

White City

Opportunity Area Planning Framework (OAPF)

■

Integrated Impact Assessment (IIA)

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Prepared by Greater London Authority and the London Borough of Hammersmith and Fulham

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Non-technical Summary

This is a non-technical summary of the Impact Assessment (IIA) of White City Opportunity Area Planning Framework (OAPF) which assesses the environmental, social and economic performance of the OAPF against a set of environmental and socio-economic objectives. The following section explains the purpose of IIA, what the OAPF is and provides an outline of the IIA's content and methodology and conclusions. The OAPF is being produced jointly by the Greater London Authority (GLA), the London Borough of Hammersmith and Fulham and Transport for London.

Integrated Impact Assessment (IIA)

The IIA incorporates the statutory responsibilities to undertake for Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA). It also includes an Equalities Impact Assessment (EqIA). This approach provides for a comprehensive assessment, seeks to increase consistency and expediency of assessment work and benefits from a shared understanding of policies.

The **Sustainability Appraisal (SA)** process incorporates the requirements of the European Directive (Directive 2001/42/EC) on the environmental assessment of plans and programmes. The SA covers wider social and economic effects of plans, as well as the more environmentally-focused considerations in the Directive.

The SEA Directive is implemented in England through the Environmental Assessment of Plans and Programmes Regulations 2004. The Directive is procedural in nature and sets out a series of steps that must be undertaken as part of an assessment. The purpose of the SEA is summarised in Article 1:

"To provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adaptation of plans and programmes with a view to promoting sustainable development".

The purpose of an **Equality Impact Assessment (EqIA)** is to help the Council to give the due regard that is necessary, when reviewing or devising strategies, policies and projects by making sure they do not unlawfully discriminate and that, where possible, promote equality of opportunity. This assessment must consider the impacts of any policies upon different Equality groups or 'protected characteristics', as set out by the Equality Act 2010. In adopting the OAPF, the Council will need to give due regard to the equality duty as set out on S149 of the Equality Act 2010. That may or may not involve an EqIA. In this case, EqIA has been carried out as the OAPF sets a strategic framework, on which decisions may be based that will affect the public. Through the integration of an EqIA, the Mayor can ensure that equalities issues are considered in the making of OAPF document.

The preparation of this IIA is subsequent to firstly the IIA of the London Plan as adopted in 2011 (The OAPF is supplementary the London Plan) and then secondly the London Borough of Hammersmith and Fulham, Local Development Framework Core Strategy 2011, Sustainability Appraisal (2011), and Equality Impact Assessment. A Consultation Draft White City OAPF was published in April 2011, with SA and EqIA. In accordance with requirements of the SEA Directive, the 3 Statutory Consultees¹ were invited to comment on the Draft Sustainability Appraisal published in April 2011. The second public consultation period ran from June to August 2013 and further comments were received on the revised OAPF and IIA, which have been reviewed and taken account of in this document.

What is the OAPF?

Covering an area of 110 Ha. White City Opportunity Area is one of 33 opportunity areas identified in the Mayor's London Plan. The primary intent of the OAPF is to provide clearer guidance on the London Plan and Core Strategy policy. The OAPF will help resolve complex planning issues relating to the provision of significant residential and commercial growth. This provides for a new community of some 5,000 homes and 10,000 jobs over the next 15 to 20 years.

The OAPF area comprises established residential communities, commercial centres and brownfield sites (where most of the development potential is focussed). The area benefits from strategic road and rail access. The resident population in the OA is approx. 10,340 (4,310 households) and 24,000 jobs. While many of the objectives of the OAPF pertain to brownfield sites, the IIA must address have specific regard to potential impacts on existing populations, facilities, services and infrastructure.

White City OAPF Objectives:

The White City OAPF provides for the following key elements:

- a) Mixed use commercial development: Offices, hotels, and flexible work spaces to allow the continued growth of creative, media, biomedical, research and development industries building on the presence of the BBC, Imperial College London, Westfield and Hammersmith Hospital.
- b) Town centre: Reinforcement of the metropolitan town centre with a revitalised market, to include significant public leisure, arts, cultural, and entertainment uses in addition to retail. Extension of the above town centre activities northwards to better connect with the area north of

¹ English Heritage, The Environment Agency and Natural England

Westfield, improve the public realm, and provide new north-south connections.

- c) Employment and training: 10,000 new jobs provided throughout the OA. Opportunities will be targeted to local people with initiatives to increase training, apprenticeships, raise aspirations and awareness of job possibilities.
- d) Housing choice and opportunities: In White City East, as well as in select opportunity sites in the rest of the OA, 5,000 new homes inspired by the residential areas of West London to be built, along with additional student housing. A broad range of tenures, house sizes and affordability, including housing that is affordable to young families, middle income earners, key workers, and households who are neither very wealthy nor able to qualify for access to social rented housing.
- e) Social infrastructure: A range of schools, health, leisure, community facilities to support the expanded population across the whole area. Facilities and programmes to promote social inclusion, tackle deprivation, improve access and equalities.
- f) High quality public and private realm: New and improved spaces that enhance local identity, and contribute to a secure, healthy and accessible environment. A large public open space, the White City Green, at the heart of the new mixed-use hub. A network of pedestrian and cycle routes will improve permeability and connectivity; overcome the physical and spatial barriers to achieving regeneration, link sports, leisure, community, health and transport facilities with homes and jobs. Developments and local businesses will contribute to the management and maintenance of the public realm.
- g) Environmental sustainability: Exemplar approaches to sustainable design and construction, linking into area-wide networks to ensure the efficient and sustainable use of resources, and taking a co-ordinated approach to energy, heat, waste, freight, and other environmental strategies.
- h) Transport: Improvements to enable more people to use public transport, walk and cycle with ease, and to tackle local highway congestion.

Baseline/Profile of Equality Groups

The Baseline analysis highlighted a series of issues concerning the White City Opportunity Area (WCOA) in terms of Population, services, activity, employment, environment, transport, and equality groups.

Framework Development

For the purpose of assessing the potential Environmental Impact of the plan a series of SA objectives were developed which set out what is ideally to be achieved or tackled in terms of sustainable development. These objectives are wider than the plan objectives (which are typically more focused in their ambition and more oriented towards delivery). They provide a benchmark against which the content of the emerging OAPF – including options - can be assessed. The degree to which the OAPF is anticipated to contribute towards these objectives then provides a measure of its sustainability.

Alternatives

To further consider the impact of various means of achieving the OAPF goals three reasonable plan alternative(s) were developed. From this process, a preferred Alternative - the 'Medium Growth' approach - emerged as best meeting the needs of the area. It would achieve the best balance between regenerating the brownfield lands and achieving a mix of uses appropriate to the capacity of the local environment and infrastructure..

Assessment

The Assessment of the Sustainability (including SEA) and Equalities Impact of the OAPF is summarised in the following table.

Sustainability Objectives	Appraisal of White City OAPF
<p>1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.</p>	<p>Proposals to increase and improve public realm throughout the WCOA will introduce new planting, & public open space/green spaces. The OAPF would have positive cumulative impact over the short to long-term</p>
<p>2. Water Quality & Water Resources.</p> <p>To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources. Minimise the risk of surface flooding and promote sustainable urban drainage.</p>	<p>Building standards will ensure that the impact on surface water runoff is neutral, and pollutants are controlled on site.</p>
<p>3. Natural resources.</p> <p>To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products. Recycle demolition materials in</p>	<p>The proposals do not present any relative discernible benefit or negative impact on natural resources.</p>

construction and minimise the consumption of water and energy in developments	
<p>4. Climate Change.</p> <p>To address the causes of climate change through minimising the emissions of greenhouse gases. Encourage energy generation from renewable and low carbon sources, and promote energy efficiency.</p>	<p>More people generally means more energy demand and emissions. However, new intense mixed-use development potentially mitigates impact, through good building standards and diminished travel demand</p> <p>Development will need to managed to ensure effects on micro-climate are not negative</p>
<p>5. Air Quality. To improve air quality.</p>	<p>Evidence shows that Air Quality is generally dependent on vehicle emissions. The OAPF has limited impact on this, given location on strategic transport corridors, with origins and destinations outside WCOA. Bus services may adapt to new technologies with improvements. In line with London Plan policy new development in the WCOA will have to be air quality neutral. The Construction phase is likely to give rise to dust etc..</p>
<p>6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</p>	<p>New developments have potential to have a higher energy demand. However dense populations present a greater efficiency in energy use. The development strategy would facilitate the LBHF CHP initiative. There is significant potential to pursue new and innovative approaches to future development including Area Rating, so that impact can be positive. This impact is medium to long-term and positive.</p>
<p>7. Waste: To minimise production of waste across all sectors in the OA and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.</p>	<p>General waste is now being transported by river – is being received at a recently constructed EfW Facility at Belvedere, Bexley. Co-mingled dry recycled material is sent to a recently refurbished and re-opened facility at Smugglers Way in Wandsworth and is therefore processed within the WRWA area.</p>
<p>8. Soil conditions and contamination:</p> <p>Ensure all contaminated sites are remediated prior to development with the option of in-situ treatment investigated.</p>	<p>Construction activity in the OA has the potential to encounter development sites that have experienced soil contamination and requiring remedial works in the short to medium term.</p>
<p>9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public</p>	<p>Proposals to achieve an improved public realm and intense mixed use development in the Metropolitan Core area are important elements to necessitate less car journeys, and a more attractive pedestrian and cycling environment. OAPF measures are positive in medium to long-</p>

transport, by bicycle and by foot (relative to those taken by car).	term. Development in White City east will provide funding for significant public transport investment.
10. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed	Comprehensive redevelopment has potential to negatively impact on protected and important built heritage, and architectural distinctiveness. However, the tall buildings strategy addresses this. The identification of character areas and related principles of the Urban Realm seek to identify and complement the built heritage of the OA, and locations where tall buildings could be appropriate.. The OAPF strategy is considered neutral to positive over the medium to long-term.
11. Regeneration and Land Use. To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.	The OAPF provides a positive framework for regeneration and new uses of brownfield lands. The OAPF is considered to have positive cumulative impact in the medium to long-term.
12. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.	The OAPF provides clarity on the scale and location for intense redevelopment. LBHF and GLA standards for affordable housing, and diversity of tenure complement physical proposals. The OAPF impact is likely to be positive in the medium to long-term, although there is uncertainty regarding the mix of typology and tenure to be ultimately achieved.
13. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.	The OAPF contains positive objectives to support employment in construction phases, training, and growth of employment in the area over short, medium and long-term periods.
14. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	Environmental enhancements are positive initiatives in themselves, but do not necessarily have broader benefits for community and social-cohesion, which requires social and economic sustainability for the community in the long-term.
15. Open space: Improve the quality of the public realm and increase the number of public open spaces.	The OAPF provides for a new large public space, new streets, and improved east-west and north-south linkages. The overall impact on public space is positive.
16. Education and Skills. To improve the education and skills levels of the population.	Intensive growth and density will potentially support the establishment of new educational facilities in association with the LB HF Infrastructure Delivery Plan, and CIL.
17. Safety and security: Reduce the amount of crime and reduce the fear of crime through building and public realm design	The OAPF will introduce significant new populations and workers into the area. It provides for regeneration of industrial brownfield lands, and a series of public space initiatives which are likely to improve the pedestrian

principles.	experience and improve safety.
18. Health and Well-being. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	Improved public space, public realm and improvements to cycle and pedestrian network may have health benefits for population. The final mix of development may provide for health facilities in the White City East area by Imperial College, which would be a significant positive impact.
19. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	For equality groups, the promotion of diverse housing tenures and typologies within a dense urban core may potentially be positive. The OAPF may enable the delivery of new facilities and services. Investment in the public realm & population intensification may have a positive impact on safety. The OAPF Land Uses strategy also includes specific proposals for the Delivery of Social Infrastructure. The objectives proposed in the OAPF address a wide range of spatial issues which will have far reaching impact on people living and working in the borough. By providing better opportunities for jobs, homes, community facilities and transport network the OAPF would have an indirect but positive impact on community cohesion and equality issues.

Overall, this Sustainability Appraisal considers the impact of the OAPF to 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 OAPF is in general found to be sound in equality issues.

1. Introduction

1(a) Background

- 1.1 The White City Opportunity Area Planning Framework (OAPF) is being produced jointly by the Greater London Authority (GLA), the London Borough of Hammersmith & Fulham and Transport for London.
- 1.2 This Integrated Impact Assessment (IIA) has been prepared to accompany the OAPF, presenting an assessment of its potential environmental, social and economic impact.
- 1.3 The IIA incorporates the statutory requirements for Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA). This IIA also includes an Equalities Impact Assessment (EqIA). This approach provides for a comprehensive assessment, seeks to increase consistency and expediency of assessment work and benefits from a shared understanding of policies.
- 1.4 The preparation of this IIA is subsequent to firstly the IIA of the London Plan as adopted in 2011 and then secondly the London Borough of Hammersmith and Fulham, Local Development Framework Core Strategy 2011, Sustainability Appraisal (2011), and Equality Impact Assessment. A Consultation Draft White City OAPF was published in April 2011, with SA and EqIA. In accordance with requirements of the SEA Directive, a draft sustainability appraisal was prepared in July 2010 and was sent to the 3 Statutory Consultees². They were invited to comment on the Draft Sustainability Appraisal published in April 2011, along with all members of the public. The second public consultation period ran from June to August 2013 and further comments were received on the revised OAPF and IIA, which have been reviewed and taken account of in this document.

1(b) Opportunity Area Planning Frameworks

- 1.5 Policy 2.13 of the London Plan encourages strategic partners to work with the Mayor to prepare, and then implement, spatial planning frameworks for opportunity areas set out in the London Plan.
- 1.6 Paragraph 2.58 of the London Plan states that planning frameworks for opportunity areas should focus on implementation, identifying both the opportunities and challenges that need resolving such as land use,

² English Heritage, The Environment Agency and Natural England

infrastructure, access, energy requirements, spatial integration, regeneration, investment, land assembly and phasing.

- 1.7 The objectives of Opportunity Area Planning Frameworks are:
1. To establish a framework which brings together London Plan and Borough development plan documents (DPDs);
 2. To set out the policy framework in a series of maps and diagrams to define a geographically accurate spatial context to enable major developments to come forward in a co-ordinated manner;
 3. To bring forward partnership working in strategically significant development areas in London – maximising public and private resources in regeneration;
 4. To bring consultation forward in the planning process by engaging planning authorities and developers as early as possible and throughout the development process.

1(c) Introduction to the White City OAPF

- 1.8 The OAPF for White City has been produced in partnership by the Greater London Authority (GLA) with Transport for London (TfL), London Borough of Hammersmith & Fulham.
- 1.9 The White City Opportunity Area covers an area of 110 Ha. on the eastern edge of the LBHF along the boundary with RBKC. To the north and south of the OA there are two key gateways to central London, the A40 flyover and Holland Park roundabout. The OA benefits from four underground stations connecting to three underground lines, an overground station, and two bus stations. The West Cross Route marks the eastern boundary of the OA. The OA includes the Shepherd's Bush Town Centre, Shepherd's Bush Common, Shepherd's Bush Market area, the Westfield Shopping Centre, BBC Television Centre and the large White City local authority Housing Estate along with the Wood Lane Estate and Batman Close Estate. Other notable features within the OA are the Queens Park Rangers football club stadium, the Territorial Army Centre, BBC Media Village, the Imperial College Site to the north of the A40 and Hammersmith Park.
- 1.10 The core development area is north of the existing Westfield Shopping Centre and east of Wood Lane. This includes the Ariel Way industrial estate, the former dairy and warehouse sites used for light industry, logistics and storage. A Marks & Spencer 'mock shop' warehouse has been recently purchased by St. James. Imperial College London owns the site to the north and south of the Westway, and is exploring options for delivering a new campus with student accommodation (part of

which has received planning permission), teaching, research, and administration facilities.

- 1.11 The primary intent of the OAPF is to provide clearer guidance on the London Plan and Core Strategy policy. The OAPF will help resolve complex planning issues relating to the provision of significant residential and commercial growth. This provides for a new community of some 5,000 homes and 10,000 jobs over the next 15 to 20 years.
- 1.12 The OAPF area comprises established residential communities, commercial centres and brownfield sites (where most of the development potential is focussed). The area benefits from strategic road and rail access. The resident population in the OA is approx. 10,340 in 4,310 Households (Census 2011) and 24,000 jobs. While many of the objectives of the OAPF pertain to brownfield sites, the IIA must have specific regard to potential impacts of these strategic needs on local context and issues (i.e. existing populations, facilities, services and infrastructure).
- 1.13 The OAPF will help to resolve complex planning issues relating to the provision of this significant residential and commercial growth. Key issues include brownfield development, infrastructure and transport, internal and external connections and providing an attractive and consolidated commercial area. The OAPF is a comprehensive urban design framework to help to enable development by addressing issues around the existing poor public realm, tall buildings, provision of family housing, building typologies, conversions of vacant and underused office space, utilising leftover spaces, and principles for new retail development.

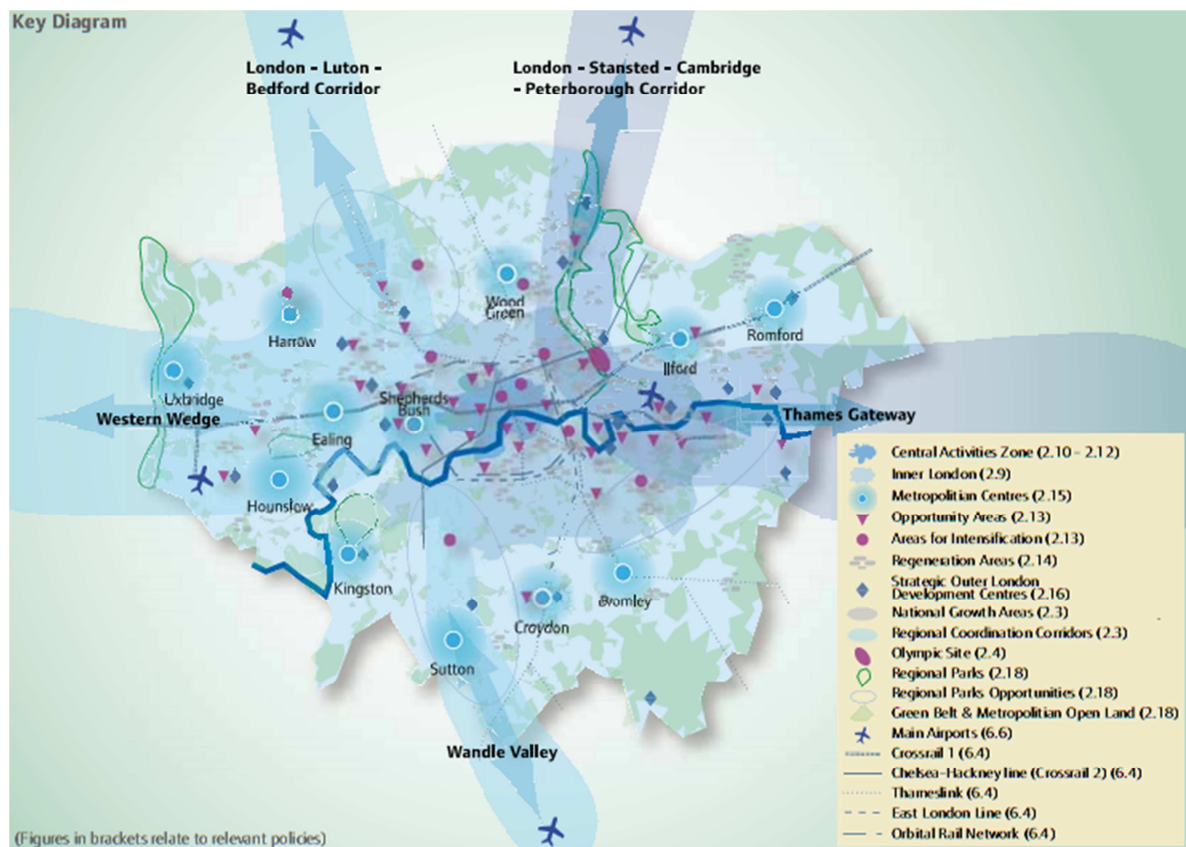


Figure 1.1. White City Opportunity Area in Londonwide Context (Source: London Plan 2011)

Context

- 1.14 The White City Opportunity Area (WCOA) includes several character areas, activities functions and potentials. Employment uses in the OA are focussed around the Wood Lane area and Shepherd's Bush, whilst residential uses and council estates dominate the area west of Wood Lane.
- 1.15 Historically Shepherd's Bush town centre has been the heart of the area, an important entertainment/leisure and cultural centre with the Shepherd's Bush Empire, Bush Theatre, numerous pubs, restaurants and bars. Retail is the dominant use in the town centre, with the West 12 Centre and Shepherd's Bush Market as the original anchors, bolstered in 2008 by the arrival of Westfield shopping centre. Westfield's development has provided approximately 5,000 jobs, improved public transport, provided a new library on Wood Lane, funding for a refurbished common, resulting in a significant increase in visitors to the area and changing the town centre's role in the London Plan's retail hierarchy. Shepherd's Bush Market is the third element of this retail offer, with a vibrant mix of multi-ethnic stalls.
- 1.16 The White City estate, LBHF's largest local authority estate, is located in the western part of the OA, along with Batman Close and the Wood Lane Estate. There is also housing in Shepherd's Bush town centre,

ranging from private Victorian terrace houses, mansion blocks, flats above shops and local authority flats. Over a quarter of the housing in the town centre is in the four tower blocks of the Charecroft estate. Outside the OA to the immediate west and north are the Old Oak and Wormholt estates, and to the south are areas of Victorian terraced housing. Across the borough boundary within the Royal Borough of Kensington and Chelsea nearby neighbourhoods are generally characterised by mansion blocks and town houses, mixed with higher rise Council housing.

- 1.17 White City is a major centre for the BBC, acting as an anchor and attraction for a range of other creative, research and development and media businesses in the area. Despite recent moves to consolidate and rationalise its local land holdings, including disposal of Woodlands and Television Centre, the BBC intends to maintain a large presence on their sites at the Media Village and to occupy some space in a redeveloped TV Centre.
- 1.18 The land east of Wood Lane is currently occupied by London Underground stations, surface car parks, modest office buildings, industrial estates, warehouses and sheds used for light industry, logistics and storage. Marks & Spencer also operate a 'mock shop' facility in this area out of a large warehouse shed (recently sold to St. James). Imperial College London is building a new campus to the north of the Westway, to incorporate student accommodation, teaching, research, and administration facilities as well as general residential, office and hotel uses. They have recently purchased the Unigate Dairy site south of the Westway as well.
- 1.19 QPR football club is located south of the White City Estate. Other sports facilities in the area include the Janet Adegoke swimming pool and the Phoenix leisure centre in the grounds of Phoenix High School, and the football pitches at Hammersmith Park. To the north of the OA are Wormwood Scrubs and Linford Christie stadium, whilst the Westway Sports Centre and Stables are located immediately east of the OA.
- 1.20 The OA is well served by primary schools. Secondary schools in the area, Phoenix High School and Burlington Danes Academy, are outside the boundaries of the OA. There are a number of health facilities located within the White City Estate, including the White City Health Centre and GP surgeries.

Fig 1.2 Definition of White City Opportunity Area

- | | | | |
|----------------------------|---------------------|---------------------------------|----------------------------|
| 1. Imperial College London | 6. Batman Close | 11. BBC TV Centre | 16. Shepherd's Bush Common |
| 2. White City Estate | 7. Hammersmith Park | 12. Ariel Way Industrial Estate | 17. W12 Shopping Centre |
| 3. BBC Media Village | 8. TA Centre | 13. DIMCO Building | |
| 4. Former Unigate Dairy | 9. Wood Lane Estate | 14. Westfield Shopping Centre | |
| 5. QPR Loftus Rd. Stadium | 10. M&S | 15. Shepherd's Bush Market | |



Figure 1.3: Opportunity area's in context

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White City OAPF Objectives

1.18 The key objectives of the White City OAPF (as set out in section 1) are as follows:

1. Mixed use commercial development: Offices, hotels, and flexible work spaces to allow the continued growth of creative, media, biomedical, research and development industries building on the presence of the BBC, Imperial College London, Westfield and Hammersmith Hospital.
2. Town centre: Reinforcement of the metropolitan town centre with a revitalised market, to include significant public leisure, arts, cultural, and entertainment uses in addition to retail. Extension of the above town centre activities northwards to better connect with the area north of Westfield, improve the public realm, and provide new north-south connections.
3. Employment and training: 10,000 new jobs provided throughout the OA. Opportunities will be targeted to local people with initiatives to increase training, apprenticeships, raise aspirations and awareness of job possibilities.
4. Housing choice and opportunities: In White City East, as well as in select opportunity sites in the rest of the OA, 5,000 new homes inspired by the residential areas of West London to be built, along with additional student housing. A broad range of tenures, house sizes and affordability, including housing that is affordable to young families, middle income earners, key workers, and households who are neither very wealthy nor able to qualify for access to social rented housing.
5. Social infrastructure: A range of schools, health, leisure, community facilities to support the expanded population across the whole area. Facilities and programmes to promote social inclusion, tackle deprivation, improve access and equalities.
6. High quality public and private realm: New and improved spaces that enhance local identity, and contribute to a secure, healthy and accessible environment. A large public open space, the White City Green, at the heart of the new mixed-use hub. A network of pedestrian and cycle routes will improve permeability and connectivity; overcome the physical and spatial barriers to achieving regeneration, link sports, leisure, community, health and transport facilities with homes and jobs. Developments and local businesses will contribute to the management and maintenance of the public realm.
7. Environmental sustainability: Exemplar approaches to sustainable design and construction, linking into area-wide networks to ensure the efficient and sustainable use of resources, and taking a co-

ordinated approach to energy, heat, waste, freight, and other environmental strategies.

8. Transport: Improvements to enable more people to use public transport, walk and cycle with ease, and to tackle local highway congestion.

White OAPF Land Use Proposals

1.19 The OAPF land use proposals provide further articulation of how the 8 principal objectives above will be achieved with a focus on three key land use categories, complemented by objectives on urban design and public realm, transport and accessibility, social infrastructure and energy.

- Commercial uses to be focused on creative, academic and technology sectors:
 - Technology and bio-medical research and innovation on a new campus for Imperial College;
 - SMEs;
 - Production, broadcasting and entertainment;
 - Fashion design & retail headquarters;
 - Potential for 10,000 new jobs;
 - Target minimum of 15% construction jobs be on a traineeship basis and 10% apprenticeship basis;
 - Target 15% of all labour used on the development should live within LBHF.

- Housing provision:
 - Opportunity for 4,500 homes on lands east of Wood Lane;
 - Mix of tenures, typologies and affordability (40% of housing should be affordable and approx 25% of all new housing should be social rented);
 - Student accommodation for Imperial College London (1,200 units);
 - Family housing;
 - Mixed-use setting with local amenities;
 - Homes and jobs in one area to reduce need for commuting;
 - Design standards as required in the London Plan and the Mayor's draft Housing Supplementary Guidance;
 - Build to lifetime standards with 10% to be wheelchair accessible.

- The Metropolitan Centre

- Shepherd's Bush Market – Enhancement to sustain its traditional role in community. Repair and improve physical fabric, expand diversity of retail, food and drink options, maintain existing retail.
 - Revitalisation of West 12 Centre along the south side of Common;
 - Support flexible use of units in town centre to support occupancy and vibrancy, and night-time economy on west side of Common;
 - Support office space / creative industries;
 - Extend town centre retail and leisure offer to area north of Westfield to Hammersmith and City line viaduct.
- Urban Design and Public Realm
 - Respect surrounding urban grain, land use , building types and scale;
 - Flexible block plan and street grid;
 - Active street frontages;
 - New east-west connections into RBKC;
 - Improved links over the Central Line cutting;
 - New north-south routes connecting Westfield to Woodlands;
 - New connections under Hammersmith and City line viaduct and A40;
 - New connections between Westfield and Hammersmith Park through BBC television centre site;
 - Enhance links to Wormwood scrubs;
 - White City Green, a major new public open space;
 - Maintain open space around Hammersmith and City line viaduct;
 - Remodel roads etc in area north of Westfield.
- Transport and Accessibility
 - Reduce barriers to movement (A40, A3220, West London line, Central Line and Hammersmith and City Line);
 - Encourage shift towards cycling and walking;
 - Ensure access to and increased capacity of public transport;
 - Ensure timely and phased interventions are in place to accommodate increased travel demand.
- Social Infrastructure
 - Facilities for 5 GPs and possibly dentist;
 - One form entry at primary school level;
 - Support early years nursery provision for low income families;
 - One form entry at secondary school level.

- Energy
 - Seek to implement CHP scheme;
 - Seek establish a coordinated and consistent approach to addressing Energy, Waste, Air Quality, Land Contamination, Noise and Vibration, Water and Flooding.

1(D) PURPOSE OF IIA

1.20 The purpose of IIA is to facilitate better strategy development by seeking to integrate key issues such as sustainability, health, equalities, climate change adaptation and mitigation and community safety within a single impact assessment process, thus maximising opportunities for synergies. IIA considers the implications of a plan or strategy, from a broad perspective, by assessing it against an appropriate level of evidence to identify potential significant effects and synergistic solutions.

1(e) Sustainability Appraisal

1.21 The Sustainability Appraisal (SA) process incorporates the requirements of the European Directive (Directive 2001/42/EC) on the environmental assessment of plans and programmes. The SA covers wider social and economic effects of plans, as well as the more environmentally-focused considerations in the Directive.

1.22 The SEA Directive was implemented in England through the Environmental Assessment of Plans and Programmes Regulations 2004. The Directive is procedural in nature and sets out a series of steps that must be undertaken as part of an assessment. The purpose of the SEA is summarised in Article 1:

"To provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adaptation of plans and programmes with a view to promoting sustainable development".

1.23 Paragraph 165 of the National Planning Policy Framework (NPPF) states:

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

1.24 The NPPF goes on to note:

166. Local Plans may require a variety of other environmental assessments, including under the Habitats Regulations where there is a likely significant effect on a European wildlife site (which may not necessarily be within the same local authority area), Strategic Flood Risk Assessment and assessments of the physical constraints on land use.³⁵ [such as land instability, contamination or subsidence] Wherever possible, assessments should share the same evidence base and be conducted over similar timescales, but local authorities should take care to ensure that the purposes and statutory requirements of different assessment processes are respected.

167. Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken. Wherever possible the local planning authority should consider how the preparation of any assessment will contribute to the plan's evidence base. The process should be started early in the plan-making process and key stakeholders should be consulted in identifying the issues that the assessment must cover.

1.25 This IIA document comprises the 'Environment Report' required under SEA. The aims of this SA are to:

1. Ensure the OAPF fully integrates sustainable development into the strategy making process, influencing all stages of the plan development.
2. Ensure the OAPF provides environment protection and balances environmental, economic and social considerations.
3. Ensure the OAPF gains more material weight and planning consideration following the process of undertaking a SA.
4. Consult on the SA process informing the public and stakeholders of the appraisal's finding.

1(f) Equality Impact Assessment (EqIA)

1.26 The purpose of an **Equality Impact Assessment (EqIA)** is to help the Council to give the due regard that is necessary, when reviewing or devising strategies, policies and projects by making sure they do not unlawfully discriminate and that, where possible, promote equality of opportunity. This assessment must consider the impacts of any policies

upon different Equality groups or 'protected characteristics', as set out by the Equality Act 2010. In adopting the OAPF, the Council will need to give due regard to the equality duty as set out on S149 of the Equality Act 2010. That may or may not involve an EqlA. In this case, EqlA has been carried out as the OAPF sets a strategic framework, on which decisions may be based that will affect the public. Through the integration of an EqlA, the Mayor can ensure that equalities issues are considered in the making of OAPF document.

1(g) Structure of this Report

1.27 The purpose of this IIA Report is to present the findings of the impact assessment of the draft White City Opportunity Area Framework Document against a range of social, economic and environmental indicators. This report is structured as follows:

Section 1 Introduction and Background: Provides the planning context to the OAPF and its ambitions and development principles.

Section 2 The IAA process Methodology of the SA and EqlA

Section 3 Baseline and Context Information on Social, Environmental and EqlA Profile of Equality Groups

Section 4 Developing the Framework

Section 5 Alternatives Consideration of the plan options and their impact

Section 6 Assessment: The assessment of policies and objectives in the OAPF, for SA and EqlA

Section 7 Mitigation A framework for the mitigation of potential impacts

Section 8 Monitoring: A framework for monitoring of important indicators

1(h) Consultation

1.28 A Consultation Draft White City OAPF was published in April 2011, with SA and EqlA. In accordance with requirements of the SEA Directive, a draft sustainability appraisal was prepared in July 2010 and was sent to the 3 Statutory Consultees³. A Draft Sustainability Appraisal published in April 2011 for consultation. The second public consultation period ran from June to August 2013 and further comments were received on the revised OAPF and IIA, which have been reviewed and taken account

³ English Heritage, The Environment Agency and Natural England

of in this document.

2. The IIA Process (methodology)

2.1 The IIA approach entails a parallel process where the key requirements of the Sustainability Appraisal (including SEA) and Equality Impact Assessment are progressed in coherent manner. The approach to these assessments takes account of relevant guidance⁴. The Assessment should be proportionate and relevant to the scale and extent of the strategy proposed. It should build on previous assessments that have been undertaken⁵, minimise duplication, but also not delegate assessment or decisions downwards that should be addressed at the strategic level. Consultation on IIA is a basic requirement. The two parallel processes are set-out below.

2(a) Sustainability Appraisal Process

2.2 The table below outlines the key stages of the SA process (which are based on Guidance on Sustainability Appraisal (ODPM,2005 (Fig. 5, p.39). Stages A, B and C of the process are combined with the SA. This approach is in keeping with Government guidance, which notes the importance of treating the SA as a flexible process, tailored to the needs of different plans and programmes to which the directive applies whilst at the same time ensuring that the requirements of the directive are met.

2(b) The SEA directive

2.3 The issues, environmental objectives, and assessment methodology to be addressed by this IIA are also required to be informed by the SEA Directive. Annex I of the SEA Directive states that the assessment should include information on the *“likely significant effects on the environment, including on issues such as:*

- (i) biodiversity*
- (ii) population*
- (iii) human health;*
- (iv) fauna;*
- (v) flora;*
- (vi) soil;*
- (vii) water;*
- (viii) air;*
- (ix) climatic factors;*
- (x) material assets;*
- (xi) cultural heritage, including architectural and archaeological heritage;*
- (xii) landscape; and*

4 See list of documents in section 3

5 GOL CIRCULAR 1/2008 Strategic Planning in London, Section 3.6,p.12

(xiii) the inter-relationship between the issues referred to in heads (i) to (xii)."

2.4 In accordance with the SEA Directive, the potential effects that may arise from the implementation of the OAPF on each of the relevant issues identified above will be considered as part of the Sustainability Appraisal as outlined in the following table.

Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope
A1	Identifying other relevant plans, policies and programmes and sustainable development objectives
A2	Collecting baseline information
A3	Identifying Sustainability issues and problems
A4	Developing the Sustainability Appraisal framework
A5	Consulting on the scope of the Sustainability Appraisal
Stage B	Developing and refining options and assessing effects
B1	Testing the OAPF objectives against the SA framework
B2	Developing the OAPF options
B3	Predicting the effects of the OAPF
B4	Evaluating the effects of the OAPF
B5	Considering ways of mitigating adverse effects and maximising the effects of implementing the OAPF
B6	Proposing measures to monitor the significant effects of implementing the OAPF
Stage C	Preparing the Sustainability Appraisal report
C1	Prepare the SA
Stage D	Consulting on the OAPF and SA report
D1	Public participation on the SA report and the OAPF
D2	Assessing against significant changes
D2	Making decisions and providing information
Stage E	Monitoring implementation of the OAPF

Table 2.1: SA Stages and Tasks incorporating SEA process.

2.5 Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which the OAPF can be assessed, together with the evidence base that will help to inform the appraisal. The evidence base determines the environmental, social and economic characteristics of the area in question, which can be used in evaluating the impacts of the OAPF on the sustainable development objectives. This OAPF focuses on brownfield development and intensification of use in an established Metropolitan Centre, so the evidence and objectives should be appropriate to this context.

2.6 Stage B assesses the proposed land use, economic and social infrastructure objectives in the OAPF against the sustainable development objectives with reference to changes that may be caused to the baseline evidence base. Measures for mitigating and

monitoring the effects of options / preferred options can also be put forward at this stage.

- 2.7 Stage C involves documenting the appraisal process and findings in a Sustainability Appraisal Report (incorporated in the IIA) and Stage D involves consultation on this report and the preferred options themselves. Stage E involves monitoring of the OAPF.
- 2.8 The purpose of preparing an SA to accompany and inform the consultation draft White City OAPF is to support the creation of sustainable communities able to manage and use resources efficiently and to tap the ecological and social innovation potential of the economy, ensuring prosperity, environmental protection and social cohesion⁶.

2(c) Limitations of the SA approach followed

- 2.9 Limitations may arise from the availability and inconsistency of baseline data. Multiple agencies and private companies are responsible for the implementation of the OAPF over a long time period, which creates uncertainty regarding how the area will ultimately be developed, negotiated and within what timescale. Appraisal of policies and objectives is not a straightforward process and the outcomes include uncertainty due to the following factors:
 - 1. Limits to data available to inform indicators;
 - 2. Natural variation. Personal perception and interpretation might interfere with policies implementation;
 - 3. Limited documentations of cause and effects. It would be difficult to associate cause and effects, for instance, the impacts of climate change and waste generation.
 - 4. Degree of integration of the SA in plan development process;
 - 5. Data could not always be compared on a like for like basis. Some categorises of census data were restricted to borough level; and
 - 6. Uncertainty in predicting policy and timeframe for implementation

6 The Renewed EU Strategy for Sustainable Development (10117/06)

2(d) Equalities Impact Assessment (Methodology)

- 2.10 The EqIA process is addressed in parallel to the SA/SEA methodology outlined above. This is in accordance with the Equalities Act 2010 which requires authorities to conduct and publish assessments to determine whether their policies, practices and procedures have an adverse impact on any section of the community.
- 2.11 The Equality Act 2010 sets out the public sector equality duty (PSED) which applies to the Council and the Mayor (GLA) in discharging its functions. Making decisions of a strategic nature falls within the scope of discharging the authorities' functions. The Equality Act 2010 sets out protected characteristics (see below).
- 2.12 The Mayor (GLA) and LB Hammersmith and Fulham when exercising their functions must have due regard to:
1. Eliminating unlawful discrimination, harassment and victimisation and any other conduct which is unlawful under the Equality Act 2010.
 2. Advancing equality of opportunity between people who share a protected characteristic, and those who don't have that characteristic. This means in particular:
 - a. Removing or minimising disadvantages suffered by people who share a protected characteristic that are connected to that characteristic.
 - b. Taking steps to meet the needs of people who share a protected characteristic that are different from the needs of people who don't have that characteristic.
 - c. Encouraging people who share a protected characteristic to participate in public life or in any other activity in which their participation is disproportionately low.
 3. Fostering good relations between people who share a protected characteristic, and those who don't have that characteristic. This means, in particular:
 - a. Tackling prejudice; and
 - b. Promoting understanding.
- 2.13 The first aim of the PSED is to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act because of any of these protected characteristics. The second and third aims of the duty (advancing

equality of opportunity and fostering good relations) only apply in relation to persons who share a 'relevant protected characteristic'.

2.14 S.149(7) sets out the list of 'relevant protected characteristics' for PSED. This includes all the protected characteristics set out below except marriage and civil partnership status (this is included under section 8 of the Act). The protected characteristics are:

1. age;
2. disability;
3. gender reassignment;
4. marriage and civil partnership
5. pregnancy and maternity
6. race, including ethnic or national origins, colour and nationality;
7. religion or belief;
8. sex/gender; and
9. sexual orientation.

2.15 For the purpose of this report people with these protected characteristics are referred as *equality groups*. This EqIA seeks to identify those groups that may be affected by the proposals, to analyse what the equality impacts are, and what measures are to be applied to policy to minimise or eliminate the adverse impacts. Where the Council cannot mitigate for adverse impacts, assurance must be given that the negative impacts are not unlawful. The EqIA also establishes a set of actions to monitor and review the proposed changes after implementation where these are needed.

2.16 This EqIA follows the preparation of the EqIA for the LB Hammersmith and Fulham Core Strategy. It also has the benefit of drawing upon the Joint Needs Assessment Study 2010 which provides information on some of the important equality groups as knowledge is gleaned through the consultation process.

3. Baseline and context

3(a) Links to policies, plans programmes, and sustainability objectives (Task A1)

- 3.1 The 2004 SEA Regulations (Schedule 2) require the Environment Report *to include an outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.*
- 3.2 The purpose of reviewing plans and programmes as part of the IIA is to ensure that the relationship the White City OAPF has with other documents is recognised, and to ensure that any relevant environmental protection and sustainability objectives contained within these are taken on board as required by the SA/SEA process. It can also highlight appropriate baseline information for the plan area and help inform identification of the key sustainability issues.
- 3.3 The OAPF is framed in the context of international, national, regional and local objectives and policy. Documents that influence (and are influenced by) the IIA of the OAPF are outlined below in Table 3.1.

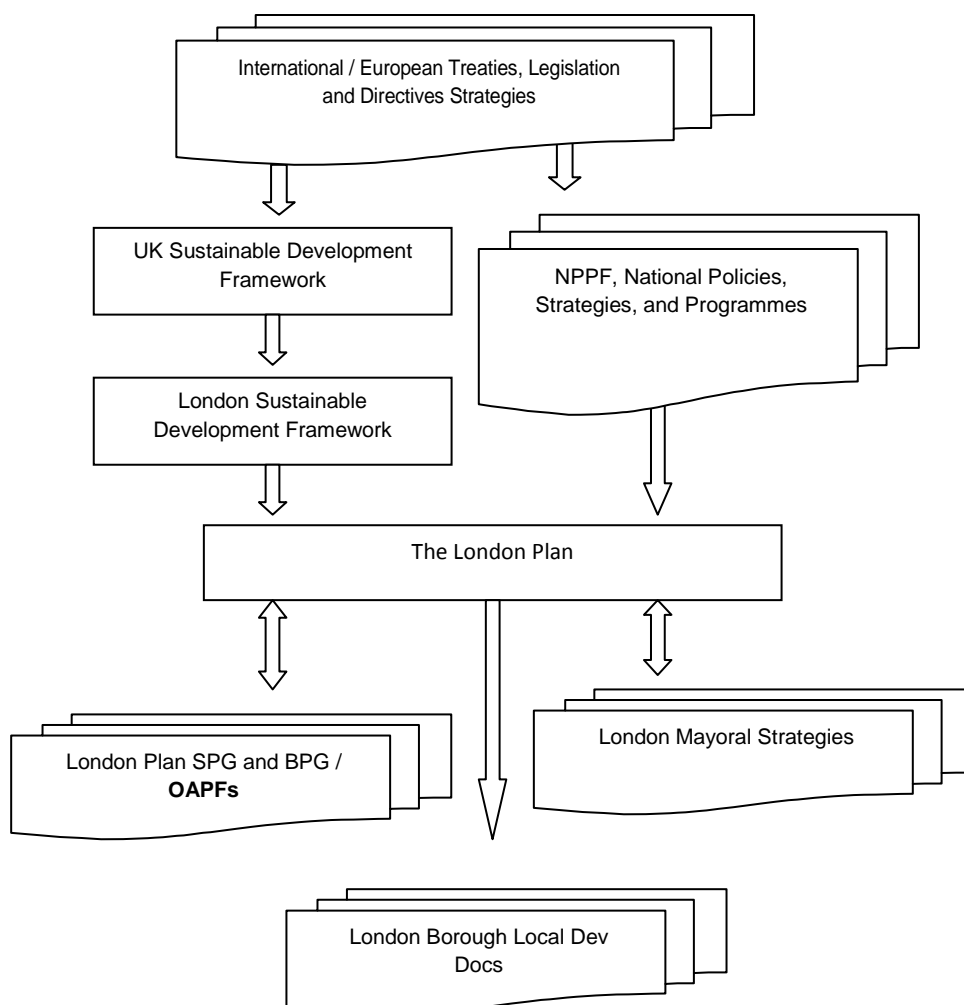


Fig. 3.1 Plan Hierarchy

3.4 The table below lists all relevant plans, policy documents and programmes at the regional and local level along with technical reports that have been used to establish the opportunity area baseline:

International
European Directive 2001/42/EC (SEA Directive)
European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats
National
National Planning Policy Framework, Department for Communities and Local Government , March 2012
Sustainability Appraisal Advice note, Planning Advisory Service, June 2010
The UK Government Sustainable Development Strategy, 2005
Localism Bill: neighbourhood plans Equalities Impact Assessment January 2011 (Department for Communities and Local Government)
Regional / London -
The London Plan 2011
Draft affordable housing note 2011
Early minor alterations to the London Plan 2011
All London Green Grid 2011
Mayoral Community Infrastructure Levy 2011
Sustainable Development Framework for London
Sustainable Design and Construction SPG 2006
Industrial Capacity SPG 2008
Draft London View Management Framework 2011
Sustainable Communities in London ODPM 2003
The Mayor's Housing Design Guide 2010
London Climate Change Adaptation Strategy

London Water Strategy 2007
Health Inequalities Strategy 2008
Draft River Basin Management Plan 2009
Health Care for London. A Framework for action. Second Edition.
Improving Londoners Access to Nature – London Plan Implementation Report 2008
London Energy Strategy 2009
London Economic Development Strategy 2010
Meeting the needs of London's diverse communities 2006
Transport 2025: transport vision for a growing world city 2006
Improving walkability. Good practice guidance on improving pedestrian conditions as part of development opportunities 2005
Sub-Regional/ West London
London Boroughs of Ealing, Hounslow and Hammersmith and Fulham Joint Retail Needs Study Update, (Roger Tym and Partners) May 2010
Kensington, Chelsea, Hammersmith and Fulham, Strategic Flood risk Assessment (JBA Consulting and Entec) June 2010
Joint Municipal Waste Management Strategy, Western Riverside Waste Authority 2006
Borough – Hammersmith and Fulham
Core Strategy, Local Development Framework, October 2011, Hammersmith & Fulham
Sustainability Appraisal Core Strategy, October 2011, Hammersmith & Fulham
LB Hammersmith and Fulham Core Strategy - Equality Impact Assessment (Draft for Consultation), July 2011
Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule (PDCS) EqIA (September 2012)
London Borough of Hammersmith and Fulham Community Infrastructure Levy
Viability Assessment (Roger Tym and Partners, August 2012)
Infrastructure Plan (September 2012) Hammersmith & Fulham
White City Development Infrastructure Funding Study, Hammersmith & Fulham, GLA (AECOM Drivers Jonas Deloitte)
Joint Strategic Needs Assessment Study

London Development Agency, White City Opportunity Area Energy Strategy Draft Report (Ove Arup & Partners Ltd) July 2011
White City Opportunity Area Planning Framework (OAPF) Strategic Transport Study (WCTS) July 2012, Transport for London
Hammersmith and Fulham Housing Strategy 2012

Table 3.1: Plans, policy documents and programmes

The London Plan (July 2011)

- 3.5 The overall objective to prepare the OAPF derives from section 2.13 of **The London Plan 2011** where it sets out the following under **Policy 2.13 Opportunity Areas and Intensification Areas**

Strategic

- 3.6 A Within the opportunity and intensification areas shown in Map 2.4, the Mayor will:
- a provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realize these areas' growth potential in the terms of Annex 1, recognising that there are different models for carrying these forward; or
 - b build on frameworks already developed; and
 - c ensure that his agencies (including Transport for London) work collaboratively and with others to identify those opportunity and intensification areas that require public investment and intervention to achieve their growth potential.
 - d encourage boroughs to progress and implement planning frameworks to realise the potential of intensification areas in the terms of Annex 1, and will provide strategic support where necessary.

Planning decisions

B Development proposals within opportunity areas and intensification areas should:

- a support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks

- b seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses
- c contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks

3.7 Annex 1 (6) of the London Plan sets out the Strategic Policy Direction for White City. It specifies that the White City OA has an indicative capacity of 10,000 jobs and a minimum of 5,000 homes.

An area undergoing substantial change within which completion of strategically significant new retail provision at Westfield has raised the status of Shepherd's Bush to a Metropolitan town centre. The BBC is consolidating its activities within the area and this will create opportunities for further development, building upon the area's strengths in creative, media and entertainment business. It is proposed to extend the Opportunity Area to include Shepherd's Bush town centre and the White City Estate. There is potential for mixed density housing and a focal point for office development at and around the tube stations at White City and Wood Lane with other commercial, leisure, open space, education and retail uses of appropriate scale to support the local community. This will be facilitated by de-designation of the historic strategic industrial location complemented by provision for waste and other industrial functions in the Park Royal Opportunity Area. The scope to improve connectivity with the wider area should be explored and development should be related to improvements in public transport capacity. Housing-led intensification should support local regeneration, enable estate renewal and seek a mixed and balanced community. There may be scope to enhance education and research capabilities in the area linked in particular to health care and bio-technology. Development should promote the vitality of the town centre, particularly in the Shepherd's Bush market area, and complement the viability of other west and central London centres. An Opportunity Area Planning Framework is being prepared by the GLA and the London Borough of Hammersmith and Fulham which will set out further strategic principles including the appropriate scale, location and mix of uses taking into account studies of the creative industries, development and transport capacity.

LBHF Core Strategy 2011

- 3.8 LBH&F adopted its Core Strategy Development Plan Document (DPD) in October 2011. The Core Strategy is the overarching document of the LDF and sets out the Council's long term vision for the borough. It highlights strategic objectives, identifies key regeneration areas and allocates strategic sites for development. The Core Strategy policies which are of most relevance to the White City OA are set out as follows:
- 3.9 Chapter 7 sets out the overall strategy for the regeneration areas and includes a strategic policy for the whole WCOA (Strategic Policy WCOA), along with detailed policies for White City East (Strategic Site 1), White City West (Strategic Site and Housing Estate Regeneration Area 2), and the Shepherd's Bush market area (Strategic Site 3).
- 3.10 These policies highlight the opportunities for mixed use development of land east of Wood Lane, partial development of the BBC TV Centre, regeneration of the White City estates and improvements to the town centre, including the Market.
- 3.11 Strategic Policy WCOA states, inter alia, that *"The Council will work with the GLA, other strategic partners, the local community and landowners to secure the comprehensive Regeneration of the White City Opportunity Area (WCOA); and, to create a vibrant and creative place with a stimulating and high quality environment where people will want to live, work, shop and spend their leisure time. The existing estates community must be able to benefit from regeneration of the area through access to jobs, better local facilities, better and more suitable housing, and improved environmental conditions."*
- 3.12 The development of WC OA will only be considered acceptable if it contributes to the regeneration of the whole OA. Measures to create a balanced and mixed community should involve: provision or refurbishment of affordable housing; provision of training, local apprenticeship programmes; targeted recruitment; environmental improvement measures; social infrastructure and provision of land, buildings and funding that benefits the area as a whole; and provision of and contributions to transport infrastructure that are necessary to secure regeneration.
- 3.13 Development is to be focused within White City East (WCOA1) which will contribute to regeneration of the whole of the OA, including the housing estates (WCOA2). It sets out an indicative potential for 5,000 new homes and 10,000 new jobs across the area (based largely on establishing a creative industries hub), but mainly located in White City East. Its aim is to expand the choice of homes and jobs in the OA, providing further opportunities for help to achieve a mixed and balanced community across the whole area.

Strategic Site- WCOA1

- 3.14 The approach to White City East reiterates much of the main policy discussed above. It aims for new development that integrates with the surrounding area and should be redeveloped primarily for a mix of housing, employment and community uses, with a local centre that could provide for supporting services. This area is identified as the focus for establishing a creative industries hub.

Strategic Site- WCOA2

- 3.15 The approach for the White City Estates is to work with estate residents to examine the opportunity for phased regeneration of the area over the plan period, to provide the existing residents with better accommodation, maximise opportunities for residents to obtain jobs and provide a more mixed and sustainable community. It is noted that if QPR FC was to approach the Council with any plans to replace the football ground, it would be assessed on the basis of how it could benefit existing residents.

Strategic Site- WCOA3

- 3.16 The strategic approach for the Shepherd's Bush Market is to provide regeneration of the Market to create a vibrant independent offer within the stalls, whilst accommodating existing market traders.

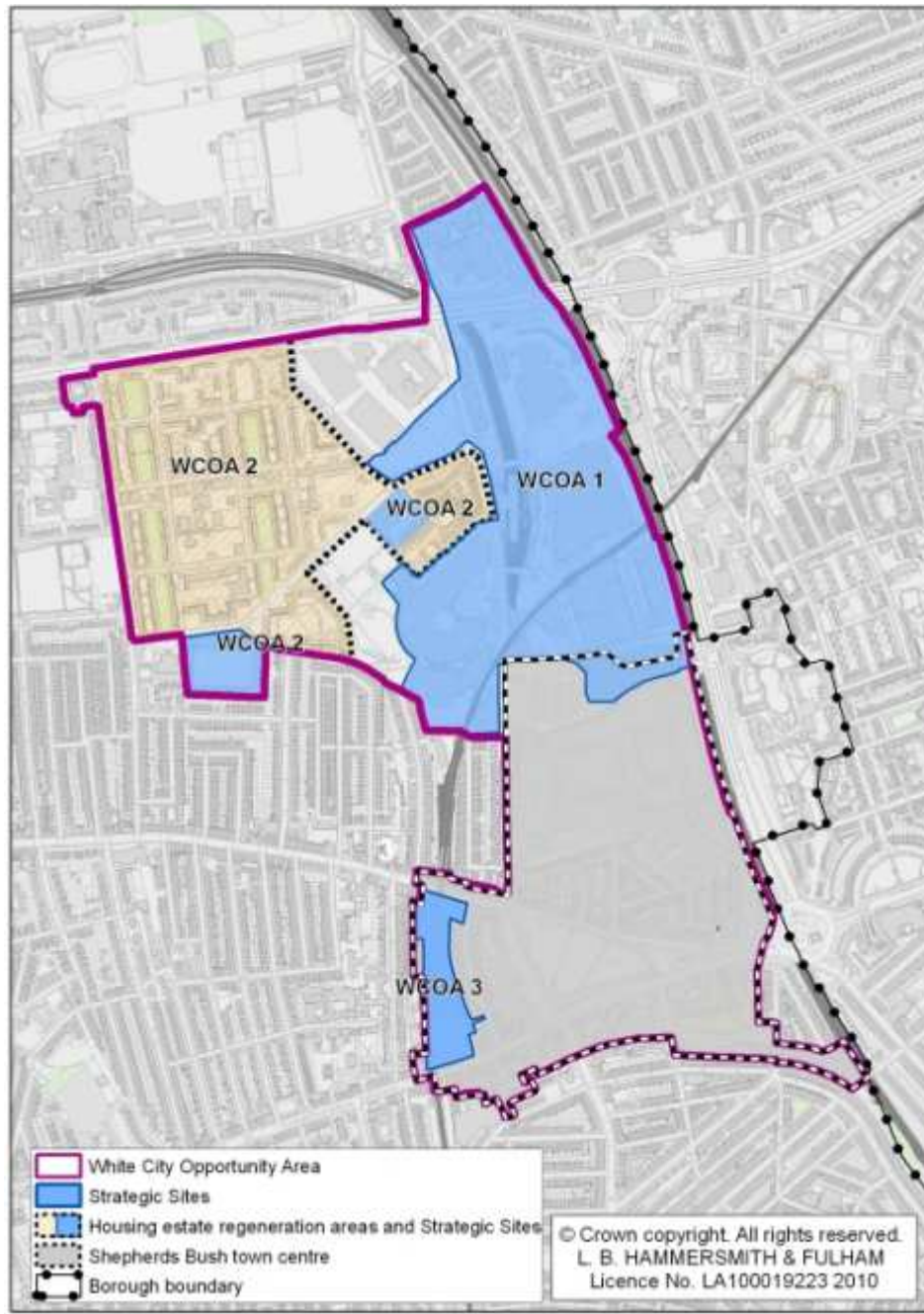


Fig. 3.2 LB HF Core Strategy for White City Opportunity Area

3(b) Baseline considerations (Task A2)

3.17 In order to identify the issues for both the plan and the SA it is necessary to first establish an evidence base. The 2004 SEA Regulations (Schedule 2) require that the Environment Report include information on 'the relevant aspects of the current state of the environment and the likely evolution thereof'. The baseline or 'receiving environment' study helps to clarify the scope of the SA/SEA Assessment and Key Sustainability Issues for the OAPF plan.

3.18 The baseline summary below describes the underlying social, economic considerations and environmental conditions, and provides a basis for predicting and monitoring effects, and includes the topic areas referred to in the SEA Regulations. The baseline conditions are taken from a range of sources including the policy, plans and programmes referenced above. The baseline is formed of the following topic areas.

1. Spatial context;
2. The built environment;
3. Heritage;
4. Employment and income;
5. Deprivation;
6. Flood risk and water resources;
7. Biodiversity;
8. Air quality;
9. Social infrastructure;
10. Transport and travel.

3(c) Sustainability Appraisal Baseline context

1. Spatial context

3.19 The White City Opportunity Area covers approximately 110 hectares (272 acres) on the eastern edge of the London Borough of Hammersmith & Fulham, along the boundary with the Royal Borough of Kensington & Chelsea. To the north and south there are two key gateways to central London, the A40 flyover and Holland Park roundabout. The area benefits from four underground stations connecting to three underground lines, an Overground station, and two bus stations.

- 3.20 The heart of the OA features several large and underused industrial sites, which suffer from a high degree of physical severance due to fast moving strategic roads and rail infrastructure that bisect and surround them. The BBC and Westfield buildings have large footprints which restrict easy connections and navigation through the area, although the development of Westfield has also led to the creation of new east-west linkages and improved transport interchange.
- 3.21 The WCOA is situated halfway between Heathrow Airport and Central London, and boasts some of the largest remaining development opportunities within 2 km (1.5 miles) of London's Central Activity Zone. A Crossrail and High Speed 2 (HS2) interchange is proposed at Old Oak Common.

2. The Built Environment (Material Assets)

Character areas and main landuses

- 3.22 The OA includes several distinct character areas with commercial/office uses along Wood Lane, industrial sheds to the east, residential housing estates to the west and town centre retail and leisure around Shepherd's Bush Common and Shepherd's Bush Market. There is also a substantial residential community in and around the town centre. The OA is bisected by heavily trafficked routes, elevated rail and road infrastructures, open railway cuttings and the large Westfield Shopping Centre.

Wood Lane Corridor

- 3.23 Wood Lane is a key transport corridor and the principal gateway to the area. Many of the key commercial uses in the OA are focused along this road. The overall impression of this corridor is a developed but incoherent frontage to the west, and an industrial and sporadic presence to the east.
- 3.24 The BBC TV Centre and the BBC Media Village/Corporate HQ buildings are located on the western side of Wood Lane set back from the pavement. Around TV Centre there is a vacant BBC site facing South Africa Road, to the south is the BBC multi-storey car park, and to the north is the Wood Lane estate. Immediately to the south of the A40 are two 3 storey office blocks.
- 3.25 Further south the street frontage changes to a collection of servicing and access entrances to land on the east side of the Central Line and individual structures such as the White City and Wood Lane Underground stations.
- 3.26 The Hammersmith & City line viaduct crosses Wood Lane just south of Wood Lane Station, beyond which is a public plaza to the recently

opened Westfield Shopping Centre. The shopping centre's ground level is 7 metres above actual ground level. Escalators lead up to a southern terrace which provides an attractive pedestrian route between Wood Lane and the southern interchange lined by shops, restaurants and bars.

Industrial land – East of Wood Lane

- 3.27 The industrial estate to the east of Wood Lane is cut off from the rest of the OA by the A40 to the north, the A3220 (West Cross Route) and West London Line to the east, the Hammersmith & City line viaduct to the south and the Central Line railway cutting to the west. It can only be accessed from Wood Lane at two points. It is occupied by light industrial uses in the form of four 5-storey office blocks, a large warehouse shed and the Unigate Dairy site.
- 3.28 South of the Hammersmith and City line viaduct are more industrial sheds, road access and servicing for Westfield, the refurbished DIMCO building housing the Central Line substation, and a TfL bus station. DIMCO appears isolated within a heavily engineered road layout.

Wood Lane Estate (White City Close):

- 3.29 The Wood Lane Estate fronts onto Wood Lane and South Africa Road, north of the BBC Television Centre. A series of brown brick terraces varying from two to four stories, providing articulation in the townscape, and breaks down what is a relatively dense housing development to a very human scale.

White City Estate:

- 3.30 The White City Estate comprises 35 5-storey brick blocks of balcony-access flats, laid out in a regular grid. Australia Road forms a U shape around the estate, from which all roads on the estate are accessed; therefore all vehicular traffic must enter and leave the estate via Bloemfontein Road.
- 3.31 Within the main blocks of the estate is Malabar Court (1966), a housing development for older people, which has a distinctive design. The central area of the estate is occupied by low rise community use buildings including churches, primary schools, and offices for Hammersmith and Fulham Homes.

Other estates:

- 3.32 There are several smaller estates west of Wood Lane: Creighton Close, an estate of inter-war walk up blocks with poor quality internal courtyard dominated by parking, and Batman Close, a post-war estate of flats and maisonettes arranged around a central open space.. Batman Close has recently been refurbished under the Decent Homes programme.

Hammersmith Park

3.33 This public park is bounded to the east by the BBC TV Centre and to the west by the back of Batman Close and Stanlake Road. The park is the last remaining feature of the Franco-British Exhibition of 1908 and is an important recreational space which provides facilities for bowling, tennis, football and children's play areas, as well as a pond and grassed/ landscaped area and Japanese Garden.

3.34 The main entrance to the park from South Africa Road is quite narrow and dominated by vacant buildings on either side. There is a second entrance to the park from Frithville Gardens, which is a quiet residential street to the south.

QPR/Loftus Road stadium

3.35 Loftus Road stadium is home to the Queens Park Rangers football club. The current capacity is just over 19,000. The stadium is equivalent to 5 storeys tall, and the frontage to South Africa Road feature entrances to the stands, a shop and ticketing offices, with some space on the pavement for parking and servicing. Other entrances to the stadium are through breaks in the Victorian terraces on Loftus Road and Ellerslie Road to the south of the OA. The stadium has a considerable presence on the surrounding residential streets.

Bloemfontein Road

3.36 Bloemfontein Road forms the western boundary to the OA, and features a concentration of retail, community, health and residential uses. The recently completed Phoenix Fitness Centre and Janet Adegoke Pool provide services which are accessed by residents in White City. The road benefits from good public transport access with two bus routes, and is one of the only direct routes between the A40 and Uxbridge Road.

3.37 To the west of Bloemfontein Road is the Wormholt and Old Oak Conservation Area, which encompasses the Wormholt and Old Oak estates and Wormholt Park. To the north a pedestrian link crosses the A40 to connect to the residential community north of the A40 and beyond via a footbridge over the Central Line.

Shepherd's Bush Common, Market and Town Centre

3.38 Shepherd's Bush is the major shopping centre in the north of the Borough and features a mixture of employment, shopping, leisure and residential uses. Shepherd's Bush Common is the main focus of the Shepherd's Bush conservation area and provides an important area of open space and a large number of mature trees.

3.39 Shepherd's Bush market is on the western edge of the town centre, and runs between the Uxbridge and Goldhawk Roads along the Hammersmith & City Line viaduct. Residential development in this part of the OA ranges from late 19th century terraces, to mansion blocks such as the landmark 1930s 'Grampians' building, to the tower blocks of the Charecroft Estate built over and adjacent to the W12 shopping centre. Groups of Victorian and Edwardian terraces in mixed uses

surrounding the Common are important in terms of their scale and the backcloth they provide, as well as being key buildings which are important features in the street scene; many of which are on the Council's Local Register of Buildings of Merit. These buildings follow a uniform building line abutting the street, form a fine urban grain and provide a strong edge around the north side of the Common. The domestic scale and quiet character of the Victorian residential streets surrounding the town centre are in contrast to the busy main roads around the Common.

3.40 The western side of the Common is characterised by individual buildings with large footprints, typically in leisure use. The southern side of the Common is dominated by the large footprint of the W12 Centre and the height of the Charecroft Estate towers, but a finer grain has been retained in the south west corner where grand Victorian villas have been converted to language schools and a hotel.





Fig 3.3 White City Opportunity Area Character Areas

3. Heritage

Historic development

3.41 The OA is defined by the last century of development which has left a distinct pattern, scale, and character. The area was largely farmland until the mid-1800s when railways were built over the land to lead into the city, with the West London Line in 1844, the Hammersmith & City Line in 1864 and the depot and generating station for the Central Line in 1900. By the early twentieth century the area around Shepherd's Bush Common had become a shopping and entertainment centre for West London with new shopping parades, cinemas and theatres.

Semi-detached villas and terraced housing of the growing and prosperous suburb lined the streets beyond the Common, leaving a legacy of relatively dense Victorian housing. This remains the dominant residential character along the Victorian street grids.

The Great Exhibitions and the first Olympic legacy

- 3.42 In 1908 the first of several international exhibitions, the Franco-British Exhibition, was held on grounds to the west of Wood Lane, in buildings rendered in white painted stucco, from which the site got its name "White City". Two new underground stations at Wood Lane (Central and Hammersmith & City Line) catered for the millions of visitors to the Exhibition.
- 3.43 The exhibition grounds featured a network of roads, bridges, waterways, as well as a stadium which was used for the 1908 Olympic Games. Although the exhibition buildings were designed as temporary structures, exhibitions continued to be held there until the late 1930's. The stadium was used by Queen's Park Rangers Football Club until they moved to Loftus Road, and continued to be used for rugby, athletics, boxing and greyhound racing until the mid-1980s.
- 3.44 Today, the diagonal road alignment between the White City estate and the BBC Media village and the grounds of Hammersmith Park are the only physical legacy of this early history of the site.
- 3.55 In the late 1930s Hammersmith Borough and the London County Council built the White City Estate on the Western part of the White City exhibition grounds. The estate featured over 2,000 homes in 5 and 6 storey blocks arranged along a grid plan with tree-lined streets. At the time the housing was of an exemplary standard although the rigid grid approach contrasted to the garden suburb approach taken in the Wormholt estate to the west.
- 3.56 After WWII, the BBC Television Centre and Hammersmith Park were built on the southern part of the exhibition grounds.
- 3.57 A new Central Line underground station was built at White City in 1947 to replace the earlier Wood Lane station. Between the Central Line cutting and the West London Line, industrial uses developed in the sites between the new road and rail infrastructure.
- 3.58 During the late 1960s the elevated Westway motorway was built to link the Marylebone Road with Western Avenue. Other major transport infrastructure developments included the West Cross Route (now the A3220), which linked the elevated gyratory at the Westway with a new roundabout at Holland Park.
- 3.59 Although the White City stadium continued to be used for various sporting events, including the 1966 World Cup, it was demolished in 1985 to make way for the BBC White City One building which was later joined by the two Media Village buildings.

- 3.60 The opening of the Westfield Shopping Centre in 2008 created a huge retail and leisure destination with improved transport facilities including a new Underground station at Wood Lane and a new over-ground train station on the West London Line

Conservation Areas and Heritage Assets

- 3.61 There are two Conservation Areas within the OA – the Wood Lane and Shepherd's Bush Conservation Areas. The surrounding area beyond the Opportunity Area also features several Conservation Areas of a primarily residential nature, including the Oxford Gardens Conservation Area in RBKC. It is noted that Appendix 1 of the OAPF provides for 'Townscape Views Analysis' from selected sites around the OAPF (including conservation areas, to provide information on the potential impact of tall buildings in the WCOA.

Shepherd's Bush Conservation Area

- 3.62 Shepherd's Bush Common is the heart of the historic town centre, and is the backdrop for the distinctive townscape character of the CA.
- 3.63 The Common features a ring of mature trees around its edges, beyond which are historic leisure and entertainment attractions such as the Grade II listed Empire Theatre and Odeon Cinema. The Empire and the Cinema were built as the area became an entertainment destination and public transport node.
- 3.64 The Common provides the setting for the built form, which includes some fine buildings most notably the listed grade II Empire Theatre and the listed grade II former Odeon Cinema which is vacant and on the English Heritage Building at Risk Register. Many of the buildings surrounding the Common are on the Local Register of Buildings of Merit including on the west side the Walkabout Inn, No. 56 Shepherd's Bush Green (itself a former cinema) and O'Neills Public House at Nos. 2-6 Goldhawk Road which houses the Bush Theatre. At the east end of the Common is the grade II listed Winged Victory, a sculpture and war memorial dating from 1922.
- 3.65 The northern side of the Common is lined with a group of highly detailed red brick Edwardian terraces at Nos. 54-108 Uxbridge Road which form much of the Primary Retail Frontage of the town centre.
- 3.66 The prevailing character of the area beyond the Common is that of an Edwardian inner London town centre, with an overall unity of scale and grain; the terraced housing and rail connections reflecting the increased suburbanisation and prosperity that was enjoyed in the area from the 19th century.

Wood Lane Conservation Area

- 3.67 Wood Lane Conservation Area includes the BBC Television Centre (listed Grade II), with the central ring and studio 1 being of special interest at a national level. Designed by Norman & Dawbarn, it was built in the 1950s and 60s as the first purpose-built television studio in England and is a nationally known landmark. The building consists of a circular central block of offices distinguished by a curved glazed facade to Wood Lane and a series of interrelated studios served by a common runway, forming a concentric plan. Although the East Tower is not considered to be of any architectural or historic importance, the remaining listed curtilage buildings including the Scenery Block and the range of studios are considered to be of local interest and are important buildings which make a positive contribution to the character and appearance of the Conservation Area. The main entrance to BBC TV Centre from Wood Lane features a covered approach set back from the pavement creating a large forecourt area.
- 3.68 The White City Underground Station is on the council's Local Register of Buildings of Merit, and is a very good example of 1940s Underground station design which is currently being considered for statutory listing by English Heritage. The Wood Lane Estate forms another sub-area of the Wood Lane CA and has a strong cohesiveness as a result of its consistent materials, domestic scale and residential land use.
- 3.69 The DIMCO Machine Tools building on the north side of the Westfield Centre, just outside of the Wood Lane CA, is also Grade II listed. The building dates to 1898-9, and is a large single-storey shed which was originally an electricity generating station for the London Underground, and has been brought back into use as a substation for the Central Line as well as a bus stand for TfL buses
- 3.70 Table 3.2 below details all Grade II listed buildings and Buildings of Merit in the OA.

Grade II listed buildings within the	Date listed
Shepherd's Bush	
No. 58 (Former Odeon)	16.01.1974
Shepherd's Bush Empire (Former Empire)	02.10.1981
War Memorial (Winged Victory) at SE	14.02.1985
Shepherd's Bush Place	
Nos. 1-24 (consec.)	28.11.1990
Sterne Street	
Nos. 33-53 (odd)	11.03.1988
Wood Lane	
Dimco Machine Tools	20.09.1988
Penfold style Pillar Box	19.08.1976
Grade II listed buildings adjacent to the	Date listed
Lime Grove	
London College of Fashion, No. 40 (Former Hammersmith)	06.06.1984
Rockley Road	
St Simon's Church and	13.08.1998
Shepherd's Bush Road	
The Grampians (inc. retail units and	10.10.2003
Uxbridge Road	
St Stephen's Church including	12.05.1970

Table 3.2 Grade II listed buildings and Buildings of Merit

Buildings of Merit within the OA	Date added to Local Register
Bulwer Street	
Lytton House, No. 31	December
Village Hall, No. 60	December
Goldhawk Road	
O'Neills PH & Bush Theatre, Nos. 2-6 (even)	December 1994
Nos. 28, 28a & 28b	December
Pennard Mansions	December
No. 49	December
The Bush Ranger PH, No. 55	December
Miller's Way	
The Old Mill House, No. 1	June 2000
Pennard Road	
Bush Green House (including No 5a)	June 2000
Library Mansions	October
Shepherd's Bush Green	
Railings & entrances to Ginglyk Club (Former Public Conveniences)	December 1994
Romney Court, No. 46 (including retail units)	October 1984
Nos. 47 to 51 (consec.)	October
Granville Mansions	October
No. 53	October
Walkabout Inn, No. 56 (Former Odeon II Cinema)	December 1994
Shepherd's Bush Road	
Nos. 1b, 1c, 1d & 1e	October
Shepherd's Bush Tabernacle Baptist Church	October 1984
Sterne Street	
Nos. 28-32 (even)	December
Tadmor Street	
No. 15 (Sherrington Villa)	December
Uxbridge Road	
Nos. 3-5 (odd)	June 2000
Shepherd's Bush Library, No. 7	October
Nos. 54-90 (even)	October
Nos. 92 & 94	October
Nos. 96-108 (even)	October
Nos. 134-142 (even)	June 2000
Nos. 156-162 (even)	December
Wood Lane	
BBC TV Centre	December
White City Underground Station (including platforms)	December 1994

- Listed Building
- Buildings of merit
- Area of special interest
- Conservation Area

- 1: Oxford Gardens
- 2: Old Oak and Wormholt
- 3: Wood Lane
- 4: Avondale Park Gardens

- 5: Ingersoll and Armingier
- 6: Norland
- 7: Shepherd's Bush
- 8: Holland Park

- 9: Coningham and Lime Grove
- 10: Hammersmith Grove
- 11: Melrose
- 12: Lakeside / Sinclair / Blythe Road



Map 4.3 Conservation Areas & listed buildings

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 01 2 3 4 5 6 7 8 9 10 11 12

Figure 3.4 Location of Listed Buildings and Conservation Areas in WCOA

4. Employment and income

Main employment sectors

3.71 Around 24,000 people work in the area. The BBC, Imperial College London and a local fashion industry, together with a number of creative businesses clustered in the area with the Textiles and Fashion college in Lime Grove, provide a strong foundation.

3.72 The BBC will continue to be a key presence for programme-making and research and development (R&D). Any refurbishment or re-use of the Television Centre is expected to prioritise media, leisure or entertainment uses. Imperial College is developing a campus in the north of the OA where technology and bio-medical R&D will take place, building on the institution's relationship with the nearby Hammersmith Hospital.

3.73 Westfield currently provides 8,000 jobs, of which 13% (1,040) are filled by H&F residents and 26% are occupied by residents from neighbouring boroughs. 61% of jobs are in retail, the remainder are in leisure, restaurants and facilities management. 20% of H&F residents who secured employment in the Westfield Centre were previously unemployed. Table 3.5 below from the 2011 Census compares the industry of employment and Occupation of Employment between the White City OA, the borough, London and England & Wales.

Industry of employment	WCOA #	WCOA %	LBHF %	London %	E&W %
Wholesale and retail trade	664	13.8	10.6	13.1	15.9
Accommodation and food service activities	523	10.9	6.8	6.3	5.6
Professional, scientific and technical activities	514	10.7	16.1	10.9	6.6
Human health and social work activities	491	10.2	9.4	10.7	12.5
Education	423	8.8	8.2	9.6	9.9
Information and communication	382	7.9	9.6	6.9	4.0
Administrative and support service activities	334	6.9	5.4	5.9	4.9
Financial and insurance activities	260	5.4	9.9	7.7	4.3
Transport and storage	251	5.2	3.2	5.0	5.0
Construction	233	4.8	4.0	6.6	7.7
Public administration and defence	145	3.0	3.0	5.0	6.0
Manufacturing	120	2.5	2.3	3.2	8.9
Real estate activities	100	2.1	2.9	2.0	1.4
Other	377	7.8	8.4	7.3	7.4

Occupation of employment	WCOA #	WCOA %	LBHF %	London %	E&W %
Managers, directors and senior officials	405	8.4	14.6	11.6	10.8
Professional occupations	950	19.7	27.0	22.5	17.4
Associate professional and technical occupations	754	15.7	22.1	16.3	12.7
Administrative and secretarial occupations	493	10.2	9.6	11.7	11.4
Skilled trades occupations	382	7.9	5.4	8.3	11.5
Caring, leisure and other service occupations	516	10.7	6.5	7.9	9.4
Sales and customer service occupations	435	9.0	5.5	7.5	8.4
Process, plant and machine operatives	233	4.8	2.5	4.7	7.2

Elementary occupations	649	13.5	6.7	9.6	11.1
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Table 3.3 Industry of Employment and Occupation of Employment

Source : 2011 Census, ONS Performance & Information Team (FCS, LBHF)

- 3.74 In 2011 there were 1,830 new businesses 'born' in the borough an increase of 190 from 2010⁷. In 2011, H&F the percentage of active enterprises that were started in the year stood at 15.4% up from 14.2% the previous year. This remains higher than the Inner London, and Greater London levels (14.6% and 14.8% and respectively).
- 3.75 The largest proportion of new employment between 2006 and 2009 was created by births occurring in the Real Estate and Business Services sector (2,460 new jobs). Other sectors that demonstrate substantial employment growth include Personal Services (940 new jobs), Wholesale and Retail (850 new jobs) and Hotels and Restaurants (840 new jobs).
- 3.76 Between 2009 and 2011, there was a 27% decrease in the number of businesses that ceased trading in the borough. When expressed as a percentage of active enterprises in H&F, 10.7% of active enterprises ceased trading in 2011, which matches the London regional average of 10%.
- 3.77 The real estate and business services sector lost the largest volume of employment through business deaths in H&F. Between 2006 and 2009, almost 6,000 jobs were lost, accounting for one third of all jobs lost due to business deaths. Other sectors which saw large losses were in manufacturing (2,980 lost jobs), personal service sector (1,810 lost) and wholesale and retail (1,770 lost).
- 3.78 According to the ONS, in 2011 95.2% of businesses that were born in the borough survived for at least one year (89.6% in 2009). The Inner London survival rate was 96.1% and London as a whole 95.9%. 2 year survival rates stand at 75%, 3 years 60.9% and 4 year and 46.9% which are slightly below London averages.

Employment Rates

- 3.79 The OA has among the lowest employment rates in the borough although there has been a significant reduction over the last few years in the economic inactivity rate (this includes retired people, students, care givers and sick or disabled people). This is reflected in the rate of 'Out of work benefit claimants' (22.1% vs 13.0% in the borough, or 12.6% across London).
- 3.80 34% of all workless people in the WCOA are claiming Job Seekers Allowance (JSA), compared with just 31% in the borough as a whole.

⁷ <http://www.ons.gov.uk>

The remainder is made up of those people claiming Employment and Support Allowance, and Lone Parents on Income Support.

- 3.81 The JSA rate (7.3%) is at the highest level for over a decade, has gone up by 12% since May 2010 and is nearly twice as high as the borough and London averages. Long-term unemployment is at the highest level for over a decade with 50% claiming JSA for over 6 months (borough 49%). 3.7% of working age population were long-term JSA recipients (borough 1.9%).
- 3.82 Youth unemployment has risen sharply since 2009 and now represents 21% of all JSA claimants (Borough 20%). 9.5% of the population aged 16 to 24 were in receipt of Job Seekers Allowance (borough 5.3%), 10.2% of working age population are claiming Employment and Support Allowance compared to the borough average of 6.7% (See figure 4). Overall 54% of all ESA / IB claimants are aged 25 to 49 and 75% of residents have been claiming IB for more than 2 years. The majority of claimants (43%) have reported a mental condition as their reason for claiming ESA / IB.
- 3.83 Socio-economic classification from the 2011 Census shows that some 25% of the OA population have never worked or are students, compared to a HF average of 18% and a London average of 19.7%.

Socio-economic classification

	WCOA	WCOA	LBHF	London	E&W
	#	%	%	%	%
Higher managerial and professional occupations	761	9.6	18.5	13.2	10.3
Lower managerial and professional occupations	1,535	19.3	27.9	23.1	20.8
Intermediate occupations	819	10.3	9.5	11.8	12.7
Small employers and own account workers	580	7.3	8.0	9.4	9.4
Lower supervisory and technical occupations	473	6.0	4.1	5.0	6.9
Semi-routine occupations	1,001	12.6	7.7	10.4	14.1
Routine occupations	775	9.8	6.1	7.4	11.1
Never worked or Students	1,994	25.1	18.2	19.7	14.7

Table 3.4 Socio-economic classification. Source: Census 2011

ONS Performance & Information Team (FCS, LBHF)

- 3.84 The series of IMD maps included in this section (Figs 3.5 to 3.7) are based on the Indices of Deprivation 2010 (ID2010) from the Department for Communities and Local Government (CLG) as they relate to London. These Indices were produced to identify areas of need at a small area level. There are three Indices. The main one is the Index of Multiple Deprivation (IMD), which uses a complex series of statistical procedures to combine information on a range of aspects of deprivation into a single measure.
- 3.85 The Index of Multiple Deprivation (IMD) is based on the concept of measuring distinct dimensions of deprivation separately and then

combining these to give an overall score. It is an area based measure, rather than an individual based measure, so it measures the extent of each type of deprivation within the area and then combines these to give a figure taking into account the extent of each type of deprivation. It does this by using statistical techniques to combine information on economic and social issues to produce scores for small areas across the whole of England. These are then used to rank the areas according to their relative level of deprivation.

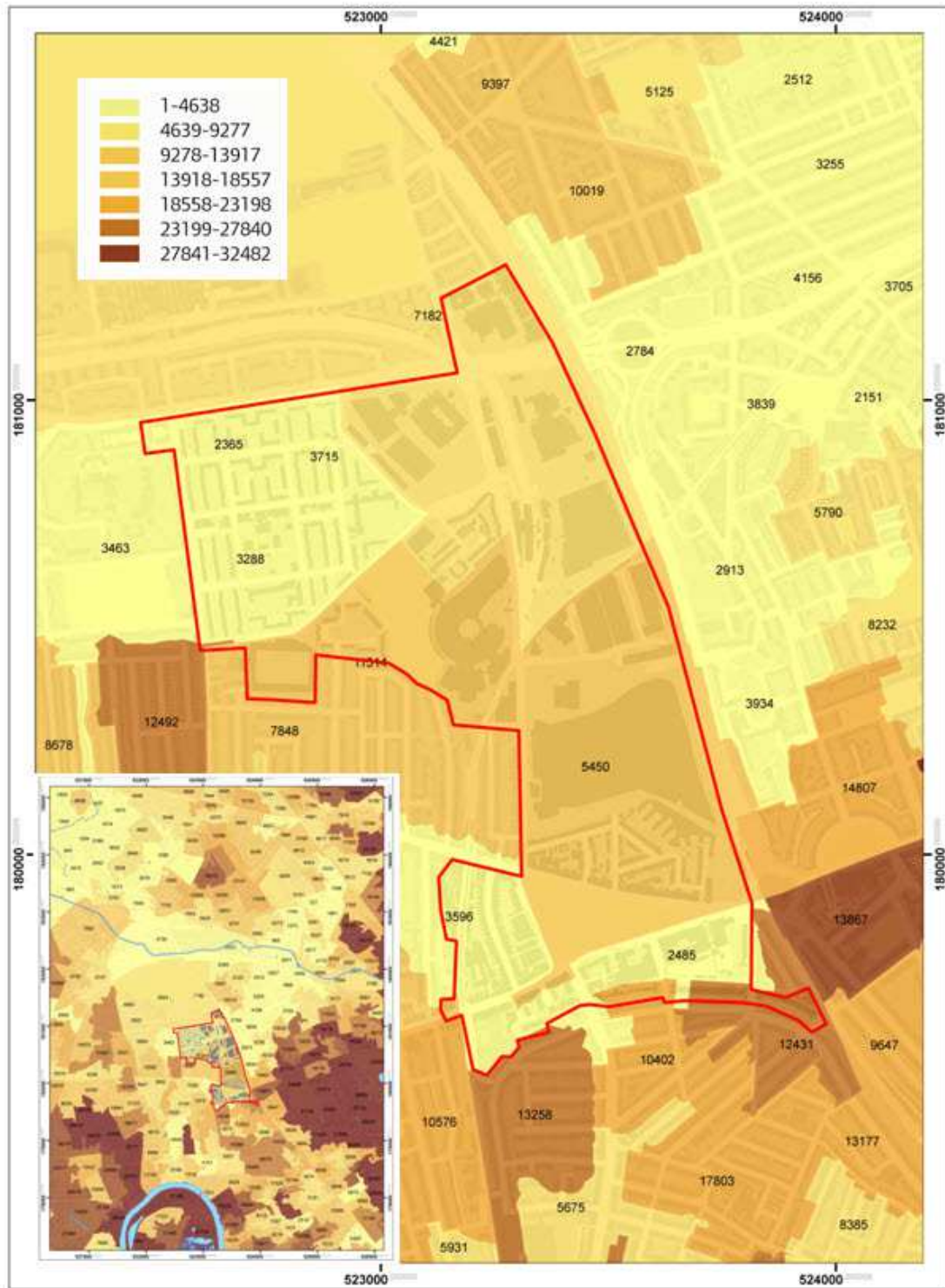


Fig. 3.5 Indices of Deprivation 2010 - Employment

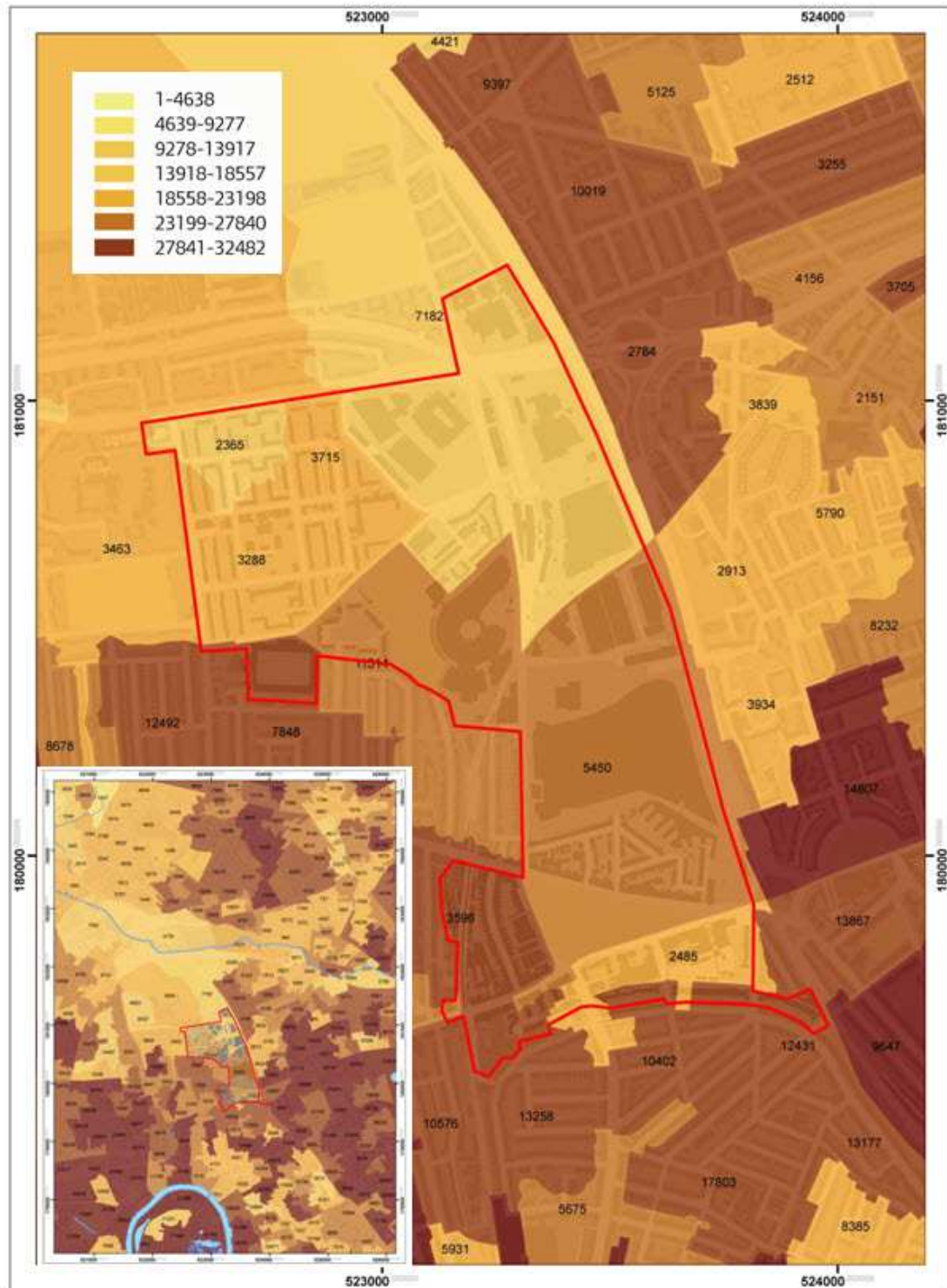


Fig. 3.6 Indices of Deprivation 2010 - Skills

3.86 In relative terms the Wormholt and White City, and Addison wards have severe levels of income and employment deprivation in comparison to other wards within the borough. Similarly the western wards of Kensington & Chelsea which adjoin the OA also have severe levels of income and employment deprivation. The OA

generally fares better in terms of health deprivation, however the southern part of the OA does suffer from severe levels of health deprivation.

3.87 The London Plan 2011 (Table 1.1) presents employment projections by Borough for the period 2007 to 2031. The figures for LB Hammersmith & Fulham are shown below. The projected growth of 35.7% over this 24 year period is well above the average for London of 16.6%, reflecting the strong employment potential associated with the regeneration of the OAPF area.

Adjusted Triangulated Forecasts ('000)								
	2007	2011	2016	2021	2026	2031	growth (2007- 31) %	
H & F		132	139	149	166	173	178	35.7%
Total (London)		4,676	4,797	4,953	5,114	5,280	5,452	16.6%

Table 3.5 London Plan (Table 1.1) Employment projections 2007-2031 by borough⁸ (figs per '000)

5.

Deprivation

3.88 The White City OA has some of the most deprived neighbourhoods in the borough according to the Index of Multiple Deprivation (IMD). Three of the WCOA's Super Output Areas are within the top 10% most deprived nationally and remaining three SOAs are in the 10%-20% most deprived.

3.89 Figure 3.7 indicates the super output areas that are deprived, namely those within the Wormholt and White City ward, part of the Shepherd's Bush ward, and the northern part of the Addison ward.

3.90 Household Income in the OA is amongst the lowest in the borough with majority (36%) depending on less than £20,000. Households earn an average of £28,900 or a quarter less than the borough average. The OA has a significantly higher proportion of Housing Benefit recipients (39%) compared to the borough as a whole (27%).

⁸ The London Plan, 2011, p.24

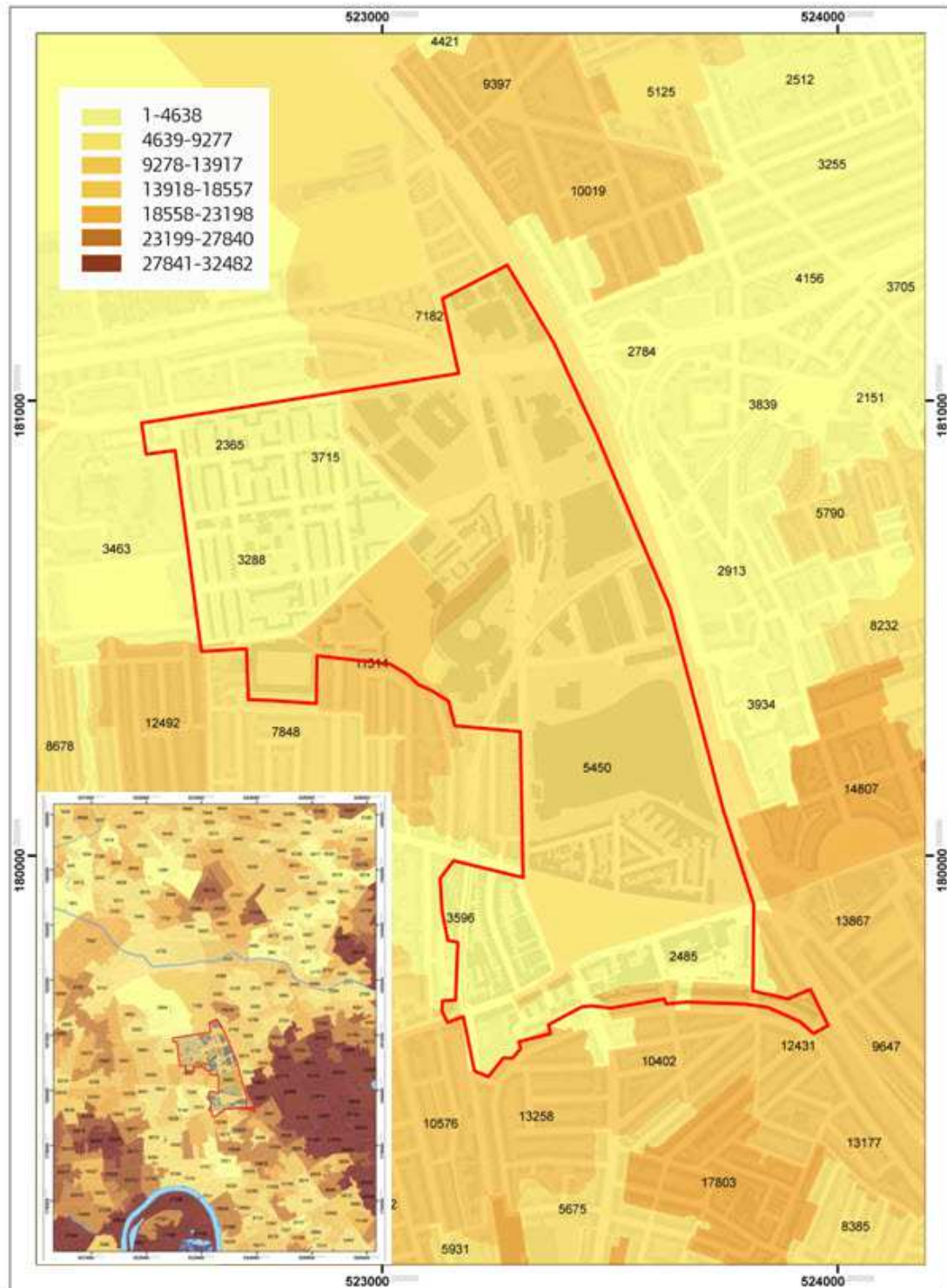


Figure 3.7 Indices of Multiple Deprivation 2010

3.91 Some parts of the OA suffer from health deprivation. The WCOA has amongst the highest standardised mortality rate for both men and women compared to other parts of the borough. Life expectancy is

74.7 for males and 80.6 for females, both lower than the borough averages. Teenage pregnancy rates are significantly higher in the OA – 52 conceptions per 1,000 teenage females compared to borough average of 37 per 1,000.

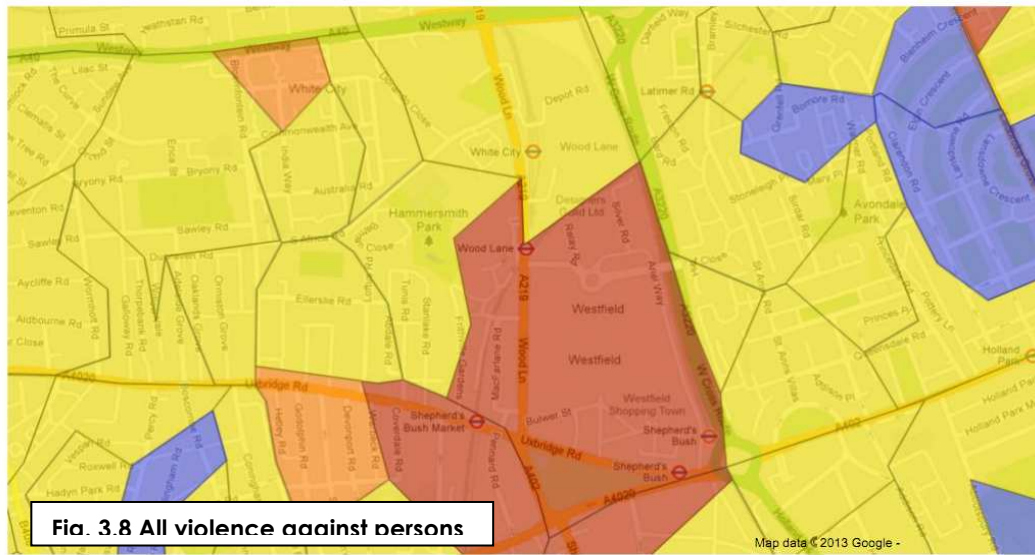
- 3.93 Referrals to both children's social care and adult's social care in the OA are higher than the borough average. The number of new referrals of a child in the area has increased by nearly 5% from 2008-2009, whilst there has been a small increase of 2% of new referrals of vulnerable adults during the same period. Residents in parts of the OA suffer from social deprivation as noted above and as a result health outcomes are relatively poor. Life expectancy, infant mortality, and premature deaths from cardiovascular diseases and cancer are all worse than both National and London averages. Major health challenges relating to unhealthy lifestyles such as high smoking prevalence, childhood obesity, improper alcohol intake and substance misuse are also overly represented. 9.5% of the working age population claims ESA compared to the borough average of 6.4%. Overall, 57% of all IB claimants are aged 25 to 49 and 71% of residents have been claiming IB for more than 2 years. The majority of claimants (45%) have reported mental condition as their reason for claiming IB.

Crime and Safety

- 3.94 The basic requirement for safe and secure living and home environments the OAPF might consider are:
1. conditions that reduce safety, security and anti-social behaviour problems, including promoting safety by design;
 2. measures to reduce or avoid actual incidence of problems and the perception and fear of problems for residents.
- 3.95 The Figure below shows Metropolitan Police Crime Mapping covering the WCOA⁹. This is based on December 2012 information. It is notable that for 'All Anti-Social Behaviour and 'Most serious violence' the OA is either average (yellow) or below average (purple). 'All violence against persons' is above average (red) in the southern part of the OA. Considerable development and change in the Borough and the town centre could have an impact on safety and security problems.

⁹ Source: <http://maps.met.police.uk/index.php?areacode=00AJGH&crimetype=7>

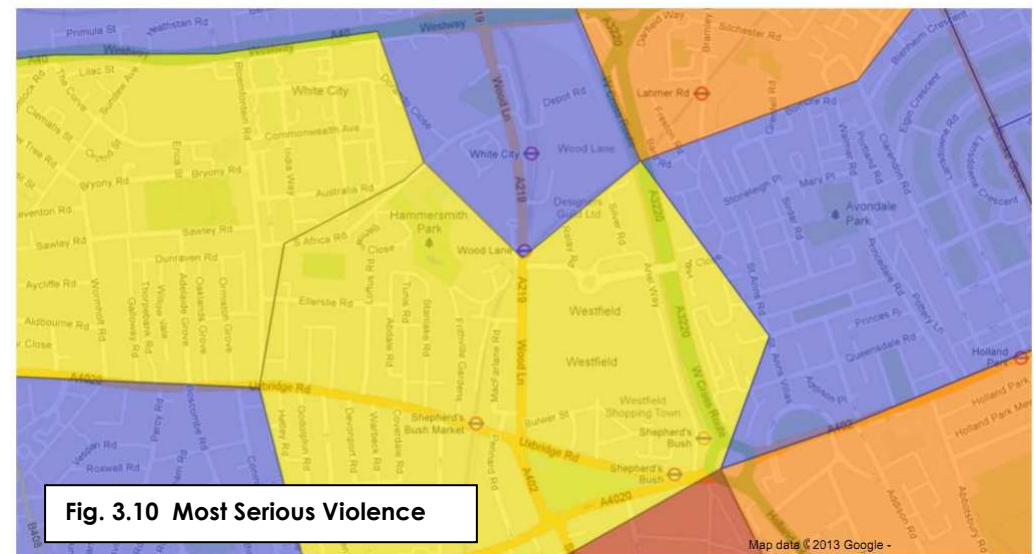
High Above average Average Below average Low or no crime



High Above average Average Below average Low or no crime

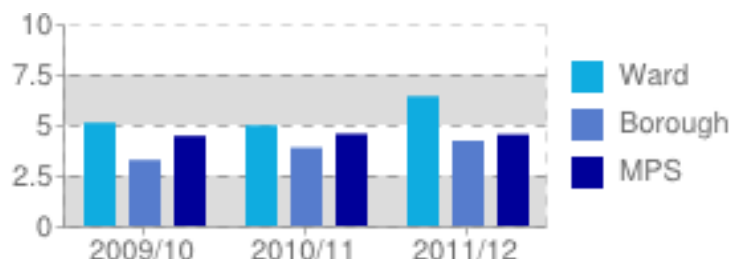


High Above average Average Below average Low or no crime



3.96 Metropolitan Police figures for Annual trends, of crime rates per 1000 population show a slight increase in crime levels in some areas for 2009 to 2012.

College Park and Old Oak Ward



Shepherd's Bush Green Ward

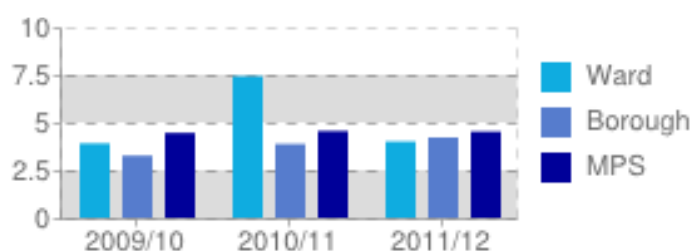


Fig. 3.11 Annual trends of crime rates

3.97 Having regard to longer term trends, the OA Experienced an overall 3% decrease in the total number of crimes committed since 2005/06 although there has been an increase of 4% around Shepherd's Bush Common during the same period. The largest decreases were both burglary and robbery by nearly a third, theft and handling (8%) and there was a small decrease in the rate of sexual offences (numbers are very small). The increase was in the number of drug arrests (nearly double) and there was also a 6% increase in both criminal damage and in 'Violence against the person' crimes.

6. Flood risk and water resources

3.98 Water is a particularly important issue for climate change, as a resource to supply populations and flora and fauna, as well as for flooding events.

3.99 A Strategic Flood Risk Assessment (SFRA) was carried out for LBHF in February 2008 in accordance with PPS 25 Development and Flood Risk. SFRA is a planning tool that enables boroughs to select and develop sustainable site allocations away from vulnerable flood risk areas by classifying zones dependent on flood risk.

3.100 Based on flood modelling, the vast majority of the OA was determined to be within Zone 1 (Low Probability). This zone comprises land assessed as having a less than 1 in 1000 annual probability of flooding

in any year (<0.1%). A small pocket of land within the OA southeast of Shepherd's Bush Common along the southern side of Goldhawk Road is within Flood Zone 3 (high probability) and has a 1 in 200 or greater annual probability of flooding (>0.5%) in any year. From a flood risk perspective all land uses are acceptable within Flood Zone 1.

- 3.101 Flood risk is not considered to be a significant constraint to development and all land uses including highly vulnerable uses are considered appropriate in this zone. Sewer and surface water flooding is acknowledged as an issue, with the borough experiencing significant problems historically. Due to their potential impact on local flood risk, a Flood Risk Assessment (FRA) will be required for all developments greater than 1 ha in size within the OA. The FRA should include consideration of surface water drainage, the approach to control surface water discharges, and onsite mitigation measures particularly where the capacity of the surface water sewer or receiving watercourse is limited.

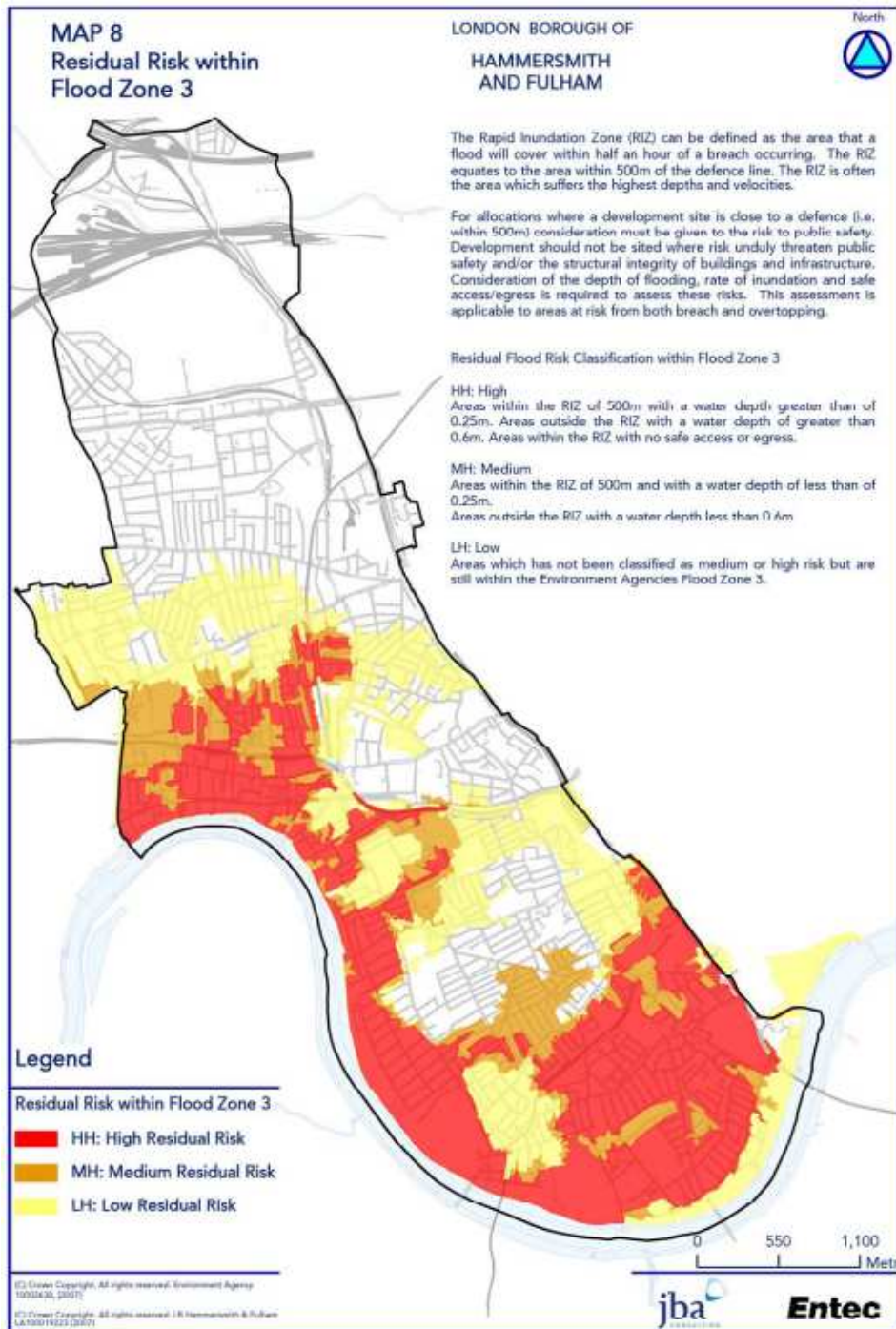


Figure 3.12 Flood Risk Zones. Source: Strategic Flood Risk Assessment,

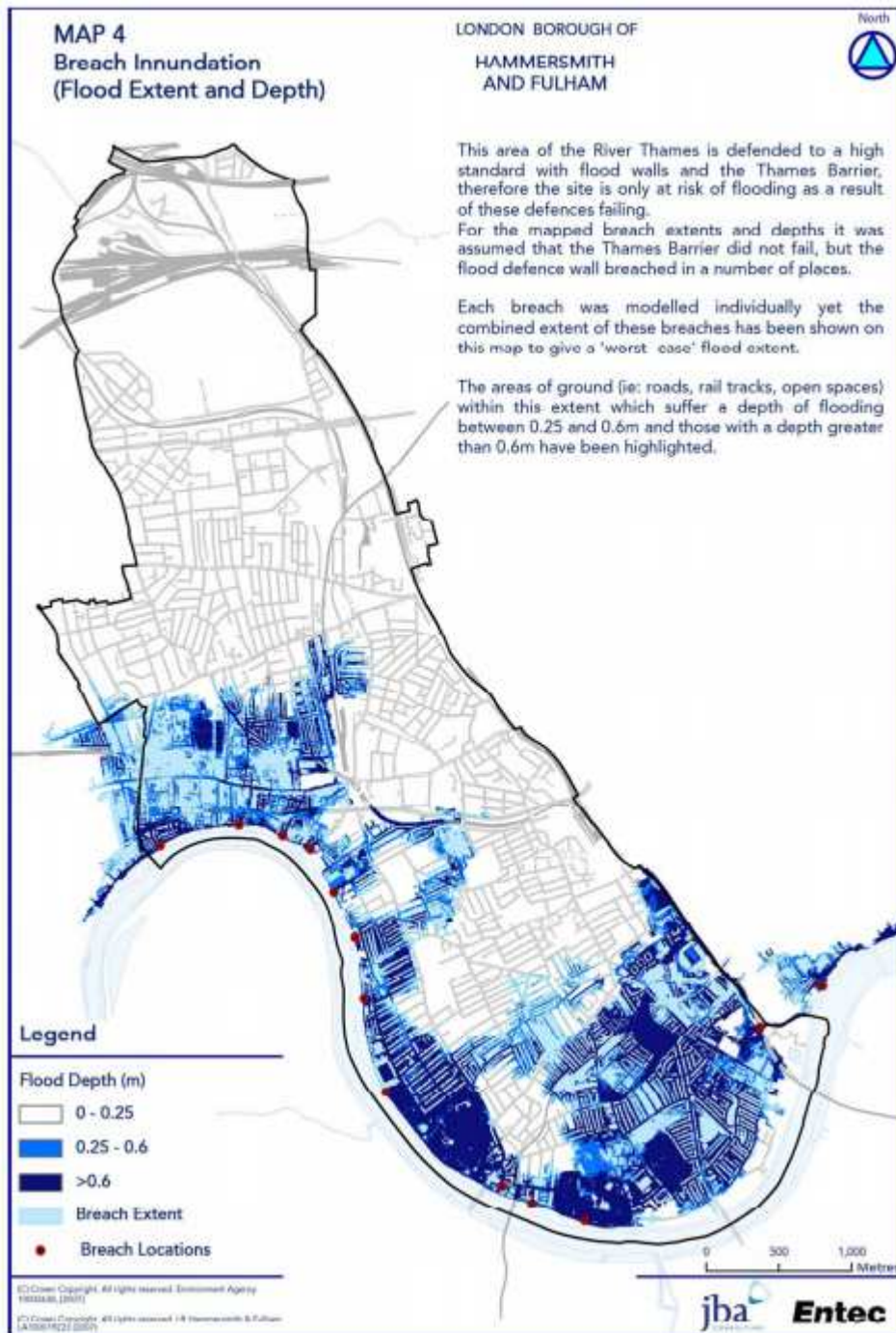


Figure 3.13 Breach Innundation Model
 Source: Strategic Flood Risk Assessment

7. Biodiversity

- 3.102 There are no areas of international importance (i.e. Ramsar sites, Special Areas of Conservation or Special Protection Areas).
- 3.103 The physical environment of the OA is degraded although there are two major public spaces which support biodiversity. Both Hammersmith Park and Shepherd's Bush Common support a range of flora and fauna and both have been recognised as nature conservation sites in the LBH&F UDP (2003) and the Biodiversity Action Plan (BAP) (2006). Hammersmith Park is classified as an area of Grade II Borough Importance whilst Shepherd's Bush Common is classified as an area of Local Importance. On the eastern embankment of the West London line there is a local SINC (site of importance for nature conservation) designation.
- 3.104 The BAP also identifies seven habitat types that are especially important in the borough, including railway land and corridors and gardens and allotments, both habitat types that are strongly represented in the OA. Two bird species have been identified in the BAP that are of particular value to the borough or are 'flagship' species, the protection of which will result in benefits to many other types of wildlife. They have been identified as the Black Redstart and House Sparrow.
- 3.105 Outside of the boundaries of the OA, Wormholt Park (3.66ha) lies on the western side of Bloemfontein Road. Wormwood Scrubs lies to the north of the OA and is Metropolitan Open Land, and Holland Park is south east of the OA within the Royal Borough of Kensington & Chelsea.

Soil

- 3.106 The character of the OA is dominated by the Previously Developed Land (PDL) that is Unused or may be Available for Development. The percentage of new homes built on previously developed land now stands at almost 100%.
- 3.107 The main issue for soils therefore is the potential for finding contamination arising from previous industrial uses on the lands and air-borne dust created by construction activity.

Waste

- 3.108 As the OA is highly urbanised area there are no waste sites. However, it is pertinent to refer to usage and potential generation of waste.
- 3.109 There is no specific information relating to waste generation and recycling rates in the OA so Borough figures are referred to below. The overall borough recycling rate was 20.56% for municipal waste and

26.59% for household waste. These rates of recycling are higher than many other London Boroughs. Greater levels of recycling are anticipated in the medium and long term in line with London Plan targets exceeding 45% for municipal waste by 2015.

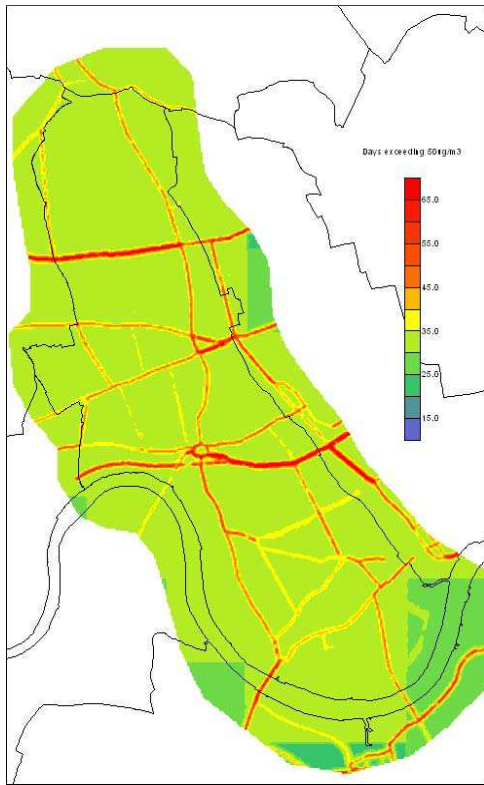
- 3.110 Landfill has now been replaced by Energy from Waste (EfW) combustion as the prime treatment method for the waste which cannot be recycled. Since February 2011, the waste – which is still being transported by river – is being received at a recently constructed EfW Facility at Belvedere in the London Borough of Bexley.
- 3.111 Here, the waste is incinerated and the heat from the process is used to generate electricity through steam generation in boilers. This process is called 'recovery' (as opposed to 'disposal') and it is a preferable method of waste treatment as it sits higher up the waste management hierarchy of options. Belvedere is the largest EfW Facility in the UK and one of the largest in Europe, which will eventually generate up to 72MW of power.
- 3.112 Co-mingled dry recycled material is sent to a recently refurbished and re-opened facility at Smugglers Way in Wandsworth and is therefore processed within the WRWA area.
- 3.113 The Wood Lane Industrial Business Park (IBP) is noted as a strategic industrial location for higher standard business uses and could potentially accommodate a waste transfer facility. However, given its location within the OA provision of waste infrastructure would result in a conflict with other OA policies. There is also currently an excess of capacity within the borough for waste processing (EMR and Powerday) in terms of the requirements of the London Plan.

8. Air quality, energy and climate change

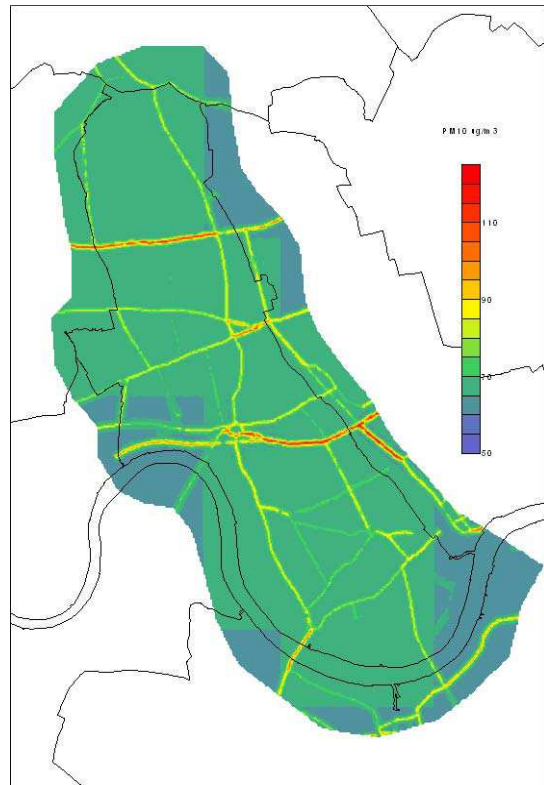
- 3.114 Climate change and air quality and energy demand are closely linked issues. CO₂ emissions from domestic energy use and transport are key sustainability / climate change issues. The demand on energy use from activities ranging from movement to use of electricity by office buildings are important considerations.

Air Quality

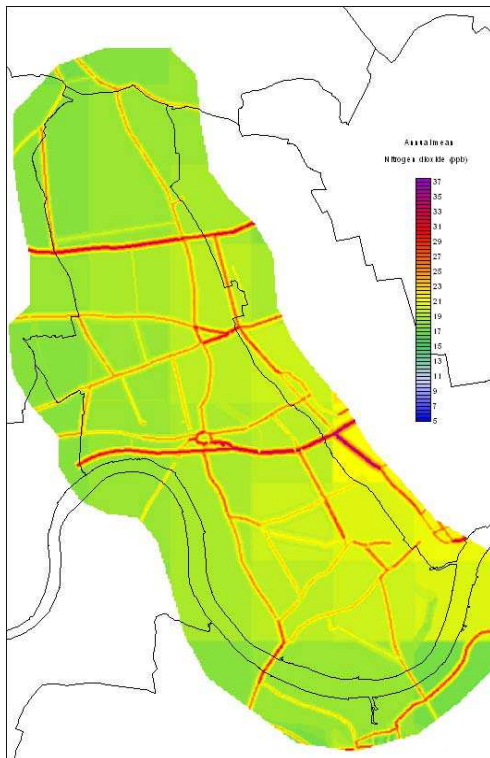
- 3.115 The OA is within an Air Quality management Area (AQMA) and currently features degraded air quality. There are areas of high NO₂ concentrations in the OA particularly along the strategic highway network. Almost all of the pollutants - gases and airborne particles, are the product of vehicular transport and traffic congestion.



1



2



3

Map 1 – Days exceeding 50 $\mu\text{g}/\text{m}^3$ (ppb)

Forecast annual mean nitrogen dioxide (ppb) for 2005 (based on 1999 meteorology) 40ppb and above represents an exceedence of the air quality objective

Map 2 – Small Particles (PM10)

Forecast number of days with daily mean PM10 $>50(\mu\text{g}/\text{m}^3)$ for 2004 (based on 1996 meteorology); 35 days and above represents an exceedence of the air quality objective

Map 3 Nitrogen dioxide (ppb)

Fig. 3.14 Annual monitoring of Air Pollution (NO₂ and PM₁₀)

Predicted Annual Mean Nitrogen Dioxide Levels

Open Space

- 3.116 A relative lack of open, green spaces reduces the quality of life for people in Hammersmith and Fulham. Better access to green spaces could increase mental wellbeing and encourage more physical activity. Busy traffic creates a significant health hazard in the borough through generating noise and air pollution and increasing the likelihood of road traffic accidents. Although generally linked to high pollution levels, admissions to hospital for asthma do not appear to be related to pollution hot-spots in the borough.
- 3.117 Busy roads, and polluted air not only increase the risk of accidents and asthma, but they contribute to the difficulty of walking and cycling in the borough. This is compounded by lack of green spaces reducing opportunities for physical activity for children.

Energy

- 3.118 LBHF is examining the potential to provide a strategic framework for the development of a site-wide, low carbon, decentralised energy (DE) scheme within the White City Opportunity Area (WCOA), to deliver environmental benefits above what might otherwise be achieved by individual developments on a plot-by-plot basis. The timeframe for the study is a 20 year period to 2030.
- 3.119 The main stakeholders consulted in the work included London Borough of Hammersmith and Fulham, Royal Borough of Kensington and Chelsea, Greater London Authority, Hammersmith Hospital, BBC, EDF, Wormwood Scrubs Prison, King Sturge, Westfield Group, Imperial College London, Building Schools for the Future, Land Securities and TfL.
- 3.120 Based on this investigation a distributed energy scheme has been proposed based around gas fired combined heat & power (CHP) and some renewable heat. It is assumed that electricity generated by the CHP plant are assumed to be sold to the grid, and that heat will be distributed to customers via a district heating network. The publicly owned areas and private sites have been identified as the most suitable areas to establish a core district heating network which can subsequently expand to supply and interconnect with other parts of the OA. These locations are characterised by high energy densities along with short distances between heat customers and similar regeneration timescales.
- 3.121 The area to the south of the existing Westfield Shopping Centre is not proposed for incorporation into the proposed scheme since there appears to be limited heat demand in this area. Future redevelopment proposals in Kensington and Chelsea could present an opportunity for connection to the proposed scheme in the future.

However these are not included within the network layout proposals at this stage.

3.122 Three potential locations have been identified for the development of energy supply infrastructure to interface with the proposed district heating network. The potential locations are:

- the Consortium Development Site
- the existing BBC TV Centre site
- the White City Estate area

3.133 One or more of these locations could supply heat to the new private development areas and publicly owned sites in and around the north of the WCOA. It is possible that more than one of these could be developed, since phasing of the network development could dictate that this is the most economically favourable solution.

3.134 A range of technology options could be suitable for the supply of heat energy into the proposed DE scheme. The option(s) to be taken forward at the time of scheme development will depend on a number of factors. The main technology options in the context of WCOA are expected to be:

- Gas fired CHP
- Biomass fired boilers
- Energy from Waste, most probably Anaerobic Digestion [to be reviewed]

Noise



Fig. 3.15 Road Noise Map (Lden - Average Daytime)
 (Source: <http://services.defra.gov.uk/wps/portal/noise/>)

- 3.135 Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and Westway.
- 3.136 Noise is defined as unwanted sound. Sensitive receptors to noise include residential areas, educational facilities, health care facilities and places of worship.
- 3.137 Road, rail and industrial noise mapping published online by the Department for Environment, Food and Rural Affairs (Defra) shows the extent to which these noise sources may affect sensitive receptors. Built up areas shield unwanted sound and cause the effect to decrease over a short distance. Open areas such as parks allow the noise to travel over a longer distance and disturb users of such spaces.

3.138 The railway lines are main sources of noise. The main road sources of noise are the A40 Westway.

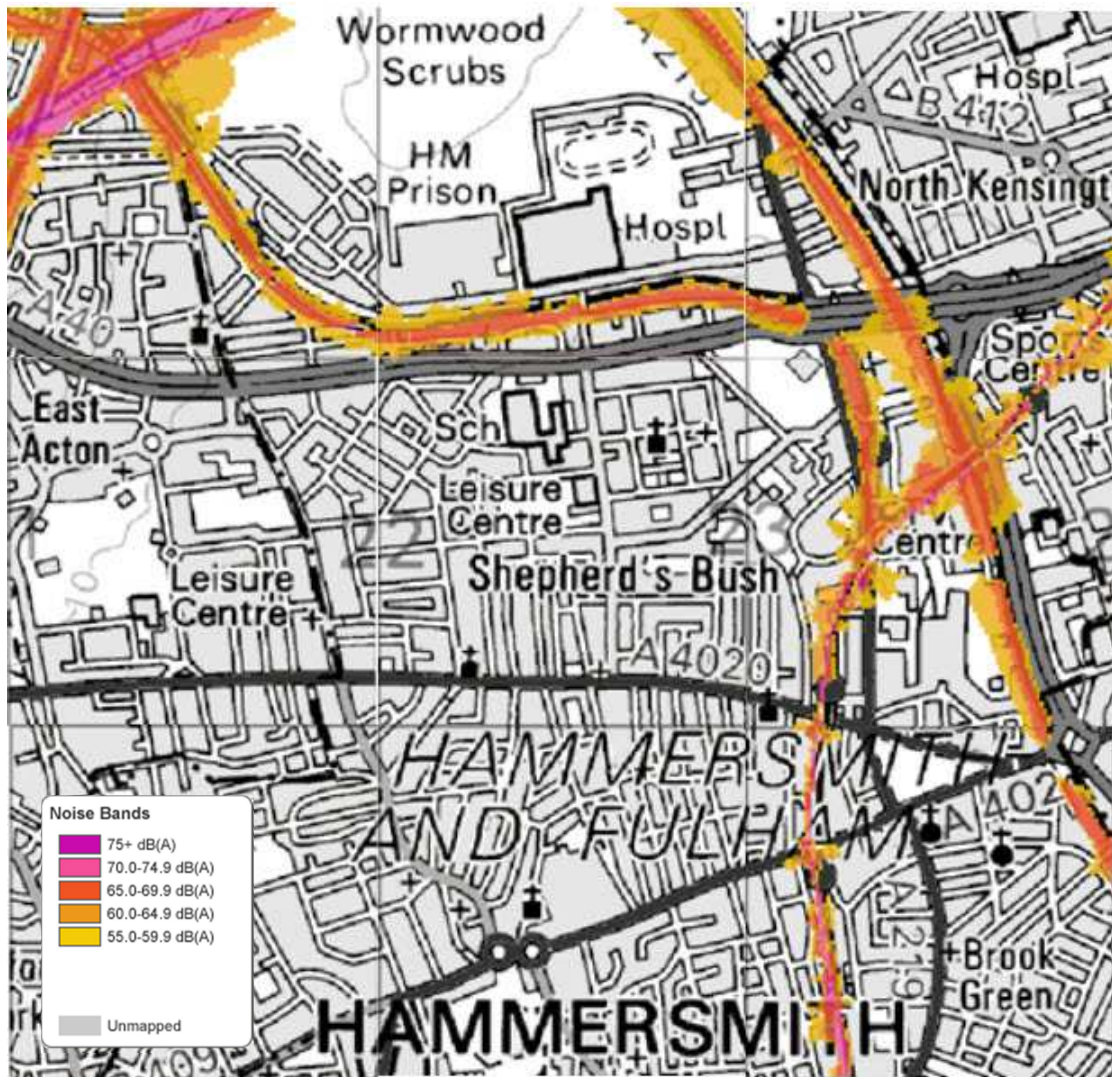


Fig. 3.16 Rail Noise Mapping (Lden – Average Daytime)

(Source:

<http://services.defra.gov.uk/wps/portal/noise/>)

Population

3.139 There is a degree of overlap in the IIA between EqlA and SA analysis of demographics in the OA area. Further detailed information is contained in the EqlA section.

3.140 The 2011 Census provides updated information on OA's population, age profile and household number. The WCOA

population stands at 10,340 residents in 4,310 households. The average household size is 2.4 persons, which is lower than the average for LBHF which is 2.26. The population density in WCOA is 99 people per Ha compared to a Borough average of 111.

3.141 It is interesting to note that this is over 1,090 persons and 260 households higher than the previous estimate in the 2011 WCOA consultation draft. (9,250 residents within 4,050 households). The average household size is also evidently falling (2011 estimate of 2.4). Further analysis of the population profile is provided in the Equalities Impact Baseline analysis section.

Household Profile

3.142 Based on the 2011 Census information, the largest groups are single adult households which account for 28% of the population (down from 29.5% in 2001) (borough average 28.7% down from 27% in 2001 and London average 22%). 13% of the population comprises a lone parent with one or more dependent children (14.5% in 2001) (borough average 7.2), and 11.4% a couple family of one or more children (borough 12.8, London 17.8).

3.143 The 2011 Census shows that only 19.4% of households (24.3% in 2001) are owner occupiers compared to 35.6% in the borough (down from 44%) and 49.5% in London. 43.3 were living in Council housing. This is significantly higher than the borough proportion of 15.7% and London figure of 13.5%

Household composition

	WCOA	WCOA	LBHF	London	E&W
	#	%	%	%	%
Couple with dependent children	492	11.4	12.8	17.8	19.3
Couple, all non dependent children	135	3.1	2.7	5.2	6.1
Couple, no children	436	10.1	14.7	13.8	17.6
Lone Parent with dependent children	560	13.0	7.2	8.5	7.2
Lone Parent, no dependent children	254	5.9	3.9	4.1	3.5
Single Adult	1,206	28.0	28.7	22.0	17.8
Elderly Couple	47	1.1	2.0	4.1	8.2
Single Elderly	350	8.1	8.8	9.6	12.4
Other with dependent children	212	4.9	3.0	4.6	2.6
Other Households, shared	622	14.4	16.3	10.4	5.3

Tenure mix

	WCOA	WCOA	LBHF	London	E&W
	#	%	%	%	%
Owned outright	330	7.6	15.9	21.1	30.8
Owned with a mortgage or loan	449	10.4	18.1	27.1	32.7
Shared ownership	60	1.4	1.6	1.3	0.8

Rented from council (LA)	1,870	43.3	15.7	13.5	9.4
Other social rented (HA)	399	9.2	15.4	10.6	8.2
Private rented and rent free	1,206	28.0	33.3	26.4	18.0

Table 3.6 Census of Population 2011, Household composition and Tenure Mix

9. Social infrastructure

3.144 The majority of primary schools and nurseries are outside the OA, with two primary schools and a nursery in the western part of the OA situated close to existing housing. There is a relatively dense coverage of primary schools and nurseries to the south and west of the OA in the surrounding residential area. Existing primary school capacity is as follows:

- Bentworth primary school – 1 form entry – at capacity
- Canberra school (currently on special measures) – at capacity
- Pope John – 1 form entry – at capacity
- St. Stephen's – at capacity
- Miles Coverdale – at capacity

3.145 The majority of the OA is within the 800m walk net from existing primary schools and nurseries. However, based on the 'at capacity' nature of existing schools, it is likely that new provision will be required in the eastern part of the OA (east of Wood Lane) where new residential communities are planned. There are no secondary schools within the OA although there are a number within close proximity. The two closest secondary schools, Phoenix and Burlington Danes, are both full and therefore cannot accommodate population growth from within the OA. 27% of adults aged between 16 and 74 have no educational qualifications. This is worse than the overall rate for both the borough (18%) and London as a whole (24%).

Hospitals, GP surgeries and pharmacies

3.146 The OA is located very near to Hammersmith Hospital, which forms part of the Imperial College Healthcare NHS Trust. The Trust provides a wide range of clinical services. Charing Cross Hospital is located in Hammersmith, which is not too far away.

3.147 There are GP surgeries and pharmacies within the OA with a number located around the edge of the OA in the existing residential districts. A major new health facility in the form of a polyclinic is being provided on the western edge of the OA to meet the needs of existing residents of the area, but there will be a need for additional facilities for new residents, workers and visitors.

Libraries and community centres

3.148 The new library next to Westfield on Wood Lane would serve the development. White City West is well served by a range of community centres within the Estate.

Sport and Leisure provision

Swimming pools

- 3.149 The main swimming pool facility that serves the WCOA is the Phoenix Sports Centre. The Kensington Leisure Centre (outside of LBHF) catchment also covers part of the WCOA. RBKC has approved a scheme to replace the Centre with an academy and new leisure centre that will have three pools (up to 25 metres), a 120 station gym and an eight-court sports hall. This is primarily aimed at meeting needs local to the centre within RBKC.



Figure 3.6: Nurseries, primary & secondary schools

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GLA (LA100032379) 2011

Sports Halls

- 3.150 A large shortfall of sports halls exists across LBHF (PMP Leisure Needs Survey). While the College Park and Old Oak ward has a good supply of facilities (at Burlington Danes Academy and Wood Lane High school), these are both dual use sites and it will be important to ensure community access. The Phoenix sports centre provides sports hall facility in the Wormholt and White City Ward, along with the Fatima community centre. There is currently no provision for sports halls in the Shepherd's Bush Green ward, so this would be a prime location for a new facility in the WCOA development. The Westway Leisure Centre is located under the Westway directly east of the A3320, which is currently not easily accessible to LBHF residents. Improvements to east west connections would greatly improve access.

Health and Fitness

- 3.151 The Phoenix Sports Centre is the only public health and fitness facility in the area, and is located just outside the OA in the Wormholt and White City ward. Provision in the College Park and Old Oak ward is also relatively low. The average provision across the three wards is significantly lower than the LBHF average and below the London average (provision per 1,000 population). Based on the accessibility catchment map, the main gaps in provision are around White City Station. The only private health and fitness facility in the OA is Fitness First, located within the W12 Centre. Royal Fitness gym, also a private facility, is located in the Shepherd's Bush Green ward, just outside the OA.

Synthetic turf pitches

- 3.152 Provision in the Shepherd's Bush Green and Wormholt and White City wards is below the London average and significantly below the LBHF averages (facilities per 1,000 population). LBHF has appointed PlayFootball.net to undertake the works and services contract for the redevelopment of Hammersmith Park sports facilities providing a football facility to include free community access. The works will include upgrading the synthetic turf pitches in South Africa Road adjacent to Hammersmith Park. There is a high level of provision in the College Park and Old Oak ward (mainly based at the Linford Christie Stadium site).

Other sport provision

- 3.153 Provision of athletics tracks is currently good given the facilities at the Linford Christie Stadium. Indoor tennis provision in the north of the borough is generally poor. The Westway Sports Centre (just outside LBHF) does serve the White City area, however Shepherd's Bush Green, Wormholt and White City, and Askew wards are all poorly served.

10. Transport and travel

- 3.154 White City is an important transport hub in terms of public transport, highways, logistics and servicing activity.

- 3.155 There are four Underground stations within the OA, providing access to the Central and Hammersmith & City lines. There has been extensive recent redevelopment as part of the Westfield development with two new rail stations: one on the Hammersmith & City Underground line (Wood Lane) and another on the West London Line (Shepherd's Bush), which is part of the TfL Overground network.
- 3.156 The Shepherd's Bush Underground station on the Central line has also been enlarged and modernised and two new bus interchanges have also been built. In addition the road network at Ariel Way and Uxbridge Road has recently been improved to better cater for pedestrians and cyclists.
- 3.157 There are 14 bus routes serving the OA. The north and northwest of the site has fewer routes and lower frequencies, although the opening of White City bus station has improved bus links. The Westway (A40) traverses the north of the OA. It is a key east-west route and serves an important strategic traffic function for freight as well as being a key London radial route connecting Central London, Heathrow airport, the M4, M25 and the South West. The site is also connected to another important east-west route to the south (A402), which links Shepherd's Bush Green gyratory to Holland Park Avenue via Shepherd's Bush roundabout and suffers from chronic congestion.
- 3.158 Both of these major highway networks and the link between them the West Cross Route (A3220), form part of the strategic Transport for London Road Network (TLRN). Wood Lane forms a north-south spine route through the OA area, which has capacity constraints resulting in peak time congestion.
- 3.159 Walking and cycling permeability is constrained due to barriers created by the Underground cutting and viaduct and the West Cross Route to the east and the Westway to the north. The Public Transport Accessibility Level (PTAL) varies throughout the OA; whilst the intensely developed south of the OA is very well served, the north and northwest of the OA is less well served.



Fig. 3.18 Transport Infrastructure in OA

3(d) Equalities Impact Assessment - Profiles of Equality groups

3.160 This section outlines the characteristics of the Equality Groups identified in section 2 (methodology) under the Equality Act 2010. The context for this analysis of Equality Groups is the OAPF's aim to resolve complex planning issues relating to a new community of

some 5,000 homes and 10,000 jobs over the next 15 to 20 years. This is in a situation where the WCOA comprises established residential communities, commercial centres and brownfield sites (where most of the development potential is focussed). The resident population in the OA is approx. 10,340 (4,310 households) and 24,000 jobs.

- 3.161 The LBHF Core Strategy 2011, identified that the planned growth in the Opportunity Area would provide the largest proportion of new homes in LB Hammersmith & Fulham of 5 regeneration areas delivering 5,000 of 13,200 new homes. It also provides opportunities for studio/workshops, creative industries, retail and night time economy. The Core Strategy EqlA emphasised that equality groups should have equal access to these new homes, jobs and facilities in this major growth area.
- 3.162 This OAPF EqlA considers how future growth will affect the equality and diversity of the existing communities in these areas, try to remove barriers for the equality groups, and promote social cohesion in the new communities created in these major growth areas. The following profile of the WCOA population is generally sourced from the White City OAPF EqlA Consultation Draft, LBHF and Core Strategy EqlA, reviewed and updated to take account of changes in available information and changes in proposals in the current OAPF.
- 3.163 This overview of the Equality Groups is based on the Protected Characteristics defined in section 2(d). Other data (particularly socio-economic) is referred to where this provides additional knowledge on Equality Groups and their circumstances.

1. Age

- 3.164 The 2011 Census releases so far provide preliminary information on OA's population, age profile and household number. The WCOA population stands at 10,340 residents in 4,310 households. The average household size is 2.4 persons, which is lower than the average for LBHF which is 2.26. The population density in WCOA is 99 people per hectare compared to a Borough average of 111. This is over 1,090 persons and 260 households higher than the previous estimate in the 2011 WCOA consultation draft (9,250 residents within 4,050 households). The average household size is also evidently falling (2011 estimate of 2.4).

Age	2011	2011	2011	2011
0 to 4	7.2%	6.5%	7.2	6.3%
5 to 14	11.7%	8.9%	11.5%	11.4%
15 to 19	5.9%	4.3%	5.8%	6.3%
20 to 44	48.2%	52.7%	43.2%	34.3%
45 to 64	19.2%	18.6%	21.2%	25.4%
65+	7.7%	9.0%	11.0%	16.4%

Table 3.7 Age. Source : 2011 Census - based on the output area (OA) figures Performance & Information Team (FCS), LBHF

3.165 The table above illustrates the various age cohorts of population in the WCOA and compares with averages for LBHF, London and England. It shows a higher proportion of people aged 20-44 (48.2%) than the London average (43.2%) and is substantially higher than the English average (34.3%), but as a result there are fewer 45-64 year olds (19.2%) than in London (21.2%) and England (25.4%). Notably, the proportion of people aged 65 and over is significantly lower within the Opportunity Area at 7.7% than the rest of London (11.0%) and the England average (16.4%). The percentage population in the 0 to 4, 5 to 14 and 15 to 19 are comparable to the London average, but above the Hammersmith and Fulham figure. Within the OA the 5 to 15 cohort is higher in College Park and Old Oak Ward and the Wormholt & White City Ward, while the 20-44 cohort is more concentrated in Addison and Shepherd's Bush Green wards.

Household Profile

3.166 Based on the 2011 Census information, the largest groups are single adult households which account for 28% of the population (down from 29.5% in 2001) (borough average 28.7% down from 27% in 2001 and London average 22%). 13% of the population comprises a lone parent with one or more dependent children (14.5% in 2001) (borough average 7.2), and 11.4% a couple family of one or more children (borough 12.8, London 17.8).

3.167 The 2011 Census shows that only 19.4% of households (24.3% in 2001) are owner occupiers compared to 35.6% in the borough (down from 44%) and 49.5% in London. 43.3% were living in Council housing. This is significantly higher than the borough proportion of 15.7% and London figure of 13.5%

3.168 The 2011 Census shows a decrease in number of householders renting from a council (from 49.1% to 43.3%), and a decrease in

social rented (RSL) (10.1% to 9.2%). The number of owned dwellings decreased over the 10 year period from 24.3% to 19.4%.

Tenure	2001 Census		2011 Census	
	Number	%	Number	%
Owned	980	24.3%	1,870	43.3%
Rented from council	408	10.1%	399	9.2%
Other social rented (eg. RSL)	2,381	59.2%	2,269	52.5%
Total Social Rented Housing	662	16.5%	1206	28.0%
Private rented or living rent free	4,023	100%	4,219	100%
TOTAL				

Table 3.8 Tenure Change

	WCOA #	WCOA %	LBHF %	London %	E&W %
Owned outright	330	7.6	15.9	21.1	30.8
Owned with a mortgage or loan	449	10.4	18.1	27.1	32.7
Shared ownership	60	1.4	1.6	1.3	0.8
Rented from council (LA)	1,870	43.3	15.7	13.5	9.4
Other social rented (HA)	399	9.2	15.4	10.6	8.2
Private rented and rent free	1,206	28.0	33.3	26.4	18.0

Table 3.9 Tenure Mix, Census 2011

Education

3.169 The wider White City Opportunity Area Profile 2009 states that 27% of adults aged between 16 and 74 within the OA have no educational qualifications. This is worse than the rate for the Borough (18%) and London (24%).

	WCOA #	WCOA %	LBHF %	London %	E&W %
No qualification	1,595	19.3	12.8	17.6	22.7
Level 1	894	10.8	7.0	10.7	13.3
Level 2	889	10.7	8.3	11.8	15.3
Apprenticeship	94	1.1	1.2	1.6	3.6
Level 3	845	10.2	10.7	10.5	12.3
Level 4* and above	2,799	33.8	49.6	37.7	27.2
Other qualification	1,156	14.0	10.5	10.0	5.7

Table 3.10 Education qualification in OA, Census 2011

Deprivation

3.170 Part of the OA is in one of the most deprived neighbourhoods in the borough, according to the Index of Multiple Deprivation (IMD 2007).

Three of the WCOA Super Output Areas (SOA) are within the top 10% most deprived nationally and the remaining three SOAs are in the 10-20% most deprived. The areas of deprivation that the OA scored lowest in related to overcrowding, homelessness and access to owner occupation and accessibility sources. Around a fifth of households in Hammersmith and Fulham are households with dependent children. Based on 2011 census data, this equates to 9% that are male lone parents and 91% that are female lone parents in H&F.

2. Disability

- 3.171 It is estimated that there are more than 11 million disabled people in Britain (Source: Family Resources Survey 2010/11). The 2011 Census shows that some 1.1m people in London have a disability (activities limited). This presents a significant challenge to ensure that new development makes provision for people with disabilities.
- 3.172 The H&F Disability Equality Scheme 2009-2012 indicates that 15% of residents in Hammersmith and Fulham have a disability. The latest Census findings (Table 3.11) show that LBHF has a level of 12.6%, and 15.3% in the WCOA.
- 3.173 DWP statistics show that 9.4% of the working age population within the OA are claiming Incapacity Benefit (IB) compared to the Borough average of 6.4%. Overall, 55% of IB claimants are aged 25-49 and 74% of this group have been claiming the IB for more than 2 years. 45% of claimants have reported mental condition as their reason for claiming IB.
- 3.174 The Hammersmith and Fulham Joint Strategic Needs Assessment states that adults with physical and sensory disabilities and those with learning disabilities generally have poor health and tend to live in the most deprived areas within the Borough and have quite a lot of housing needs associated with these problems.
- 3.175 The Hammersmith and Fulham Joint Strategic Needs Assessment 2010/11 states that within the Borough there is a relatively high level of people with mental health problem. Around 26,000 people are estimated to be living with a common mental disorder, 5,700 with a personality disorder and 500 with psychotic disorder. It states that mental health problems are linked to deprivation, both as a result and a cause. It also states that there is likely to be under-diagnosis of dementia recording, which will lead to people with dementia going untreated and not being given appropriate access to services. This is also related to the Age equality strand. This study also raised concern that locally, mental health services are not culturally appropriate.

	WCOA	WCOA	LBHF	London	E&W
	#	%	%	%	%
Activities Limited	1,581	15.3	12.6	14.1	17.9

Table 3.11 Disability (LLTI) Source: Census 2011

3.176 Due consideration of the London Plan policies 3A.14 (Protecting London's Diverse Population) and 4B.5: Inclusive Design and LBHF's SPD: Access for All are key documents which set out the Borough's requirements to ensure appropriate provision are made for people with disabilities.

3.177 The Council have had due regard for the need to make the environment accessible for all disabled people, as required by the London Plan and Unitary Development Plan Policies. Specific Design Guidance for new development is set out in the Supplementary Planning Documents produced by the Greater London Authority (GLA) and LBHF. The SPD for South Fulham Riverside would ensure compliance with these detailed standards at the detailed design stage.

Health

3.178 The Hammersmith and Fulham Joint Strategic Needs Assessment states that adult obesity levels are shown to be lower than average in the Borough, with people having slightly higher than average levels of physical activity and healthy eating. However, child obesity at year 6 is significantly higher than the national average.

	WCOA	WCOA	LBHF	London	E&W
	#	%	%	%	%
Very Good	5,173	50.0	56.5	50.5	47.1
Good	3,271	31.6	29.2	33.3	34.1
Fair	1,224	11.8	9.4	11.2	13.2
Bad	492	4.8	3.6	3.7	4.3
Very Bad	184	1.8	1.3	1.2	1.3

Table 3.12 Census 2011 Health

Dependency

3.179 The Hammersmith and Fulham Joint Strategic Needs Assessment 2010 notes that 22% of households in Hammersmith and Fulham contain dependent children, compared to 29% in London and in England. The Census gives this figure to be 24%. The Census shows 13% of households are lone parent households (10% previous estimate). The 2010 study estimated the proportion of these households is highest in the Wormholt and White City ward at 18%. There is a correlation between lone parent households and deprivation.

3.180 The Census shows (Table 3.13) that older residents are more likely to live alone (8.1% compared 1.1% in couples). This is consistent with the H&F Carers Strategy findings for the borough.

	WCOA #	WCOA %	LBHF %	London %	E&W %
Couple with dependent children	492	11.4	12.8	17.8	19.3
Couple, all non dependent children	135	3.1	2.7	5.2	6.1
Couple, no children	436	10.1	14.7	13.8	17.6
Lone Parent with dependent children	560	13.0	7.2	8.5	7.2
Lone Parent, no dependent children	254	5.9	3.9	4.1	3.5
Single Adult	1,206	28.0	28.7	22.0	17.8
Elderly Couple	47	1.1	2.0	4.1	8.2
Single Elderly	350	8.1	8.8	9.6	12.4
Other with dependent children	212	4.9	3.0	4.6	2.6
Other Households, shared	622	14.4	16.3	10.4	5.3

Table 3.13 Household Composition in OA, Census 2011

3. Gender reassignment

3.181 Official statistics, such as census data are not collected on gender reassignment and so are not available with regard to gender reassignment. The Government Equalities Office (GEO) is to commission a project to try to determine the size of the trans population in the UK, which may help if available during the life cycle of the consultation rounds of this guidance.

4. Marriage and civil partnership

3.182 According to the 2011 Census for the Borough, an estimated 85,433 people (55.9 per cent) aged 16 and over never married or never registered a same-sex civil partnership; this is the fourth highest level of any local authority in England & Wales (London 44.1 per cent and England & Wales 34.6 per cent). 29.6 per cent of the Borough residents aged 16 and over stated they were married at the time of the 2011 Census (London 39.8 per cent and England & Wales 46.6 per cent). The Borough has higher than the regional and national proportion of residents that are in a registered civil partnership (734 people).

Living Arrangements

3.183 The living arrangements classification combines responses to the question on marital and civil partnership status with information about whether or not a person is living in a couple. This topic is only applicable to people living in households. According to the 2011 Census some 60,569 people aged 16 and over in H&F were living in a

couple (married, in a same-sex civil partnership, or are cohabiting with a partner of any sex); this represents 40.1 per cent of the total adult population (London 48.2 per cent and England & Wales 57.8 per cent).

5. Pregnancy and Maternity:

3.184 The table below compares age of mother at birth in the Borough with London and England averages. The teen pregnancy rate is lower than London and England averages, and the average number of conceptions in the Borough is relatively slightly lower at 63.6 per 1000 births, compared with a London average of 72.1 and England average of 65.5.

Area of usual residence of mother	All ages	Under 18	Under 20	20-24	25-29	30-34	35-39	40-44	45+
Totals									
ENGLAND	687,007	10,273	37,844	129,003	188,812	193,600	111,128	24,938	1,682
LONDON	133,111	1,100	4,070	18,867	34,335	42,710	26,078	6,526	525
Hammersmith and Fulham	2,773	18	69	300	521	964	740	165	14
Rates per 1,000 in age group									
ENGLAND	65.5	11.2	23.9	73.6	107.6	118.1	62.1	12.7	0.9
LONDON	72.1	9.3	20.1	68.4	91.4	116.0	81.2	21.5	1.9
Hammersmith and Fulham	63.6	8.6	19.9	40.2	51.1	107.3	100.6	27.0	2.7

Table 3.14 Live births (numbers and rates): age of mother and area of usual residence, England and Wales, 2010 (Source: ONS)

6. Race, including ethnic or national origins, colour and nationality

3.185 There have been significant changes in the ethnic and religious composition of the OA in the last decade. The 2011 census data reveals that within the four wards the percentage of White British is lower (25.5%) than the Borough (44.9%), London (44.9%) and England (80.5%) as a whole. It is notable that White: Other White stood at 16.7%.

3.186 In general, the proportion of those from other ethnic groups in the four wards is higher than in the Borough, London and England as a whole, particularly for Black British Caribbeans and Africans (7.7% and 14.8% respectively) which proportion is well above the average Borough (3.9% and 5.8%), London (4.2% and 7%) and England (1.1% and 1.8%) average.

	WCOA #	WCOA %	LBHF %	London %	E&W %
White: British	2,640	25.5	44.9	44.9	80.5
White: Irish	348	3.4	3.5	2.2	0.9
White: Gypsy or Irish Traveller	28	0.3	0.1	0.1	0.1

White: Other White	1,727	16.7	19.6	12.6	4.4
Mixed	631	6.1	5.5	5.0	2.2
Asian: Indian	145	1.4	1.9	6.6	2.5
Asian: Pakistani	104	1.0	0.9	2.7	2
Asian: Bangladeshi	178	1.7	0.6	2.7	0.8
Asian: Chinese	174	1.7	1.7	1.5	0.7
Asian: Other Asian	622	6.0	4	4.9	1.5
Black: African	1,533	14.8	5.8	7.0	1.8
Black: Caribbean	798	7.7	3.9	4.2	1.1
Black: Other Black	549	5.3	2.1	2.1	0.5
Other ethnic group: Arab	409	4.0	2.9	1.3	0.4
Other ethnic group: Other	458	4.4	2.7	2.1	0.6

Table 3.15 Ethnicity in OA, Census 2011

3.187 In 2004, in Great Britain generally, people in employment from Pakistani, Chinese and White Irish groups were more likely to be self-employed than those in other ethnic groups. One in five Pakistanis in employment were self-employed (21 per cent), as were just under one in six Chinese (16 per cent) and White Irish (15 per cent) people. This compared with around one in eight (12 per cent) White British people and fewer than one in ten people from a Mixed or Black ethnic group.

3.188 Gypsy and Travellers experience wide-ranging inequalities, including accommodation, employment, health, education, criminal justice system and are often subject to racism and discrimination. Immediately adjoining the OAPF area is a Traveller settlement at 'Stable Way', with an estimated 28 to 30 families. This community experiences significant severance from the WCOA due to the significant linear barriers of the West Cross Route and the West London Line. The existing brownfield/industrial quality of the area between Wood Lane and West Cross Route, and the lack of green space amenity also diminishes the residential environment of this area. While the 'Stable Way' traveller community is located outside the OAPF boundary, it remains important to ensure that this protected characteristic group does not experience unlawful discrimination, and has access to equality of opportunity with those who don't have a protected characteristic, as detailed at section 2.12.

8. Religion or belief

3.189 47.9% of the religious profile of the four wards is Christian, which is slightly below the Borough (54.1%), and England profiles (59.3%) and slightly lower than the London profile (48.4%). This figure for the OA was 60% in 2001. There are marginally lower numbers of Hindus and Jews than the borough and a marginally lower higher number of Sikh. The percentage of Muslims in the OA at

21.8% is over double the borough average. In 2001 this figure was 6%.

	WCOA	WCOA	LBHF	London	E&W
	#	%	%	%	%
Christian	4,959	47.9	54.1	48.4	59.3
Buddhist	164	1.6	1.1	1.0	0.4
Hindu	74	0.7	1.1	5.0	1.5
Jewish	38	0.4	0.6	1.8	0.5
Muslim	2,252	21.8	10.0	12.4	4.8
Sikh	32	0.3	0.2	1.5	0.8
Other religion	48	0.5	0.5	0.6	0.4
No religion	1,901	18.4	23.8	20.7	25.1
Religion not stated	876	8.5	8.4	8.5	7.2

Table 3.16 Religion, Census 2011

9. Sex/gender

Gender balance and pay gap

3.190 The 2011 Census shows that the population of the WCOA is 48.2% female and 51.8% male. In LBHF overall the balance is 48.7% male and 51.3% female. For London the balance of the sexes stands at 51% female and 49% male. So overall the OA is consistent with Borough and Regional trends.

3.191 A study on the gender pay gap by the Government Equalities Office showed that 10% of the overall pay gap can be attributed to occupational sex segregation. A 10% greater share of men in an occupation is associated with 2 per cent higher average hourly wages. 12% of the gap is due to the industries in which men and women work, 21% is due to differences in years of experience of full-time work, 16% is due to the negative effect on wages of having previously worked part-time or having taken time out of the labour market to look after family and 36% of the pay gap cannot be explained by any of the characteristics that have been controlled for in the study.

3.192 9% of households in the borough are lone parent families and over 90% of these parents are women. The proportion of such households in the population doubled since the 1991 census. Single parents make up a high proportion of households living in social housing (23% of council tenants and 32% of housing association tenants).

3.193 Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income and they are far poorer than couples with children; they are more than three times as likely to be dependent on benefits than the average household; they are twice as likely to be in unsuitable housing than others. Households headed by women are

also highly represented among housing applicants. 18% of waiting list applicants and 55% of homeless households on the housing register are headed by a woman.

3.194 Women are much more likely to suffer from gender specific violence than men, including rape and sexual violence, trafficking and prostitution and domestic violence.¹ 1 in 3 women experience domestic violence in their lifetime. Men can also be affected by domestic violence. There are more men than women sleeping rough and it can be harder to place men in hostel accommodation. Men are more likely to suffer from psychotic illness or have a learning disability.

10. Sexual orientation

3.195 The second National Survey of Sexual Attitudes and Lifestyles in 2004 found that 3.9% of women and 5.5% of men aged 16 to 44 and living in London had had a same gender sex partner in the last five years. The figures were lower in the rest of the UK for both women (2.4%) and men (2.1%), confirming that LGBT people migrate to large cities, especially London. Within London, LGBT people are concentrated in inner rather than outer London.

3.196 LGBT Studies in Lambeth (2006) found that the greatest social need amongst LGBT people resides with those who are members of groups which are already disadvantaged, such as women and ethnic minority groups.

3.197 Recent studies estimate prevalence of transgender people to be about 20 per 100,000 people, (about 10,000 people in the UK in total), of whom 6,000 have undergone transition in the UK. There is no figure for the number of transgender people in White City or Hammersmith & Fulham but the group is likely to be relatively small and the majority are likely to be in concealment for family or employment reason.

3.198 Official statistics, such as census data are not collected on sexual orientation within London Borough of Hammersmith and Fulham. However, the ONS's most recent research indicates that 1.5% of the adult population identify as lesbian, gay, or bisexual (LGB). This figure, taken proportionately across all equality strands is the basis for our assessment on LGB people.

Crime

3.199 Young people are most likely to be victims and offenders of certain crimes such as street crime.¹⁰ The Joint Strategic Needs Assessment

¹⁰ www.lbhf.gov.uk/Directory/Community_and_Living/Crime_Prevention/Community_safety

notes that although they are not most likely to be the victims of crime, deprived families in public housing and poorer minority families have the greatest fear of crime.

3.200 Hate Crime is particularly pertinent to several Equality Groups. Hate crime is any criminal offence committed against a person or property that is motivated by an offender's hatred of someone because of their:

- race, colour, ethnic origin, nationality or national origins
- religion
- gender or gender identity
- sexual orientation
- disability¹¹

3.201 Current statistics are not readily available at a local level for hate crime. Table 3.17 below records Hate Crimes for the Metropolitan area and Total figure for England, Wales and Northern Ireland. Table 3.18 shows statistics by the CPS (Crown Prosecution Service) on the percentage of crime in Principal Offence Categories that can be attributed to Hate Crime. It shows there are significantly high levels of hate crime associated with 'Offences against the Person', and 'Public Order Offences'.

Police Force	RACE	FAITH	S O	TRANS	DIS	TOTAL	ANTI-SEM
Year: 2010							
Metropolitan	8,270	667	1,362	82	116	10,497	270
TOTAL	39,311	2,007	4,883	357	1,569	48,127	488
Year: 2011							
Metropolitan	7,791	603	1,266	63	112	9,835	199
TOTAL	35,875	1,773	4,477	299	1,937	44,361	440

Table 3.17 Total of recorded hate crime from police forces in England, Wales and Northern Ireland during the calendar year 2011^{12 13}

2011 - 2012 Hate Crimes Principal Offence Categories	Disability Hate Crime %	Homophobic and Transphobic %	Racial and Religious Hate Crime %
Homicide	0.34%	0.59%	0.09%
Offences Against The Person	41.71%	52.21%	49.60%
Sexual Offences	6.20%	0.17%	0.18%
Burglary	7.37%	0.59%	0.49%
Robbery	9.55%	1.70%	0.79%

¹¹ ibid

¹² Monitored categories are Race, Faith and Religion (FAITH), Sexual Orientation (SO), Transgender (TRANS), Disability (DIS), Antisemitism (ANTI-SEM)

¹³ Source: True Vision: http://www.report-it.org.uk/hate_crime_data1

Theft And Handling	9.05%	2.89%	3.61%
Fraud And Forgery	5.03%	0.08%	0.11%
Criminal Damage	3.18%	3.48%	4.94%
Drugs Offences	0.84%	0.59%	1.14%
Public Order Offences	12.06%	31.75%	32.45%

Table 3.18 Hate Crime Principal Offence Categories (Source: Crown Prosecution Service)¹⁴

3.202 Having regard to longer term trends (Metropolitan Police Crime Mapping covering the WCOA¹⁵ Based on December 2012 information) the OA Experienced an overall 3% decrease in the total number of crimes committed since 2005/06 although there has been an increase of 4% around Shepherd's Bush Common during the same period. The largest decreases were both burglary and robbery by nearly a third, theft and handling (8%) and there was a small decrease in the rate of sexual offences (numbers are very small). The increase was in the number of drug arrests (nearly double) and there was also a 6% increase in both criminal damage and in 'Violence against the person' crimes.

3(e) Identifying sustainability issues and problems (Task A3)

3.203 Task A3 of the SA process requires the identification of sustainability issues. This is integral to the SA process, and informs Stage B where the OAPF alternative options are tested against the SA framework. The identification of sustainability issues meets the requirements of the SEA Directive to identify "any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to relevant areas or particular environmental performance".

3.204 The following list of issues has been developed from the review of plans, programmes and policies and baseline data summarised above.

Table 3.5 Key sustainability issues and problems

Economic: The OAPF provides a framework to support significant investment in

¹⁴ http://www.cps.gov.uk/data/hate_crime/hate_crime_2011_12_report.html

¹⁵ Source: <http://maps.met.police.uk/index.php?areacode=00AJGH&crimetype=7>

White City over time. The challenge is to ensure this framework is robust over time, and provides life-long neighbourhoods, as well as short-term economic wins.

Population: The OAPF is likely to provide some 5,000 new households, and is LBHF's main source of housing growth. The greatest issue in the Borough is not demand, as it generally outstrips supply, but one of affordability. There have been notable changes in demographic profile, ethnicity in the last decade.

Retail: The OAPF supports a balanced approach to retail provision in the Metropolitan Centre. The maintenance of multiple retail approaches and formats is to be encouraged, that supports flexibility and a range of businesses from multi-national malls, to indigenous retailers and traditional formats.

Employment: The implementation of the OAPF is likely to lead to the generation of upwards of 10,000 jobs focussed on Wood Lane and White City East. The challenge is for the local community to seize job creation opportunities, and minimise the demand for travel generated by the employment opportunities, firstly by providing a significant number of new homes close to work location, and secondly by encouraging the use of public transport, walking and cycling.

Social

Deprivation: The opportunity area includes some deprived wards. The OA as a metropolitan centre, serves an important function for surrounding areas, and should be related to this population in terms of function, profile, and services.

Health and Wellbeing: The OA has needs to ensure that social infrastructure facilities can be provided in accordance with the needs of the growing population of the area. New development opportunities are set within lands segregated by noisy transport infrastructure.

Education: The quantum of development envisaged for the area has implications for schools and nurseries within and surrounding the opportunity area.

Transport and travel: The WCOA is served by very good public transport infrastructure. Strong physical segregation based on railway and road infrastructure severely affects pedestrian and cycling permeability across the OA. The plan provides opportunities to improve connectivity, permeability and improving mobility choices.

Housing: The WCOA sits within a mature urban area, with significant populations. The OAPF foresees the development of significant residential development. It is relevant to consider the mix of housing typologies, tenure, and user groups. The rented sector has a relatively high representation in the OA area.

Environment

Open space: White City East is characterised by industrial sites, which is in

accessible to the general public. The OAPF is an opportunity to significant opportunity to provide new public realm and public space to the benefit of new and existing communities.

Biodiversity: There are no Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation and Sites of Importance for Nature Conservation. There is an opportunity for increased open space and intensive planting and a positive impact.

Air quality: The opportunity area is within an Air Quality Management Area, arising from car based pollutants, and the foreseen increase in household numbers has the potential to impact on CO² emissions. There are potential impacts arising from demolition and construction.

Waste: There are no existing waste processing facilities within the opportunity area. Significant reconstruction projects may cumulatively give rise to environmental impacts.

Water quality and resources: Development is on brownfield sites. Intensification of development has potential to increase hard surface area, with negative effect on surface water run-off.

Natural resources: Intensive development in the WCOA will give rise to an increased demand for water, energy use, pressure on biodiversity and open space arising from population growth and increased economic activity.

4. Developing the SA framework (Task A4)

Testing the framework objectives against the SA framework

- 4.1 SA has generally been based on an 'objectives-led approach'. Essentially, those responsible for the SA develop – having consulted with stakeholders – a series of objectives which set out what is ideally to be achieved or tackled in terms of sustainable development. These objectives are wider than the plan objectives (which are typically more focused in their ambition and more oriented towards delivery). They provide a benchmark against which the content of the emerging OAPF – including options - can be assessed. The degree to which the OAPF is anticipated to contribute towards these objectives then provides a measure of its sustainability.
- 4.2 This IIA uses topics and sub-areas as the basis for the appraisal to provide a more narrative based approach centred on an assessment against the baseline situation (a key requirement under the SEA Directive). 20 Sustainability Appraisal Objectives are set-out below.

Table 4.1 Sustainability Appraisal Objectives

Sustainability Appraisal Objectives	Possible Indicators and Sources
Managing Resources	
<p>1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.</p>	<p>There are no areas of importance for nature conservation Net loss or increase of open space (the London Plan Monitoring Report).</p>
<p>2. Water Quality & Water Resources. To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources. Minimise the risk of surface flooding and promote sustainable urban drainage.</p>	<p>Estimated Water consumption (source: OFWAT). This is also a UK Government Sustainable Development Indicator.</p> <p>Rivers of good biological quality (source: DEFRA). This is also a UK Government Sustainable Development Indicator.</p> <p>Existing performance target:</p> <ul style="list-style-type: none"> • No net loss of functional flood plain. • Introduction of SUDs techniques in new development/protection of groundwater from pollutants • New development and construction achieve good standards etc.
<p>3. Natural resources. To minimise the global, social and environmental impact of consumption of resources by using sustainably produced,</p>	<p>Energy generated from renewables (source: Department of Trade and Industry).</p> <p>Energy Use (Transport, Domestic and Commercial Use)</p> <p>Reconstruction/decommissioning of materials</p>

<p>harvested and manufactured products. Recycle demolition materials in construction and minimise the consumption of water and energy in developments</p>	<p>(particularly construction).</p> <p>Existing performance target: Ensure new development achieves the highest standards of energy efficiency under Part L of 2010 Building Regulations</p> <ul style="list-style-type: none"> • Promotion of a decentralised energy network • New development maximise the potential use of on-site energy generation (CHP and renewable) • Percentage of homes meeting the Code for Sustainable Homes (LBHF Community Services) • □ NI 192 Household waste recycled and composted (LBHF Environment services Dept) • Estimated water consumption (OFWAT – this is also a UK Government sustainability indicator)
<p>4. Climate Change.</p> <p>To address the causes of climate change through minimising the emissions of greenhouse gases. Encourage energy generation from renewable and low carbon sources, and promote energy efficiency.</p>	<p>Carbon dioxide emissions. Note: Already collected as part of the London Plan Annual Monitoring Report process. This is also a UK Government Sustainable Development Indicator.</p> <p>Area of functional flood plain (source DCLG). Note: Already collected as part of the London Plan Annual Monitoring Report process.</p> <p>Number of zero-carbon developments</p> <p>Hectares of land at risk of flooding. Source: Environment Agency.</p> <p>Carbon efficiency of economic activity (source: EBS, GLA Economics, GLA Environment). This is also a LSDC Quality of Life Indicator.</p> <ul style="list-style-type: none"> • NI 186 per capita CO2 emissions (• LBHF Community Services) • Renewable Energy Capacity Installed by type (Environment Services Department) • Percentage of homes meeting the highest achievable Code for Sustainable Homes (LBHF Community Services)
<p>5. Air Quality. To improve air quality.</p>	<p>Estimated emissions of NO2, PM10 and SO2 (source: DEFRA). This is also a UK Government Sustainable Development Indicator and a LSDC Quality of Life Indicator.</p> <p>Number of days of moderate or higher air pollution (source: Defra,).</p> <p>Existing performance target: Continued monitoring of Air Quality Status of WCOA as Air Quality Management Area (AQMA).</p>
<p>6. Energy. To achieve greater energy efficiency and to reduce reliance</p>	<p>Increase in energy generated from renewable sources. Note: Already collected as part of the London Plan Annual Monitoring Report process.</p>

on fossil fuels for transport, heating, energy and electricity.	Reduction in Energy Use (efficiency)
7. Waste: To minimise production of waste across all sectors in the OA and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.	<ul style="list-style-type: none"> • NI 192 Household waste recycled and composted (LBHF Environment services Dept) • Cubic metres of waste arising by sector GFA (DEFRA, EA, GLA, Waste arising by sector)
8. Soil conditions and contamination: Ensure all contaminated sites are remediated prior to development with the option of in-situ treatment investigated.	Soil samples and ground water monitoring before and following site remediation (LBHF conditions of planning permissions, sampling results from individual sites)
9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).	<p>Use of public transport in relation to the use of the private car (source: TfL, ONS, the London Travel Report). Note: Already collected as part of the London Plan Annual Monitoring Report process).</p> <p>Bus Passengers per year (source: TfL, BVPI102).</p> <p>Average number of cycling trips made (source: TfL Annual Report).</p> <p>Travel to School – proportion of children walking to school (source: Department of Transport). This is also a LSDC Quality of Life Indicator. Note: Travel to school data is not monitored on an annual basis.</p> <p>Traffic Volumes (Source: Department of Transport Traffic Volumes). This is also a LSDC Quality of Life Indicator.</p>
10. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed	<p>At Risk list- listed buildings and Conservation Areas in Hammersmith and Fulham (source English Heritage Register of Buildings at Risk).</p> <p>Existing performance target:</p> <p>Reduction in the number of buildings and Conservation Areas at risk.</p>
11. Regeneration and Land Use. To stimulate regeneration that maximises benefit to the most deprived areas	<p>Percentage of development on previously developed land within London (source ODPM). Note: Already collected as part of the London Plan Annual Monitoring Report process. This is also a UK Government Sustainable Development Indicator.</p> <p>Protection/loss of open space designated (source:</p>

<p>and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.</p>	<p>The London Development Database). Note: Already collected as part of the London Plan Annual Monitoring Report process (also mentioned under objective 1).</p> <p>Average density of new housing (source: DEFRA). This is also a UK Government Sustainable Development Indicator.</p>
<p>12. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.</p>	<p>Supply of Affordable housing.</p> <p>Households living in fuel poverty (source: DTI). Note: This is also a UK Government Sustainable Development Indicator.</p> <p>Percentage of homes not meeting the 'Decent Homes' standard (source: English Housing Conditions Survey, ODPM). Note: This is also a UK Government Sustainable Development Indicator. This is also a LSDC Quality of Life Indicator.</p> <p>Total number of housing completions</p> <p>Tenure, typology and diversity of units constructed.</p>
<p>13. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.</p>	<p>New jobs created in area (both construction and long-term)</p> <p>Employment opportunities for those suffering from disadvantage in the employment market (source: Annual Local Area Labour Force Survey 2002/2003). Note: Already collected as part of the London Plan Annual Monitoring Report process.</p> <p>Employment rates in London's most disadvantaged areas (source: Census). Note: This is an indicator identified in London Development Agency (2005) London Economic Snapshot.</p> <p>London's employment rate (by women / ethnic group etc) (source: GLA Economics, ONS). This is also a LSDC Quality of Life Indicator.</p> <p>Workless households with dependant children (source: LSDC).</p> <p>Unemployment (source: London Health Strategy High Level Health Indicator).</p> <p>Unemployment among BME population (source: London Health Strategy High Level Health Indicator).</p> <p>Registration of New Businesses in Area</p>
<p>14. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.</p>	<p>Percentage of households satisfied with the area in which they live (source: ODPM). This is also a UK Government Sustainable Development Indicator.</p> <p>Neighbourhood satisfaction (source: GLA MORI Poll). This is also a LSDC Quality of Life Indicator.</p> <p>Number of visitors per year (source: GLA Economics).</p> <p>New development is built to highest standards to</p>

	provide insulation from Noise generated by transport infrastructure
15. Open space: Improve the quality of the public realm and increase the number of public open spaces.	Total area of open space (LBHF, annual monitoring report; London Plan annual monitoring report)
16. Education and Skills. To improve the education and skills levels of the population.	<p>Percentage of businesses reporting a lack of appropriately skilled employees as a significant problem (source LABS). Note: This is an indicator identified in London Development Agency (2005) London Economic Snapshot.</p> <p>19 year-olds with Level 2 qualifications and above (source: ONS Labour Force Survey). Note: This is also a UK Government Sustainable Development Indicator.</p> <p>The number of nursery places per 100 children in London This is also a LSDC Quality of Life Indicator.</p> <p>The Quality of Primary School Education (Source: Department for Education and Skills). This is a LSDC Quality of Life Indicator.</p> <p>Third Level: Number of Students</p>
17. Safety and security: Reduce the amount of crime and reduce the fear of crime through building and public realm design principles.	<ul style="list-style-type: none"> • NI 2 % of people who feel they belong to their neighbourhood (LBHF Finance and Corporate services) • NI 5 Overall/general satisfaction with local area (LBHF, annual monitoring report) □ NI 16 Serious acquisitive crime rate (LBHF Community Services, via Police) □ NI 17 Perceptions of anti-social behaviour • LBHF Community Services, via Police)
18. Health and Well-being. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	<p>Healthy life expectancy (males and females) (source: GLA and ONS). This is also a UK Government Sustainable Development Indicator. This is also a LSDC Quality of Life Indicator.</p> <p>Prevalence of obesity in 2-10 year olds (source: Department of Health). This is also a UK Government Sustainable Development Indicator.</p> <p>Prevalence of cigarette smoking (source: Department of Health). This is also a UK Government Sustainable Development Indicator.</p> <p>Cardiovascular diseases (source: Health Survey for England).</p> <p>Percentage reporting good health (source: Census & Health Survey for England and London Health Strategy High Level Health Indicator).</p>
19. Equality and Diversity. To ensure equitable outcomes for all	Pensioners in relative low-income households before housing costs and after housing costs (source: DWP). This is also a UK Government Sustainable

<p>communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Development Indicator.</p> <p>Children in relative low-income households before housing costs and after housing costs (source: DWP). This is also a UK Government Sustainable Development Indicator.</p> <p>Existing performance indicators: Deprivation and Health indices Crime statistics and indices</p>
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Comparing Plan Objectives and SA Objectives¹⁶

- 4.3 Identifying and evaluating the likely significant effects of the plan requires systematic consideration of the measures (or 'choices') which together make up the plan, including Strategic Objectives¹⁷.
- 4.4 This following sub-section provides a brief commentary on the OAPF objectives and asks: Do the objectives reflect the key sustainability issues for the area identified at the scoping stage? Are the OAPF objectives internally consistent and, if not, can any tensions be resolved early on?
- 4.5 The OAPF is an implementation document that sits beneath the London Plan and the LBHF Core Strategy. Its role is to translate the policies of these plans into tangible objectives. In this sense, there is not a close correlation between the Strategic SA objectives and the OAPF objectives, simply because the OAPF is not a strategic document. Rather, the OAPF seeks to achieve sustainable development through the promotion and management of urban transformation by outlining steps towards sustainable development, rather than regurgitating SA objectives as planning objectives.
- 4.6 For SA objectives concerning Biodiversity, climate change, air quality and noise, the key consideration is that the OAPF promotes the redevelopment and intensification of use of 100% brownfield sites. The OAPF's initiatives and interventions, including improved public realm and building standards are consistent with the SA framework.
- 4.7 Energy demand and use are key areas where tensions exist, and require mitigation. The OAPF seeks to introduce significant additional resident and working populations into the area. This is likely to be positive in terms of SA Objectives of Population, Social Infrastructure and Economy/Employment. However, these populations will give rise to an increase in energy demand (heating, lighting, appliances and

¹⁶ Planning Advisory Service (June 2010) Sustainability Appraisal Advice Note, section 5.3.3

¹⁷ Ibid, section 5.2.1

movement). Important measures will include the energy efficiency of buildings and energy supply, and improvements in movement alternatives from mixed-use development (walking and cycling).

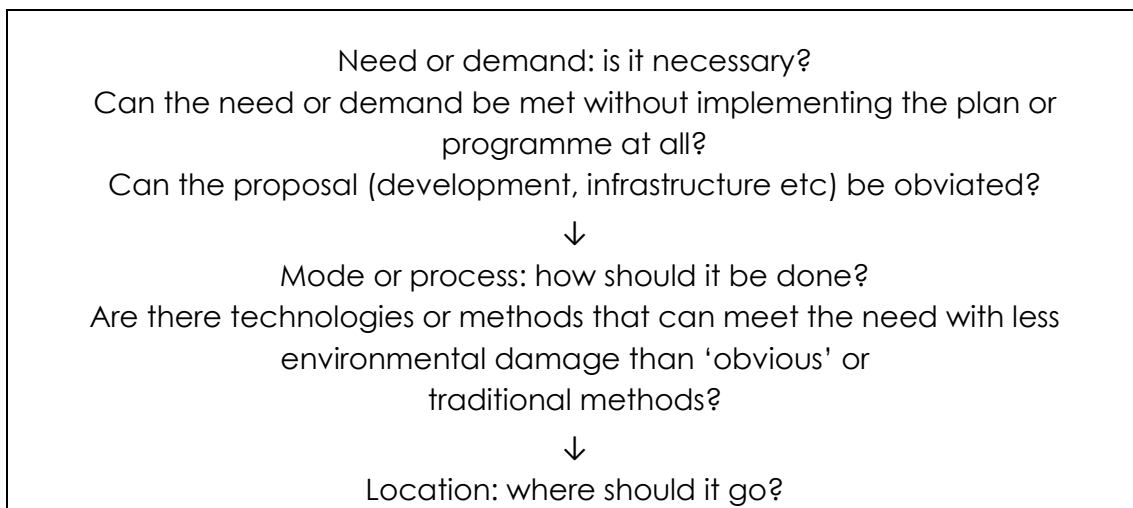
- 4.8 The Urban Design and Public Realm strategy seeks to provide for a robust physical framework of permeable streets and networks, that support dense multi-use and diverse communities. It is very difficult to predict the exact outcome or precise form or use of development, but the OAPF framework seeks to deal with such uncertainty by maintaining principles of form, street and movement connections and diversity.
- 4.9 For housing and employment SA goals, the OAPF positively responds by targeting significant growth in these areas. The OAPF should be responsive to the Equalities and Social Infrastructure needs of populations in and around the OA, in order to address these SA Objectives positively. It promotes mixed-use development of some 4,500 new homes and 1,200 student units across the WCOA, accommodating a new community in a mix of medium to high density housing; of infill, mid-rise and towers. This will help deliver a new community with education, health and cultural facilities. The Livability and Place SA objective is complemented by the OAPF's Urban Design and Public Realm strategy.
- 4.10 SA Employment objectives are complemented by the OAPF's proposed growth of multiple commercial sectors, including creative industries building on the world-class BBC cluster, health and education focussed on Imperial College London, and retail growth in the Metropolitan Centre (Westfield Mall, Shepherd's Bush Market and Shopping Centre).
- 4.11 The Regeneration and land use SA Objective is complemented by the universal goal to provide for and manage change in the established Metropolitan centre on brownfield lands.
- 4.12 Key issue for transport is the major infrastructure works required in creating links over and under the significant road and railway barriers that criss-cross the area, and present a significant challenge to the creation of a coherent urban area. The other side of this transport challenge is the cost of this new infrastructure. The need for such a significant quantum of investment places a burden on new development to pay for it, and thus is a significant factor in terms of development viability and implementation.
- 4.13 OAPF Delivery proposals complement a range of SA Objectives, particularly Regeneration and Land Use, where social infrastructure and land-use proposals are linked to delivery mechanisms and funding.

5. Alternatives

(Task B2: Development Scenarios)

- 5.1 The assessment of reasonable alternatives is a requirement of the SEA Directive. It is an important part of the assessment process overall because it enables the sustainability implications of different options to be compared.^{18 19.}
- 5.2 Reasonable alternatives must also be assessed in the context that the OAPF has been prepared as part of a hierarchy of plans. In particular, The London Plan 2011 directed that WCOA Area should accommodate growth of the level predicted.
- 5.3 The OAPF is distinct from the other documents in that it considers in detail how the strategic objectives of the London Plan (as noted in section 3) can be achieved within the WCOA. Also, given the urban nature of the receiving environment, there are no distinct scenarios i.e. there is not a choice of greenfield vs. brownfield development, and it cannot ignore the realities such as consented development. The 'Hierarchy' of alternatives'²⁰ Figure 5.1 below highlights that alternatives in this OAPF/SA focus on location, timing and detailed implementation (scale, density, timing etc).

Fig. 5.1 Hierarchy of alternatives



¹⁸ The Plan Making Manual

¹⁹ PAS Sustainability Appraisal Advice Note s.3.4. Article 5(1) of the SEA Directive states "Where an environmental assessment is required ... an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated". Annex I(h) requires "an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information"

²⁰ A Practical Guide to Strategic Environmental Assessment, OPDM 2006, Appendix 6, Fig.14



Timing and detailed implementation:

When, in what form and in what sequence, should developments be carried out?

What details matter, and what requirements should be made about them?

- 5.4 A Development Capacity Study was undertaken as part of the preparation of the OAPF comprising a detailed spatial analysis of the physical capacity of the sites likely to come forward in the plan period. The main purpose of this analysis is to explore the optimum quantity of development that could deliver the regeneration objectives of the planning framework, the LDF Core Strategy and the London Plan.
- 5.5 The study only focussed on lands likely to be redeveloped within the plan period (i.e.the area north of Westfield and east of Wood Lane, as well as the potential development areas at the BBC Media Village and Television Centre).

Development Scenarios

- 5.6 The London Plan 2011 sets out that the whole OA (including the estates and Shepherd's Bush Town Centre) could accommodate an indicative minimum of 5,000 new homes and a target of 10,000 jobs. The LDF Core Strategy has an indicative capacity figure of 5,000 homes and 10,000 jobs.
- 5.7 For the development capacity study, the indicative levels of growth in the LDF and London Plan were used as a starting point to establish three levels of growth to be tested spatially. These were incorporated into a 'middle' scenario reflecting the LDF/LP indicative figures. The two other scenarios were a 'high' and 'low' option, which respectively feature an increase and decrease in floorspace over the LDF/LP by approximately 20% in each direction.
- 5.8 All scenarios assume a substantial number of new homes and non-residential space for the White City East area, as shown in table 5.2. All scenarios also included assumptions of space that would be needed for car parking, social infrastructure (schools, health, community facilities) and open space (both private on-site and strategic public open space) to support within the development sites the residential and working populations that would result from the level of development proposed. All three scenarios assume a mix of land uses including for private and affordable housing, student accommodation, retail, office, hotel, education, leisure and community facilities.
- 5.9 Scenario A features 56% residential floorspace, approximately 3,700 new homes plus 1,260 student units. Within the non-residential

component, office space accounts for over 60% of the floorspace, with a minor retail component (the equivalent of a large foodstore), a primary school, office and community uses.

- 5.10 Scenario B reflects residential quanta in line with the London Plan minimum for housing. In this scenario, the floorspace equivalent for 500 residential units has been replaced by 1,260 student units (at approximately 28 square metres / unit); when added to the 4,500 residential units proposed in the scenario, it is consistent with the LP minimum for new homes in the OA. The residential units total is also consistent with the indicative LDF Core Strategy quantum.
- 5.11 The residential and student accommodation in Scenario B represents 52% of the overall development, with the rest taken up with higher levels of non-residential space, to include two hotels, three times the amount of retail as scenario A, and a new primary and secondary school.
- 5.12 Scenario C assumes a doubling of retail space proposed in scenario B, and increases in office space which results in non-residential uses taking up just over half of the floorspace (51%).
- 5.13 The floor areas indicated in these scenarios is not absolute or deterministic of future allocations, but rather provide distinct development alternatives to allow evaluation of the strategic impact of the plan.

	Scenario 1	Scenario 2	Scenario 3
Residential (units)	3,700	4,500	5,000
Student residential (units)	1,260	1,260	1,260
Total residential floorspace (sqm)	295,540	351,540	386,540
Non-residential floorspace (sqm)			
Office	156,000	182,000	207,000
Retail	15,000	45,000	89,000
Hotel	20,000	40,000	45,000
Education	4,000	14,000	18,000
Community (D1)	10,000	11,000	12,000
Leisure	13,000	14,000	16,000
Other	14,000	14,000	14,000
B2-B8 - -			
Total non-residential floorspace (sqm)	232,000	320,000	401,000
Total floorspace (sqm / GFA)	527,540	671,540	787,540

Figure 5.2: Development scenarios for White City East

Scenario Testing

- 5.14 The three scenarios were evaluated in terms of their impact on the transport network, and their potential to deliver high quality residential and commercial environments in an urban form appropriate to the local context and a good range of housing types in a satisfactory residential environment.
- 5.15 All scenarios were physically modelled to illustrate how they could be accommodated within the indicative masterplan developed from an understanding of existing precedents and local context, physical and environmental constraints and challenges. Environmental factors such as noise, air quality, water, pollution were not specifically analysed as part of the scenario testing, and as such are now referred to in Table 5.2 below. Key environmental constraints are consistent across all scenarios as all explore ways of regenerating the White City East Lands. The key challenge in all scenarios is finding the balance between the potential development quantum and the capacity of supporting infrastructure and services.
- 5.16 Furthermore, the London Plan imposes a requirement to utilise the potential of the lands as much as possible. There is a clear logic in that, where jobs and homes are not created in this location, the alternative would be re-location to suburban places and Greenfield sites that do not perform well when set against the sustainability criteria previously referred to.
- 5.17 The Alternatives for this SA are developed from this scenario development, to take into account other important indicators including social, population, energy, heritage, redevelopment, air pollution/water quality/disturbance.
- Alt 1 **LOW** Medium housing growth, High-Office Space - 56% residential floorspace, approximately 3,700 new homes plus 1,260 student units. Within the non-residential component, office space accounts for over 60% of the floorspace, with a minor retail component (the equivalent of a large foodstore), a primary school, office and community uses.
- Alt 2 **MEDIUM** High housing service/student accommodation and retail growth. The floorspace equivalent for 500 residential units has been replaced by 1,260 student units (at approximately 28 square metres / unit); when added to the 4,500 residential units The residential and student accommodation represents 52% of the overall development, with the rest taken up with higher levels of non-residential space, to include two hotels, three times the amount of retail as scenario A, and a new primary and secondary school.
- Alt 3 **HIGH** High retail and office, medium residential. Doubling of retail space proposed in scenario B, and increases in office

space which results in non-residential uses taking up just over half of the floorspace (51%).

5.18 The Alternatives were evaluated against the SA objectives in the table below. All alternatives follow the broad objective of the OAPF strategy and therefore on many items the relative impact is neutral and does not warrant extensive comment. Rather the table focuses on tangible merits and disbenefits to the various approaches.

Table 5.2 Evaluation of Alternatives against Sustainability Appraisal Objectives

Key: + Positive relative to other alternatives
 - Negative relative to other alternatives
 / No discernible differences between alternatives

SA Objectives	Alt 1	Alt 2	Alt 3	Comment
1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.	/	/	-	Increase in parks and open space would have an advantage. . Less dense options likely to be neutral & dense option (4) relative disadvantage
2. Water Quality & Water Resources. To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources. Minimise the risk of surface flooding and promote sustainable urban drainage.	/	/	/	Replacement of older building stock with new build (to high standard) could have positive impact on run-off from sites. Increase in hard surface areas will require mitigation and good practice. No scenario emerges as relatively favourable.
3. Natural resources. To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products. Recycle demolition materials in construction and minimise the consumption of water and energy in	/	/	/	The alternatives do not present any relative discernible benefit or negative impact on natural resources.

developments				
<p>4. Climate Change.</p> <p>To address the causes of climate change through minimising the emissions of greenhouse gases. Encourage energy generation from renewable and low carbon sources, and promote energy efficiency.</p>	/	/	-	More people generally means more energy demand and emissions. However, new intense mixed-use development potentially mitigates impact, through good building standards and diminished travel demand. Alt 3 through the significantly higher quantum in retail floorspace is likely to generate additional travel movements from outside the locality and therefore be relatively negative.
<p>5. Air Quality. To improve air quality.</p>	/	/	-	Air Quality is generally dependent on vehicle emissions. The various alternatives have limited impact on this, given location on strategic transport corridors. The alternatives are not negative, as mixed-use dense development is likely to encourage shorter trips. Alt 3 is likely to be relatively negative due to additional car trips likely to be generated to high retail floorspace increase. Large scale development projects have potential to impact on air quality during the construction phase.
<p>6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</p>	-	/	/	High growth scenarios have potential for a higher energy demand. However dense populations present a greater efficiency in energy use. There is significant potential to pursue new and innovative approaches to future development including an Area Rating Tool, so that impact can be positive. The high density options will also help the Council realise its ambitions to deliver a district wide energy system in the WCOA, which would significantly reduce carbon emissions from all development. A balanced mix of uses mitigates high travel demands, and commercial/ domestic energy use.

<p>7. Waste: To minimise production of waste across all sectors in the OA and increasing rates of re-use, recycling and recovery rates aswell as composting of all green waste.</p>	/	/	/	The alternatives do not present any relative discernible benefit or negative impact on waste.
<p>8. Soil conditions and contamination: Ensure all contaminated sites are remediated prior to development with the option of in-situ treatment investigated.</p>	-	+	-	The alternatives do not present any relative discernible benefit or negative impact on soil.
<p>9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).</p>	/	+	-	Achievement of high residential densities in OA would potentially support a greater diversity of travel options. A reduction in density, or maintenance of status quo would be negative. The Alt 3 scenario may have a less desirable impact than other scenarios.
<p>10. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed</p>	-	+	-	Comprehensive redevelopment has potential to negatively impact on protected built heritage, and architectural distinctiveness. However, the introduction of new populations, would increase demand for ancillary services in the WCOA and promote feasible uses for historic structures. Alt 2 provides for a range of uses at Medium density, providing greater scope in placing tall buildings in appropriate locations.
<p>11. Regeneration and Land Use. To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.</p>	/	/	/	New investment and renewal of brownfield sites are important potential impacts of the OAPF. Scenarios that do not actively envision growth actually seek to manage decline, with limited benefits for the communities in WCOA and surrounding areas. There is no discernible difference in scenarios in this regard.
<p>12. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.</p>	-	+	+	The Alt 2 and Alt 3 provides for higher level of housing and student accommodation, than Alt 1 providing opportunity for increased affordable housing

				provision.
13. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.	/	/	/	All alternatives are proactive in employment growth,
14. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	/	+	/	Environmental enhancements are positive initiatives in themselves. Improvements to the public realm would help create a more liveable place, People will want to spend more time in the WCOA, and this will be instrumental in attracting future investment (commercial, retail and residential). The mix and balance of uses promoted in Alt 2 combined with less density is relatively positive
15. Open space: Improve the quality of the public realm and increase the number of public open spaces.	/	/	/	There is no discernible difference between scenarios in terms of open space.
16. Education and Skills. To improve the education and skills levels of the population.	/	/	/	Intensive growth and density will potentially support the establishment of new educational facilities. All alternatives support student accommodation.
17. Safety and security: Reduce the amount of crime and reduce the fear of crime through building and public realm design principles.	/	/	/	The range of floorspace scenarios does not provide any discernible difference between the Alternatives.
18. Health and Well-being. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	+	+	-	A balanced mix of uses supports a range of activities for existing and new populations. Alt 3 is relatively negative significantly higher allocation of commercial floorspace.
19. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	-	+	+	For equality groups, the promotion of diverse housing tenures and typologies within a dense urban core may potentially be positive. High growth scenarios may enable the delivery of new facilities and services. Investment in the public realm may have a positive impact on safety. Alt 1 is relatively negative through less housing provision.

Preferred Alternative

- 5.19 The above table helps to examine the impacts of various development scenarios for the OAPF in terms of Sustainable Development. While the scenarios are not distinct alternatives, **Alt 2, the 'Medium Growth' approach emerges as a preferable alternative**, due to its capacity to address the needs of the area; namely housing affordability, housing quantum, student housing and commercial/retail employment.
- 5.20 Both Scenarios 1 and 2 would result in a scale of development that is appropriate to the setting and context, would both provide a good range of housing types with general or predominant densities of 700-900 habitable rooms per hectare and (in Scenario B) scope to increase to 1100 habitable rooms per hectare in places. These densities are also within the range set out in the London Plan density matrix.
- 5.21 On the basis of wanting to achieve the optimum housing and regeneration potential in the OA and delivering a high quality environment, Scenario 2 is the preferred option of development capacity for this OA. It will realise the full potential of the sites, while enabling delivery of the objectives of the framework, the LDF Core Strategy and the London Plan.
- 5.22 The balance of density, and floorspace levels provided under this scenario allow choices be made as to the appropriate location of new development, particularly for tall buildings. Balanced mixed-use development is at the heart of sustainable development, and the aim to encourage development that addresses community needs.

6. Sustainability Assessment – White City OAPF

Tasks B3 and B4: Predicting and evaluating the effects of the OAPF

Approach to appraising the OAPF

- 6.1 The aim of the SA is to identify and respond to significant effects of a plan. What constitutes significant will vary according to circumstance. In appraising the significance of effects, the Plan Making Manual²¹ includes a series of principles:
- significance has to be determined individually in each case – effects which are significant in one situation are not necessarily significant in another;
 - analysis of significance needs to be proportionate to the expected severity of the effect; and
 - mathematical models are sometimes difficult to use to determine significance - inappropriate use of numeric models could give rise to fictitious precision and attempts to quantify qualitative and semi-qualitative aspects are unlikely to lead to an increase in objectivity²².
- 6.2 Annex II to the SEA Directive further specifies the following criteria for determining the likely significance of effects of the plan:
- the probability, duration, frequency and reversibility of the effects
 - the cumulative nature of the effects
 - the risks to human health or the environment (e.g. due to accidents)
 - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)

²¹ The National Planning Policy Framework (NPPF) means that PPS12 is now cancelled. DCLG are reviewing all their planning guidance, including this manual. However in the meantime, until it is officially withdrawn or revised, it remains extant. Source: <http://www.pas.gov.uk>

²² PAS Sustainability Appraisal Advice Note

- the value and vulnerability of the area likely to be affected due to:
 - a. special natural characteristics or cultural heritage,
 - b. exceeded environmental quality standards or limit values,
 - c. intensive land-use
 - d. the effects on areas or landscapes which have a recognised national, Community or international protection status

6(a) Sustainability Appraisal Assessment

- 6.3 The following table draws together the Sustainability Objectives of the SA with the principles of the OAPF. In other words, it is a means to test the sustainability credentials of the OAPF. This table should be viewed as a useful means to examine and describe multiple issues arising from the making of the OAPF.
- 6.4 The SA Objectives heading set out across the top of the table and their sub-headings are based on the corresponding sections of the OAPF, and consolidates the principal issues/ objectives of the OAPF under those headings. By necessity these headings are descriptive, as the OAPF is an implementation document, and not a policy document comparable to the Core Strategy. The following commentary extracts key sustainability issues to emerge from the table and overall assessment.

Table 6.1 Environmental Assessment of White City OAPF Objectives

Key: + Likely to contribute positively

- Likely to detract from the achievement of the IIA objective

/ Considered to have no significant positive or negative effect

SA Objectives									Comment
<p>1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.</p>	/	/	/	/	/	/	/	/	<p>Proposals to increase and improve public realm throughout the WCOA will introduce new planting, & public open space/green spaces. The OAPF would have positive cumulative impact over the short to long-term</p>
<p>2. Water Quality & Water Resources. To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources. Minimise the risk of</p>	+	/	/	/	/	+	+	/	

surface flooding and promote sustainable urban drainage.									
3. Natural resources. To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products. Recycle demolition materials in construction and minimise the consumption of water and energy in developments	/	+	/	/	/	/	+	+	The proposals do not present any relative discernible benefit or negative impact on natural resources.
4. Climate Change. To address the causes of climate change through minimising the emissions of greenhouse gases. Encourage energy generation from renewable and low carbon sources, and promote energy efficiency.	/	/	/	/	/	+	+	+	More people generally means more energy demand and emissions. However, new intense mixed-use development potentially mitigates impact, through good building standards and diminished travel demand Development will need to managed to ensure effects on micro-climate are not negative
5. Air Quality. To improve air quality.	/	/	/	/	/	+	+	+	Evidence shows that Air Quality is generally dependent on vehicle emissions. The OAPF has limited impact on this, given location on strategic transport corridors, with origins and destinations outside WCOA. Bus services may adapt to

										new technologies with improvements. In line with London Plan policy new development in the WCOA will have to be air quality neutral. The Construction phase is likely to give rise to dust etc..
6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.	+	+	/	/	+	+	+	+		New developments have potential to have a higher energy demand. However dense populations present a greater efficiency in energy use. The development strategy would facilitate the LBHF CHP initiative. There is significant potential to pursue new and innovative approaches to future development including Area Rating, so that impact can be positive. This impact is medium to long-term and positive.
7. Waste: To minimise production of waste across all sectors in the OA and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.	/	/	/	/	/	/	/	+	-	General waste is now being transported by river – is being received at a recently constructed EfW Facility at Belvedere, Bexley. Co-mingled dry recycled material is sent to a recently refurbished and re-opened facility at Smugglers Way in Wandsworth and is therefore processed within the WRWA area. The removal of waste from the lands may cause congestion during the construction phase, and be negative in the short-term on this point.
8. Soil conditions and contamination: Ensure all contaminated sites are remediated prior to development with the option	-	/	/	/	/	/	/	+	/	In general new development will be on brownfield sites, mitigating impacts on good quality soils. Construction activity in the OA has the potential to encounter development sites that

of in-situ treatment investigated.									have experienced soil contamination and requiring remedial works in the short to medium term.
9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).	+	+	+	+	+	+	/	+	Proposals to achieve an improved public realm and intense mixed use development in the Metropolitan Core area are important elements to necessitate less car journeys, and a more attractive pedestrian and cycling environment. OAPF measures are positive in medium to long-term. Development in White City east will provide funding for significant public transport investment.
10. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed	/	/	/	/	/	/	/	/	Comprehensive redevelopment has potential to negatively impact on protected and important built heritage, and architectural distinctiveness. However, the tall buildings strategy addresses this. The identification of character areas and related principles of the Urban Realm seek to identify and complement the built heritage of the OA, and locations where tall buildings could be appropriate. The OAPF strategy is considered neutral to positive over the medium to long-term.
11. Regeneration and Land Use. To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable	+	+	+	+	+	+	/	/	The OAPF provides a positive framework for regeneration and new uses of brownfield lands. The OAPF is considered to have positive cumulative impact in the medium to long-term.

reuse of previously developed land and existing buildings.									
12. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.	+	/	/	+	+	/	/	/	The OAPF provides clarity on the scale and location for intense redevelopment. LBHF and GLA standards for affordable housing, and diversity of tenure complement physical proposals. The OAPF impact is likely to be positive in the medium to long-term, although there is uncertainty regarding the mix of typology and tenure to be ultimately achieved.
13. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.	+	+	+	/	+	/	/	/	The OAPF contains positive objectives to support employment in construction phases, training, and growth of employment in the area over short, medium and long-term periods.
14. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	+	+	/	+	+	+	+	/	Environmental enhancements are positive initiatives in themselves, but do not necessarily have broader benefits for community and social-cohesion, which requires social and economic sustainability for the community in the long-term.
15. Open space: Improve the quality of the public realm and increase the number of public open spaces.	+	+	/	+	/	+	+	/	The OAPF provides for a new large public space, new streets, and improved east-west and north-south linkages. The overall impact on public space is positive.
16. Education and Skills. To improve the education and	/	/	/	/	/	/	/	/	Intensive growth and density will potentially support the establishment of new educational facilities in

skills levels of the population.									association with the LB HF Infrastructure Delivery Plan, and CIL.
17. Safety and security: Reduce the amount of crime and reduce the fear of crime through building and public realm design principles.	+	+	+	+	+	+	/	/	The OAPF will introduce significant new populations and workers into the area. It provides for regeneration of industrial brownfield lands, and a series of public space initiatives which are likely to improve the pedestrian experience and improve safety.
18. Health and Well-being. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	+	/	/	/	+	+	+	+	Improved public space, public realm and improvements to cycle and pedestrian network may have health benefits for population. The final mix of development may provide for health facilities in the White City East area by Imperial College, which would be a significant positive impact.
19. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.									For equality groups, the promotion of diverse housing tenures & typologies within a dense urban core may potentially be positive. The OAPF may enable the delivery of new facilities and services. Investment in the public realm & population intensification may have a positive impact on safety. The OAPF Land Uses strategy also includes specific proposals for the Delivery of Social Infrastructure. The objectives proposed in the OAPF address a wide range of spatial issues which will have far reaching impact on people living and working in the borough. By providing better opportunities for jobs, homes, community facilities and

									transport network the OAPF would have an indirect but positive impact on community cohesion and equality issues.
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General Commentary

- 6.5 The White City OAPF is vehicle to help resolve complex planning issues relating to the provision of significant residential and commercial growth in the White City Opportunity Area.
- 6.6 This plan seeks to facilitate the establishment of a new community of some 5,000 homes and 10,000 jobs over the next 15 to 20 years. The Opportunity Area comprises established residential communities, commercial centres and brownfield sites (where most of the development potential is focussed). The resident population in the OA is approx. 10,340 in 4,310 Households (Census 2011) and has some 24,000 jobs.
- 6.7 The Sustainability Appraisal seeks to establish how the plan proposals relate to the environmental and socio-economic constraints and opportunities of the receiving or baseline environment. While many of the objectives of the OAPF pertain to brownfield sites, the IIA must have specific regard to potential impacts of these strategic needs on local context and issues (i.e. existing populations, facilities, services and infrastructure).
- 6.8 Key issues include brownfield development, infrastructure and transport, internal and external connections and providing an attractive and consolidated commercial area.
- 6.9 The OAPF sets out 10 Key Planning Objectives. It will help to enable development by providing guidance on improving the existing poor public realm, tall buildings, provision of family housing, building typologies, conversion of vacant and underused office space, using leftover spaces, and principles for new retail development.
- 6.10 The OAPF proposals score positively overall when appraised against the 19 SA criteria in Table 6.1. The more positive categories are highlighted as follows:
- 6.11 Energy: While new developments have potential to have a higher energy demand, the dense mixed-use development proposed presents a greater efficiency in energy use, particularly if this were compared with equivalent suburban development. The development strategy would potentially facilitate the LBHF CHP initiative, thus enabling an energy-efficient local power system to be implemented.
- 6.12 Transport: Proposals to achieve an improved public realm and intense mixed use development in the Metropolitan Core area are important elements to necessitate fewer car journeys, and a more attractive pedestrian and cycling environment. OAPF measures are positive in

medium to long-term. Development in White City east will provide funding for significant public transport investment.

- 6.13 Regeneration: The OAPF provides a positive framework for regeneration and new uses of brownfield lands. The OAPF is considered to have positive cumulative impact in the medium to long-term. The OAPF 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 OAPF concludes that there is not a direct negative impact on the heritage assets and their setting.
- 6.14 Housing: The OAPF provides clarity on the scale and location for intense redevelopment. LBHF and GLA standards for affordable housing, and diversity of tenure address a range of SA issues that can be addressed through development. The OAPF impact is likely to be positive in the medium to long-term, although there is uncertainty regarding the mix of typology and tenure to be ultimately achieved.
- 6.15 Employment: The OAPF contains positive objectives to support employment in construction phases, training, and growth of employment in the area. It is clear that employment projections are based on a strong economic base through the main employers, industries and services already based in White City OA.
- 6.16 Liveability and Place and Open Space: Implementation of the OAPF would transform the White City OA. Environmental enhancements are positive initiatives in themselves, but do not necessarily have broader benefits for community and social-cohesion, which requires social and economic sustainability for the community.
- 6.17 Health and Well Being: Improved public space, public realm and improvements to cycle and pedestrian network may have health benefits for population. The final mix of development may provide for health facilities in the White City East area by Imperial College, which would be a significant positive impact.
- 6.18 On the negative side, the redevelopment of brownfield sites in an established built-up environment does potentially give rise to disturbance, particularly in the construction phase. Construction activity in the OA has the potential to encounter development sites that have experienced soil contamination and requiring remedial works. Construction activity may give rise to dust, and construction traffic may have temporal impacts on the existing road network.
- 6.19 Overall, the White City OAPF is found to be positive for the purposes of this Sustainability Appraisal.

6(b) Equalities Impact Assessment

- 6.20 The policies proposed in the OAPF address a wide range of spatial issues which will have far reaching impact on people living and working in the borough. By providing better opportunities for jobs, homes, community facilities and transport network the OAPF would have an indirect but positive impact on community cohesion and equality issues.
- 6.21 The policies in the White City OAPF have been assessed to ensure the equalities impacts of the objectives been considered. In preparation of the assessment of the effects of the OAPF on Equality Groups in the WCOA and surrounding communities, the potential impact of OAPF Policy are analysed in respect of various substantive issues as they relate to particular Equality Groups. Analysis of potential impact of the 8 main strands of OAPF objectives is summarised in Table 6.3 below.
- 6.22 It is considered that the OAPF is likely to be supportive of equality of opportunity for this protected characteristic.

1. Age

- 6.23 Redevelopment of the White City Opportunity Area in accordance with the OAPF development principles would help deliver an integrated, inclusive urban environment designed to accommodate the needs of people of all ages. OAPF objectives will particularly advance equality of opportunity for this protected characteristic.
- 6.24 The OAPF sets out a framework for the delivery of a broad range of building types and residential units. Read in conjunction with the Housing strategy, there is a strong positive response to the housing needs of the Borough, and its diverse population.
- 6.25 The Hammersmith and Fulham Housing Strategy 2012 identified household growth, declining household size and the growth in the proportion of lone parents, older people and BME households within the borough's population as key drivers of household growth. More recently the Mayor of London published an evidence base in support of his 2010 London Housing Strategy²³ which similarly identified population growth and the growth in the proportion of one person households as one of the key issues for housing in London. High house prices and rents in comparison to household income is the key issue for affordability set out in the 2006 evidence base and the Mayor's 2010 evidence base.

23 Housing in London, GLA (2010) (published as a draft for consultation in November 2008)

- 6.26 The new housing strategy highlights that demand outstrips supply in the Borough, and it is impossible to meet need. Affordability is highlighted as a significant challenge. It is the strategy's aim to provide 450 new households per annum. The White City Opportunity Area (WCOA) is considered to have a capacity of 3,500 to 4,000 additional homes. In the WCOA there is a strategy to provide 4,500 new homes and 1,200 student homes.
- 6.27 The promotion and provision of higher levels of family housing would increase housing choices and provide additional housing opportunities for the area's current population which is significantly younger than that of London as a whole. This in turn would make it easier for people to stay in the area as their family circumstances change, thereby helping community cohesion and stability.
- 6.28 There are also likely to be substantial improvements in general accessibility throughout the OAPF area with barriers to accessibility removed and a network of new connections created to link the area's new and existing communities. This would help people at all stages of their life and particularly benefit the elderly and parents and carers with young children. New social infrastructure including health and community facilities would also directly serve the needs of the area's different age groups.
- 6.29 Improvement to the transport network in the centre of the borough will be beneficial to those groups who tend to have less access to cars such as students/pupils, the elderly and other equality groups living in or visiting the areas. Improvement to the pedestrian crossings / cycle links and accessibility would be beneficial in particular for those who are less mobile, the elderly and people with shopping trolley bags and push chairs.
- 6.30 With regard to impact on young people, the following education initiatives mentioned under Social Infrastructure (Land use) are noted:
- 6.31 The Council has plans for the expansion of provision in the north of the borough supported by Government grant and expects that some of the children from the White City East development will be able to access that expanded local provision. However, an additional form entry primary school will be required to fully meet longer term need resulting from the development. The additional primary school provision must be local to the development area, although it is likely to be met by expansion on one of the existing school sites.
- 6.32 There is currently unmet childcare need in the north of the borough, which will become more severe with development in the OA. There is no child care or schools provision in White City East. The only nursery school in the OA is located in White City Estate and is at capacity. All

the primary schools in and close to the OA are full within their Early Years and reception phases (Bentworth, Pope John, St. Stephen's and Canberra). The recently opened Ark Conway free school is also at capacity for the year groups (4-11 years old) it operates.

- 6.33 The increase in nursery age children will require provision of nursery and affordable childcare provision equivalent to two nurseries. Developments should support affordable nursery provision so that low income families can access local early years facilities. Imperial College has provided for a crèche in their phase 2 proposals.

Secondary school

- 6.34 There are no secondary schools within the OA boundary, although Phoenix High and Burlington Danes schools are just outside the OA, and are at capacity. A planning application has been submitted to RBKC for construction of a new academy and leisure centre on the existing Kensington Leisure Centre site at Silchester Road in North Kensington, which is within 500 metres of the opportunity area but currently with very limited access from the area.
- 6.35 Further capacity will be required at secondary level to provide a local offer and this will require an additional one form entry. The additional secondary school provision will be planned at an appropriate location. LBH&F and RBKC will plan for the location of future primary and secondary provision as part of their bi-borough approach to education services.

University:

- 6.36 Imperial College London will have a significant influence on the progress of the WCOA. Student accommodation is currently under construction, and the potential of campus expansion (as per planning permission) south of the A40 is likely to introduce a strong third level profile to the OA area.

2. Disability

- 6.37 New development in the OAPF area carried out in accordance with the OAPF's development principles would help deliver an integrated, inclusive urban environment that is likely to reduce barriers for people with disabilities.
- 6.38 For example, the application of London Plan lifetime home standards as set out in the OAPF would ensure that at least 10% of new homes across the OAPF area would be designed to accommodate the needs of disabled people and the creation of new Lifetime Neighbourhoods will help disabled people travel to and through the OAPF area and access its facilities and open spaces. This will particularly advance

equality of opportunity for this protected characteristic. The target for affordable housing in the WCOAPF of 40% in line with the Core Strategy objectives, will be of general benefit to this protected characteristic.

- 6.39 The wide range of new and improved business space and training and employment opportunities the OAPF seeks should also be fully accessible to disabled people and the health outcomes this section of the OAPF promotes will benefit all people, including those with disabilities.
- 6.40 The OAPF seeks to provide housing, job opportunities and community facilities in the WCOA (which is accessible locations by public transport). The Public Realm strategy provides for greatly enhanced public spaces, streets, and pedestrian facilities. It therefore is likely to have some positive impact on the accessibility needs for disabled people.
- 6.41 Tube and bus enhancement and line extension would be beneficial for wheelchair users and those with mobility scooters as well as people pushing buggies and pushchairs.

3. Gender reassignment

- 6.42 Gender reassignment is the process of transitioning from one gender to another. The OAPF objectives have not so far emerged as specifically relevant to this protected characteristic, as no services or infrastructure is to be provided specific to people that are transitioning.
- 6.43 The 8 strands of the OAPF provide a planning context to support multi-faceted mixed-use regeneration, with a broad range of residential, economic and educational opportunities. It is considered that the OAPF is likely to be neutral in its impact on equality of opportunity for this protected characteristic.

4. Marriage and civil partnership

- 6.44 The promotion and provision of higher levels of family housing would increase housing choices and provide additional housing opportunities for the area's current population which is significantly younger than that of London as a whole. This in turn would make it easier for people to stay in the area as their family circumstances change, thereby helping community cohesion and stability. This is likely to be supportive of equality of opportunity for this protected characteristic. The target for affordable housing in the WCOAPF of 40% in line with the Core Strategy objectives, will be of general benefit to this protected characteristic.

5. Pregnancy and maternity

- 6.45 Whilst the OAPF is not seeking to deliver a service for people who are pregnant or have just given birth there are benefits that would accrue to pregnant women and those with young children.
- 6.46 For example, new development in the OAPF area in accordance with the OAPF's development principles would require designing buildings and places so that they are accessible to all, and a wide range of affordable and accessible housing would be provided with a particular focus on family housing. The target for affordable housing in the WCOAPF of 40% in line with the Core Strategy objectives, will be of general benefit to this protected characteristic.
- 6.47 There would be a substantial improvement in general accessibility throughout the OAPF area with barriers to accessibility removed and all footways and crossings built to safely and conveniently accommodate prams and buggies. The creation of new connections that link homes with community facilities and transport nodes will increase the ability of all people, in particular pregnant women and those with young children to navigate and move through the OAPF area safely and directly. This would positively impact on pregnant women and women with babies and young children and new social infrastructure including health facilities, crèches and community facilities would also serve the area. It is important that childcare needs of the existing and new populations are closely monitored, particularly in light of current levels of provision in the WCOA. The Pregnancy and maternity protected characteristic could be adversely impacted if good childcare facilities are not achieved as development is implemented.
- 6.48 The OAPF Strategy addresses some concerns of women: the promotion of business start up and creative industries might provide more flexible time/part time working opportunities for women. The proposal to have more homes, community facilities, and studio/ workshops/ creative industries (i.e. jobs) in accessible locations by public transport would be useful for women who are more likely to depend on public transport. The improvement of access, movement, crossing and links and public space is particularly useful for those people with push chairs and those using shopping trolley bags.. This is supportive of equality of opportunity for this protected characteristic.

6. Race

- 6.49 The OAPF is located within a Borough that is not as diverse when compared to London. However, 24.8.% of H&F's population are now estimated to be from a Black or Ethnic Minority Group. With

concentrations of Black Caribbeans, Black Africans, Indians and Pakistani, projected to reach 26 per cent BAME in 2021, increasing to 26.7 per cent in 2031.

Table 6.2: Hammersmith and Fulham Borough Ethnicity Projections

Year	Totals	White	Black Caribbean	Black African	Black Other	Indian	Pakistani	Bangladeshi	Chinese	Other Asian	Other	BAME
2011	188,235	75.2	4.46	5.17	3.29	1.38	1.16	0.77	0.98	3.08	4.52	24.8
2021	202,222	73.99	4.07	5.30	3.53	1.32	1.22	0.91	1.04	3.54	5.09	26.01
2031	208,683	73.29	3.93	5.42	3.68	1.3	1.25	1.03	1.06	3.77	5.27	26.71

Source: GLA Ethnic Group Population Projections, London Boroughs, 2012

6.50 Table 3.5 of the EqIA baseline analysis shows that the OA area includes a relatively low White population (46%) and relatively high Black African (14.8%) and Black Caribbean populations (5.8%). GLA analysis shows that Black and Ethnic Minority Households are disproportionately likely to become homeless and are also more likely to be living in overcrowded conditions. Unemployment rates are also higher than those faced by white people, particularly for younger people. The number of racist incidents increased in 2008/09 as did faith hate crime.

6.51 Also, research published by the Office of the Deputy Prime Minister in 2005²⁴ cites previous research²⁵ from 2003 in concluding that *“The very way the planning system operates can unwittingly exclude some persons and groups. Examples are those who do not understand the technical language that planners use, or those whose responsibilities in caring for young children prevent them from attending public meetings held in the evening.”*

6.52 Drawing largely on research from overseas, the 2003 report itself concludes that: *“Poverty and ethnicity are major barriers that need to be tackled if real inclusion is to be achieved.”*

6.53 The OAPF does not directly address the needs of a particular ethnic group. However it does indirectly address equality group needs. For example, it seeks to address existing housing need (and scarcity of dwellings) within the WCOA as well as the needs for the Borough more generally. The OAPF complements the LB Hammersmith and Fulham

²⁴ *Diversity and Equality in Planning-A good practice guide* (ODPM, January 2005) <http://www.communities.gov.uk/documents/planningandbuilding/pdf/324051.pdf>

²⁵ *Participatory Planning for Sustainable Communities: International experience of mediation, negotiation and engagement in making plans* (ODPM, 2003). <http://www.communities.gov.uk/documents/planningandbuilding/pdf/participatory-planning.pdf>

Housing Strategy in providing for a diversity of tenure and typology appropriate to the relevant equality groups. The target for affordable housing in the WCOAPF of 40% in line with the Core Strategy objectives, will be of general benefit to this protected characteristic.

- 6.54 The OAPF strongly stresses the need to promote and secure convergence outcomes, and by good design, help integrate new and existing development. Improved connectivity and safety will also help reduce crime and the fear of crime amongst the area's disadvantaged groups as well as the area's population as a whole.
- 6.55 It will be particularly important and challenging to ensure that existing communities have access to the new facilities and opportunities, and are not excluded or displaced by the changes in the OAPF area.
- 6.56 Immediately adjoining the OAPF area is a Traveller settlement at 'Stable Way', with an estimated 28 to 30 families. This community is at present cut-off from the WCOA by infrastructure. The OA provides for the comprehensive redevelopment of the lands between Wood Lane and West London Line. The former Unigate Dairy and M & S sites are located in this area bounded by the Westway to the North and West London Line/West Cross Route to the east. The OAPF provides for 3-6 storey mixed-use community along the edge with the West London Line. This rises to 9-10 stories away from eastern edge. Two towers are also proposed for this area. 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. The existing community, due to their proximity to WCOA area, will be aware of the changes to the built environment from brownfield, to mixed-use to the west. However, it is not considered that this Equality Group will experience discrimination, harassment, victimisation and any other conduct prohibited by the Act because of any of these protected characteristics, compared to groups who do not have a protected characteristic, by virtue of proposals for brownfield regeneration in the WCOA. The OAPF has potential to have a positive impact on this equality group through the provision of new facilities, services and connectivity in the adjoining OAPF area. The WCOAPF proposes an attractive mixed-use area which includes new amenity open space. There will also be improved access to jobs, training and leisure facilities in the WCOA. The provision of new east-west pedestrian links over the West London line and West Cross route will counter the significant infrastructural severance between the areas. The WCOA therefore supports equality of access to opportunity for this equality group.

7. Religion or belief

- 6.57 A GLA report in 2011 found that one of the key issues in examining faith inequality is the lack of current and accurate information, and found that there was no up to date data available on religious groups in London, with the 2001 Census providing the most accurate source of data²⁶.
- 6.58 The 2011 Census shows that London had a wide diversity of faiths, with Christians representing the largest group (48.4% down from 58% in 2001), followed by Muslims (12.4%), Hindus (5%), Jews (1.8%) and Sikhs (1.5%). There were also significant Baha'i, Jain and Zoroastrian communities in London and around 20% of Londoners stated that they followed no faith. Hammersmith and Fulham's largest faith groups are Christian (54%), Hindu(1.1%) Muslim(10%), Buddhist (1.1) and Jew(0.6%). In the OA, Christian is the largest group at 47.9% and Muslim 21.8%.
- 6.59 Since the 2001 Census, London's population has changed significantly and GLA population projections for London predict significant increases in the proportions of BAME and white 'other' groups over the next twenty years.
- 6.60 However given the race profile of LBHF it is considered unlikely that there will be a significant revision to specific concentrations of faith groups within the OAPF area, in particularly Christian, Muslims, and Hindus. There will also be a significant number of people with no religious belief.
- 6.61 Redevelopment of the OAPF area in accordance with the OAPF's development principles would help deliver an integrated, inclusive urban environment that could accommodate faith groups. This will though require that all social and community infrastructure (such as new libraries and community spaces) be made available for use by faith and special interest groups. Public open space and green space should also be made available for formal and informal events.
- 6.62 The OAPF seeks to provide more opportunities for employment and new housing of different size and affordability to suit the needs of the residents. The target for affordable housing in the WCOAPF of 40% in line with the Core Strategy objectives, will be of general benefit to this

²⁶ Updated information from the 2011 Census is due to be released on 30th January 2013.

protected characteristic. It also seeks to provide community facilities in accessible locations. It promotes the creation of a well-connected network of high quality, multi-functional public spaces. It is therefore likely to contribute positively towards good relations between people of different racial or other minority/community/social or economic groups.

8. Sex

- 6.63 The OAPF is intended to benefit both male and female residents and workers. Jobs and range of jobs available should be able to benefit both sexes in relation to the spread of job opportunity and homes will be available to both sexes. As women in the OA have a lower level of economic activity, but males currently have a higher rate of unemployment, it is likely that employment programmes developed as part of the OAPF will benefit males slightly more than females.
- 6.64 Women in London are less likely to be in employment than men in London and women elsewhere in the UK, and that this is almost entirely due to the lower employment rate of women with children. Furthermore, the same report notes that the overall employment rate of Black and Ethnic Minority women in London is significantly less than that of men and women in London as a whole, and that the employment rate of Bangladeshi and Pakistani women is lower than that of women from other minority ethnic groups.
- 6.65 The OAPF does not provide for direct funding of social and community infrastructure or facilities. However, Chapter 5 (Social, community and Leisure Infrastructure) and Chapter 7 (Delivery and Implementation Strategy) of the WCOAPF as well as the DIF study have considered in detail the key social infrastructure required to support the growing population which will be delivered through Section 106 and then Community Infrastructure Levy (CIL), in accordance with the roll-out of development over time.
- 6.66 Development in the OAPF area carried out in accordance with the OAPF's development principles will help deliver an integrated, inclusive and safer urban environment that would also help improve women's safety, and whilst transport and accessibility improvements will be inclusive, as men generally have more travel choices than women, improved access to public transport could further help improve women's safety, employment choices and access to community infrastructure and facilities.
- 6.67 Although the objectives in the OAPF do not deal with unlawful discrimination and harassment directly, the London Plan and the Core

Strategy together do promote a well-designed and safe public realm and safer neighbourhoods. These policies are likely to have positive impacts on elimination of unlawful discrimination and harassment.

9. Sexual Orientation

6.68 Sexual orientation means whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

6.69 The OAPF objectives have not so far emerged as relevant to this protected characteristic because it is not aiming to put in place a specific service for lesbian, gay, bisexual or heterosexual people.

6.70 However, the document is intended to positively impact on sexual orientation through the supporting infrastructure to include schools, health, leisure, community uses, and open space. It will provide an inclusive environment with a mix in housing which would afford greater balanced and mixed communities, increase the number of jobs and access to jobs, improve pedestrian and links and connections throughout the OA and surrounding areas for increased accessibility. Provision of good quality public and private spaces will create greater social interaction and reduce deprivation and provide a creative hub which can foster cultural activities and provide better access to and improve community services and infrastructure.

Table 6.3 Equality Impact Assessment of White City OAPF Objectives

Key: + Likely to contribute positively to Equality duty
 - Likely to detract from the achievement of Equality duty
 / Impact of objective considered to meet Equality duty

Equality Groups	1. Mixed development. Use commercial Offices, hotels, and flexible work spaces - growth of creative, media, biomedical.	2. Town Centre Reinforcement of the metropolitan town centre with a revitalised market	3. Employment and Training (10,000 new jobs provided throughout the OA. Incentives to increase training.	4. Housing choice & opportunities 5,000 new homes additional student housing. broad range of tenures & type and affordability.	5. Social Infrastructure schools, health, leisure & community facilities to support the expanded population	6. High quality public and private realm A large public open space, the White City Green, network of	7. Environmental sustainability coordinated approach to energy, heat, waste, freight, and other	8. Transport improvements enable more people to use public transport, walk and cycle with ease, and to
Age	+	+	+	+	+	+	+	+
Disability	+	+	+	+	/	+	+	+
Gender reassignment	/	/	/	/	/	/	/	/
Marriage and civil partnership	+	/	+	+	/	+	+	+
Pregnancy and maternity	/	/	+	+	/	+	+	+
Religion or belief	+	+	+	+	/	+	+	+

Sex	+	+	+	/	/	+	+	+
Sexual orientation	/	/	/	/	/	/	/	/

- 6.71 In view of the strategic nature of the OAPF objectives, their impacts on equality and diversity should be treated as *potential*. Whether these impacts would materialise depends on the details of the scheme during the implementation stage and the mitigation actions.
- 6.72 The implementation of OAPF is related to other delivery mechanisms, such as the Infrastructure Development Plan, Community Infrastructure Levy and Masterplans. A broad range of equalities impacts are dependent on the provision of affordable housing. The final quantum, type and tenure are subject to negotiation, and having regard to the DIF study, the balance of development contribution resources allocated to transport infrastructure in particular.
- 6.73 The OAPF is in general found to be sound in equality issues.

7. Mitigation (Task B5)

Sustainability Assessment Mitigation

- 7.1 Table 3.5 of this IIA outlined a series of key sustainability issues and problems for the WCOA arising from the Baseline SA review of plans, programmes, policies and baseline data for the area. The development of the OAPF objectives, incorporated various mitigation measures to address the issues identified. These are summarised under the same headings used in table 3.5; Economic, Social and Environment.

Economic

- 7.2 The OAPF's objective to provide for a dense, diverse mixed-use centre will mitigate potential negative impacts arising from mono-use development, or a potential narrow diversity of residential tenure and typology.
- 7.3 The OAPF supports new commercial development and expansion and re-investment in the retail offer (malls, markets and high streets), and greater diversity of building typology and enterprise. This addresses potential negative displacement effects.

Social

- 7.4 The OAPF is focussed on the development of the WCOA as a vibrant mixed-use urban area that is related to the needs of the LBHF population, including business, services and equality groups. Public Realm, Building Height, Land Use and Delivery objectives present a co-ordinated approach to ensure that social deprivation, health, education, transport and travel and housing needs are taken into account in the objectives and implementation programmes. These measures are referred to in further detail in Section 7 – General Commentary, and Equalities Impact Assessment.

Environment

- 7.5 The improvement of the urban environment and the achievement of a high standard of environmental indicators is integral to the OAPF objectives for a revitalised Metropolitan Centre. Building height objectives incorporate definition and mitigation of impact on sensitive receptors, and heritage assets. Potential increase in energy demand is to be mitigated through high building standards to be delivered as part of any proposals in WCOA (ie. BREEM, Carbon Neutral development) redevelopment proposals to support delivery of White City CHP scheme. Flood Risks have been identified, and measures

included to ensure that new development addresses surface water run-off and filtration.

Equality Impact Assessment Mitigation

- 7.6 The EqIA has identified the Equality Groups in and around the WCOA, and raises issues facing these groups, and how the OAPF can be viewed as an opportunity to address the needs of the population.
- 7.7 The OAPF has identified Social Infrastructure facilities to be implemented including education facilities and health facilities. This has mitigated the potential impacts of preparing a plan that would exclude consideration and integration of social infrastructure delivery.
- 7.8 OAPF Transport and Public Realm proposals have been prepared to facilitate equality groups and improve access and movement experience and facilities for all groups. Play facility objectives have been developed to provide facilities for families, and to mitigate against exclusion of Equality Groups who would experience exclusion through an urban environment that is not family and child friendly.
- 7.9 Urban design objectives have been developed to facilitate diversity of residential tenure and typology so that no group is excluded.
- 7.10 The OAPF includes proposals to encourage redevelopment of retail in the Metropolitan Centre (Market, High Streets and Malls) and refurbishment of office/ new commercial space. The proposal to support a percentage of trainee positions will help mitigate the exclusion of equality groups from access to employment opportunities.

8. Monitoring (Task B6)

- 8.1 Both SA and EqIA processes have a requirement to monitor and review the proposed changes after implementation. The purpose of this is to check the proposals work as planned and to screen for unexpected impacts.
- 8.2 The following list details how GLA /TfL and LB Hammersmith and Fulham will monitor/evaluate or review the proposals and when the review will take place. As the authorities responsible for the OAPF GLA/TfL and LB HF are in a position to bring this information together complementing the Annual Monitoring Report (AMR) for the Core Strategy. This is the main reference document for SA and EqIA indicators in the Borough. TfL will monitor transport and accessibility implementation. The OAPF is regarded as an implementation strategy, rather than a static document, and will be regularly revisited and monitored by GLA.
- 8.3 Monitoring will have regard to changes in the following indicators:
1. **Biodiversity conservation:** increase in habitat areas
 2. **Land use:** monitoring of dominant land uses/mix of use/typology of residential and commercial building
 3. **Land recycling: monitor** new development on previously developed land
 4. **Dwelling density: monitor** average density of new housing and population
 5. **Households and dwellings:** households, single person households, dwelling stock and tenure
 6. **Heritage Monitor** Buildings/Conservation Area at Risk
 7. **Flooding:** *Monitor though planning proposals in or near Flood Risk areas*
 8. **Safety – Crime** (Met Police Statistics)
 9. **Health – Health indices and implementation of Health Facilities in Infrastructure Delivery Plan**
 10. **Quality of Green Space** – Monitor quantum of green/public spaces, and planting incorporated as street improvements. Monitor Green Flag Status of parks.
 11. **Energy** – Implementaiton of CHP (medium to long-term)
 12. **Inequalities** –Deprivation Indices, Equality Group consultation and feedback, access to Education/ affordability and access to services, demographic profile
 13. **Local Environmental Quality** Audit **potentially with Area Rating Tools.** (Breem/English Green Building Council)

14. **Transport Indicators** – Monitor Public Transport, cycling, pedestrian statistics. Car Parking spaces (quantity and locations (off-street and car-parks)Traffic Volumes.
15. **Waste - Waste generation and recycling indices**
16. **Energy Indicators – Energy use indices**
17. **Emissions of air pollutants:** SO₂, NO_x, NH₃ and PM₁₀ emissions and GDP
18. **River quality*:** rivers of good (a) biological (b) chemical quality
19. **Water** *monitor the impacts of water quality and supply)*