal of these alternatives will be fed back to the Council so that they might be considered when preparing the draft plan.

16.1.3. Once the draft ('pre-submission version') plan has been prepared by the Council, it will be subjected to SEA and the Environmental Report prepared for consultation alongside it.

16.1.4. Following consultation on the draft Local Plan and the Environmental Report, the Local Plan will be finalised and submitted for Independent Examination.

16.2. Consultation on the Scoping Report

16.2.1. Public involvement through consultation is a key element of the SEA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.

16.2.2. The statutory consultation bodies are the Environment Agency, Historic England, and Natural England. This scoping report has been released to these three statutory consultees.

16.2.3. Consultees are invited to comment on the content of this scoping report, particularly the evidence base for the SEA, the identified key issues, and the proposed SEA Framework.

16.2.4. The consultation period runs from 09.06.2025 to 14.07.2025. Comments on the scoping report should be sent to:

Antonio Vinti, AECOM

Email address: antonio.vinti@aecom.com

16.2.5. All comments received on the scoping report will be reviewed and will influence the development of the SEA where appropriate.

Appendix A Proposed IIA Framework

- 16.2.6. The IIA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for a range of IIA themes (as set out in **Chapters 2-15**).
- 16.2.7. The framework consists of a set of headline objectives and supporting assessment questions, which will be used to appraise the environmental effects of the draft Plan (and reasonable alternatives).
- 16.2.8. **Table A.1** below outlines the proposed IIA framework, bringing together the objectives and assessment questions that have been set out at the end of each IIA theme.

Table A.1: Proposed IIA Framework

IIA Theme	IIA Objective
Air Quality	Improve air quality and reduce exposure to air pollution.
Biodiversity and Green/Blue Infrastructure	Maintain and enhance the extent and quality of biodiversity habitats and networks within and surrounding the borough.
Climate Change Adaptation	Support resilience to the potential effects of climate change, including flood risk.
Climate Change Mitigation	Mitigate climate change by supporting decarbonisation, with a focus on both transport and the built environment.
Communities 1: Accessibility	Improve accessibility to essential services and facilities across the borough.
Communities 2: Equality	Promote equality, social inclusion, and opportunities for all, ensuring that diverse needs are met across Hammersmith & Fulham's communities.
Communities 3: Health, wellbeing and safety	Promote and protect health, wellbeing, and safety by ensuring access to healthcare, reducing health inequalities, improving road safety, enhancing green infrastructure, and creating safe and sustainable communities.
Economy and employment	Support a productive, diverse and resilient economy that provides opportunities for all.
Historic Environment	Protect, conserve and enhance the historic environment within and surrounding the borough.
Housing	Provide for the full range of housing needs and maximise delivery of affordable housing.

IIA Theme	IIA Objective
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including green infrastructure corridors.
Resources	Protect mineral resources and manage waste effectively.
Transport	Promote sustainable transport use and reduce the need to travel.
Water	Protect and enhance water quality and resources, ensuring sustainable water management to support current and future needs while reducing pollution risks.

