



London Borough of Hammersmith & Fulham

COUNCIL

23 OCTOBER 2013

WHITE CITY OPPORTUNITY AREA PLANNING FRAMEWORK (WCOAPF)

**Report of the Cabinet Member for Transport and Technical Services:
Councillor Victoria Brocklebank-Fowler**

Open Report

Classification: For Decision

Key Decision: No

Wards Affected:

College Park & Old Oak; Wormholt and White City; Shepherd's Bush Green; and Addison

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1. EXECUTIVE SUMMARY

- 1.1. This report seeks a resolution to adopt the White City Opportunity Area Planning Framework (WCOAPF) as a Supplementary Planning Document to the Council's adopted Core Strategy 2011. The Mayor of London will be publishing the WCOAPF as Supplementary Planning Guidance (SPG) to the London Plan. This report highlights the key elements within each chapter of the WCOAPF. It also outlines key issues raised during the statutory public consultation undertaken from 21 June to 2 August 2013 and how these comments have influenced the final draft.
- 1.2. Attached to the report is the WCOAPF (Appendix 1); a summary of the main issues raised in the representations received during the statutory public consultation period that took place between 21 June and 2 August 2013 (Appendix 2); a track changed version of the WCOAPF highlighting changes made to the document in response to comments received during the consultation exercise (Appendix 3); and Integrated Impact Assessment that incorporates the Equalities Impact Assessment combined with a Sustainability Appraisal and Strategic Environment Assessment (Appendix 4).

2. RECOMMENDATIONS

- 2.1. That the White City Opportunity Area Planning Framework (WCOAPF) (Appendix 1) as a Supplementary Planning Document be adopted.

3. REASONS FOR DECISION

- 3.1 The WCOAPF has been through extensive public consultation in line with the Regulations. It has been through two rounds of public consultation, the first in April – June 2011 and the second (statutory) round in June – August 2013. The consultation met the requirements set down in planning legislation and was also in accordance with the council's Statement of Community Involvement (SCI) and gave a broad range of people the opportunity to comment and influence the final version of the WCOAPF.
- 3.2 Many sites within the White City Opportunity Area (WCOA) are coming forward for redevelopment hence the importance of moving the WCOAPF forward for adoption, putting in place more detailed guidance to assist in steering future development in the area in line with the Strategic Policy for White City in the Core Strategy. Adoption of the WCOAPF as an SPD will give it more weight in making planning decisions.

4. INTRODUCTION AND BACKGROUND

- 4.1 The WCOA covers approximately 110 hectares (272 acres) on the eastern edge of LBHF along the boundary with Royal Borough of Kensington and Chelsea (RBKC). The area is roughly bounded to the east by the West Cross Route (A3220), Sulgrave Road to the south, Bloemfontein Road to the west and Shinfield Street to the north.
- 4.2 The area is identified as an OA in the London Plan and a Regeneration Area in the Core Strategy. The WCOAPF will provide additional guidance to supplement the London Plan, Core Strategy and Development Management Local Plan policy and focuses on the environmental, social, economic and design objectives that apply to development within the area. The WCOAPF also presents an indicative masterplan on how the area could deliver the proposed 10,000 new jobs and 5,000 additional homes identified in the Core Strategy over the next 20 years.
- 4.3 While the WCOAPF will not form part of the statutory development plan for the borough, it will be a material planning consideration when determining applications in the area.

5 WCOAPF - SUMMARY OF CHAPTERS

5.1 Introduction

- Advises of the preparation and status of the document as Supplementary Planning Guidance (SPG) to the London Plan and Supplementary Planning Document (SPD) to the Core Strategy prepared jointly between LBHF and the GLA in partnership with TfL.
- WCOAPF covers approximately 110 hectares divided into 3 sub areas: White City East, Shepherds Bush Town Centre and White City West.
- It sets out the growth targets for the area, 10,000 additional jobs and 5,000 new homes over the plan period of 20 years (in line with Core Strategy).
- It sets the Key Objectives for regeneration including: the creation of new housing; increased employment opportunities; maximised connectivity enhanced social and community facilities; high quality public realm/open space; and innovative sustainable energy solutions

5.2 Land Use

- Employment – focus on the creative, academic, technology and retail sectors linked to key companies/institutions already present in the area: the BBC, Imperial College and Westfield.
- Housing – seeks a range of unit sizes and tenures with a specific requirement for family accommodation. The Core Strategy sets out a target that 40% of housing should be affordable. Viability testing within the DIFS established that due to high infrastructure costs 15% affordable housing might be all that could be delivered in the current climate (subject to detailed developer viabilities).
- There are no proposals for the redevelopment of the estates in White City however new social rented housing in White City East will accommodate those tenants from White City West who wish to move in line with the Core Strategy.
- Metropolitan centre objectives – maintain Shepherds Bush Town Centre as a Metropolitan centre linking its three retail anchors (Westfield, W12 centre and Shepherds Bush Market) emphasising its leisure and cultural importance.

5.3 Urban Design

This chapter sets out the urban design and conservation objectives:

- Creating areas of new public realm and open space - seeking a new high quality area of public open space in the heart of the Opportunity Area.
- Maximising Connectivity – Linking the new community to the surrounding area with a series of well thought out streets and overcome barriers created by the Westway, A3220, West London Line, the Central Line cutting and Hammersmith and City Line viaduct.
- Quality urban design that responds to context – the majority of buildings at a height of 6-10 storeys, some low rise terraces adjacent to existing neighbourhoods. Taller buildings would be more appropriate along the elevated Westway, where they would act as a point of identification.

An indicative masterplan for White City East is included to assist developers.

5.4 **Transport**

This chapter summarises the key transport interventions:

- Reduce the impact of existing barriers to movement and build on the areas good network of strategic and local connections.
- Ensure timely and phased interventions are put in place to accommodate increased travel demand from development. (junction improvements at key highway congestion hotspots, Bloemfontein Road/Uxbridge Road, Shepherd's Bush Green/Uxbridge Road and Shepherd's Bush Green/Goldhawk Road).
- Encourage a shift towards walking, cycling and public transport and deliver improved accessibility to the public transport network.
- Identify required transport infrastructure improvements at key interchanges such as Shepherd's Bush station and junction improvements.

5.5 **Social Infrastructure and Employment**

This chapter details the social infrastructure required to support the proposed increase in homes and jobs:

- Education – One form of entry at primary school and secondary school and support for early year's nursery provision for low income families.
- Health – Facilities for up to 5 GPs and possibly dentists.
- Recreation sports and fitness facilities – new provision or enhancing access to existing facilities including support for low income families.
- Community Safety – measures to enhance safety and security.
- Local Labour – Target 15% of construction jobs for traineeship and 10% apprentices. Target 10% of all labour should live within LBHF.
- Support for Businesses – Maximise procurement opportunities for local businesses. Start-up business space and engagement activities.

5.6 **Environmental Strategy**

- Energy – Address the shortfall in electricity capacity at WCOA, move towards zero carbon development and connection to a District Heating network.
- Waste – Developers are encouraged to jointly consider installation of an Automated Waste Collection System.
- Ecology and Biodiversity – Protecting and enhancing existing nature Conservation Areas, Sites of Importance for Nature Conservation (SINCs) and Green Corridors.

5.7 **Delivery and Implementation**

This chapter presents the outcomes from the Development Infrastructure Funding study (DIFS) and Strategic Transport study undertaken to identify, quantify and prioritise the infrastructure to support the proposed growth.

The DIFS investigated:

- infrastructure necessary to support development in White City East for 20 years;
- the overall cost of delivering the infrastructure;
- the amount that each development is likely to be able to contribute towards infrastructure and affordable housing without adversely affecting development viability;
- which infrastructure elements should have funding priority and how any potential gap in funding might be addressed; and
- recommended a tariff rate that could be acceptable to achieve the infrastructure elements deemed critical to achieve regeneration.

The study concluded that, given the current economic circumstances and without any grant, residential development in the area could not meet the 40% affordable housing target and at the same time make sufficient contribution to infrastructure costs needed to support the development. However, at 15% affordable housing, the study revealed that development should be able to fund most essential infrastructure costs. The total estimated essential infrastructure costs come to £56.9Million.

As the Council is intending to introduce a Borough wide Community Infrastructure Levy (CIL) from Spring 2014 (implementation date subject to change) this would be likely to take over from S106 contributions as the principal mechanism for developers to contribute to infrastructure in WCOA. Until the Borough CIL is implemented, Section 106 will continue as the mechanism by which developer contributions are captured, and post CIL, S106 will still have a role.

6 Supporting Evidence Documents

A number of supporting documents have been produced in order to inform the WCOAPF. A summary of each document is set out below;

- 6.1 **Strategic Transport Study** – produced by TfL supported by the GLA and LBHF it provides the transport evidence base for WCOAPF. It considered existing transport conditions and the impact of the development proposed on the transport network. A series of transport measures are identified as required to support growth in the Opportunity Area.
- 6.2 **Townscape and Views Analysis** - a study of 21 views surrounding the Opportunity Area focussing on the impact of the proposals on 5 key sites within WCOA. This study has informed the indicative building heights in the Urban Design Chapter.
- 6.3 **Development Infrastructure Funding Study (DIFS)** - considered the necessary infrastructure required to support the proposed growth in homes and jobs in the Opportunity Area and an assessment of the extent to which development could fund this having regard to viability.

- 6.4 **Integrated Impact Assessment (Appendix 4 of this report)** - incorporates the Equality Impact Assessment that assesses the potential impact of the WCOAPF on a number of identified Equality Groups. Also includes the Sustainability Appraisal that assesses the impact of the document on a range of environmental, social and economic criteria.
- 6.5 **Statement of Consultation** – A statement setting out those who were consulted in preparation of the WCOAPF, how the consultations were carried out, a summary of the main issues raised in those consultations (the Consultation Summary Report) and how the representations have been addressed in WCOAPF (the Consultation Responses Schedule).
- 6.6 **Consultation Summary Report (Appendix 2 of this report)** - provides a summary of the comments raised during the statutory consultation period.
- 6.7 **Consultation Response Schedules** – sets out the comments received during the statutory consultation and officer's responses to these comments.

7 KEY ISSUES ARISING FROM STATUTORY CONSULTATION AND OFFICERS' RESPONSE INCLUDING AMENDMENTS MADE TO THE SPD

7.1 Stable Way Travellers site

Summary of Comments Made

- The Stable Way community has sought a way for the community at Stable Way to be part of this OA – given its proximity to the development and LBHF's historic and current link in discharging its duty to providing Gypsy and Traveller provision.

Response

- The SPD process is unable to change the boundary of the OA, which is established in the Council's Core Strategy. However one of the WCOAPF's objectives is to improve connectivity between the OA and its surrounding hinterland, including a new tunnel connection to the east immediately to the north of the Stable Way traveller site and a pedestrian link over the West London Line. This improved connectivity will assist in accessing jobs, training, social and leisure facilities in the OA.

7.2 Housing

Summary of Comments Made

- Considerable concern has been raised that only 15% affordable housing could be achieved (as anticipated in the DIFS) rather than the 40% identified as the target in the Core Strategy.

- Concern has been expressed that the lack of affordable housing in recent planning decisions in White City East will mean that the regeneration of the estates will never happen.

- There are also objections to any existing White City social-rented homes being converted to other forms of tenure, where social-tenants move to new homes in White City East.
- Concern regarding no reference to the need for supported housing or extra care housing in the area.
- Concern that a number of properties in White City East will be bought as investment properties and will not contribute to creating a vibrant community.

Response

- The 40% affordable housing target remains and is still the target set out in the Core Strategy. The DIF study was identifying that due to the high infrastructure costs involved in developing sites in WCOA developers may not always be possible to provide affordable housing at 40%. All housing schemes will need to be accompanied by financial viability assessments to justify levels of affordable housing provision.
- No proposals are included in the document for the regeneration of the estates and existing residents would need to be consulted on any proposals. In order to provide a mixed and balanced community options would be discussed with local residents to vary the mix of tenures available in the estates.
- Wording has been added to the SPD referencing the potential for supported and extra care housing to be provided within the OA, subject to need.
- The SPD is not the right place for consideration to be given to the issue of dwellings being bought as investment properties. However, the Council is undertaking a review of its Local Plan and will consider the issue as part of this process.

7.3 **Land Use**

Summary of Comments Made

- Concern raised regarding the additional 45,000sqm retail proposed and the detrimental impact this will have on neighbouring centres, specifically High Street Kensington in RBKC.
- Office provision of 182,000sqm is proposed but further clarity is required regarding how this fits within growth plans for the whole of the Borough to ensure there is not unused office space.
- The document is currently silent on how to deal with existing employment or businesses that will be displaced as the result of development.

Response

- The table in the Core Strategy on page 39 provides the West London Retail Needs Study (WLRNS) 2010 as the source for the 45,000 figure for Shepherds Bush. The WLRNS 2010 justifies the large amount of comparison floorspace up to 2021, based primarily on the town centre's proposed (and now agreed) metropolitan centre status. Impact on other centres was also assessed in the WLRNS report.
- The Council's Core Strategy was supported by an Employment Land Assessment (2010). This assessment tested the provision of 180,000sqm of employment floorspace within the White City

Opportunity Area and no concerns were raised in this assessment that this quantum of office floorspace would have a detrimental impact on other employment centres.

- Although there will be some loss of employment on sites as they come forward for redevelopment, significant replacement employment is proposed that conforms to Core Strategy Strategic Policy LE1 which will be used to help assess proposals at planning application stage.

7.4 **Building Heights**

Summary of Comments Made

- The overwhelming concern expressed relates to guidance in the WCOAPF regarding building heights. Whilst there is some support for more flexibility regarding where tall buildings can be located in the opportunity area the majority oppose the building heights as being excessive and express concern regarding their impact on surrounding areas especially the impact on conservation areas.

- Of most concern are the two towers proposed in the indicative masterplan on either side of the Westway and their detrimental effect on the skyline and their impact on local residents to the north and east including residents in RBKC and the Stable Way traveller's site. There is mention made of the recent Imperial College purchase of the former Dairy Crest site and the opportunity this presents to move away from the proposed tower on the site under the Helical Bar/ Aviva proposed scheme that has a resolution to grant planning permission.

- Other comments raise concern regarding the tall building identified next to BBC TV Centre and the impact this will have on the TV Centre Grade 2 listed building.

- A number of comments raised concern that the Townscape View Analysis supporting document is flawed and has underestimated the impact of tall buildings on views outside the opportunity area.

- Request that housing densities should not exceed the guidance in the London Plan.

- Concern that the impact tall buildings will have on historical buildings and other important designations has not been adequately considered for example the setting of the Dimco building.

Response

- The approach to tall buildings in WCOAPF is supported by policy at a National, Regional and Local level and specific guidance relating to tall buildings:

- At National level – Central Government guidance is found in the National Planning Policy Framework. The framework encourages local authorities to proactively drive and support sustainable economic development and identify the development needs of an area in the plan-making process and then respond positively to the opportunities for growth.
- In terms of Regional Policy, the development needs of the White City area was identified as policy in the London Plan and the GLA are our partners in the production of the WCOAPF and share the Boroughs vision for the area. In terms of tall buildings, the London Plan recognises that individually or as a group, tall

buildings can improve the legibility of an area by emphasising a point of visual significance and where appropriate can enhance the skyline and image of London at key locations. It recognises that tall buildings can make a significant contribution to local regeneration.

- At a local level, the Council in its Core Strategy has identified the White City Opportunity Area as an area for significant regeneration and states that it may be a suitable location for buildings of a greater scale, and some tall buildings.

- In terms of guidance on Tall Buildings the joint national guidance produced by English Heritage and CABI is relevant. The guidance states that in the right place tall buildings can make a positive contribution to the identity of areas and the skyline generally, and that they can be excellent works of architecture in their own right. The guidance goes on to say that they can serve as beacons of regeneration.

- As part of the production of the Core Strategy, officers undertook a townscape assessment of the whole of the Borough and also a desk-based tall buildings study which built upon the advice in English Heritage and CABI guidance. Both opportunities for, and constraints which serve against the location of tall buildings, were mapped in an exercise to identify areas in the borough where tall buildings may be appropriate. The method, analysis and conclusions were supported by the Inspector at the Examination in Public into the Strategy. The results were fed into policy BE1 of the Core Strategy which concluded that most parts of the borough would be inappropriate for tall building but identified four areas which included parts of the White City Opportunity Area as being appropriate for tall buildings.

- The Core Strategy Strategic Policy WCOA developed this further and identifies the area close to the A40 and A3220 as potential locations. The locations identified have been tested in a range of views both within and outside of conservation areas, and both within LBHF and RBKC, in order to assess potential impact. The assessments were undertaken using nationally agreed methodology. The impacts on surrounding heritage assets e.g. conservation areas, listed buildings and locally designated buildings of merit were assessed against the proposed massing masterplan and found to be acceptable. The massing and urban design proposals are soundly based on policy and are the product of an adopted methodology of impact assessment.

- The housing density matrix in the London Plan is for guidance only. The indicative masterplan has been based on Scenario B which is within the range set in the London Plan density matrix.

7.5 **Open Space and Public Realm**

Summary of Comments Made

- The proposed new area of public open space in the centre of the opportunity area, "White City Green" should not be allowed to be compromised and downgraded by the developers.

- Concern was expressed regarding the current lack of open space in the opportunity area and whether the proposals will adequately provide for this shortfall and support the new population. Is the size of the new

public open space “White City Green” sufficient to address any deficiency?

- Concern regarding the tall buildings proposed close to “White City Green” and the detrimental impact this will have on the quality of the open space.
- All new open spaces in White City East should be open to the public and not closed to residents only.
- Support for the green link/ecology corridor along the West London Line but more clarity required regarding levels, security and accessibility.

Response

- White City Green will provide the focus of the public realm in the area. It is envisaged that it will be largest area of open space in the opportunity area, and will be connected to other areas of publicly accessible open space in each of the redevelopment areas. The objective is a series of connected green spaces which would link Shepherds Bush Common in the south to Wormwood Scrubs to the north.
- The whole of White City East is identified as an area deficient in access to open space which is why the WCOAPF proposes a new large area of public open space in the centre of the WCOA.
- The new open space will be of high quality design in terms of its hard and soft landscaping and it is envisaged that its edge will be defined by a series of high quality buildings of an appropriate scale to give a sense of containment and contribute to the sense of place, whilst not overwhelming the space.
- The provision of the green link / ecology corridor is promoted in the framework. Details of its design in terms of levels, security and accessibility will be sought in all proposals for development.

7.6 **Transport**

Summary of Comments Made

- The main issue raised in the comments made is that there should be proposals in WCOAPF for a new railway station on North Pole Road on the West London Line.
- Step free access at White City underground station should be essential not desirable.
- Concern regarding the impact of growth resulting in increased traffic congestion around Holland Park roundabout, and on Wood Lane specifically the North Pole Road/Scrubs Lane junction.

Response

- TfL has investigated the provision of a new station on the West London Line at North Pole Road and it is understood their preferred option would be to construct a new station at Old Oak to maximise interchange potential with other rail lines.
- Infrastructure in the DIFS had to be prioritised to be able to support the level of development anticipated in Scenario B for the WCOA. Every effort has and will continue to be made to secure the maximum contribution from developments.

- The traffic modelling carried out as part of the Transport Study included Holland Park roundabout and does not require any interventions to it to support the level of development anticipated in Scenario B. Junction reconfiguration was investigated, however this was considered impractical due to infrastructure constraints.
- The Scrubs Lane/Wood Lane/North Pole Road junction was also modelled as part of the Transport Study with significant increases in traffic congestion not expected at it. Transport Assessments submitted for approved applications have also modelled this junction and following optimisation of the signal timings at this junction it will operate within capacity.

7.7 **Social, Community and Leisure Infrastructure**

Summary of Comments Made

- Most schools are outside the WCOA so land should be allocated within the WCOA for a new primary and secondary school provision.
- Proposals need to be clearer regarding upgrading sports facilities.
- RBKC is concerned regarding their health, schools and sports facilities close to WCOA that will become overused as the population of WCOA grows. Access to training, employment and apprenticeships should be open to RBKC residents as well.
- Concern that a section of Hammersmith Park has been taken up with a new commercial venture for football which will have very limited facilities for local people.
- There should be money allocated to the youth club.

Response

- The DIFS established that linked to the predicted growth in housing numbers and corresponding child need that one additional form of entry would be required at primary and secondary school. It is not possible to be specific regarding location at this time as the strategic approach needs to be established with bi Borough partners RBKC.
- Further study is required to establish the approach regarding upgrading sports facilities hence the WCOAPF cannot be more specific at this stage.
- The DIFS has fully planned for new facilities that will be required linked to anticipated growth in homes in the WCOA it, has not assumed this demand can be accommodated in adjoining Boroughs. On going discussions will continue RBKC regarding delivery of relevant social, community and leisure infrastructure.

7.8 **Development Infrastructure Funding Study (DIFS)**

Summary of Comments Made

- Concern that tariff levels are too high and will prevent development from coming forward.

Response

- The tariff levels are supported by specific viability evidence in the DIFS, for which no specific comments on the viability assumptions has been received. Chapter 7 of the SPD is clear that viability will be a factor in assessing contributions that can be made.

7.9 SPD or Area Action Plan?

Summary of Comments Made

A number of consultees have stated that the council should have produced an Area Action Plan (AAP) for the area rather than an SPD and that the document could be considered an AAP.

Response

An AAP is not necessary because up to date strategic policies for the Opportunity Area are already set out in the London Plan and Core Strategy. Officers consider that it is appropriate that the WCOAPF, which provides guidance rather than policy, is an SPD. It should also be noted that the council's Local Plan review will provide an opportunity for any policy review if that is considered necessary.

8 CONSULTATION

- 8.1 The WCOA has been identified as a regeneration area throughout the preparation of the Core Strategy, commencing with the Issues and Options stage in 2005. Comments received during the Core Strategy public consultation exercises, including representations on the Proposed Submission Core Strategy 2010 have informed the WCOAPF.
- 8.2 The WCOAPF has been through two rounds of public consultation. An early draft of the WCOAPF underwent a comprehensive public consultation exercise from 8 April to 10 June 2011. A total of 291 responses were received which informed the updated version of the WCOAPF.
- 8.3 Statutory Consultation Process
This statutory consultation took place over 6 weeks commencing on 21 June and ending on 2 August 2013. Several consultation techniques were used to engage the public and interested parties and encourage feedback namely:
- Consultation newsletter distributed to properties in and around the regeneration area.
 - Press release encouraging people to have their say.
 - Availability of WCOAPF for inspection at several locations including local libraries, White City Community Centre, LBHF Duty Planner office and GLA office.
 - Notified by letter/email those who commented on the first draft of WCOAPF.
 - 1,500 letters sent to statutory consultees and individuals and groups on the LBHF Local Development Framework database including special interest groups and resident organisations.
 - Website launched on 21 June 2013.
 - Presentations were made to White City Neighbourhood Forum and Hafad and meetings were held with representatives from a number of amenity groups and residents organisations. A meeting also took place with RBKC.

- 8.4 56 written responses were received from a wide range of respondents including local amenity groups, local residents and businesses, resident groups, landowners, developers, statutory organisations and a range of special interest groups.
- 8.5 The responses to the second draft of the WCOAPF have been considered and where appropriate, they have informed the production of the final SPD (see Appendix 3 of this report for a track changed version of WCOAPF). A summary of the consultation responses is appended to this report (Appendix 2).
- 8.6 In accordance with Regulation 14 of The Town and Country Planning (Local Planning) Regulations 2012 once adopted, the SPD must be made available during normal office hours, together with an adoption statement that specifies the date of adoption and that anyone with sufficient interest in the decision to adopt the SPD may apply, promptly and not later than 3 months after adoption, to the High Court for permission to apply for judicial review of the decision to adopt the SPD. We will also publish the SPD on the council's website and send the adoption statement to anyone who requested to be notified and everyone who has taken part in the consultation. There are also requirements to be followed under the Strategic Environment Assessment Directive 2004.

9 EQUALITY IMPLICATIONS

- 9.1 The Integrated Impact Assessment (IIA), incorporating the Equality Impact Assessment and Sustainability Appraisal has been prepared and is attached to this report (Appendix 4). The IIA was included as a supporting document when the WCOAPF underwent its second (statutory) round of public consultation during June – August 2013. Overall the Sustainability Assessment considers the impact of the WCOAPF to be positive in the medium to long term period, while there are likely to be short term impacts on air, noise and traffic (construction phase). The WCOAPF is in general found to be sound on equality issues. By providing better opportunities for jobs, homes, community facilities and transport network the WCOAPF would have an indirect but positive impact on equality issues.
- 9.2 Three comments were received on the IIA and the document has been updated to address the issues raised. In addition the IIA has been updated to reflect updates made to the WCOAPF in response to comments received.
- 9.3 English Heritage raised concern that the trans-boundary impact of tall buildings on conservation areas had not been properly assessed in the IIA. The IIA (6.13) has been updated to emphasise that the WCOAPF includes considered analysis of the impact of tall buildings and towers at key sites from adjoining areas (including Conservation Areas outside the WCOA) in Appendix 1 'Townscape Views Analysis', and shows

slender towers could be appropriate at specific locations, subject to being considered at planning application stage. The analysis in the WCOAPF concludes that there is not a direct negative impact on the heritage assets and their setting.

- 9.4 Stable Way Resident Association represents the Irish Traveller community living in North Kensington adjacent to the WCOA and raised the following issues;
- a) Concern regarding the height and location of tall buildings and the impact on residential amenity. A representation was also received from Councillor Judith Blakeman RBKC on behalf of a number of North Kensington ward councillors also raising concern regarding this issue.
 - b) Request that both councils commit to improving conditions on site and enable additional provision.
 - c) Desire to be part of the WCOA.

Response to the issues raised;

- a) It is not considered that there will be a negative impact on existing amenity including loss of daylight/sunlight or overshadowing as a result of the proposals in the WCOAPF masterplan.
- b) A bi- Borough Needs Assessment relating to Gypsies and Travellers is currently being prepared and will be considered as part of the Local Plan review.
- c) The SPD process is unable to change the boundary of the WCOA, which is established in the Council's Core Strategy.

In addition the IIA does identify that this community is at present cut off from the WCOA by infrastructure. The WCOA provides for the comprehensive redevelopment of the lands between Wood Lane and West London Line and has potential to have an indirect positive impact on this equality group through the provision of new facilities, services and connectivity into the adjoining WCOAPF area.

10 LEGAL IMPLICATIONS

- 10.1 The Planning and Compulsory Purchase Act 2004 (as amended) requires that the SPD be in general conformity with the London Plan. The Town and Country Planning (Local Planning) Regulations 2012 requires that the SPD must not conflict with the adopted development plan (the London Plan, the Core Strategy and the Development Management Local Plan). The SPD is considered to satisfy these requirements.
- 10.2 The consultation is considered to have been carried out in accordance with the requirements set out in The Town and Country Planning (Local Planning) Regulations 2012.
- 10.3 The post-adoption requirements are set out in paragraph 8.6 of this report.

Implications verified by: Alex Russell, ext: 2771.

11 FINANCIAL AND RESOURCES IMPLICATIONS

- 11.1 This report seeks a resolution to adopt the White City Opportunity Area Planning Framework as a Supplementary Planning Document (SPD) to the Council's Core Strategy (2011). The SPD has been through a rigorous process of statutory public consultation between 21 June until 2 August 2013 and costs incurred during this process have been contained within existing budgets. There are no additional costs associated with adopting the SPD as recommended in this report.

Implications verified by: Gary Hannaway, ext 6071.

12 RISK MANAGEMENT

- 12.1 The subject of the report is not included on a departmental or corporate risk register. Risks will be minimised by ensuring a robust public consultation exercise takes place in line with statutory guidance.

LOCAL GOVERNMENT ACT 2000 **LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT**

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
	None		

List of Appendices

Appendix 1 - White City Opportunity Area Planning Framework (WCOAPF)

Appendix 2 – Consultation Summary Report

Appendix 3 – A track changed version of the White City Opportunity Area Planning Framework highlighting changes made to the document in response to comments received during the statutory consultation exercise.

Appendix 4 - Integrated Impact Assessment (incorporating the Equality Impact Assessment and Sustainability Appraisal).