

London Borough of Hammersmith and Fulham

Representations to the Proposed Submission Local Plan Regulation 19 Consultation

16th September to 28th October 2016

Contents

1. General.....	3
2. Introduction & LBHF.....	94
3. Spatial Vision & Strategic Objectives.....	115
4. Delivery & Implementation.....	131
5. Regeneration Area Strategies.....	137
6. Meeting Housing Needs & Aspirations.....	253
7. Economy & Employment.....	325
8. Town & Local Centres.....	344
9. Community Facilities, Leisure & Recreation.....	370
10. Green & Public Open Space.....	388
11. River Thames.....	415
12. Design & Conservation.....	429
13. Environmental Sustainability.....	459
14. Transport & Accessibility.....	484
15. Planning Contributions & Infrastructure.....	500
16. Glossary.....	508
17. Appendices.....	512

1.General

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
67	111	Parsons Green Depot Tenants and the Andrew Robson Bridge Club	General	NO			The draft Plan does not meet the test of soundness as it is not effective in meeting the local needs of small business enterprises and privately run facilities that meet a community need which were identified in the evidence base. Furthermore the chosen strategies do not reflect all the options available to the Borough to protect these uses even though they are acknowledged as making an important contribution to the social and economic well being of the Borough.	Map AD5 Parsons Green Lane Neighbourhood Parade This designation should extend beyond the bridge to the north and include the retail shops and cafes on the west of Parsons Green Lane and 31 Parsons green Lane on the east (see map below). These properties make an important contribution to the neighbourhood and it is perverse that they are not included within this designation as they meet all the tests described within the draft plan and should be afforded the same protection for parades as defined under policy TLC4.
9	115	Mr Nicolas Crosthwaite	General				On pages 115 & 116 of the Sustainable document Policy CF1 Supporting Community Facilities and Services there would appear to be some serious contradictory observations when it comes to para (4) Supporting the continued presence of major public football, particularly when it is stated later in the sustainability documents that 'In general the proposed policy is considered to have a neutral impact on sustainability objectives' For example in the CF1 table it is deemed the football clubs get ticks for contributing to: Social Equity Health Education and Skills Social Cohesion	

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							<p>Satisfying Work</p> <p>Heritage</p> <p>Sustainable Economy</p> <p>This seems to be at odds with the conclusion reached in CF4 I look forward to receiving any comments you may have to the above</p>	
7	117	Sport England	General	NO	YES		<p><u>Evidence base</u></p> <p>The NPPF requires each Local Plan to address the spatial implications of economic, social and environmental change based on an adequate, up-to-date and relevant evidence base. The NPPF, at paragraph 73, requires that:</p> <p><i>“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”</i></p> <p>Sport England acknowledges the Sports and Physical Activity Strategy but does not consider this to be a robust and up-to-date assessment of the supply and demand of sport and recreation facilities and opportunities for new provision. The document does not appear based on a thorough and collaborative assessment of current and future playing field and built facility supply and demands setting out key recommendations and actions. In addition, the Sports and Physical activity Strategy appears at least five years old therefore Sport England considers this document to be out of date. As a result the policies contained in the in the Submission Local Area</p>	<p>To overcome the objections raised Sport England recommend that the Council develop Playing Pitch and Built Facility Strategies to establish a clear and robust evidence base and strategy for playing pitches and built sport facilities and revise the Community Facilities and Services Policy to fully reflect Sport England’s policy to protect, enhance and provide.</p> <p>Sport England also strongly advise the rewarding of the open space policy, the glossary and references to sport facilities and the regeneration area policies as explained in the preceding text.</p>

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							<p>are unsound as they are not fully justified by an up-to-date and robust evidence base and strategy as required by the NPPF.</p> <p>Sport England would be happy to provide further advice on how the Council can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England's website at: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/ . In addition, Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England's website at: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/</p>	
17	122	Hammersmith Society	General				<p>The Society welcomes the format and organisation of the latest document, which is a considerable improvement over the previous split policy documents.</p> <p>We are pleased to note that many of our suggestions/proposals made at the January 2015 draft stage have been incorporated.</p> <p>We welcome that much of previous policy texts have been rewritten or laid out in a clearer format.</p> <p>We note the extraction since the 2015 draft of the Old Oak and Park Royal area since it was declared a Mayoral Development Corporation in April 2015 : Our members have continued to take an active role in consultation of matters relating to the OPDC, particularly as they affect Hammersmith.</p>	

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							<p>We suggest that the Proposed Submission Local Plan and the final Local Plan could benefit from a detailed contents breakdown (or index) with numbering so that it is easy to reference individual policies.</p> <p>Please can the Proposal Maps be part of the main document as an Appendix? We request that there be a revised borough wide map as part of the Final Plan.</p> <p>We note that there is little reference to the potential effects of the Heathrow expansion in the current draft but we assume that now the Government has made a decision in favour, the Plan will be updated in terms of the potential effects on the A4, the Piccadilly Line and Air Quality in Hammersmith.</p>	
18	184	Old Oak and Park Royal Development Corporation	General				<p>It would be helpful for the policies to have lettered or numbered bullets for ease of reference in planning committee reports.</p> <p>It would be helpful for the document to include an explanation of the role of OPDC as the local planning authority within its boundary.</p>	
19	224	Natural England	General				<p>Strategic Environmental Assessment (SEA)</p> <p>Natural England notes that a thorough and detailed SEA has been carried out and has no specific comments to make regarding this assessment.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	

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20	225	Peterborough Road and Area Residents Association	General				<p>I am responding to the invitations to Peterborough Road & Area Residents' Association and myself, Mr Anthony Williams, to comment on this updated Plan.</p> <p>As the comments you are seeking primarily concern whether or not the policies meet legal requirements to have been positively prepared, are appropriate and are justified, we do not feel sufficiently competent to make any specific submissions of that nature. However, we do comment positively on the readability and clarity of the Plan.</p>	
21	226	Canal & River Trust	General				<p>The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that “living waterways transform places and enrich lives”. We are a statutory consultee in the development management process.</p> <p>The Trust has reviewed the consultation documents, and I can confirm that we have no further comment to make on the Draft Local Plan.</p> <p>We note that although the Old Oak and Park Royal Development Corporation area now includes the section of Grand Union Canal that previously fell within the LB Hammersmith & Fulham, the Draft Local Plan still includes references to the canal in some of its policies.</p>	

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22	227	Caroline Brooman- White	General				Please could something be included to protect Parsons Green Depot from demolition. It is home to 50 business and gives employment to over 320 people.	
23	229	H&F Disability Forum	General				<p>Introduction</p> <p>Hammersmith and Fulham Disability Forum (DF) is a user led group of disabled residents and older disabled residents.</p> <p>We work on behalf of the 20,403 (27.05%) households with at least one person with a disability or limiting long term illness.</p> <p><i>Source: 2001 census. www.neighbourhood.statistics.gov (KS21) updated 9 November 2004.</i></p> <p>2011 census included 22,958 (12.6%) people in Hammersmith and Fulham who self reported that their day to day activities were limited due to long term illness or disability.</p> <p>Whether we look at statistics on households or individuals with a long term illness or disability they include people with a physical impairment, older disabled people, deaf or hard of hearing people, blind and visually impaired people, people with a learning difficulty or mental health conditions as well as people living with long term illness. Please note that disabled people or people with a long term illness are represented in all equality groups as defined by Equality Act 2010. In this response we refer to these people as disabled people or disabled visitors as appropriate.</p> <p>Disabled people like everyone else aspire to</p>	We recommend that all Strategic Policies and Regeneration Area Policies for avoidance of doubt should include reference to accessible and inclusive development, principles or design.

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							<ul style="list-style-type: none"> • Accessible and inclusive housing they can afford to rent or buy • Employment opportunities that pay more than being on benefit • Education and training opportunities • take part in community activities • Use accessible and inclusive transport and pedestrian environment • being supported by accessible and inclusive housing, health and social care services that meet their needs. <p>The Disability Forum Planning Group meets during the first week every month to discuss planning and development issues. Every month a volunteer comments on relevant planning applications validated in the previous month. The Group selects 4/5 planning applications to review with the relevant case officer on the third Wednesday every month. After each meeting we send formal written advice to the case officer. Our response is based on scanning nearly 5,000 applications, commenting on 280 applications and reviewing in detail 48 to 50 applications a year; experience of responding to previous LDF and housing consultations as well as the London Plan and various Examinations in Public.</p> <p>We act as a local Access Group for planning and development in Hammersmith and Fulham. We have first hand experience of the issues from reviewing detailed drawings and other plans with case officers. We are currently working with the Planning Department to ensure pre-application advice and Design Codes assist developers to deliver accessible</p>	

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							<p>and inclusive public realm, housing and sustainable development compliant with current national or London Plan standards.</p> <p>Executive Summary:</p> <p>The Hammersmith and Fulham Disability Forum Planning Group (DF) is pleased to respond to the Hammersmith and Fulham Local Plan 2015.</p> <p>We welcome the council's appointment of a Disabled People's Commission to ensure Hammersmith and Fulham is an inclusive borough. We anticipate the Commission will have an impact on how the Council works with disabled residents on a range of issues.</p> <p>We welcomed the council's Spatial Vision in the previous Local Plan 2015 that included creating well designed, accessible and inclusive buildings, public and private spaces in conformity with the London Plan <i>policy 7.2 an inclusive environment</i> .</p> <p>We are disappointed that access and inclusion has not been included in this year's Spatial Vision. We hope this is an oversight that will be amended in the final version of Local Plan 2016. This Local Plan needs to send a strong signal that developers should come forward with specific development proposals consistent with accessible and inclusive e principles and detailed standards. It will provide a strong basis for the council in assessing and approving planning applications consistent with national guidance and the London Plan .</p> <p>This includes promoting and creating opportunities for accessible and inclusive housing, training and employment, accessible transport and</p>	

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							<p>pedestrian environment, accessible and inclusive health and social care services as well as leisure and community activities.</p> <p>Many Borough Wide policies in Local Plan 2016 include helpful references to accessible and inclusive development, principles and design. However, we are surprised that at the strategic level the Strategic Policies and Regeneration Area Policies do not include these principles.</p> <p>We are also concerned that the Local Plan 2016 may assume that compliance with London Plan minimum space standards enables developers to comply with Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings. We include recommendations to deal with this issue.</p> <p>Statutory duty not to discriminate against disabled people</p> <p>Since December 2006, the council has a statutory duty under its Disability Equality Duty (Disability Discrimination Act 2005) replaced by the Equality Act 2010 not to discriminate against disabled children, disabled young people to 25, disabled adults under 65, disabled older people (disabled residents); take positive steps to make sure that council policies, procedures and practices also do not discriminate against disabled residents.</p> <p>Equality Impact Assessment (EQIA)</p> <p>We note the EQIA for the Local Plan 2016. It is high level and does not provide assurance that local residents, vulnerable, disabled and older people will benefit from the Council's Local Plan 2016 over the next 20 years.</p>	

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							Many Borough Wide policies in Local Plan 2016 do support accessible and inclusive development but Strategic Policies and Regeneration Area Policies do not include accessible and inclusive development, principles or design.	
23	233	H&F Disability Forum	General				<p>We believe it is essential Local Plan 2016 policies are explicit in requiring developers to submit proposals consistent with accessible and inclusive principles and detailed standards. Some policies are explicit and other policies imply this. We do not believe inconsistency helps developers or case officers. Case officers have advised us that any condition attached to a planning permission or S106 agreements must flow from specific policies whether they are London Plan or LBHF planning policies etc.</p> <p>All Local Plan 2016 policies should conform with</p> <p>National Planning Policy Framework <i>detailed guidance</i> on Inclusive Design; (see paras 35 transport; 50 housing choice; 57 developments; 61 Buildings and public realm; 58 Public realm; 159 on housing need)</p> <p><i>The Government's Planning Practice Guidance on inclusive design (see Accessible London)</i></p> <p>London Plan policy 7.2 an inclusive environment</p> <p>London Plan SPG: Play and Informal Recreation (2012)</p> <p>London Plan SPG: Character and Context (2014)</p> <p>London Plan SPG: Accessible London (2014)</p>	

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							<p>London Plan SPG: Town Centres (2014)</p> <p>London Plan SPG: Social Infrastructure (2015)</p> <p>London Plan SPG Housing (2016)</p> <p><i>Accessible London</i> has a helpful section that pulls together NPPF detailed guidance on inclusive design; all relevant London Plan policies relating to accessible and inclusive design as well guidance to boroughs and developers on how to use principles of accessible and inclusive design to achieve an accessible and inclusive environment.</p>	
24	256	Home Builders Federation						<p>Plan Period</p> <p>It would be very helpful if the front cover of the Local Plan stated the plan period – i.e. 2015 – 2035. We assume that this is the correct period over which the new plan will operate.</p>
24	258	Home Builders Federation	General	NO	NO	NO	<p>Duty to cooperate</p> <p>Strategic and Cross Boundary Matters</p> <p>Paragraph 1.9</p> <p><u>is unclear how the Council has discharged its legal responsibilities in connection with the duty to cooperate. As such the Local Plan may be unlawful. It may also be unsound from a planning point of view.</u></p>	<p>It would also be helpful to know what Hammersmith & Fulham Council has been discussing with its London neighbours in terms of cross-boundary strategic matters and whether it is aware of any housing under-supplies relative to the London Plan housing benchmarks. It would be helpful to know if Hammersmith & Fulham has been approached by another borough for assistance in accommodating an unmet need. For example, we are aware that Kensington & Chelsea's emerging local plan is signalling that it is unable to accommodate its new</p>

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							<p>The Local Plan is almost silent on the question of the duty to cooperate other than asserting that effective cooperation has taken place (paragraph 1.9).</p> <p>Policy 2.2 of the London Plan, and part E in particular, requires the London boroughs, especially those in outer London, to work with neighbouring authorities including those outside of Greater London. Unfortunately there is no information available to demonstrate what the Council has done in relation to its legal duty to cooperate so it is hard for respondents to know what the cross border strategic issues might be and what Hammersmith & Fulham Council has done about planning for these. As such it is unclear whether the Council has addressed the legal aspect of the duty to cooperate. The London Plan is not a development plan document, as the Mayor is keen to stress, and so therefore compliance with the legal duty to cooperate under Section 33A of the Planning and Compulsory Purchase Act 2004 falls to Hammersmith & Fulham Council. This places a legal duty on Hammersmith & Fulham Council to engage constructively, actively and on an ongoing basis in order to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. Hammersmith & Fulham Council will need to clarify what the strategic cross boundary issues are and how it has attempted to address these issues. Planning for the migration assumptions that are implicit within the Mayor of London's demographic Central Variant is one of these strategic issues, as the London Plan acknowledges (Policy 2.2E and paragraph 2.13 of the London Plan), and as the inspector examining the London Plan observed in relation to the London SHMA:</p>	London benchmark in full (see table below in the housing need section).

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							<p><i>“The SHMA, which includes assumptions relating to migration, is also likely to be material to the preparation of local plans outside London.”</i> (paragraph 8)</p> <p>The Council’s SHMA provides some information on migration flows but it does not analyse where these people are going. We note on page 17 that Hammersmith & Fulham has seen significant increases of internal migration net loss between 2011 and 2013 – the fourth highest loss of any local authority in the country. It also needs to be born in mind that the Mayor of London’s demographic projection for London as a whole in the London 2013 SHMA (that supported the preparation of the new London Plan) is very much lower than the official DCLG Household Projection. The Mayor assumed that household formation would amount to just 39,500 households per year compared to the official DCLG 2011-interim Household Projection that projected that some 52,000 household might form per year over the planning period 2011 to 2036 (see paragraph 3.60).</p> <p>The difference between the Mayor’s projection of housing need of 39,500 household per year and the official projections (the most recent DCLG 2014 Household Projections suggest that some 54,000 household will form a year across London) has major implications for plan-making across the wider south east of England (by which we mean primarily the former South East and East of England regions although the south of the East Midlands is also affected as are parts of the western most of the South West region). Hammersmith & Fulham Council has responsibility for ensuring that this demographic assumption of the Mayor’s is being planned for by those authorities in the wider south east who will have to deal with the consequences – i.e. a higher population to accommodate and higher housing need. The Mayor has asserted that he is not responsible for the legal duty to cooperate. This responsibility resides with the London</p>	

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							<p>Boroughs – see paragraphs 1.2.4 and 3.1.3 of the Mayor’s Housing SPG (March 2016) for clarification on this point. Many authorities in the south east are becoming increasingly concerned by the influx of migrants who have been priced-out of London partly as a consequence of the lower housing targets that are a consequence of the Mayor of London’s migration assumptions. It also needs to be said that no local authority outside of Greater London is preparing a new local plan on the basis on increased levels of inward migration from London and decreased out-migration to London. At best, most, are barely meeting the 2012 household projections. No increase in housing capacity is being provided by the wider south east, and therefore, it is arguable whether people can leave London at the rates being assumed by the Mayor. The fact that Hammersmith & Fulham is recording high levels of over-crowding (13% of all households according to paragraph 2.2 of the Local Plan) is evidence that the Mayor’s forecasts are not coming true. It also speaks to the failure of strategic planning between London and the wider south east. The planning system is failing to adequately cater for migration and household formation and the problem is compounded because no-one is taking responsibility as each side claims that someone else is responsible for the duty to cooperate.</p>	
25	266	Tri-Borough Public Health	General				<p>Overview</p> <p>Local authorities are measured against 68 Public Health Outcome Measures to assess how they are improving the health of their population. Many of these health impacts can be directly and indirectly delivered through improving street environments and public transport. Some</p>	

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							<p>examples include obesity, physical activity, air quality, noise, deaths and serious injuries on the road, and social connectedness.</p> <p>Summary</p> <p>To conclude it is worth reiterating the strengths of LBHF's Local Plan. There has been a clear attempt to weave the challenges of improving health and wellbeing in the borough into the document and to good effect.</p> <p>The London Borough of Hammersmith and Fulham's Local Plan is applauded for reflecting effectively the emphasis on Public Health now expected of local authorities, embedding Public Health concerns right across Local Authority strategy and business. This document makes suggestions for how the Local Plan might be further strengthened and clarified in relation to this.</p>	
28	292	Hammersmith Mall Residents Association	General				<p>The Hammersmith Mall Residents Association (HAMRA) represents the residents of LBH&F who live in the Mall Conservation Area and is concerned with maintaining, protecting and enhancing the conservation area and safeguarding its beautiful and historic riverside.</p> <p>The Mall Conservation Area is a very special part of Hammersmith nestled between the A4 to the North and the River Thames. It is made up predominantly of traditional, low rise buildings, many of which are either listed or recognised as buildings of merit. The river frontage from Hammersmith Terrace, along Upper and Lower Mall to the Grade II* listed</p>	

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							<p>Hammersmith Bridge is recognised in Thames Strategy Kew to Chelsea as providing <i>'an exceptional townscape to the river edge'</i>.</p> <p>HAMRA are concerned that any future development, within the conservation area itself and adjacent parts of the borough, must ensure that the character of this important stretch of the riverside is protected and not compromised in any way.</p> <p>GENERAL REMARKS:</p> <p>HAMRA broadly supports the Strategic Objectives of the Proposed Submission Local Plan (Section 3), in particular: (1-2) regenerating the borough, (5-6) delivering affordable homes for local people, (10 – 14 delivering an environmentally sustainable borough)</p>	
30	322	Big Yellow Self Storage Company Ltd	General				<p>We are instructed by our client, Big Yellow Self Storage Company Limited ("BYSS"), to submit representations on their behalf regarding the consultation on the Hammersmith and Fulham Proposed Submission Local Plan ("the Plan").</p> <p>BYSS is one of the leading self storage operators in the UK. It is a publicly listed company which develops, owns and operates modern self-storage centres for personal, business and leisure storage. It now has 71 trading stores open, totalling over 4.5 million sqft of storage space. BYSS operate two stores within the London Borough of Hammersmith and Fulham; one at 71 Townmead Road, SW6 2ST and another at 149 Scrubs Lane, NW10 6RH. BYSS has been a pioneer in the self-storage industry, being the first operator to focus on providing the highest quality service to its customers. It has also been the first operator to build purpose built warehouses, as well as providing high quality, sensitive conversions of existing premises.</p>	<p>Summary</p> <p>In summary, it is considered important that the Hammersmith & Fulham Proposed Submission Local Plan (September 2016) does not prevent the continued operation or future expansion of my clients' self storage stores at both Fulham and North Kensington. We would also suggest that the Plan should recognise the compatibility of self storage operating in proximity to residential uses and how such a mix of uses could make a positive contribution towards the residential led regeneration of the South Fulham Riverside Regeneration Area.</p>

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							<p>The Company is listed on the London Stock Exchange and employs over 300 full and part time staff.</p> <p>Self Storage (Use Class B8) within South Fulham Riverside Regeneration Area</p> <p>The North Kensington store at 149 Scrubs Lane is located within the boundary of the Old Oak and Park Royal Development Corporation. However, BYSS store in Fulham (71 Townmead Road) is located within the proposed South Fulham Riverside Regeneration Area</p> <p>("SFRRA"). The Plan confirms that across the four regeneration areas identified within the Plan, the Council will support major regeneration and growth and will work to ensure that within these areas, proposals will deliver 19,800 new homes and 29,500 new jobs in the period up to 2035. Policy SFRRA sets out indicative targets for the creation of 4,000 homes and 500 jobs within the South Fulham Riverside Regeneration Area over the same period. This policy states that, <i>"The council will work with landowners and other partners to secure the phased regeneration of the area to become a high quality residential area together with a mix of other uses."</i> It also clarifies that proposals for development in this area should include employment based uses that will meet local business needs and are also compatible with residential development in the most accessible parts of the area.</p> <p>The self storage (Use Class B8) offered by BYSS stores is compatible with residential (Use Class C3), as demonstrated by the BYSS store in Kingston-upon-Thames which successfully combines self storage and residential uses</p>	Where amendments are proposed, these are considered necessary in order ensure that soundness of the Plan in accordance with the tests set out at paragraph 182 in the National Planning Policy Framework (March 2012).

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							<p>within a single building. Customers of BYSS use self storage for either domestic or business purposes. The flexible service provided by BYSS is particularly attractive to Small and Medium Enterprises ("SMEs"). On average around 80% of customers of a store will be domestic, with the remaining 20% being business customers. This proportion relates to the numbers of customers, but business customers usually take a greater area of floorspace and thus the floor area they occupy is actually substantially greater than 20% (around 30%). It is therefore considered that self storage (B8) floorspace would be a complementary land use within the residential led regeneration of this area, being compatible with residential uses and supporting SMEs.</p>	
31	325	Port of London Authority	General				<p>Thank you for your letter dated 16 September 2016, inviting the Port of London Authority to comment on the proposed submission Local Plan (Regulation 19) consultation. It is noted that the new Local Plan will set out a vision, strategic priorities and a planning policy framework to guide and manage development in the Borough for the next 20 years.</p> <p>The Port of London Authority provided comment in response to the Regulation 18 consultation in 2015, and has the following comments to make with respect to this Regulation 19 consultation. As you are aware, the PLA is the statutory harbour authority for the tidal Thames between Teddington and the Thames Estuary. It's statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movements and it's consent is required for the carrying out of all works and dredging in the river and the provision of moorings. As the body responsible for licensing river works and moorings, the PLA has a special regard to their continued viability for unimpeded use</p>	

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							<p>by the PLAs licenses. The PLAs functions also include for promotion of the use of the river as an important transport corridor to London.</p> <p>The aims and objectives of the Local Plan is to (amongst other matters):</p> <ul style="list-style-type: none"> - Regenerating the Borough - Building a stronger local economy - Ensure the development of safe, sustainable transport network that includes improvements to public transport and cycling infrastructure to complement the existing highway network. - To create an environment that supports business growth, and create local job opportunities - To protect and enhance the quality of the natural, built and historic environment. <p>These objectives are supported by National Policy and Guidance, and remain of relevance to planning.</p> <p>The PLA is encouraged by the level of emphasis given to the Borough's position by the River Thames. The Borough's riverside location is key to it's future development and success and should be utilised as an asset where practicable. Particular reference has been made to South Fulham Riverside, which offers opportunities for growth and supporting infrastructure, and, importantly, the location of the Borough's three safeguarded Wharves.</p> <p>The PLA consider that the River Thames can be used as a key economic support in the development of these areas, in accordance with the</p>	

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							<p>approach set out in it's Thames Vision published earlier this year. In addition, I would like to take this opportunity to emphasise the PLAs support in the retention of riverside industry and employment locations, and to the continued utilisation of wharf facilities (for uses requiring riverside locations) to ensure the continued and improved use of the Thames for the transport of goods.</p> <p>Working with site features</p> <p>There are a number of site features which should inform the appraisal process and eventual design proposal of a future scheme, this can include water features, and is particularly relevant for river frontage development. The PLA considers that proposals should positively address water bodies and courses in and around the site including the River Thames.</p> <p>The Thames is the most significant asset for the Borough. It provides an historic focus as well as supporting a diverse range of major employment sites, including Safeguarded Wharves. Where water features are included at the edge of or within a site, the PLA consider that development must be designed to have a positive relationship with these environments. The PLA fully support the aims and objectives of the Borough in terms of ecology and biodiversity but more should be made of river habitats.</p> <p>The promotion of active and healthy life styles and public transport should include the river Thames, for the transport of passengers, where practicable.</p> <p>The Local Plan identifies a number of place typologies including commerce, industry and the economy. The Borough's Safeguarded Wharf sites are a focus for commerce, employment and activity, providing striking features</p>	

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							within the landscape. Given the prominence and economic importance of these land uses and associated structures, there is even more importance placed on the requirements of good design. For riverside development, consideration of noise and vibration, lighting, plant and equipment and how these are integrated into the design from the outset, to ensure minimal impact on the river regime and on any adjacent existing or future residential developments must be a priority. Again, the PLA would encourage the introduction of a policy safeguarding existing wharf and port use for use by cargo handling/river related industries.	
36	341	Brackenbury Residents Association (Mr Richard Winterton)	General				<p>I have reviewed the Local Plan and attach a note of comments I request to be taken into account to ensure the Plan is strengthened before being submitted for formal inspection.</p> <p>The Local Plan is a statutory document which provides general guidance to steer new development towards a coherent vision for the future of the borough. This vision is not defined in the Plan. The Local Plan is nudge-control, deliberately non-prescriptive, straddling opposing ambitions to avoid stifling development creativity whilst at the same time resisting development creativity which is conflicts with the Local Plan.</p> <p>The statutory status of the Local Plan places it at the forefront of development debate, with both the Local Authority and the Developer using this same document to justify opposing development arguments. ' <i>It says tall buildings are acceptable in certain circumstances.....</i> ' <i>Not that tall....</i> 'But this is first class architecture ...' 'No it isn't...' etc.</p> <p>The Local Plan (together with the London Plan and the NPPF) is the borough's planning law - but it is a loosely drafted, imprecise law, which</p>	

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							<p>lacks the strength to resist legal attack. The value of the Local Plan is considerably diminished if it is unable to provide a defence against development which is contrary to the Local Authority vision for the future of the borough.</p> <p>A strong Local Plan would change the Local Authority's outlook, from one overshadowed by the fear of losing a planning decision at appeal, to one boosted by a confident determination to realise the plans for the future of the borough.</p> <p>Developers use planning lawyers to manipulate the Local Plan to suit their proposals.</p> <p>The Local Authority must employ planning lawyers to strengthen the Local Plan to resist this manipulation.</p> <p>This reflects Local Authority support for development which is in the interests of the future of the borough - and is in accordance with the NPPF directive to support sustainable development.</p>	
39	343	Power Leisure Bookmakers Ltd	General	NO	YES	YES	<p><u>Introduction</u></p> <p>We write on behalf of our client, Power Leisure Bookmakers Ltd, to make representations on the Hammersmith and Fulham</p> <p>Proposed Submission Local Plan 2016. Section 19 of the Planning and Compulsory Purchase Act 2004 requires that development plan documents or any other local development document must have regard to national</p>	<p>Conclusion</p> <p>In our view policies TLC2, TLC3, TLC4 and TLC6 are not justified, effective, positively prepared or consistent with national policy. The policies are not founded on a robust and credible evidence base and as demonstrated within this statement, have been found to be based on inaccurate assumptions and perceptions.</p>

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							<p>policy documents and guidance as in the NPPF. For the reasons set out below, this draft document is plainly contrary to the NPPF.</p> <p>Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) regulations prescribes that the local plans must contain a reasoned justification of the policies. As set out in the NPPG (Paragraph 014. Reference ID: 12-014-20140306) “Appropriate and proportionate evidence is essential for producing a sound Local Plan” and evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan”. Paragraph 182 of the NPPF states that a local planning authority should submit a plan for examination which it considers is sound – namely that it is: positively prepared; justified; effective; and consistent with national policy. It is considered that the Plan is not justified, as it is not founded on a robust and credible evidence base, particularly in relation to betting shops.</p> <p>The Council will also be aware that as a regulator they must comply with Regulators’ Code (April 2014), laid down in parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006. The code seeks to promote proportionate, consistent and target regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate to reduce burdens on businesses.</p> <p>Our representation letter focuses on Policies TLC2 ‘Town Centres’, TLC3 ‘Local Centres’, TLC4 ‘Small Non Designated Parades, Clusters and Corner Shops’ and TLC6 ‘Betting Shops, Pawnbrokers and Payday Loan Shops and Hot Food Takeaways’. Our comments in respect of these policies (and the supporting text) are set out below.</p>	<p>The policies are not consistent with national policy nor with the London Plan. The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG. The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p> <p>We have no issue with the fact that the Council will want to scrutinise new betting shop applications and ensure that they will not lead to any clusters or concentrations which would lead to negative impacts, however, to assert unnecessary exclusion zones as a starting point for all new applications that are not based on a robust and credible evidence base is wholly unsubstantiated and does not allow officers/members to make objective decisions. It is important to remember that betting shops now operate as a Sui Generis use and an application is required for any change of use to a betting shop. This already gives Council’s control over proposals for a betting shop.</p> <p>We conclude that the introduction of a 400m exclusion zone around existing betting shops is not based on robust evidence or sufficient analysis of the borough’s centres. It</p>

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								is a knee-jerk reaction to a popular political issue and significant and convincing
44	355	Hammersmith & Fulham Historic Buildings Group	General				The Historic Buildings Group's previous comments on the Draft Local Plan, Jan 2015, were all related to our concern for the protection, preservation and conservation of the borough's historic environment, as they are now. We welcome the inclusion in this PSLP of a number of our previous suggestions, re-iterate others that have not been included and have added some further suggestions.	
73	406	St Quintin and Woodlands Neighbourhood Forum	General				<p>These comments from the St Quintin and Woodlands Neighbourhood Forum are in response to the current consultation on the Borough's Regulation 19 Local Plan.</p> <p>The Forum covers an area of North Kensington, immediately adjacent to the LBHF borough boundary, and has a membership of over 400 residents and businesses. Our comments are divided into two parts</p> <ul style="list-style-type: none"> • comments on the almost total lack of recognition in the Regulation 19 Draft of the role of neighbourhood planning within the planning system, and the role of Neighbourhood CIL. • comments on a number of draft policies and justification statements in the document, primarily relating to the White City Regeneration Area and the north of the Borough. <p>Neighbourhood Planning and the Draft Local Plan</p>	The new Local Plan for LBHF therefore needs to be drafted in a form that makes clear the relationship between a Local Plan and neighbourhood plans, and which takes into account NPPF principles and DCLG Planning Practice Guidance on the subject.

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							<p>The current draft document makes two passing references to <i>designated neighbourhood forums</i> at paragraph 4.4 and in Policy DEL1. Nowhere is the role and scope of this part of the planning system explained, and neither of the terms <i>neighbourhood forum</i> or <i>neighbourhood plan</i> features in the otherwise helpful Glossary.</p> <p>We made similar points in our previous response of February 2015 to the Regulation 18 Draft Local Plan. These comments have not been picked up or responded to in the Consultation Statement accompanying the Regulation 19 Plan.</p> <p>Paragraph 1.4 at the start of the Regulation 19 document states <i>It (the Local Plan) will be supplemented by supplementary planning documents (SPDs) which will need to be in conformity with the Local Plan</i>. There is mention of the fact that any 'made' neighbourhood plans will also form part of the Development Plan.</p> <p>DCLG Planning Practice Guidance Paragraph: 002 Reference ID: 12-002-20140306 on Local Plans states <i>Plans should recognise the contribution that Neighbourhood Plans can make in planning to meet development and infrastructure needs</i>. We think that a planning inspector at EIP stage will want to see rather more in the new LBHF document than there is at present, before accepting the Draft Plan as 'sound' and having sufficient regard to the NPPF.</p> <p>Hammersmith & Fulham is not viewed as a local authority supportive of neighbourhood planning. This compares with e.g. Westminster, where 75% of the borough has been designated as a series of neighbourhood areas, or RBKC or Camden (boroughs in both of which two neighbourhood</p>	

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							<p>plans have been successful at referendum and where neighbourhood plan policies are now being routinely applied as part of the Development Plan).</p> <p>The new Local Plan for LBHF therefore needs to be drafted in a form that makes clear the relationship between a Local Plan and neighbourhood plans, and which takes into account NPPF principles and DCLG Planning Practice Guidance on the subject. The current Regulation 19 document falls short in several respects:</p> <p>a) it does not state in the introduction that neighbourhood plans, as well as supplementary planning documents, form part of the Development Plan. Nor does it explain the basics of neighbourhood planning (this could be done in the Glossary if necessary, if there are concerns over length of the document).</p> <p>b) it does not explain that any neighbourhood plan will require to <i>generally conform</i> to the <i>strategic policies</i> of the Local Plan.</p> <p>c) it does not make clear (as required by paragraph 184 of the NPPF) which of the policies in the updated LBHF Local Plan are deemed 'strategic' and which are not, in order that neighbourhood forums (and independent examiners of neighbourhood plans) can apply the test of general conformity as and when neighbourhood plans come forward.</p> <p>d) it makes no reference to paragraph 185 of the NPPF which states that <i>Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it</i></p>	

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							<p><i>contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict.</i></p> <p>A full redraft of the Council's 2011 Core Strategy gives the opportunity to provide a clear explanation of the potential of neighbourhood plans and to address relevant NPPF requirements. Absence of such material in the Regulation 19 Draft is in our view a significant omission. There are several examples of recent London Borough Local Plans which cover these issues perfectly adequately, on which to draw.</p> <p>It is not clear which draft policies, or parts of policies, in the current Regulation 19 Draft are deemed by LBHF to be 'strategic'. Paragraph 156 of the NPPF sets out what the Government sees as 'strategic priorities'. Planning Practice Guidance Paragraph: 076 Reference ID: 41-076-20140306 provides a list of criteria for distinguishing between strategic and non-strategic policies.</p> <p>While many of the policies proposed in the current LBHF Regulation 19 Draft are clearly 'strategic' there are also many that would not seem to meet these criteria. For example, policies DC4 on Alterations and Extensions, DC5 on Shop fronts, DC6 on Replacement Windows, and many parts of DC8 on Heritage and Conservation. These are precisely the sort of policies which a neighbourhood forum is likely to wish to vary, strengthen, weaken, or extend via policies in a neighbourhood plan.</p> <p>The Regulation 19 Draft makes no mention of the fact that LBHF designated an (unnamed) neighbourhood area in 2013. This designation does not feature as one of the changes on the Proposals Map, since the</p>	

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							2011 Core Strategy. Is it the Council's intention that this designation will fall away on adoption of the new Local Plan (given that no neighbourhood plan for the area has been progressed)? Clarification on this question is needed given the option available for residents in this area (Eynham Road and surrounding streets) to be included in the proposed Old Oak neighbourhood area currently under discussion with OPDC and LBHF officers.	
72	419	Hammersmith and Fulham Clinical Commissioning Group (CCG)					<p>Thank you for the opportunity to comment on the draft Local Plan.</p> <p>Hammersmith and Fulham CCG has reviewed the draft Local Plan and set out detailed comments in the attached paper. It is important to reflect that our comments are set within the context of the North West London Sustainability and Transformation Plan (STP) which sets out our overall strategic vision and aims for the next five years, and is being developed with colleagues from all eight local authorities in NW London.</p> <p>As with the Local Plan, the STP provides the framework for the CCG's ambitions for health care in Hammersmith & Fulham. It is important, therefore, that we achieve as much coordination in our plans as possible. The draft Local Plan has as one of its stated strategic objectives: "To maintain and improve health care provision in the borough and encourage and promote healthier lifestyles, for example through better sports facilities, to reduce health inequalities." The CCG would wholeheartedly agree with the objectives of improving health care, promoting healthier lifestyles and reducing health inequalities.</p> <p>The public health department in LBHF has shared with us their submission to the consultation, which we would also endorse.</p>	

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							<p>I am pleased that, having reviewed the draft Local Plan, there are already many areas which reflect our shared ambitions for healthier lives. These include: the Borough's aim for housing to take account of population growth and reduce overcrowding; providing open spaces to improve health and wellbeing; and opportunities for people within the Borough to live and work within a safe and sustainable environment.</p> <p>The draft Local Plan emphasises the need for effective partnership working. This is a principle that the CCG strongly endorses and we will continue to work with the Borough on the areas of the Local Plan where we have a shared interest. There is much that we can achieve working together for the residents of Hammersmith and Fulham. I look forward to continuing the partnership working that has been established between our organisations and to making a positive impact on the Borough's ambitions as set out in the Local Plan.</p>	
72	420	Hammersmith and Fulham Clinical Commissioning Group (CCG)	General				<p>1 Summary & Context</p> <p>1.0 NHS Hammersmith and Fulham Clinical Care Commissioning Group (CCG) is the GP-led organisation responsible for planning and buying health services in the borough. The CCG works with NHS England, who directly commission core primary care services and some specialised services.</p> <p>Hammersmith and Fulham CCG works in partnership with CCGs and Local Authorities across north west London (NWL), who have come together to develop a NW London Sustainability and Transformation Plan (STP), the first draft of which was submitted to NHS England in June 2016, and updated version submitted on 21 October. Ealing Council and the London Borough of Hammersmith and Fulham did not agree on the changes for</p>	

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							<p>hospital services and felt unable to fully endorse the STP. Whilst we recognise that we don't agree on everything it is, however, the shared view that this will not stop us working together to improve the health and well-being of our residents.</p> <p>We are grateful for the opportunity to respond to the consultation on the Local Plan, the content of which highlights the range of opportunities for partnership working between the London Borough of Hammersmith & Fulham and the CCG to improve the lives of local residents.</p>	
71	431	London Borough of Wandsworth	General				<p>Many thanks for meeting with the planning policy team (representing Wandsworth Council) last week, to discuss Hammersmith & Fulham's Proposed Submission Local Plan Consultation, Wandsworth's Employment and Industry Local Plan (EILP) review and other strategic matters.</p> <p>Evidence Base</p> <p>Wandsworth's Employment Land and Premises Study (AECOM, 2016) has identified a growing need for offices across the Functional Economic Market Area (FEMA) and an on-going (though possibly reducing) need for industrial land. Wandsworth's ELPS identified that meeting continued demand for industrial land in the borough will be challenging, given the wider strategic aims such as regeneration of Nine Elms as part of the VNEB Opportunity Area. The recent Industrial Land Supply and Economy study (2015) carried out for the GLA identified that the loss of industrial land across the FEMA has outstripped the London Plan benchmark. Wandsworth's ELPS considers Hammersmith and Fulham and Wandsworth to be in the same FEMA for both offices and industry. Wandsworth are keen to ensure that the needs of businesses across the</p>	<p>On-going Co-operation Work</p> <p>Wandsworth Council will be pleased to continue to work closely with Hammersmith and Fulham as both boroughs review their local plans through the usual duty to co-operate routes. As you will be aware, Wandsworth Council are consulting on policy options for the EILP review and will be happy to discuss any issues you may have arising from those policy options to inform Wandsworth's proposed submission version, which we are intending to consult on in March 2017.</p>

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							FEMA are being taken into consideration in the Local Plans of neighbouring boroughs, alongside wider strategic objectives.	
65	453	Travis Perkins	General	NO	YES		<p>We are instructed by our client, Travis Perkins (Properties) Limited ('TPP'), to submit the enclosed representations to the Proposed Submission Local Plan Consultation. Our client is the freehold owner of the existing builders' merchants at Harrow Road, Kensal Rise which lies across the boundary between Hammersmith and Fulham and Brent but is also looking at a number of other potential sites in the borough. The planning use of a Travis Perkins' builders' merchants is <i>sui generis</i>.</p> <p>TPP are involved in a number of residential-led mixed use developments on both existing and new sites in London. Two recent examples are a Travis Perkins builders' merchant operating alongside private residential units in Battersea, LB Wandsworth and a Travis Perkins builders' merchant operating alongside student accommodation near Kings Cross, LB Camden. This model has been very successful and can be replicated elsewhere on sites throughout London.</p> <p>As such, TPP wish ensure that builders merchants uses are protected to the same level as other employment uses throughout London. However if absolutely necessary to meet the housing need, they wish to educate London boroughs that builders' merchants can operate alongside residential developments.</p> <p>a) Site Context</p> <p>Travis Perkins site is located in a mixed use area with the neighbouring area consisting of residential housing, small commercial shops with both convenience and comparison stores as well as the Travis Perkins Builders</p>	<p>Summary</p> <p>The current business operations of Travis Perkins in Hammersmith and Fulham and the surrounding Boroughs are commercially successful and our client does not intend to release any sites in the short term instead it plans to expand greatly, especially within the M25. To ensure this occurs TPP needs to consider the modifications put forward in the Proposed Submission Local Plan to protect their existing business and any future sites. Whilst Policies E1 and E2 offer some protection for existing employment uses we feel it does not go far enough to protect the existing <i>sui generis</i> builders' merchants.</p> <p>Our client, and indeed the Council, should have more certainty that the builders' merchant use is protected and the additional wording set out in these representations should therefore be included in the wording of Policies E1 and E2.</p> <p>It is worrying that the number of builders' merchants and other commercial services, which are essential to local businesses and tradespeople, are being lost to accommodate housing needs throughout London although TPP does respect the Council's need to meet</p>

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							<p>Merchant although most of these lie outside the borough's boundary. The Travis Perkins site is situated predominantly in the Hammersmith and Fulham boundary although its entrance and vehicle access is situated in the London Borough of Brent. Despite this it is important for the site to be protected by planning policy from both sides.</p> <p>The site continues to operate as a builders' merchant and there are no immediate plans to cease trading.</p> <p>b) Policy Context</p> <p>The Government requires that the National Planning Policy Framework (NPPF) is taken into account in the preparation of Local Plans. One of the 12 key principles of the NPPF is that local plans support sustainable economic development to deliver business and industrial units (as well as housing and infrastructure), stating at paragraph 17 that Local plans should:</p> <p>"proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities"</p>	<p>housing numbers. It is agreed that a mixed use redevelopment of this site with residential units is possible, however the builders' merchants use must be protected by policy going forward.</p> <p>Conclusion</p> <p>The existing builders' merchant is a successful and profitable business and an important branch in the TPP portfolio. TPP has no intentions of ceasing operations from this site to allow for a residential redevelopment, unless the builders' merchant use is protected. In line with national planning policy, the Local Plan should ensure that the existing employment generating <i>sui generis</i> builders' merchants is protected to ensure the continued operation of an employment generating use on the Site.</p>

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							<p>At paragraph 20 the NPPF seeks to ensure that Local Authorities proactively support the development needs of business and at Paragraph 21 advises that Local Plans should:</p> <p>" support <u>existing business sectors</u> , taking account of whether they are expanding or contracting" (our emphasis)</p> <p>Furthermore, Local Planning Authorities should ensure that planning policies should:</p> <p>" avoid the long term protection of sites allocated for employment use <u>where there is no reasonable prospect of a site being used for that purpose</u>. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities" (our emphasis)</p> <p>In terms of housing, the NPPF requires local authorities to identify sites which are <u>available now and have a realistic prospect of delivering</u> .</p> <p>The NPPG advises that the policies within a Local Plan must be based on a clear and deliverable vision and ensure that the Local Plan vision for the area is realistic. The NPPG advises that draft policies, should be deliverable stating:</p> <p>"Development of plan policies should be iterative – with draft policies tested against evidence of the likely ability of the market to deliver the plan’s policies, and revised as part of a dynamic process"(our emphasis)</p>	

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							<p>Finally, the guidance recommends that Gross Development Value is taken into account and that <u>landowners should be engaged</u> in considering options to secure the successful development of sites.</p> <p>Turning to the London Plan FALP (March 2015) which seeks to protect inner London's industrial land. Policy 4.4 places emphasis on the need to manage the release of industrial land stating:</p> <p>"The Mayor will work with boroughs and other partners to:</p> <p>a) adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of <u>different types of industrial and related uses in different parts of London</u> , including for good quality and affordable space</p> <p>b) plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal"(our emphasis)</p> <p>The London Plan discusses the need for industrial sites to remain in London in order to provide necessary services to local businesses with an evidence based approach promoted to reconcile demand and supply of industrial land and related uses. Furthermore, the Mayor's Land for Industry and Transport SPG (September 2012) further emphasises the need to protect existing industrial sites and promotes a mixed use approach to redevelopment with the use of careful siting, design and access arrangements to prevent any conflict of future occupiers.</p>	

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45	477	Berkeley Group (St James & St George) & St William	General				<p>We write on behalf of our client, Berkeley Group (St James and St George) and St William which is a joint venture company formed by the Berkeley Group and National Grid Property Holdings, in response to the Council's Regulation 19 consultation on the Proposed Submission Local Plan for London Borough of Hammersmith and Fulham (LBHF).</p> <p>Our client has an interest in a number of strategic sites in the borough including Fulham Gasworks, Fulham Reach, Chelsea Creek, Sovereign Court and the former M&S Warehouse Site at White City.</p> <p>All these sites fall within proposed allocated Strategic Sites and the Council has accepted that they are important sites to help deliver the necessary new homes and infrastructure needed in the borough.</p> <p>Our client brings substantial experience of redeveloping complex regeneration sites and has the ability to deliver a significant number of new homes in the borough. The redevelopment of the abovementioned sites in which our client has an interest provides an opportunity to significantly contribute to regeneration in the borough and deliver a substantial number of new homes which would help the borough to meet and exceed its housing targets. The St William planning application recently submitted for the redevelopment of the Fulham Gasworks proposes 1,375 new homes. St George has secured planning permission for the Fulham Reach development which will deliver 744 homes (including 186 affordable homes), Sovereign Court which will deliver 418 homes (including 124 affordable homes) and Chelsea Creek which will deliver 489 homes (including 147 affordable homes). St James has secured planning permission for the redevelopment of the former M&S Warehouse Site at</p>	<p>Summary</p> <p>Our client is broadly supportive of the policies contained within the Proposed Submission version of the Local Plan, particularly the identification of the key Strategic Sites and acknowledgement of their ability to deliver regeneration, growth and a significant number of new homes contributing towards the Council's aim to exceed its housing target.</p> <p>There are areas, highlighted in this letter where we consider slight adjustments to wording of the policies in the Local Plan could be made to ensure that the document is consistent and reflects strategic policy and the NPPF.</p> <p>The key concern with the Local Plan as currently drafted is that the scale of obligations and policy burdens, including the current CIL charge, has the potential to threaten the ability for strategic sites identified to be developed viably. This is contrary to paragraph 173 of the NPPF. In this sense we are concerned that the Local Plan as currently drafted could be deemed unsound. Further work in regards to the viability evidence underpinning the Local Plan is required to demonstrate that its policies and ultimately new development can be delivered viably. We would welcome further engagement with the Council to assist in this regard.</p>

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							<p>White City which will deliver 1,465 homes (including 296 affordable homes plus a £33.5m contribution to deliver affordable homes off-site).</p> <p>Our client acknowledges the Council's requirement to develop a 'sound' Local Plan which is positively prepared, justified, effective and consistent with national policy. We have reviewed the Proposed Submission version and policies within and hereby submit representations in response to the Spatial Vision and Strategic Objectives, Policy DEL1, Strategic Policy WCRA and WCRA1, Strategic Policy SFRA and SFRA1, Housing Policies HO3, H4, HO5, HO7 and HO11, Policy DC3, Policy T1 AND Policy INFRA1.</p> <p>We consider that the Proposed Submission version of the Local Plan as currently worded raises significant concerns regarding development viability meaning that potentially some developments would be undeliverable over the plan period (i.e. not 'effective') and as a result it would be inconsistent with national policy.</p> <p>Our more detailed comments are set out below with suggestions as to how the plan could be amended set out in boxes below each section.</p>	<p>Our client is keen to continue to work with the Council through the plan making process, preapplication and application process to ensure that the cumulative weight of obligations can be agreed to ensure that the policies of the Local Plan and the strategic sites in which they have an interest are certain, affordable, deliverable and viable.</p> <p>Following this submission we would be grateful if you could keep us informed of progress of the emerging Local Plan.</p>
37	478	Eastern & Oriental PLC	General				<p>On behalf of our client, Eastern and Oriental Pic ('E&O'), we wish to make the following representations to the recently published London Borough of Hammersmith and Fulham ('LBHF') 'Proposed Submission Local Plan Consultation (Regulation 19)' document, published in September 2016 (hereafter referred to as 'the emerging Local Plan').</p> <p>E&O's offices are currently located within central Hammersmith, at Landmark House, Hammersmith Bridge Road, London, W6 9DP. E&O are currently engaging with LBHF concerning bringing forward a redevelopment scheme at this site, which has the potential to assist the</p>	

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							<p>Council in meeting its objectives for the local area. As such, E&O wish to be kept abreast of any advancements concerning the preparation of the emerging Local Plan.</p> <p>Broadly, Eastern and Oriental are supportive of the principle of the emerging Local Plan, as a means of helping to deliver significant numbers of necessary jobs, new homes and wider large-scale regeneration within the Borough. Particularly, E&O are supportive of the Council's aspiration to regenerate and improve Hammersmith town centre.</p>	
38	484	Greater London Authority and Transport for London Planning Team	General				<p>Thank you for your email of 16 September 2016 consulting the Mayor of London on the Proposed submission draft of Hammersmith & Fulham Council's Local Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004</p> <p>The Mayor is of the opinion that Hammersmith & Fulham's draft Local Plan is in general conformity with the London Plan. He has afforded me delegated authority to make more detailed comments on the emerging Local Plan on his behalf. Representations from Transport for London (TfL), which I endorse, are attached as Appendix 1 and have also been sent separately.</p> <p>On 18 February 2015, the Mayor provided comments on the Regulation 18 Consultation document (reference: LDF13/LDDI2/EKOI) and the Mayor is pleased that almost all the issues raised have now been addressed in the proposed submission Plan.</p>	

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38	496	Greater London Authority and Transport for London Planning Team	General				<p>Wharves</p> <p>The Council's intention within the South Fulham Riverside Regeneration Area to seek consolidation of Hurlingham Wharf to the east of Wandsworth Bridge is noted. Whilst the principle of consolidating wharf space is valid and acceptable in terms of London Plan policy 7.26, in this particular case there does not appear to be any realistic prospect of moving Hurlingham Wharf to an alternative site east of Wandsworth Bridge, especially with the recent redevelopment of the Sainsburys/Fulham Wharf site. Simply considering Hurlingham Wharf to be absorbed as part of the existing Swedish and Comleys Wharf area would result in a net loss of wharf capacity and would not be acceptable within the terms of London Plan policy 7.26.</p> <p>Alternative models for consolidation may be worthy of exploration providing they do not result in a loss of wharf capacity in this part of west London. It should also be noted that the Thames Tideway Tunnel Development Consent Order requires the project to use Hurlingham Wharf for a London Plan compliant wharf use (i.e water freight transport) and contains a specific requirement to re-instate Hurlingham Wharf to enable a viable wharf operation, once the construction works for the Thames Tideway Tunnel are complete. However, this wharf policy is likely to be subject of a general wharves review over the next two to three years as part of a full review of the London Plan.</p>	
42	567	National Grid	General				National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.	

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							<p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:</p>	
35	592	Standard Life Investments	General				<p>On behalf of our client, Standard Life Investments ("SLI"), we wish to make the following representations to the recently published London Borough of Hammersmith and Fulham ('LBHF') 'Proposed Submission Local Plan Consultation (Regulation 19)' document, published in September 2016 (hereafter referred to as 'the emerging Local Plan').</p> <p>SLI's currently has property interests within central Hammersmith, at 255 Hamersmith Road, London. As such, SLI wish to be kept abreast of any advancements concerning the preparation of the emerging Local Plan.</p> <p>Broadly, SLI is supportive of the principle of the emerging Local Plan, as a means of helping to deliver significant numbers of necessary jobs, new</p>	

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							homes and wider large-scale regeneration within the Borough. particularly, SLI is supportive of the Council's aspiration to regenerate and improve Hammersmith town centre.	
50	596	Capital and Counties on Behalf of Earls Court and Olympia Group	General				<p>EXECUTIVE SUMMARY</p> <p>a. These representations are submitted by EC Properties LP ('ECP') on behalf of Capital & Counties Properties plc ("Capco") and its subsidiary companies, including Earls Court Partnership Limited, a joint venture between Capco and Transport for London ("ECPL"), who together are bringing forward proposals for the comprehensive regeneration of the Earls Court area.</p> <p>b. These representations largely focus on ECP's proposal for greater clarity and less ambiguity in relation to references in draft Policies FRA and FRA1 and their supporting text to the future regeneration of the West Kensington and Gibbs Green estates (the 'estates') within the Earls Court and West Kensington Opportunity Area ('ECWKO') and Fulham Regeneration Area ('FRA'). They build on representations submitted by ECP in February 2015 and are accompanied by topic-specific representations in relation to other proposed Local Plan policies and supporting text.</p> <p>c. ECP's representations in relation to the draft Local Plan's approach to the estates comprise the following key points:</p> <ul style="list-style-type: none"> It is strongly felt that Policies FRA and FRA1 have not been prepared positively or effectively in accordance with the soundness tests set out in the National Planning Policy 	

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							<p>Framework ('NPPF') to ensure that objectively assessed needs for new homes and jobs can be delivered by the Local Plan.</p> <ul style="list-style-type: none"> To achieve London Plan minimum homes delivery and job creation targets for the ECWKO and stated/assumed housing pipeline for the FRA in the draft Local Plan, then comprehensive regeneration of the estates is necessary. The comprehensive regeneration of the FRA, including the estates, accounts for 32 per cent of the Borough's housing pipeline over the Plan period. Policies FRA and FRA1 as they are currently worded create uncertainty insofar that they state that the estates are only to be 'improved'. This is misleading and out of sync with both London Plan and assumed housing output as stated in the draft Local Plan. The draft Local Plan also fails to mention any of the evidence base that supports a comprehensive regeneration of the estates. This includes, for example, the extant, implemented November 2013 planning permission that includes the regeneration of the estates and the land contract (known as the 'CLSA') that was signed in January 2013 and triggered the Council's sale of the estate land to Capco at the same time planning permission was granted in November 2013, which was informed by Council evidence supporting the regeneration of the estates .The Council acknowledged in its own Consultation Report (dated September 2016) that greater clarification is needed in the Local 	

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							<p>Plan where it refers to the policy objective being for improvement and, importantly, renewal. This has not been done</p> <ul style="list-style-type: none"> • .ECP contends that the wording of Policies FRA and FRA1 needs to go further than referring to 'renewal' and clearly state that the estates are to be 'regenerated' as part of the comprehensive redevelopment of the ECWKOA / FRA, having regard to London Plan targets for the ECWKOA, draft Local Plan housing objectives/pipeline, rising housing need across London and the weight of evidence that supports the regeneration of the estates. • For above reasons policies FRA and FRA1 need to be amended in order for the Plan to be sound. The representations include proposed text changes for policies FRA and FRA1 and their supporting text to include clear reference to the regeneration of the estates as part of the comprehensive redevelopment of the ECWKOA / FRA to ensure that the policies are prepared positively and effectively in accordance with the provisions of the NPPF <p>d. Key points raised in relation the other topic-specific representations include the following:</p> <ul style="list-style-type: none"> • Housing The Local Plan housing target proposed by draft Policy H01 should be increased from 1,031 new homes per annum to at least 1,328 new homes per annum; draft Policy H01 should include references to Build to Rent housing typologies and Starter Homes; and the 50% affordable housing target proposed by draft Policy H03 has been proposed without the benefit of 	

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							<p>supporting evidence and should be replaced by an evidence-based figure.</p> <ul style="list-style-type: none"> • Design and Conservation Reference to the planning balance between harm and public benefit should be included in draft Policies DC3 and DC8. • Transport Minor comments in relation to draft Policy T1. • Retail and Town Centre Issues Draft Table 3 should be amended to incorporate up-to-date evidence in relation to need for additional retail floorspace and clarification is required in supporting text with regard to needs which cannot be accommodated in Fulham town centre should be accommodated in the ECWKO, provided they do not have significant adverse impact on existing centres; and draft Policy FRA should recognise the opportunity for the additional need for retail floorspace that cannot be met in Fulham town centre to be accommodated in the wider FRA and the ECWKO. • Public Houses Wording should be inserted into draft Policy TLC1 to provide scope for the policy to be applied flexibly in designated Regeneration and Opportunity Areas, where benefits associated with wider redevelopment proposals can be demonstrated to outweigh the loss/replacement of an existing public house. 	

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50	597	Capital and Counties on Behalf of Earls Court and Olympia Group	General				<p>These representations are submitted by EC Properties LP ('ECP') on behalf of Capital & Counties Properties plc ("Capco") and its subsidiary companies, including Earls Court Partnership Limited, a joint venture between Capco and Transport for London ("ECPL"), who together are bringing forward proposals for the comprehensive redevelopment and regeneration of the Earls Court area. References in these representations to ECP should be read accordingly.in response to the London Borough of Hammersmith and Fulham ('LBHF') Draft Proposed Submission Local Plan consultation document (referred to hereafter as the '2016 Draft Local Plan'). The representations follow those submitted in February 2015 in relation to the Issues and Options version of the Draft Local Plan.</p> <p>By way of context, a number of Capco entities, including ECP and ECPL, are bringing forward proposals for the comprehensive redevelopment and regeneration of the Earls Court area, which is supported by the London Plan; the relevant planning policies of Royal Borough of Kensington and Chelsea ('RBKC'); the current adopted LBHF Core Strategy; a joint Greater London Authority ('GLA')/LBHF/RBKC Supplementary Planning Document; and has the benefit of planning permission and associated land/development agreements.</p> <p>ECP's proposals cover the majority of the Fulham Regeneration Area ('FRA') as referenced in LBHF's current Core Strategy and the Draft Proposed Submission Local Plan and the full extent of the Earls Court and West Kensington Opportunity Area ('ECWKOA') designated within the London Plan (March 2016), at Annex 1 ref. Currently the ECWKOA comprises three main land parcels: Earls Court Exhibition Centre buildings (now substantially demolished); the Lillie Bridge Rail Depot; and the West Kensington and Gibbs Green Estates. ECP's proposals will realise the</p>	

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							<p>comprehensive redevelopment of each of these land parcels. The proposals are well advanced, as explained in section 2.0 below.</p> <p>The ECWKO is expected to contribute substantially towards the delivery of new homes, jobs and supporting infrastructure for LBHF and London more widely. It provides the opportunity to optimise development density and is critical to forecasted housing supply within both LBHF and neighbouring RBKC. It plays a pivotal role in LBHF realising their objectives for the FRA. In particular, it is worth highlighting the following:</p> <p>Annex 1, ref. Opportunity Area 10 of the London Plan designates the ECWKO for the following:</p> <p>A minimum 7,500 new homes</p> <p>An indicative 9,500 new jobs</p> <p><i>States that "The Area presents a significant opportunity for regeneration comprising estate renewal and housing and employment growth"</i></p> <p>Table 1 on page 144 of the 2016 Draft Local Plan states an indicative new homes figure of 7,000 and an indicative new jobs figure of 9,000 for the FRA. ECP's proposals for Earls Court, which benefit from planning permission and fall entirely within the FRA, amount to 7,057 new homes.</p> <p>The LBHF housing delivery pipeline assumes the FRA includes the comprehensive redevelopment of the Earls Court site and this includes the redevelopment of the key land holdings, set out above, which includes the regeneration of existing estate land. The contribution of Earls Court / the FRA to the housing pipeline would be substantially impacted were any of these land holdings not to come forward as part of a comprehensive</p>	

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							<p>redevelopment of the FRA. ECP's proposals are, therefore, critical to the 2016 Draft Local Plan expected outputs for the FRA. In turn, it is important to note that the FRA contributes significantly to overall housing pipeline for the Borough. Refer to Table 2 on page 187 of the 2016 Draft Local Plan which shows that the FRA contributes to 7,000 new homes of a total expected Borough wide total of 22,200 new homes within a 20 year period. This equates to 32 per cent of the housing pipeline over this period. The FRA and ECP's proposals for the Earls Court area are clearly critical to the Borough's expected/predicted housing pipeline and, therefore, the robustness and soundness of the 2016 Draft Local Plan.</p> <p>The 2016 Draft Local Plan provides the opportunity for LBHF's planning policies associated with ECWKO / FRA to be brought up to date to reflect the adopted London Plan and the current amount of development that planning permission has been granted for within the ECWKO. It is important that policies (and supporting text) associated with the ECWKO / FRA are positively and effectively worded given, as stated above, the critical importance of the area to contributing substantially to the Boroughs housing pipeline and to meeting London Plan minimum housing designation.</p> <p>Having reviewed the 2016 Draft Local Plan, ECP is concerned that draft policies specific to ECWKO / FRA do not fully reflect the strategic opportunity of the ECWKO, are inconsistent with the adopted London Plan and do not reflect extant planning permissions that have been implemented. Draft policies also do not reflect changes / clarifications that the Council has said that it will action in its Consultation Statement. Overall, policies for the ECWKO / FRA are unclear and ambiguous. They fail to be positively or effectively worded in relation to promoting comprehensive redevelopment of the key land parcels comprising the Earls</p>	

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							<p>Court site. This is particularly the case in relation to the regeneration of the West Kensington and Gibbs Green estate land.</p> <p>The representations set out in this document propose that policies, and supporting text, for the ECWKO / FRA need to be amended in order to be more positively and effectively worded. In essence, this amounts to needing to confirm, without any ambiguity, that the London Plan minimum homes designation for the ECWKO and the anticipated housing output for the FRA in the Draft Local Plan is dependent upon the comprehensive regeneration of the West Kensington and Gibbs Green estate land.</p> <p>ECP also has a number of general concerns associated with topic-based policies. These have been set out in a schedule format and proposed text amendments proposed.</p> <p>The enclosed representations and supporting evidence relate to a number of topics, but are principally focussed on wording and supporting text associated with Policies FRA and FRA1 in relation to the redevelopment of the ECWKO / FRA. Representations and supporting evidence regarding the following topics/policies are also submitted and are appended to this main document:</p> <p>Appendix 1 ECP's representations to the January 2015 Issues and Options Draft Local Plan</p> <p>Appendix 2 Full details of tracked changes to proposed policy and supporting text wording for Policies FRA and FRA1</p>	

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							<p>Appendix 3 Topic-specific representations (3a – Housing; 3b – Design and Conservation 3c – Transport 3d – Retail and Town Centre Issues and 3e – Public Houses) and</p> <p>Appendix 4 ECWKOA Permissions Plan.</p>	
50	598	Capital and Counties on Behalf of Earls Court and Olympia Group	General				<p>Representations were submitted by ECP on behalf of Capco in response to the Issues and Options version of the Draft LBHF Local Plan consultation document (referred to hereafter as the '2015 Draft Local Plan') on 20th February 2015.</p> <p>In addition to the above concerns, the representations set out contextual information regarding planning permissions for comprehensive redevelopment of the ECWKOA and details of land ownership within the ECWKOA (i.e. West Kensington and Gibbs Green Conditional Land Sale Agreement (CLSA) between Capco and LBHF and Capco and Transport for London (TfL) Joint Venture (JV)). This information remains of relevance to these representations given the potential impact of the wording of draft Policies and supporting text on these existing planning permissions and land ownership agreements. For further details please see ECP's previous representations, which are enclosed at Appendix 1 for ease of reference.</p> <p>The Council's response to ECP's representations are set out within its Consultation Statement (September 2016).</p>	
12	609	Imperial College	General	-	-	-	It has come to our trust's attention that the London Borough of Hammersmith & Fulham is currently consulting on its "Proposed Submission Local Plan" document. On behalf of the trust I am providing our	

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		Healthcare NHS Trust					<p>response on the healthcare aspects of the Council's plan in the attached/enclosed document.</p> <p>However, I would appreciate an explanation as to why the London Borough of Hammersmith & Fulham does not appear to recognise Imperial College Healthcare NHS Trust as, either a 'Statutory Consultee' or a 'General Consultee'.</p> <p>From your document entitled 'Consultation Statement: September 2016' I note that Hammersmith & Fulham Clinical Commissioning Group is listed as a 'Statutory Consultee, while Imperial College London is listed as a 'General Consultee'.</p> <p>It would be helpful for you to explain why our partner organisation are formally recognised as consultees by the Council, while Imperial College Healthcare NHS Trust is not regarded as falling into either category.</p> <p>Given that our trust and its hospitals are referred to directly in the "Proposed Submission Local Plan", it would have been good practice to contact us in order to ensure we were aware of the references and invite us to respond.</p> <p>As the document says in paragraph 6.132:</p> <p>"In terms of secondary care, the three main hospitals operating in the borough (Queen Charlottes Hospital, Hammersmith Hospital, Charing Cross Hospital) are managed by Imperial College Healthcare NHS Trust which is one of the largest NHS Trusts in the Country".</p>	

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12	610	Imperial College Healthcare NHS Trust	General				<p>1. Trust Background</p> <p>1.1 Imperial College Healthcare NHS Trust Overview</p> <p>The Trust provides acute and specialist healthcare for a population of nearly two million people in North West London, and more beyond. We have five hospitals – Charing Cross, Hammersmith, Queen Charlotte’s & Chelsea, St Mary’s and Western Eye – as well as a growing number of community services.</p> <p>Both Charing Cross and the co-located Hammersmith and Queen Charlotte’s & Chelsea hospitals are in the London Borough of Hammersmith & Fulham.</p> <ul style="list-style-type: none"> Charing Cross Hospital provides a range of acute and specialist services, a 24/7 accident and emergency department and hosts the hyper acute stroke unit for the region. It is also a growing hub for integrated care in partnership with local GPs and community providers Hammersmith Hospital is a specialist hospital renowned for its strong research connections. It offers a range of services, including renal, haematology, cancer and cardiology care, and runs the regional specialist heart attack centre Queen Charlotte’s & Chelsea Hospital is a maternity, women’s and neonatal care hospital, also with strong research links. It has a midwife-led birth centre as well as specialist services for complicated pregnancies, foetal and neonatal care. 	

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							<p>With our academic partner, Imperial College London, we are one of the UK's six academic health science centres, working to ensure the rapid translation of research for better patient care and excellence in education</p> <p>We are also part of Imperial College Health Partners – the academic health science network for North West London – spreading innovation and best practice in healthcare more widely across our region.</p> <p>1.2 Trust Clinical Strategy</p> <p>The publication of the Trust's Clinical Strategy in July 2014 was a major milestone, kick-starting a long-term programme of clinical transformation to ensure we are able to meet future health needs and enabling our current services and models of care to respond to more immediate pressures.</p> <p>The Clinical Strategy is designed to improve clinical outcomes and patient experience, to help people stay as healthy as possible and to increase access to the most effective specialist care. It also responds to changing needs, with more of us living with multiple, long-term conditions like diabetes, heart disease, asthma and dementia.</p> <p>The Clinical Strategy focuses on:</p> <ul style="list-style-type: none"> • creating more local and integrated services, to improve access and help keep people healthy and out of hospital • concentrating specialist services where necessary, to increase quality and safety 	

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							<ul style="list-style-type: none"> ensuring better organised care, to improve patient experience as well as clinical outcomes developing more personalised medicine, capitalising on advances in genetics and molecular medicine. <p>The Trust's Clinical Strategy sees our three main hospital sites building on their own distinctive, but interdependent, focus:</p> <ul style="list-style-type: none"> Charing Cross Hospital: evolving to become a new type of local hospital, with planned, integrated and rehabilitation care Hammersmith Hospital and Queen Charlotte's & Chelsea Hospital: extending their role as specialist hospitals St Mary's Hospital with a co-located Western Eye Hospital: being the major acute hospital for the area. <p>1.3 Trust Estate Redevelopment</p> <p>In order to enable the Trust to implement our Clinical Strategy – connecting services and specialties in the right way and supporting new models of care – we need to re-develop our estate. The poor condition of much of our estate makes this an increasingly pressing need.</p> <p>We are continuing to work with local healthcare commissioners to develop our approach for how Charing Cross Hospital can best be developed as a local hospital. Additional work is also being undertaken to explore options</p>	

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							<p>for future estates redevelopment at Hammersmith Hospital to improve facilities, enable expansion and tackle backlog maintenance.</p> <p>Our approach includes realising the value from surplus land on our sites and using the money to reinvest in the redevelopments.</p> <p>We are continuing to work in partnership with Imperial College Healthcare Charity and Imperial College London who own parts of the land across our sites.</p>	
12	615	Imperial College Healthcare NHS Trust	General				<p>3. North West London Sustainability and Transformation Plan</p> <p>3.1 National Context</p> <p>Sustainability and Transformation Plans (STPs) are ‘place based’, five-year plans built around the needs of local populations and which support the implementation of NHS England’s (NHSE) ‘Five Year Forward View’ by addressing the three gaps in: health and wellbeing; care and quality; and, finance and efficiency.</p> <p>STPs are of great importance as they describe the strategic direction agreed by partners across a geographical footprint to develop high quality sustainable health and care and, from</p> <p>2017/18, will determine access to the NHS Sustainability and Transformation Fund (STF) which will total £3.4 billion by 2020/21.</p> <p>3.2 North West London Context</p>	

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							<p>In developing the North West London STP, the eight boroughs and commissioning groups, acute, mental health and community service providers are working together to improve the health and wellbeing of a population of 2.1million and 2.3 million registered patients with an annual health and social care spend of £4 million.</p> <p>At the heart of the North West London STP is a desire to increase collaborative working and breakdown organisational silos. Shared approaches to estates, digital capabilities and workforce are presented as essential enablers in our STP work programme.</p> <p>A 'checkpoint' submission of the first full draft version of the STP was submitted to NHSE and NHS Improvement on 30th June 2016.</p> <p>There are nine priorities in the North West London STP drawn from local place based planning across health and social care:</p> <ol style="list-style-type: none"> 1. Support people who are mainly healthy to stay mentally and physically well, enabling and empowering them to make healthier choices and look after themselves 2. Improve children's mental and physical health and well-being 3. Reduce health inequalities and disparity in outcomes for the top 3 killers: Cancer, heart disease, respiratory disease 4. Reduce social isolation 5. Reduce unwarranted variation in the management of long term conditions 	

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							<p>6. Ensure people access the right care in the right place at the right time</p> <p>7. Improve the overall quality of care for people in the last phase of life and enable them to die in their place of choice</p> <p>8. Reduce the gap in life expectancy between adults with serious and long term mental health needs and the rest of the population</p> <p>9. Improve consistency in patient outcomes and experience regardless of the day of the week services are accessed</p> <p>It should be noted that, to date, while all of the health providers in North West London gave their support to the checklist submission of the 30th June 2016, six out of the eight local boroughs have indicated their support given the concerns that remain around the NHS's proposals developed through the 'Shaping a Healthier Future' programme. All STP partners have therefore committed to review the assumptions underpinning the proposed changes to acute services in North West London before making further changes. Therefore the North West London STP which covers the five year period to 2021 does not envisage changes to Charing Cross Hospital in this timeline.</p> <p>For further information: https://healthiernwlondon.commonplace.is</p>	
77	616	Environment Agency		YES	YES	YES	Having reviewed the submitted draft Strategic Flood Risk Assessment (2016) we find the evidence base sound. As discussed, this response does	

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							<p>not represent a full sign off of the SFRA in line with the Paragraph 11 of the NPPG. This will must be undertaken by our flood risk team.</p> <p>We welcome the inclusion of references to the Thames Estuary 2100 Plan, and the inclusion of our most up to date breach modelling within the SFRA. However, we note that Figures 8-9.1 show the 2065 epoch tidal breach outline instead of 2100 epoch tidal outline required to make a full assessment of the impacts of climate change. This must be amended to show the 2100 epoch outlines, and policy CC3 must reference the updated SFRA to ensure the correct areas are assessed at application stage.</p> <p>The submitted plan has assessed surface water risk in the Surface Water Management Plan (SWMP) and this has accounted for climate change. Although the plan applies a 30% increase in peak rainfall intensity in accordance with previous climate change allowances, this is mid-way between the central and upper ranges that would be required under the newly published Climate Change Allowances (2016). This means that the areas identified as being Critical Drainage Areas in their SWMP, will not be as well represented geographically or for depth of water had it used the new central and upper ranges in the new climate change allowances.</p> <p>However, the local plan has strong surface water policies both specific to the Critical Drainage Areas defined in SWMP and borough wide so we accept that the risk of surface water flooding has been adequately addressed across the plan and do not wish to find the plan unsound.</p> <p>Attached is our LLFA briefing note on climate change allowances and we would encourage you to incorporate the recommendations and</p>	

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							requirements of the new climate allowances wherever possible into the SFRA and into the local plan.	
43	618	Church Commissioners of England	General				<p>We act on behalf of the Church Commissioners for England (CCE) and wish to make representations to the Proposed Submission Local Plan (dated September 2016).</p> <p>We write in relation to our client's site which is located at Fulham Palace Garden Centre, Bishops Avenue, SW6 6EE (the Site) (Appendix A). The Site comprises of 0.5 ha of developed land which is in commercial use.</p> <p>CCE seek to amend the planning policies identified below to allow for the future sustainable re-development of the Site; and to ensure the draft proposals map policies recognise the Site as being developed, privately owned, and outside of the proposed Metropolitan Open Land and Historic Park and Open Space designations.</p> <p>Conclusions</p> <p>In summary, we are seeking to:</p> <ul style="list-style-type: none"> • Amend the identified planning policies to allow for appropriate and sustainable development to come forward on the site at a future point. • Alter the draft proposals map to ensure that it accurately reflects the use and characteristics of the Site. 	

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43	622	Church Commissioners of England	General					<p>Proposals Map Alterations</p> <p>We are seeking to make alterations to the draft proposals map in relation to the designations for the Site.</p> <p>The draft proposals maps shows the Site partially located in Metropolitan Open Land (a small section to the north), while the remainder lies outside this designation. The whole site is also within the Historic Park and Garden designation.</p> <p>We propose that the Site is removed from the Historic Park and Gardens designation as well as the small section of land which resides within Metropolitan Open Land designation OS36 (The Warren). We consider this to be reasonable and appropriate as the site is already developed site and is in commercial use. The site is also bordered by Fulham Palace Road, Bishops Park Road and Bishops Road with tennis courts to the immediate south of the Site, and therefore does not contribute to the surrounding green and open space, or the historic park. The site is very different in character and use, and this should be reflected in the Proposals Map.</p> <p>We note that the proposed amendment is not dissimilar to other proposed policy submission alterations that have been put forward. Of note are the proposed amendments for the Parsons Green Club (Map reference AM13) site</p>

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								<p>and also Hammersmith Park (Map reference AM16). These are summarised below:</p> <ul style="list-style-type: none"> The Parsons Green Club proposes to amend the boundary of the site to reflect "the loss of open space to new housing development." The proposed amendment is similar to our proposed alteration in that the site is again an existing developed site, located on a green space edge. The Hammersmith Park site is located within a green space edge, is on an existing developed site and not under public ownership. The justification asserts the reason for amending the proposal map as to "reflect the correct position boundary."
77	630	Environment Agency	General	YES	YES	YES	<p>Proposals Map</p> <p>The following Strategic Site Policy allocations are located contain areas of Flood Zone 3a as defined by table 1 of the NPPG.</p> <p>WCRA3, HRA1, HRA2, FRA1, SFRA1</p>	<p>These sites should be sequentially tested in line with the requirements set out in paragraph 18 of the NPPG. This is to ensure that development is directed to areas of lowest possible flood risk.</p> <p>In addition to this, any development coming forward in these locations must be accompanied by a site specific Flood Risk Assessment, in line with the requirements of paragraph 102 of the NPPG.</p>

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77	631	Environment Agency	General	YES	YES	YES	<p>Proposals Map</p> <p>The following Strategic Policy Areas contain areas within 16m of the tidal Thames</p> <p>HRA, SFRRA</p> <p>Developments coming forward within 16m the River Thames must:</p> <p>Maintain and where necessary enhance or raise flood defences in line with the requirements of the Thames Estuary 2100 Plan,</p> <p>Seek improvements to the tidal foreshore in line with the requirements of the Thames River Basin Management Plan and the Thames Estuary 2100 Plan</p>	
77	632	Environment Agency	General	YES	YES	YES	<p>The map AM12 shows proposals for the alteration of the Thames path, bringing it adjacent to the Thames Tidal defences.</p> <p>Any works within 16m the River Thames tidal defence must</p> <p>Maintain and where necessary enhance or raise flood defences in line with the requirements of the Thames Estuary 2100 Plan,</p> <p>Seek improvements to the tidal foreshore in line with the requirements of the Thames</p>	

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42	634	National Grid Property Ltd	General				<p>On behalf of our client, National Grid Property Ltd (NGP), we write in response to the Proposed Submission consultation on the London Borough of Hammersmith and Fulham (LBHF) Draft Local Plan in accordance with Regulation 19 of the Town and Country Planning (Local Planning (England) Regulations 2012).</p> <p>NGP made previous representations to the draft Local Plan in February 2015 and these comments are submitted subsequent to those comments.</p> <p>National Grid Property Ltd</p> <p>NGP is the property division of National Grid Plc, the national utility provider. Its duties include managing and disposing of surplus land throughout the UK and creating joint venture partnerships to redevelop its land holdings, NGP is committed to bringing its decommissioned sites, including the 6.84 ha Imperial Gasworks site at Imperial Road, Fulham SW6 (the Site) forward for non-operational development.</p> <p>Imperial Gasworks</p> <p>Imperial Gasworks is situated within the South Fulham Riverside Regeneration Area (SFRRA) and the ward of Sands End, approximately 0.3 miles south east of Fulham Town Centre. The Site comprises six redundant gasholders, overground pipes, a Pressure Reduction Station (PRS) and a series of associated operational and employment buildings.</p> <p>Due to changes in the way gas is stored, NGP's sister company National Grid Gas has, in consultation with the Health & Safety Executive (HSE), been able to decommission the onsite gasholders. The gasholders are</p>	<p>Summary</p> <p>NGP continues to support the strategic vision for the SFRRA. However, it is considered that further amendments are required to ensure that the policies relation to the regeneration areas and the Gasworks Site provide the basis for a viable and deliverable development.</p>

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							<p>purged of gas and capped off from the local distribution network which thus provides an opportunity for the Site to be substantially redeveloped.</p> <p>To enable this redevelopment, NGP secured planning permission in 2015 for the demolition of 5 of the 6 redundant gasholders, ancillary buildings and associated structures.</p> <p>NGP will shortly prepare to begin the approved demolition works and remediate the Site.</p> <p>Since the previous representations, NGP and the Berkeley Group Holding plc have established a Joint Venture to develop major residential and mixed use development schemes across London and the South East.</p> <p>The joint venture is named St William Homes LLP (St William). St William will develop the Site and submitted a Hybrid application for the comprehensive redevelopment in June 2016 (App No. 2016/02983/COMB). NGP will still be involved in the development of the Site as part of the Joint Venture.</p> <p>The Berkeley Group has separately made detailed representations to Local Plan. As part of the Joint Venture , NGP fully endorse these representations about the future potential of the Site to contribute to the provision of residential development in the Borough and on proposed development management policies.</p> <p>NGP's comments on the Draft Local Plan are made in a strategic context of its progress towards bringing forward the Site's redevelopment and therefore focus on strategic site allocations.</p>	

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8	649	Hammersmith and Fulham Air Quality Commission	General				<p>The H&F Air Quality Commission commends the clean air measures embedded within the LBHF draft Local Plan, and draws attention to its independent report of October 2016 on air quality (attached).</p> <p><u>Report of Hammersmith & Fulham Air Quality Commission Summary</u> (please see full report for more information)</p> <p>Key Findings:-</p> <ul style="list-style-type: none"> • Planning Policy & Practice- the Local Plan and London Plan need revision; • Transport policy and practice-diesel powered vehicles are a major concern due to the levels of nitrous oxide emissions; • Greening policy and practice- trees, hedges and grasses can provide a protective barrier from air pollution, increase biodiversity and encourage walking and cycling; • • Public health – there needs to be much greater public awareness of the dangers of air pollution and its causes. <p>Key recommendations for the Council:</p> <ul style="list-style-type: none"> • Revise the Local Plan and supplementary planning documents to promote greening policies and to ensure that the impact on air quality of all new developments is given consideration; • Establish a freight consolidation scheme in West London and convert fleets to low-emission vehicles; 	

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							<ul style="list-style-type: none"> • Develop an Urban Ecology Plan to drive greening and arboricultural policy and practice and increase tree, hedge and grass planting; • Increase parking permit charges for diesel vehicles; • Adhere to the WELL Building Standard and encourage the use of prefabrication in construction works; • Develop plans to increase pedestrianisation, cycling and greening in town centres; • Increase safer cycle routes, playing fields, parks and sporting facilities; • Increase the number of electrical charging points across the borough; • Introduce washing down of streets and pavements in areas of high particulate matter pollution. <p>Planning Policy</p> <p>It is the view of the Commission that Hammersmith & Fulham Council needs to make air quality a priority in setting out planning policy. The Local Plan, which is the strategic planning policy document produced by the Council, must recognise air quality issues in shaping planning policies and seek to ensure that developments are carbon neutral or even reduce air pollution in the borough.</p> <p>This recommendation was made to the Council in the summer and the new Local Plan, which was subject to public consultation in September and</p>	

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							<p>October 2016, has incorporated this requirement at Section 6 – Environmental Sustainability.</p> <p>The Commission recommends that the existing air quality policy and Supplementary Planning Document (SPD) be expanded to cover all developments which may be impacted by local sources of poor air quality or may adversely contribute to local air quality.</p> <p>The Commission recommends that arboricultural and greening policies be promoted in the Local Plan or SPD.</p> <p>The Commission is also of the view that the Council needs to plan for ‘walkability’ and the promotion of cycling as clean transport, and that these be recognised in SPDs to the Local Plan.</p> <p>Building design and construction policies are also important in ensuring that the built environment does not have a negative impact on human health and well-being and, again, the Commission recommends these be recognised in SPDs. For example, the WELL Building Standard³ should be adhered to in the planning of all new developments.</p> <p>Construction works are also responsible for particulate matter and this can be greatly reduced with prefabrication. This greatly reduces particulate matter on site as well as speeding up the construction time.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • The Local Plan to specify the need to consider the impact of all new developments on air quality and to require developments not to add to air pollution. 	

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							<ul style="list-style-type: none"> • Arboricultural and greening policies to be promoted in the Local Plan or Supplementary Planning Documents (SPDs). • The need to plan for 'walkability' and cycling in an area to be recognised in SPDs to the Local Plan. • The WELL Building Standard to be adhered to in the planning of all new developments. • The Council to encourage the use of prefabrication in construction works to reduce particulate matter. • The Mayor of London to review the London Plan and prioritise air quality in a new London Plan. • A new London Plan should require more permeable surfaces, more tree planting and other arboricultural barriers between highways and pedestrian areas. • Zero carbon policies should be incorporated in planning guidance for all new buildings. • The Mayor of London to review London's Climate Change and Energy Strategy to reconcile the potential conflict between decentralised energy and air pollution and cease promoting combined heat and power installations in its energy hierarchy above air quality neutral technologies. • All major developments, particularly those which will last for many years, to be closely monitored to ensure that all steps are being taken to mitigate 	

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							<p>the impact on air quality of the construction, drilling and movement of spoil.</p> <p>Transport Policy and Practice</p> <ul style="list-style-type: none"> • The Commission recommends that the Council, along with its strategic partners such as Transport for London, makes plans to increase pedestrianisation, cycling and green space in its own town centres. The Commission believes that this should be referenced in the Hammersmith SPD • The Commission welcomes the Mayor of London's plans for clean bus corridors and calls on TfL and the Council to ensure that, with the proposed redevelopment of Hammersmith Broadway, only electric, hybrid or low-emission buses are in use in Hammersmith town centre. • More safer cycle routes to be developed by the Council and Transport for London. <p>Greening Policy and Practice</p> <ul style="list-style-type: none"> • The Commission recommends that arboricultural policies be incorporated into the Local Plan and Supplementary Planning Documents (SPDs). • The Commission also calls on the Council to exercise its planning and enforcement powers to ensure that developers fulfil commitments in delivering tree-planting agreements. 	

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							<ul style="list-style-type: none"> • The Council to develop an Urban Ecology Plan to drive greening policy and practice across the borough. • Arboricultural policies to be incorporated into the Local Plan and SPDs. • The Council to exercise its planning and enforcement powers to ensure that developers fulfil commitments in delivering tree-planting agreements. • The Council to increase tree, hedge and grass planting on Council-owned land and highways, and to facilitate new trees on development sites. • The Council and developers to seek ways of maintaining mature tree cover when planning for new developments. <p>Public Health Policy and Practice</p> <ul style="list-style-type: none"> • The Commission, therefore, calls on the Council to increase playing fields, pocket parks and sporting facilities in the borough, and encourage Hammersmith & Fulham residents to be the most active in London. 	
16	651	Romulus Construction Ltd	General				<p>I am writing to you in relation to the above on behalf of our clients, Romulus Construction Limited, in respect of their interest in the site at the Triangle located in Hammersmith town centre.</p> <p>This representation focuses on the need to ensure that the emerging policies are consistent with national planning policy, particularly in relation to heritage issues, where there are currently some discrepancies. In this context, it may be helpful to set out the policy approach set out in</p>	

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							<p>paragraphs 133 and 134 of the National Planning Policy Framework (NPPG) which state the following:</p> <p>133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</p> <ul style="list-style-type: none"> ● the nature of the heritage asset prevents all reasonable uses of the site; and ● no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and ● conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and ● the harm or loss is outweighed by the benefit of bringing the site back into use. <p>134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.</p> <p>In light of this, there are a number of policies where some adjustment is necessary</p>	

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9	652	Mr Nicolas Crosthwaite	General				<p>Further to your email to me of October 25th regarding the LBHF Draft Local Plan, I thought you might be interested in seeing this statement on The Billings Conservation Area which was approved by RBKC last week if you have not already seen it. The maps contained within it are most interesting as is the reference to The LBHF Designated Conservation Area- The Billings and Brompton Cutting.</p> <p>https://planningconsult.rbkc.gov.uk/gf2.ti/f/701378/23138213.1/PDF/-/Billings_CAA_low_res.pdf</p>	
7	653	Sport England	General	NO	YES		<p>Thank you for consulting Sport England on the Hammersmith and Fulham Proposed Submission Local Plan. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport.</p> <p>Sport England aims to ensure positive planning for sport by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for participation now and in the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found via the following link:</p>	<p>To overcome the objections raised Sport England recommend that the Council develop Playing Pitch and Built Facility Strategies to establish a clear and robust evidence base and strategy for playing pitches and built sport facilities and revise the Community Facilities and Services Policy to fully reflect Sport England's policy to protect, enhance and provide.</p> <p>Sport England also strongly advise the rewarding of the open space policy, the glossary and references to sport facilities and the regeneration area policies as explained in the preceding text.</p> <p><u>Conclusion</u></p> <p>Sport England objects to the lack of evidence base and clear strategy for sport provision and infrastructure delivery, the wording and content of policies relating to Community Facilities and Services and Infrastructure delivery. Sport England also advise the rewording of the</p>

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							https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/ Sport England has reviewed the Proposed Submission Local Plan in light of these planning objectives and national planning policy set out in the National Planning Policy Framework (NPPF) and <u>object to the Submission Local Plan</u> as detailed in the comments below.	open space policy, the glossary and references to sport facilities and the regeneration area policies as set out above. Sport England trust that these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.
47	654	Stanhope PLC	General				Gerals Eve LLP is instructed, on behalf of Stanhope PLC, to submit formal representations to the London Borough of Hammersmith and Fulham ('the Council') in relation to the Regulation 19 Draft Local Plan consultation document. The Draft Local Plan has been prepared under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Stanhope is currently developing a number of substantial schemes within Hammersmith and Fulham including TVC, White City Place, and the Joint Venture Sites. Stanhope PLC are a significant landowner in the Borough and form part of the Local Developers Group with other key developers in the White City Opportunity Area. Stanhope PLC therefore welcomes the opportunity to comment on the draft consultation document. We have submitted a copy of these representations through the website as well In gernal terms Stanhope would encourage greater transparency of where CIL and S106 money is spent for both applicants and the wider community. If the process became more transparent developers, and	

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							investors could facilitate it further by promoting business and investment with the Council.	
38	658	Greater London Authority and Transport for London Planning Team	General				TfL consider that the document would benefit from more explicit reference to transport mitigation measures identified in specific area planning frameworks.	
10	659	CLS Holdings	General				<p>We write on behalf of our client, CLS Holdings, in response to the Council's Regulation 19 consultation on the Proposed Submission Local Plan for London Borough of Hammersmith and Fulham (LBHF).</p> <p>Our client has an interest in Quayside Lodge which falls within South Fulham Riverside Regeneration Area. This is an area which the Council has accepted is an important site to help contribute towards the delivery of the new homes, employment floorspace, and infrastructure needed in the borough.</p> <p>Our client brings substantial experience of redeveloping regeneration sites and has the ability to deliver new employment floorspace and homes in the borough. The above-mentioned site currently comprises out-dated, inefficient employment floorspace and there is an opportunity to deliver a redevelopment scheme providing significant regeneration benefits including potential for new homes and employment floorspace. This would</p>	<p>Summary</p> <p>Our client is broadly supportive of the policies contained within the Proposed Submission Version of the Local Plan, including the identification of key Strategic Sites, and acknowledgement of their ability to deliver regeneration, and a significant number of new homes contributing towards the Council's aim to exceed its housing target as well as additional jobs through new employment floorspace.</p> <p>There are areas, highlighted in these representations where we consider slight adjustments to wording of the policies in the Local Plan should be made to ensure that the document is consistent and clear in meeting its vision and objectives.</p>

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							<p>help the borough by contributing towards housing and employment targets and contributing to the wider regeneration of the area. .</p> <p>Our client acknowledges the Council's requirement to develop a 'sound' Local Plan which is positively prepared, justified, effective and consistent with national policy. We have reviewed the Proposed Submission Version policies within the Local Plan and hereby submit representations in response to the Spatial Vision and Objectives, Policies DEL1, SFRRRA, HO3, HO4, HO5, HO11, E1 and INFRA1.</p> <p>We submit that the Proposed Submission Version of the Local Plan as currently worded is not sound due to viability pressures meaning it is potentially undeliverable over its period (i.e. not 'effective') and inconsistent with the National Planning Policy Framework. Further that the wording of some policies is inconsistent and creates uncertainty in delivering the aims and objectives of the Plan.</p>	The key concern with the Local Plan as currently drafted is that the scale of obligations and policy burdens, including the current CIL charge, has the potential to threaten the ability for the strategic sites identified to be developed viably. This is contrary to paragraph 173 of the NPPF and results in an ineffective Local Plan. In this sense we submit that the Local Plan as currently drafted cannot be found sound. Further work in regards to the viability evidence underpinning the Local Plan is required to demonstrate that it can be viably developed.
49	661	Royal Borough of Kensington & Chelsea	General				<p>Thank you for the opportunity for the Royal Borough of Kensington and Chelsea (RBKC) Council to respond to the London Borough of Hammersmith and Fulham (LBHF) Proposed Submission Local Plan Regulation 19 Consultation. Please find the comments from RBKC below for the deadline of Friday 28 October 2016.</p> <p>These comments are also made in light of the statutory Duty to Cooperate which places a legal duty on the Councils to engage "constructively, actively and on an on-going basis" in "maximising the effectiveness" of</p>	

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							<p>Local Plans relating to "strategic matters" which may impact on at least two planning areas including in connection with infrastructure which is strategic</p> <p>Whilst we have a number of detailed comments and suggestions which are set out in full on the following pages, the general thrust of our response is to help ensure that impacts from new development proposed in LBHF do not have a detrimental impact, and in fact result in a positive impact, on the environment and character of RBKC. We are in no doubt that LBHF would share this general principle.</p> <p>I would like to confirm that the Council wishes to participate at the oral examination.</p>	
55	665	West Ken Gibbs Green Community Homes, the West Kensington TRA and the Gibbs Green and Dieppe Close TRA	General	NO	YES	YES	<p>I am writing to you on behalf of West Ken Gibbs Green Community Homes, the West Kensington TRA and the Gibbs Green and Dieppe Close TRA. Please find attached to this email a copy of our Consultation Form regarding the Proposed Submission Local Plan. Thank you for inviting us to contribute at this stage.</p> <p>Please also find attached a copy of our People's Plan, which is referred to in the consultation form.</p> <p>About us</p> <p>West Kensington Estate TRA, Gibbs Green & Dieppe Close TRA, and West Ken Gibbs Green Community Homes Limited (WKGCH) are made up of Committee and Board Members elected by residents at the AGMs. The TRAs were re-established in 2009 and WKGCH was founded by the two TRAs in 2011. All three organisations have been working to save the</p>	

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							<p>estates from demolition and redevelopment as part of Capco's Earl's Court scheme.</p> <p>Each organisation held its most recent Annual General Meeting (AGM) on Tuesday 4th October 2016. Every household living in the West Kensington Estate, the Gibbs Green estate and Dieppe Close was invited to attend the AGM for WKGCH as well as the AGM for the relevant TRA. Overall, the meetings were attended by 78 residents from across both estates. The resident representatives for all three organisations were publicly elected at the meetings. The West Kensington TRA AGM and the WKGCH AGM was witnessed by local ward councillor Daryl Brown and local MP Andy Slaughter.</p> <p>In 2009, residents from 83% of households signed a petition saying no to demolition and demanding that residents have a say in the future of their homes.</p> <p>In 2011, residents from two thirds of households on the estates joined WKGCH which is dedicated to improving the neighbourhood and saving the estates by transferring them into community ownership under resident control.</p> <p>In 2012 residents responded to the Council's consultation on the redevelopment proposals by four to one against demolition.</p> <p>In 2013 residents from 60% of households signed a petition to the Secretary of State requesting that he refuse consent for the sale of the estates to Capco's EC Properties LP undertaking.</p>	

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							<p>In 2014 120 residents attended a General Meeting at which members voted unanimously that WKGCH should serve a Right to Transfer Proposal Notice on the Council.</p> <p>In 2015 residents from 57% of households signed a petition to the Secretary of State requesting that he support the aforementioned Right to Transfer Proposal progressing to the next stage. Over one hundred residents subsequently took part in workshops and estate tours to brief architects to produce The People's Plan: a costed alternative to demolition which proposes improvements to the West Kensington and Gibbs Green estates; new homes as infill and additional storeys to existing buildings without demolition.</p> <p>In 2016 an online petition started by a resident on the West Kensington estate calling on the Mayor of London to review the Earls Court Masterplan garnered over 7,600 signatures. Before his election as Mayor of London, Sadiq Khan issued the following statement to The Guardian:</p> <p>Sadiq will review the Earl's Court Masterplan as he has serious reservations about the overall direction the scheme is taking.</p> <p>The vision being pursued by all three residents' organisations includes:</p> <ul style="list-style-type: none"> • Implementation of The People's Plan, which would keep the existing 760 homes on the estates, provide 250 new homes in the form of infill and additional storeys to existing blocks. The sale of 180 of these homes will help to subsidise 70 new homes for social rent to ease overcrowding and allow older residents to downsize locally. It will also help to pay for improvements to the existing council properties. A copy of The 	

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							<p>People's Plan, which has been sent to all households on both estates for consultation, is attached.</p> <ul style="list-style-type: none"> • A landlord elected by residents that would decide the policies, employ professional staff to manage the properties, and spend all the income on the estates; • Social rents with increases strictly limited, and tenants keeping the security they have now; • Estate-based management and maintenance providing a personal service for residents and tailored to meet the needs of the neighbourhood; • Tackling overcrowding through implementation of The People's Plan, use of local knowledge and an end to the uncertainty created by the threat of demolition; • Repairs and improvements to the West Kensington blocks and to open spaces, with more CCTV and increased supervision by staff; • Community services and events for residents with many more activities for younger people. 	
52	667	Westfield Shoppingtowns Ltd	General				<p>These representations are submitted by Montagu Evans on behalf of Westfield Europe Limited ("WEL"), the joint owners of the Westfield London shopping centre ("Westfield London" or "the centre") to the London Borough of Hammersmith and Fulham's ("LBHF" or "the Council") Proposed Submission Local Plan (Regulation 19). The Proposed Submission Local Plan was published for consultation in September 2016.</p>	<p>Closing</p> <p>In general, WEL are supportive of the thrust of emerging policy contained within the draft Local Plan, and in particular they welcome the proposed inclusion of the</p>

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							<p>The purpose of these representations is to help ensure that the policies contained within the emerging Local Plan are consistent with other policies at the local, regional and national levels, and are sufficiently robust to promote delivery of the stated objectives and development across the borough – in particular in White City and Shepherds Bush. It is recognised that at this stage, representations should relate to the soundness of the Proposed Submission Local Plan – we refer to this later within this letter.</p> <p>Background to the Representations</p> <p>By way of background to these, representations, WEL have submitted a number of applications for planning permission for the extension of the existing centre – these works are collectively known as ‘Phase 2’. A number</p> <p>of these applications have been approved by LBFH, as summarised below:</p> <p>In March 2012, WEL secured outline planning permission (ref. 2011/02940/OUT – “the 2012 Consent”) for the comprehensive redevelopment of the area to the north of Ariel Way, involving a mix of uses across a number of distinct building blocks, including retail uses (A1, A3- A5), commercial, community and leisure uses and residential units;</p> <ul style="list-style-type: none"> Subsequently, WEL secured outline planning permission (ref. 2013/05115/OUT – “the 2014 Consent”) for a slightly reduced site area (excluding the Dimco buildings and bus station and surrounding land), again involving a mix of uses across distinct building blocks; 	<p>Westfield London Phase 2 extension site within Shepherds Bush Town Centre.</p> <p>There are, however, concerns regarding the proposed increase of the borough wide target for affordable housing to 50%, given the potential impact this has on the delivery of housing, but also in terms of the need to set reasonable and deliverable targets for affordable housing at the local level. The current evidence is that targets of 40% affordable housing are not being met on the majority of sites, thus increasing the rate appears to be unjustified.</p> <p>Indeed, the Council’s own evidence base demonstrates that a policy target of 50% affordable housing would not be achievable on a number of the scenarios that were tested. It is on this basis that we have concerns as to the soundness of the draft Local Plan. In particular, we do not consider that the emerging Local Plan meets the requirements of paragraph 182 of the National Planning Policy Framework in respect of the need for it to be ‘justified’ – i.e. to set out “the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”. For this reason, we consider that for the Local Plan to meet the tests of soundness, the identified target rate for affordable housing across the borough – currently identified as 50% - should be reduced.</p>

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							<ul style="list-style-type: none"> In order to facilitate the comprehensive redevelopment of the site as per the 2014 Consent, LBHF granted full planning permission in July 2014 (ref. 2013/05350/FUL - “the enabling works consent”) for works on the site including the demolition of existing buildings and associated structures, the closure and temporary diversion of highways, construction of temporary highways, excavation and construction of a tunnel and support structures to connect to the existing centre’s basement; In March 2015, WEL submitted an application for reserved matters pursuant to the 2014 Consent to allow the formation of the basement below the extension to the centre; A subsequent application was submitted under Section 73 of the Town and Country Planning Act 1990 for amendments to the 2014 Consent, reflective of design development. The amendments to the 2014 Consent included a reduction in the minimum width of the east-west link from 14.8m to 12m; the incorporation of formerly external circulation space inside the ‘Public Room’; the extension of roof-top car parking decks over Ariel Walk to provide for car parking bridges at upper levels; the amalgamation of Plot B within Plot A; an increase in the quantum of proposed D2 and A1 floorspace; and a reduction in the quantum of A3 – A5 floorspace and B1 floorspace. This application was approved by LBHF on 13 October 2015 and is known as “the 2015 Consent”; 	WEL intend to engage with the Council further in terms of the preparation of local planning policy, and we therefore request that we are kept up to date with the next stages in the preparation of the Local Plan.

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							<ul style="list-style-type: none"> Reserved matters pursuant to the above consent were approved by the Council in April 2016 for Phases B (building structure) and C (building envelope); Further reserved matters pursuant to the October 2015 Consent were submitted in June 2016 for the delivery of the residential Block K, which comprises a part 8 and part 14 storey building to provide 74 residential units. A resolution to grant was passed by the Council's Planning and Development Control Committee in September 2016; An application for non-material amendments to the 2015 Consent was approved by the Council in September 2016 ("the September 2016 NMA"). This application allowed minor changes to Block K necessary to enable the determination of the above reserved matters application, comprising the relocation of the energy centre flue stack from Block C to Block K and the reduction in its height; In August 2016, a further Section 73 Application was submitted to seek amendments to the 2015 Consent (as amended under the September 2016 NMA). The key amendments sought under this application include an increase in the quantum of retail floorspace, reduction in the quantum of leisure floorspace, revision to the limit of deviation of certain block lines, revision to the maximum building heights of Block K, and revision to the maximum height of the energy centre flue. The objective of these amendments is two-fold as follows: 	

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							<p>i. To bring about changes to Block K, enabling the submission of a second reserved matters application for that block comprising additional units within an enlarged building mass; and</p> <p>ii. To enable the delivery of the 'Restaurant Scheme' to be delivered in conjunction with the Phase 2 development.</p> <ul style="list-style-type: none"> As per i) above, a second reserved matters application for the delivery of Block K was submitted to the Council in September 2016. This application is currently pending determination; As per ii) above, the following applications were submitted to the Council in October 2016 and are currently pending determination: <p>i. Application for detailed planning permission for the delivery of the restaurant block; and</p> <p>ii. Second reserved matters application for the delivery of the residential Block K, allowing the delivery of 89 units within the block.</p> <ul style="list-style-type: none"> In addition, reserved matters applications for the delivery of the public room and the public realm were submitted to the Council in October 2016 and are currently pending determination. <p>Given their long term investment within the area, WEL have sought to engage with the development of planning policy in Hammersmith and Fulham, and specifically within White City, over a number of years. On</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							behalf of WEL, Montagu Evans have previously submitted representations to the borough's Core Strategy, which was adopted in 2011, as well as to the White City Opportunity Area Planning Framework (WCOAPF), which was adopted in October 2013. In addition, Montagu Evans submitted representations to the Regulation 18 Consultation of the Local Plan on behalf of WEL, in January 2015.	
53	668	Land Securities	General				<p>Land Securities is a specialist real estate investment trust. It advises on and leads the development and asset management of a number of sites and interests within the London Borough of Hammersmith and Fulham</p> <p>These representations are issued in the context of proposals for the potential redevelopment of the W12 Centre in the White City Regeneration Area.</p> <p>Our client supports LBHF in its ambitions for the Borough and support the principle of the regeneration and wider improvements that are proposed. It is clear that there is an urgent and pressing need for housing that must be addressed. It is within this context that following Policies are supported in relation to the aspirations for the W12 Centre site.</p>	
57	674	Henrietta Bewley H&F Liberal Democrats	General				<p>I welcome the new development plan, and am delighted to see</p> <ul style="list-style-type: none"> - More affordable homes, - regeneration of development areas 	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<ul style="list-style-type: none"> - commitment to sustainable building and design - commitment to create new public space and green ways in the development areas, particularly along the canal - commitment to making walking and cycling more attractive, with new pedestrian bridges over the canal and roads in the development areas to the north of the borough. 	
26	679	Nadine Grieve	General				My main point, which I hope can be fed in, is that the laudable aspirations expressed in the plan seem to be at odds with what is actually happening on the ground.	
18	210	Old Oak and Park Royal Development Corporation	General				<p>Chapter 6</p> <p>The Local Plan does not appear to include a policy on mineral extraction. This should be included to accord with NPPF para 143.</p>	
23	243	H&F Disability Forum	General				<p>Chapter 6 Borough Wide Policies</p> <p>We support the following Borough Wide Policies because they include accessible and inclusive designs, facilities or services.</p> <p>Policy HO1 Housing Supply</p> <p>Policy HO3 Affordable Housing</p> <p>Policy HO9: Student Accommodation</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>Policy CF3 : Enhancement of arts, culture, entertainment, leisure, recreation and sport etc</p> <p>Policy OS2 : Access to Parks and open space</p> <p>Policy OS3 : Playspace for children and young people</p> <p>Policy RTC2 : Access to the Thames riverside</p> <p>Policy RTC3: design and appearance of development within the Thames Policy area</p> <p>Policy DC1: Built environment</p> <p>Policy DC2: Design of New Build</p> <p>Policy DC3: Tall buildings</p> <p>Policy DC4: alterations and extensions</p> <p>Policy DC5: shopfronts</p> <p>Policy DC8: heritage and conservation</p> <p>Policy CC6: On site waste management</p> <p>Policy T1: Transport</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>Policy T3: Increasing and promoting Opportunites for Cycling and Walking.</p> <p>Policy T4: vehicle Parking standards</p> <p>Policy T5: Parking for Blue Badge Holders (and Appendix 7 Car Parking Standards)</p>	

2. Introduction & LBHF

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
17	185	Old Oak and Park Royal Development Corporation	Introduction				Para 1.8 It would be helpful for the document to include an explanation of the role of OPDC as the local planning authority within its boundary.	
24	257	Home Builders Federation	Introduction	NO			<p>The Local Plan's relationship with other policies and strategies (page 3)</p> <p><u>The Council's intention to retain policies from the old Core Strategy is unsound because it is unjustified and contrary to national policy.</u></p> <p>The new Local Plan for Hammersmith & Fulham should provide a full and comprehensive update of planning policy in the Borough and the new Local Plan should replace entirely the old Core Strategy. The Council should not continue to rely on policies from the old Core Strategy to determine planning applications. This is poor planning practice and will result in uncertainty for applicants. The Council should use the opportunity in preparing its new Plan to replace entirely the old Core Strategy. The expectation in the NPPF is that only one Local Plan should be produced (paragraph 153). Any additional development plan documents should be used where clearly justified. If the Council considers that there are policies in the Core Strategy that are still relevant and needed, then these should be transported into the new Local Plan so that they can be subject to public scrutiny via the consultation and examination process.</p>	The Council should provide a list in the Local Plan of what these 'saved' policies are from the Core Strategy.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
52	367	Westfield Shoppingtowns Ltd	Introduction				<p>Within this context, it is important that the emerging Local Plan reflects policy that has gone before it and builds upon the substantial body of work that already exists and has recently undergone independent examination and adoption.</p> <p>Paragraph 1.8 of the draft Local Plan states that:</p> <p><i>“The Local Plan will build upon the existing Core Strategy and Development Management Local Plan. Although a number of existing policies will be amended, or replaced, many other policies will (2)remain substantially the same as those included in the existing Core Strategy and Development Management Local Plan”.</i></p> <p>This is noted and supported.</p>	
14	45	Mr Jon Burden	(2) Hammersmith and Fulham	NO	YES	YES	<p>Para 2.7 is confusing. I think it means that depravation has become less severe in the borough. If I read it correctly, H&F used to be the 31st most deprived borough in the conuntry. Now it is "only" the 76th. If this is the case, the sentence could be changed to:</p> <p>2.7 The borough has high levels of deprivation. According to the 2015 Indices of Deprivation, it is ranked 76th most deprived local authority area in the country (31st in 2010 and 38th in 2007). ADD: This is an improvement but there are significant pockets of deprivation, particularly in the north of the borough.</p>	<p>As above, change 2.7 wording to:</p> <p>The borough has high levels of deprivation. According to the 2015 Indices of Deprivation, it is ranked 76th most deprived local authority area in the country (31st in 2010 and 38th in 2007). ADD: This is an improvement but there are significant pockets of deprivation, particularly in the north of the borough.</p>

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9	116	Mr Nicolas Crosthwaite	(2) Hammersmith and Fulham				In the Proposed Submission Local Plan Sept 2016 2.57 it states "that Football Club Facilities enrich, educate and improve lives and add greatly to making the Borough a place where people want to live". I think that this statement needs further analysis and justification as I don't see where the education and improvement to life is provided which it is claimed that the football clubs bring to the residents of the Borough. I would also question as to whether these clubs add GREATLY to making the Borough a place where people want to live.	
17	124	Hammersmith Society	(2) Hammersmith and Fulham				<p>Section 2 – Hammersmith and Fulham : Good summary of the many problems but does not say how they are going to be solved? For example:</p> <p>What to do about the energy inefficiencies in most of the aging housing stock in the Borough?</p> <p>Under the section 'Children and Young People', there is no reference to play or youth facilities outside of schools.</p> <p>Under transport, it is accepted that the road routes particularly on north-south routes suffer from 'some of the worst congestion in London' (para 2.34) – but the plan contains no solutions to these problems which are only likely to increase with the massive developments around White City and the OPDC area. There is also little opportunity to improve north-south public transport provision within the Borough except for development of the West London line</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
58	158	Historic England	(2) Hammersmith and Fulham				<p>This chapter provides a helpful starting point for the local plan and we welcome the opening statement that the local plan strategy should be based on an understanding of the borough.</p> <p>We have previously noted that a borough-wide characterisation study would be appropriate to identify the significance of the historic environment resource, its contribution to local character and the opportunities for this to be conserved and enhanced. This remains an important piece of work which it would be beneficial to carry out, and would tie in with the London Plan policies for conservation of heritage assets and local character, and the NPPF, paras 126 (promoting a positive strategy) and 169 (up-to-date evidence). At present, approximately half of London Boroughs have carried out borough-wide characterisation studies. Historic England would be pleased to advise on parameters for such a study.</p> <p>Notwithstanding this, at this stage we note that you can refer to a number of conservation area appraisals and there are other sources of information such as the Historic Environment Record (HER) held by GLAAS. There is a background paper addressing townscape character dated 2011.</p>	<p>Built Heritage</p> <p>With respect to the 'Built Heritage' section on page 17 we have the following comments:</p> <ul style="list-style-type: none"> The title should be changed to 'Historic Environment' as the term built heritage is normally understood to exclude archaeology and historic parks and gardens. We recommend that the text includes reference to the status of Fulham Palace registered historic park and garden and scheduled monument. Fuller information should be included regarding the archaeology of the borough and its early history. Accepting that this section is a summary, you could draw out information from the following overview provided by the Greater London Archaeological Service (GLAAS): <p><u>Early Heritage</u></p>

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								<p><i>The borough has a long and rich heritage. Potentially as early as the Mesolithic period, when societies were still nomadic the area was being used for flint working such as that found during excavations in the 1970s at Fulham Palace. The Neolithic period saw the development of agriculture, causing the human populations to become more sedentary, forming more permanent settlement. In 1978 archaeological investigations at Blakes Wharf and Rosebank Wharf recorded a large quantity of worked and waster flint, but stone and pottery along with a single pit or ditch, indicating the presence of such a settlement. Another settlement may also have been located in the vicinity of the Lygon Almshouses on Fulham Palace Road, the substantial amount of Neolithic/Bronze Age pottery and flint work were also encountered. To the north, around Hammersmith, part of a Bronze Age to Iron Age earthwork was excavated at 120-124 King Street. The exact function of the earthwork is currently uncertain owing to the small part that has been investigated to date, but it has been interpreted as representing possibly either a farmstead or a defended settlement. In 1996 a variety of Iron Age settlement features including rubbish pits and potential roundhouses were recorded at the site of Lardy Margaret School in Parsons Green.</i></p> <p><i>The London to Silchester Roman road crosses the borough running west from the south side of</i></p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
								<p><i>Shepherd's Bush Green to Bath Road. The close proximity to the Roman settlement within the City may have prevented major settlements from being established. The presence of the road would have enabled hinterland farm produce and trade goods moving into and out of the urban centre.</i></p> <p><u>Later Heritage</u></p> <p><i>During the Saxon and later medieval period the two key settlements of Hammersmith and Fulham began to develop. Hammersmith originally evolved around the mouth of the Hammersmith Creek, eventually spreading along the riverfront, while Fulham formed the main settlement for the Parish. The area of Fulham also became an important residential seat for the Bishops of London from about AD 700 onwards. Other smaller settlement developed within the borough during the medieval period including that at Shepherd's Bush, Parson's Green and Walham Green.</i></p>
17	186	Old Oak and Park Royal Development Corporation	(2) Hammersmith and Fulham				<p>Chapters 2 and 3</p> <p>The facts and figures in these chapters appear to cover the whole borough. Either at the start of these chapters or within the Introduction Chapter (chapter 1), it would be helpful to clarify that facts and figures are for the entire borough, including the part within the OPDC area.</p>	

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25	267	Tri-Borough Public Health	(2) Hammersmith and Fulham				<p>This section offers a good introduction to the purpose and context of the Local Plan and to the borough of Hammersmith and Fulham. The overall framing presents health and wellbeing as integral drive for the document which is welcome and applauded.</p> <p>Page 9: Deprivation</p> <p>Paragraph 2.10: The Child Poverty JSNA 2014 reports LBHF as having 30% of its children living in poverty. This is taken from the HMRC figures 2011 and is a more up to date figure than that quoted in your document. This is slightly higher than the London average and much higher than the national average.</p> <p>The commentary notes that child poverty in H&F does not follow the general north-south divide however the CP JSNA offers a fuller picture. There is a clear concentration of child poverty in the north, with the greatest density (35-53%) in the two northernmost wards (among the 20% wards in London with the highest density), College Park and Old Oak; Wormholt and White City. The only ward that features among the 20% wards in London with the lowest density of child poverty (0-14%) is the southernmost ward, Palace Riverside. Similarly the wards with the second lowest density of child poverty (14-22%) are both in the south of the borough. It is remaining two degrees of density which are pretty evenly spread across the borough.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
25	268	Tri-Borough Public Health	(2) Hammersmith and Fulham				<p><u>Page 9: Health</u></p> <p>This section is very welcome, offering both an important marker for addressing health inequalities and an important introduction to the centrality of the social determinants of health.</p>	
25	269	Tri-Borough Public Health	(2) Hammersmith and Fulham					<p><u>Page 10: Local economy and employment</u></p> <p>It would be constructive in paragraph 2.19 to make reference to supported employment for those with health and/or disability barriers to employment and for engagement with local businesses to secure family friendly terms and conditions. We know that it is our 35-55yr age group which is most likely to be long term unemployed and we know that we have a high level of child poverty in the borough. Just as the Local Plan might provide the conditions for the qualifications and skills of local people to be improved (see also strategic objective 3), so too might it provide the conditions for the provision of tailored employment support.</p>
25	270	Tri-Borough Public Health	(2) Hammersmith and Fulham					<p><u>Page 11: Housing</u></p> <p>This section would benefit from referring to the impact of the challenges on health and wellbeing of additional sections of the resident population. Just as you reference the impact on families of overcrowding</p>

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								(para. 2.25), the lack of wheelchair accessible units (2.24) and fuel poverty stemming from energy efficiency (2.26), it would also be constructive to reference the impact of the lack of desirable housing options appropriate for older people. This is an area which is currently a priority area of work for both Adult Social Care and Housing and its inclusion in the Local Plan might strengthen the levers available to the Council to address the problem.
25	271	Tri-Borough Public Health	(2) Hammersmith and Fulham				<u>Page 13: Children and young people</u> Early Years provision is a gap in this Local Plan. In order for potential education attainment to be achieved, early years' development is key and currently there is a deficit of childcare places.	It would be invaluable for the Local Plan to promote increased provision and to facilitate the incorporation of outdoor place space to improve health and reduce child obesity levels.
25	272	Tri-Borough Public Health	(2) Hammersmith and Fulham				<u>Page 13: Transport</u> Paragraph 2.36 references the poorer public transport linkage in the north of the borough particularly. .	Given the centrality of physical activity to health and wellbeing in the short and long term, as well as its potential contribution to reducing congestion and air pollution, there is considerable merit in expanding paragraph 2.39 with an explicit commitment to enhances walkways and cycle routes across the borough.

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25	273	Tri-Borough Public Health	(2) Hammersmith and Fulham				<p><u>Page 15: Green and open space</u></p> <p>The section is welcome and offers important context for later sections, building in the value to health and wellbeing of individuals and to social inclusion.</p>	
52	372	Westfield Shoppingtowns Ltd	(2) Hammersmith and Fulham				<p>Paragraph 2.17 of the draft Local Plan notes that</p> <p><i>“with the development of the Westfield London shopping centre there has been an increase in the importance of the retail sector to the local economy, with Westfield London providing approximately 8,000 jobs”.</i></p> <p>As set out above, various consents have been granted by LBHF for the extension of the existing centre, with the estimate that this will deliver approximately 3,000 additional jobs. We suggest that this is reflected in the text within this paragraph.</p>	
72	421	Hammersmith and Fulham Clinical Commissioning Group (CCG)	(2) Hammersmith and Fulham				<p>2.1 Section 2 – Hammersmith & Fulham</p> <p>2.11... "The borough's hospitals are a key part of the local community and the recent closure of Hammersmith Hospital A&E and the proposed closure of Charing Cross Hospital A&E, together with the loss of 336 acute in-patient beds are of great concern. The council is concerned that the health needs of the increasing local population has not been adequately assessed. Also that the proposed improvements in primary and community care and the Out of Hospital Strategy(8) have not yet reduced demand for in-patient beds. Until there is evidence of a reduced</p>	<p>The CCG would ask that the references in 2.1.1 be corrected to remove the reference to the closure of Charing Cross hospital. There are no plans to close Charing Cross hospital.</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
							<p>need for hospital beds to serve the local community, Charing Cross Hospital should not be closed."</p> <p>Whilst recognising the importance of this issue to the Council and to local residents:</p> <p>1. The CCG would ask that the references in 2.1.1 be corrected to remove the reference to the closure of Charing Cross hospital. There are no plans to close Charing Cross hospital.</p> <p>Both Charing Cross and Hammersmith and hospitals will continue to play a vital role in the provision of services for local residents. Hammersmith Hospital will become a world-leading specialist hospital, linking closely with Imperial College to provide 21st century renal, haematology, cancer and cardiology services for local residents and patients across the UK. Charing Cross will become a local hospital, including primary care services, diagnostics and pharmacy, transitional care and rehabilitation, and education and wellbeing services. Urgent and emergency care services appropriate to a local hospital will also be provided at Charing Cross, as well as existing mental health and cancer support services.</p> <p>2. The health needs of the local population, including the use of GLA housing projections to reflect the increasing numbers of local residents, underpin the CCGs plans for acute hospital care. As well as reflecting the increasing numbers of residents, the plans have been specifically designed by local clinicians from across north west London to reflect the changing demands put on the health system by changes to the health needs of those residents; for example, the need to provide effective care for people with chronic diseases and those living for longer with more</p>	

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							<p>complex health conditions (as referenced in the Local Plan, section 6.130). Our population planning also takes into account all feedback received from our local authority colleagues following our written approach (May 05 2016) for their input into our population figure projections from now until 2025/26. This includes population projections based on recent housing projections and best estimates of planned growth as advised by local authorities Hammersmith & Fulham.</p> <p>3. The implementation of any changes to acute services will be subject to a comprehensive assurance process, including significant external scrutiny. As part of the STP development, a commitment has been made to review the assumptions underpinning agreed Shaping a Healthier Future plans for acute services across NW London and to progress with the delivery of local services before making any further changes.</p> <p>As has been demonstrated in the changes made since 2012 at Hammersmith, Central Middlesex and Ealing hospitals, the NHS in NWLondon has a track record of making significant changes to services for the benefit of local residents whilst ensuring patients continue to be cared for in a safe environment.</p>	
72	422	Hammersmith and Fulham Clinical Commissioning Group (CCG)	(2) Hammersmith and Fulham				"2.12 As part of a strategy to improve the health of the local community, it is important that residents and workers are able to live and to participate in healthier lifestyles. Tackling overcrowding and poor housing, improving air quality, reducing the impact of climate change, improving access to parks and open spaces, controls on hot food	The CCG shares this ambition and will work closely with LBHF and the public health team to influence the wider determinants of health for local residents.

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							takeaways and opportunities to walk and cycle can all help to reduce health inequalities in the borough."	
38	515	Greater London Authority and Transport for London Planning Team	(2) Hammersmith and Fulham				2.35 Tfl would welcome the opportunity to review and comment on the updated Air Quality Action Plan.	
38	519	Greater London Authority and Transport for London Planning Team	(2) Hammersmith and Fulham				2.38 Tfl look forward to working with LBH&F to minimise the level of motorised traffic generated by new development.	
38	521	Greater London Authority and Transport for London Planning Team	(2) Hammersmith and Fulham				2.39 Hammersmith Gyratory is a part of the Strategic Road Network (SRN). It is noted that there are planned cycle infrastructure Improvements to this junction to return it to a two-way working system, with works scheduled to commence in November 2017.	

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40	570	MR PRASHANT BRAHMBHATT	(2) Hammersmith and Fulham				Housing Para 2.24 College Court requires wheelchair access College Court requires lifts	
40	571	MR PRASHANT BRAHMBHATT	(2) Hammersmith and Fulham				Housing Para 2.26 Energy & noise insulation is necessary for properties in Town Centre	
40	572	MR PRASHANT BRAHMBHATT	(2) Hammersmith and Fulham				Transport- 2.35 Residential properties in Town Centres need both noise insulation and AIR pollution filters.	
40	573	MR PRASHANT BRAHMBHATT	(2) Hammersmith and Fulham				Environmental Sustainability- 2.43 Open space monitoring of AIR QUALITY and displayed in all TOWN CENTRES plus online	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
40	574	MR PRASHANT BRAHMBHATT	(2) Hammersmith and Fulham				<p>Community and leisure facilities para 2.56-2.58</p> <p>Recreation use i.e. skateboard park, art exhibitions and local handicraft markets under the Hammersmith flyover.</p>	
12	611	Imperial College Healthcare NHS Trust	(2) Hammersmith and Fulham				<p>2.1 Section 2: Hammersmith and Fulham: Health</p> <p>In Section 2 of the document headed 'Hammersmith and Fulham' it is stated in paragraph 2.11 on 'Health':</p> <p>"Among the key health issues in relation to the council's spatial strategy is the health and well-being of residents as well as ensuring that health care is provided to meet the needs of local residents. Life expectancy for men in Hammersmith and Fulham is 79.7 years and for women it is 84.1 years. The difference in life expectancy between affluent and deprived areas in the borough is 7.9 years in men and 5.4 in women. In order to improve the health of borough residents it is important that they have good access to the appropriate facilities, including high quality specialist and emergency health care facilities. The borough's hospitals are a key part of the local community and the recent closure of Hammersmith Hospital A&E and the proposed closure of Charing Cross Hospital A&E, together with the loss of 336 acute in-patient beds are of great concern. The council is concerned that the health needs of the increasing local population has not been adequately assessed. Also that the proposed improvements in primary and community care and the Out of Hospital Strategy have not yet reduced demand for in-patient beds. Until there is evidence of a</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
							<p>reduced need for hospital beds to serve the local community, Charing Cross Hospital should not be closed."</p> <p>The Trust agrees with the statement contained in this paragraph that:</p> <p>"In order to improve the health of borough residents it is important that they have good access to the appropriate facilities, including high quality specialist and emergency health care facilities."</p> <p>It should be noted that, in terms of the closure of the emergency unit at Hammersmith Hospital in September 2014, this was an entirely clinically driven decision. It was intended to ensure we have high quality specialist services where they are most needed. We can provide better emergency and urgent care, more sustainably, by concentrating more resources for seriously ill and injured patients at Charing Cross and St Mary's hospitals while ensuring good local access for those with urgent but not life-threatening conditions at our urgent care centres, including the expanded urgent care centre at Hammersmith Hospital.</p> <p>The urgent care centre at Hammersmith Hospital was expanded to be open 24 hours a day, seven days a week, in preparation for the safe closure of the hospital's emergency unit. The expanded urgent care centre can now care for more people with conditions which are urgent but not life-threatening, while ambulances will take more serious cases straight to other A&Es or specialist units where they will receive specialist emergency care. Anyone arriving at Hammersmith Hospital as an emergency with a serious condition will receive immediate care and be transferred to the A&E or specialist unit most suitable for their health needs.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
							<p>There are no plans to close Charing Cross Hospital. As part of our Trust's Clinical Strategy (and the wider service reconfiguration agreed for the north west London area), Charing Cross Hospital will evolve to become a new type of local hospital, offering a wide range of specialist, same-day, planned care, as well as integrated care and rehabilitation services for older people, and those with long-term conditions. Within the strategy Charing Cross Hospital will retain a 24/7 A&E appropriate to a local hospital.</p> <p>The Trust is clear that we need to have the care and support in place and working effectively, before we can see any reduction in demand for acute hospital bed requirements. This means that there will be no changes to the A&E at Charing Cross Hospital until 2021 at the earliest, and there is a commitment to involve all stakeholders in planning for any proposals for clinical service change as soon as possible.</p> <p>As part of the North West London Sustainability and Transformation Plan (see section 3 of this paper below), the NHS will work jointly with local communities and local authorities to review planned changes to acute services and to agree a model of acute provision that addresses clinical quality and safety concerns and expected areas of demand pressure. For Charing Cross Hospital that means there will be no planned changes made during the five year life span of the Sustainability and Transformation Plan so, as stated above, not before 2021.</p>	
26	635	Nadine Grieve	(2) Hammersmith and Fulham				Local Economy and Employment	

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							encouraging creative industries -- but the Fulham Gasworks site is destroying artisans' studios.	
26	636	Nadine Grieve	(2) Hammersmith and Fulham				Housing hopefully there are more firm plans to bring in more affordable and rented housing? Eg at Earl's Court?	
26	637	Nadine Grieve	(2) Hammersmith and Fulham				Town Centres and Local centres shops - good idea, but if only pawnshops and betting shops can afford the rents, it is just as aspiration	
26	638	Nadine Grieve	(2) Hammersmith and Fulham				Transport -- improving air quality -- but what about the increased traffic likely from the Heathrow expansion? what about nitrogen dioxide? Transport access would be greatly improved especially for people with disabilities if there were to be a subterranean tunnel between (i.e. within) the two tube stations. No mention of any links between Old Oak station and the nearest tube station.	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
26	639	Nadine Grieve	(2) Hammersmith and Fulham				Health improving health -- how can this be squared with losing Charing Cross?	
17	662	Hammersmith Society	(2) Hammersmith and Fulham				Built Heritage p17 Para 2.53 mentions the archaeological priority areas and the ancient monument of the Fulham Palace moated site. The recent significant archaeological finds at Palingswick (now Ravenscourt Park) of a moated manor house whose owners can be traced back to the 14th century, although clues in historic maps point to even earlier settlements here should be mentioned. Provision should be included for archaeological investigation with any proposals for a tunnel to replace the A4 through Hammersmith.	
17	663	Hammersmith Society	(2) Hammersmith and Fulham				There are Conservation Areas adjacent to the river with important historic residential buildings which need to be recognised in the policy. Further details of the qualities and character of the river and riverside are included in the Thames Strategy Kew to Chelsea and mention of it should be incorporated into the Plan here as well as being in the overview in para 2.49 p17.	
14	50	Mr. Jon Burden	Map 1 Index of Multiple Deprivation	YES	YES	YES	Section 2 on the Economy is very good. We strongly agree with the emphasis on assisting small businesses and the other proposals in this section.	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	DTC	Comments	Suggested amendments by representor
18	188	Old Oak and Park Royal Development Corporation	Map 2 Open Space				<p>Map 2, Open Space</p> <p>As local planning authority for the area, OPDC will be responsible for designating open space. It is suggested that the part of the borough within OPDC area is greyed out or removed from this image</p>	
18	189	Old Oak and Park Royal Development Corporation	Map 3 Conservation Areas				<p>Map 3, Conservation Areas</p> <p>As local planning authority for the area, OPDC will be responsible for designating conservation areas. It is suggested that the part of the borough within OPDC area is greyed out or removed from this image.</p>	

3. Spatial Vision & Strategic Objectives

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
10	65	CLS Holdings	(3) Spatial Vision and Strategic Objectives				<p>Our client supports the broad Spatial Vision and Strategic Objectives of the borough specifically the aim to facilitate growth in housing, seek to exceed the London Plan housing targets and to deliver jobs, focussed in the designated Regeneration Areas and major town centres.</p> <p>Our client supports the objectives to increase the supply and choice of high quality housing along with creating opportunities for employment and job growth.</p> <p>The Council's vision will, in part, rely on fostering good working relations with key landowners who will contribute to delivering the vision over the Plan period. Our client, with their land interest in South Fulham Riverside Regeneration Area, has the ability to work with the Council to maximise the delivery of new housing and jobs as part of the growth envisaged.</p>	
17	125	Hammersmith Society	(3) Spatial Vision and Strategic Objectives				We support the positive vision.	
18	187	Old Oak and Park Royal Development Corporation	(3) Spatial Vision and Strategic Objectives				<p>Chapters 2 and 3</p> <p>The facts and figures in these chapters appear to cover the whole borough. Either at the start of these chapters or within the Introduction Chapter (chapter 1), it would be helpful to clarify that facts and figures are for the entire borough, including the part within the OPDC area.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
23	232	H&F Disability Forum	(3) Spatial Vision and Strategic Objectives	NO			<p>Chapter 3: Spatial Vision and Strategic Objectives</p> <p>We welcomed para 4.7. 6th bullet point in Local Plan 2015 stating the council’s Spatial Vision for well designed, accessible and inclusive buildings, public and private spaces in conformity with the London Plan <i>policy 7.2 an inclusive environment</i> .</p> <p>However, we are concerned that the Spatial Vision in Local Plan 2016 has removed this statement and believe there may be an error.</p>	<p>We strongly recommend on p 2: that the council considers amending the paragraph on <i>Delivering affordable homes for local people to buy and rent</i> :</p> <p><i>Insert wording in bold to 2 para</i></p> <p>P 20: para: <i>Delivering affordable homes for local people to buy and rent</i></p> <p><i>Delivering affordable, accessible and inclusive homes to buy and rent” . to conform “ creating more mixed, sustainable, accessible and inclusive communities”.</i></p> <p><i>para Improving local health and adult social care provision amendment on p22: ... they will excel in the sustainable, accessible and inclusive design and management...</i></p> <p>Justification:</p> <p>The Spatial Vision does not conform to London Plan Policy 7.2 an inclusive environment. Local Plan 2016 needs to be explicit that outcomes of accessible and inclusive buildings and public realm also benefit disabled residents, older residents and other vulnerable residents. Not everyone recognises “all residents” as including these residents.</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
23	234	H&F Disability Forum	(3) Spatial Vision and Strategic Objectives	NO			<p>The Local Plan 2016 needs Strategic Objectives that are explicit about access and inclusion to give direction to its policies on accessible and inclusive design. We are disappointed to note that none of the Strategic Objectives include any reference to accessible and inclusive design or housing despite our detailed drafting recommendations in our previous response to the Local Plan 2015.</p> <p>Justification:</p> <p>The Local Plan 2016 to conform with London Plan policy 7.2 an inclusive environment and Mayor of London SPG: Accessible London (2014) and other London Plan SPGs.</p>	<p>We recommend that the council considers amending the Strategic Objectives on</p> <ul style="list-style-type: none"> • Regenerating the borough • Achieving sustainable communities • Delivering affordable homes for local people • Delivering an environmentally sustainable borough <p>To include a clear reference to access and inclusion. It is important that both public realm and housing in new developments are accessible and inclusive to benefit all sections of the community including disabled people.</p>
23	255	H&F Disability Forum	(3) Spatial Vision and Strategic Objectives	NO			<p>The Spatial Vision does not conform with:</p> <p>National Planning Policy Framework <i>detailed guidance</i> on Inclusive Design; (see paras 35 transport; 50 housing choice; 57 developments; 61 Buildings and public realm; 58 Public realm; 159 on housing need)</p> <p><i>The Government's Planning Practice Guidance on inclusive design (see Accessible London)</i></p> <p>London Plan policy 7.2 an inclusive environment</p>	<p><i>Insert wording in bold to 2 para</i></p> <p>P 20: para: <i>Delivering affordable homes for local people to buy and rent</i></p> <p><i>Delivering affordable, accessible and inclusive homes to buy and rent" to conform " creating more mixed, sustainable, accessible and inclusive communities".</i></p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>London Plan SPG: Play and Informal Recreation (2012)</p> <p>London Plan SPG: Character and Context (2014)</p> <p>London Plan SPG: Accessible London (2014)</p> <p>London Plan SPG: Town Centres (2014)</p> <p>London Plan SPG: Social Infrastructure (2015)</p> <p>London Plan SPG Housing (2016)</p> <p><i>Accessible London</i> has a helpful section that pulls together NPPF detailed guidance on inclusive design; all relevant London Plan policies relating to accessible and inclusive design as well guidance to boroughs and developers on how to use principles of accessible and inclusive design to achieve an accessible and inclusive environment.</p>	<p><i>para Improving local health and adult social care provision</i></p> <p><i>amendment on p22:</i></p> <p><i>... they will excel in the sustainable ,accessible and inclusive design and management...</i></p> <p><i>NB: Hammersmith and Fulham Disability Forum formal response includes all its representations, justifications and suggested amendments to the Local Plan 2016. We hope this is acceptable to the Inspector.</i></p>
25	274	Tri-Borough Public Health	(3) Spatial Vision and Strategic Objectives				<p><u>3.1 Spatial Vision</u></p> <p><i>Regenerating the Borough</i></p> <p>The first paragraph references pedestrian reconnections with the river. It would be a valuable addition to reference active travel more broadly, and the development of a coherent network of cycleways around the borough in particular. These are proven to have a significant positive impact on physical and mental wellbeing and on air quality. A commitment in this section would carry weight.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>The second paragraph may be better placed under <i>Delivering social and digital inclusion</i> , which is currently a weak section of the vision, with a simple sentence referring the reader to that section under this.</p> <p><i>Delivering social and digital inclusion</i></p> <p>This is a weaker section, and given that social inclusion is a Cabinet priority, it might be significantly improved. Reference to the commitment to enhancing community facilities (strategic objective 4), parks and open spaces, addressing public transport ‘deserts’ in the north of the borough are all in the Local Plan so could be referenced here, alongside digital inclusion.</p> <p><i>Providing the best start for younger people</i></p> <p>This too is a weaker section. Reference to commitments in other sections to facilitating active play, addressing overcrowding and the proposed inclusions (see above) to facilitating a strengthened Early Years provision and increasing parental employment rates would be worthwhile additions.</p>	
25	275	Tri-Borough Public Health	(3) Spatial Vision and Strategic Objectives				<p><u>3.2 Strategic objectives</u></p> <p><i>Improving local health and adult social care provision</i></p> <p>Objective 15 is welcome, however it does not make reference to social care provision. It could be easily strengthened by reference to an increased focus on prevention in Adult Social Care (they are in the process of producing their prevention strategy).</p>	<p><i>Improving local health and adult social care provision</i></p> <p>It could be easily strengthened by reference to an increased focus on prevention in Adult Social Care (they are in the process of producing their prevention strategy).</p> <p><i>Providing the best start for younger people</i></p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								This would be strengthened through the addition of the following at the end of the sentence 'addressing inequalities in health and social outcomes'.
34	324	Thurrock Borough Council	(3) Spatial Vision and Strategic Objectives	NO	YES		<p>Whilst the Proposed-Submission Local Plan includes a number of strategic objectives for most of the key development issues and policy themes, the plan it does not include a Strategic Objective for the Management of Waste. Reference to waste management is also not included in the other objectives for delivering an environmentally sustainable borough. There is no reference to waste issues or management of waste in any of the other Strategic Objectives in Section 3 of the Proposed Submission Local Plan.</p> <p>It is considered the local plan should include a strategic objective for the management of waste to ensure delivery of the vision and alignment between the identified issues, the strategy and objectives of the plan and the local plan policies.</p>	<p>To ensure the local plan has been positively prepared and justified it is considered the following amendment should be made.</p> <p>The Local Plan should include a Strategic Objective for the management of waste that aligns the vision for the Borough with the environmental objectives and the policy approach set out in the local plan waste policies.</p>
45	457	Berkeley Group (St James & St George) & St William	(3) Spatial Vision and Strategic Objectives				<p>Our client supports the broad Spatial Vision and Strategic Objectives of the borough specifically the aim to deliver growth in housing, seek to exceed the London Plan housing targets, and to deliver jobs focussed in the designated Regeneration Areas.</p> <p>Our client supports the objective to regenerate the strategic sites increasing the supply and choice of high quality housing. The Council's vision will, in part, rely on fostering good working relations with key developers who will contribute to delivering the vision over the Plan period. Our client, with their land interest in strategic growth areas, have the ability to work with the</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							Council deploying expertise and the ability to maximise the delivery of new housing and associated infrastructure as part of the growth envisaged.	
37	479	Eastern & Oriental PLC	(3) Spatial Vision and Strategic Objectives				<p>We support the Council's objectives towards 'building a stronger economy' and 'regenerating the Borough'.</p> <p>We are also supportive of the Council's aspiration to further enhance its pre-eminent position for Culture, Media and Arts companies within the Borough.</p> <p>The Council's aspiration to encourage new inward investment to support local job growth is also supported.</p> <p>We consider that there is also an opportunity, however, for the Council to promote its town centres as a location for new tourism and hotel development. Such uses not only attract further visitors to these areas, and therefore positively benefit the local business and cultural economy, but would also generate significant employment opportunities for local area. Promoting further hotel developments within the Boroughs town centres would also compliment the Council's existing aspiration to connect to wider economic opportunities within the local area and beyond.</p> <p>We acknowledge that Draft policy E3 seeks to direct proposals for new visitor accommodation within the Borough to its town centres and this objective is strongly supported.</p> <p>We are also supportive of the spatial strategy as outlined on 'Map 4 Key Diagram' within the emerging Local Plan, particularly that this image broadly</p>	However to further strengthen the Council's position in this regard, we consider that support for tourism and hotel related development should also be an inherent principle within the emerging Local Plan's Spatial Vision.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							identifies Hammersmith Town Centre as a location appropriate for Tall Buildings (further details concerning E&O's support for LBHF's proposed tall buildings strategy is included.	
35	593	Standard Life Investments	(3) Spatial Vision and Strategic Objectives				<p>We consider that the proposed approach towards 'building a stronger economy' and 'regenerating the Borough' is broadly appropriate and acceptable, particularly the promotion of employment generating uses within LBHF. The Council's aspiration to encourage new inward investment to support local job growth is especially supported.</p> <p>We consider that there is also an opportunity, however, for the Council to further promote its town centres as a location for new tourism and hotel development. Such uses not only attract further visitors to these areas, and therefore positively benefit the local business and cultural economy, but would also generate significant employment opportunities for the local area. Promoting further hotel developments within the Borough's town centres would also compliment the Council's existing aspiration to connect to wider economic opportunities within the Borough and beyond.</p> <p>We acknowledge that Draft Policy E3 seeks to direct proposals for new visitor accommodation within the Borough to its town centres, and this objective is strongly supported.</p>	However, to further strengthen the Council's position in this regard, we consider that support for tourism and hotel related development should also be an inherent principle within the emerging Local Plan's Spatial Vision.
12	612	Imperial College	(3) Spatial Vision and				2.2 Section 3: Spatial Vision and Strategic Objectives: Strategic Objectives	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
		Healthcare NHS Trust	Strategic Objectives				<p>The Trust supports the strategic objective 15 on "Improving local health and adult social care provision" set out in Section 3 headed "Spatial Vision and Strategic Objectives":</p> <p>" 15. To maintain and improve health care provision in the borough and encourage and promote healthier lifestyles, for example through better sports facilities, to reduce health inequalities."</p>	
17	123	Hammersmith Society	Map 4 Key Diagram				<p>We consider that Map 4 is deficient in that it does not show either the OPDC area or Earl's Court Regeneration Areas. Nor does it show the two major roads A4 and A40 traversing the Borough. The potential route of Crossrail 2 is also missing.</p>	
18	190	Old Oak and Park Royal Development Corporation	Map 4 Key Diagram				<p>Map 4, Key Diagram</p> <p>Within the OPDC area, this should also show the two proposed new London Overground stations at Old Oak Common Lane and Hythe Road.</p>	
31	342	Port of London Authority	Map 4Key Diagram				<p>Safeguarded Wharves</p> <p>There are three safeguarded wharves within the Borough, which are subject to the relevant Policies within the London Plan, notably 7.26:</p> <ul style="list-style-type: none"> - Hurlingham Wharf - Swedish Wharf - Comley's Wharf (formally RMC Fulham). 	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							The PLA recommends that the above-mentioned Wharves are shown on a key diagram.	
49	393	Royal Borough of Kensington & Chelsea	Map 4 Key Diagram				Map 4 Key Diagram: The Kensal Gasworks Opportunity Area has been removed from the Key Diagram. This should be put back to acknowledge the importance of the proximity of the Opportunity Area to LBHF (and OPDC). [Duty to Cooperate; Effectiveness]	
35	594	Standard Life Investments	Map 4 Key Diagram				We are also supportive of the spatial strategy as outlined on 'Map 4 Key Diagram' within the emerging Local Plan, particularly that this image broadly identifies Hammersmith Town Centre as a location appropriate for Tall Buildings (further details concerning SLI's support for LBHF's proposed tall buildings strategy is included below).	
8	32	Hammersmith and Fulham Air Quality Commission	Spatial Vision					<p>Delivering an environmentally sustainable borough , p.21</p> <p>2nd para – insert ‘... contribution to the biodiversity , <i>clean air</i> and health...’</p> <p>Include clean air as a benefit.</p>
58	161	Historic England	Spatial Vision					<p><u>Spatial Vision</u></p> <p>We support the coverage of heritage assets in the third paragraph of ‘Delivering an environmentally sustainable borough’, p21. We recommend strengthening to ensure</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<p>appropriate coverage of the historic environment in the fullest sense:</p> <p>- p.21, para 2, third sentence: <i>'They will be valued for leisure, sport and recreation as well as for their <u>historic significance and contribution to biodiversity</u> ..'</i> This then reflects the historic significance of the borough's open spaces including both the designated (Fulham Palace Historic Park) and undesignated (Parson's Green), and that parks and open spaces also encompass individually recognised heritage assets.</p> <p>- P.21, para 3, we recommend the following amendments: 'New development will have created a high quality safe environment that respects local context and the borough's natural, built <u>and historic</u> environment, including <u>the designated</u> heritage assets, conservation areas, listed buildings, historic parks and gardens and <u>scheduled monuments, as well as undesignated heritage assets and important archaeological remains. The settings of heritage assets within and across borough boundaries will have been considered to secure the heritage values and enjoyment of London's historic environment.</u> Developments along the Thames ...'. These changes would encompass the range of heritage assets, and would ensure that full consideration is given</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<p>to the setting of heritage assets, including cross-boundary effects.</p> <p>- P.22, first para, we recommend that the third sentence is amended to ‘ <u>Increases in housing density will have been achieved in appropriate locations and will excel in ...</u>’The reference to high density is unclear and open ended in the present text, although we are very supportive of the references to liveability, enhanced historic buildings and spaces and an improved sense of place at the end of this paragraph.</p> <p><u>Strategic objectives, p24</u></p> <p>We welcome the inclusion of strategic objective 10 which identifies the role of the historic environment as a strand of sustainable development within its environmental dimension (para 7, NPPF). In line with our earlier comments, we recommend that the terminology here should reflect that of the NPPF more accurately (paras 61 and 157(8)) to avoid any concern that archaeology is not included. We therefore request the following change to address this and to ensure that the matter of setting and cross-boundary effects is identified:</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<i>'To preserve and enhance the quality, character and identity of the borough's natural, built <u>and historic</u> environment (including their settings, and the settings of heritage assets in adjoining boroughs) by respecting the local context ...'</i>
49	394	Royal Borough of Kensington & Chelsea	Spatial Vision				Spatial Vision: The Council objects to the "promotion of a Crossrail 2 station at Imperial Wharf". The Council strongly supports the provision of a Crossrail 2 station at King's Road, Chelsea. [Duty to Cooperate; Justification; Effectiveness] .	
38	524	Greater London Authority and Transport for London Planning Team	Spatial Vision				TfL welcome efforts to reduce road traffic in the borough which will ameliorate issues including air quality and noise.	
5	600	Hammersmith Community Gardens Association	Spatial Vision	NO			<p>Relevance of Community Food Growing to the Spatial Vision for Hammersmith and Fulham</p> <p>The Council's Vision is to see a stronger economy that provides training and job opportunities for local people, a 'Greener' Borough, and securing and promoting health facilities for residents – all of which community food growing will enhance.</p> <p>Borough issues that can be improved by community food growing:</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<ul style="list-style-type: none"> • The draft plan discusses ways of targeting the health inequalities by promoting healthier lifestyles. Community food growing has been formally recognised as contributing to mental and physical wellbeing. The food grown provides access to fresh and healthy food. Social interaction contributes to mental wellbeing. • Unemployment, living on benefits – the draft discusses how the local plan needs to provide the conditions for businesses to thrive to ensure that there is a broad range of employment opportunities. It mentions how it wants to support the smaller firms and highly entrepreneurial economy to develop and remain. Community food growing can provide participants with training, confidence and motivation • .Community and leisure facilities – the draft mentions that the community uses are struggling to meet the needs of vulnerable households. Community gardens are beneficial to social inclusion and combating isolation • .Environment and sustainability is a challenge that the plan recognises needs to be addressed including Flood risk and CO2 emissions. Community food growing spaces capture rainwater, slow down run off and reduce the urban heat island. Local food reduces carbon emissions. • Expensive or unsuitable housing – Community food growing spaces can deliver a wide choice of high quality housing, producing high quality design and a good standard of amenity. 	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>HCGA believe</p> <ul style="list-style-type: none"> • Current food growing spaces need to be protected • new community food space should be integrated into the new high density development which is being proposed • The opportunity for community food growing in any suitable open space needs to be focussed on rather than the narrow definition of allotments. 	

4. Delivery & Implementation

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
17	126	Hammersmith Society	(4) Delivery and Implementat ion				We support the positive statement.	
10	66	CLS Holdings	Policy DEL1 - Delivery and implementat ion	NO			<p>Our client supports the Council's recognition that there is a need to work with stakeholders to deliver the policies of the Development Plan and as already noted is willing and able to work with the Council in this regard.</p> <p>Our client welcomes that the borough recognises the need to have regard to the financial viability of development in terms of plan making, CIL charge setting and negotiating S106 agreements. However we have concerns that the level of CIL charge along with obligations and policy burdens set out within the Local Plan has the potential to threaten deliverability of some of the key strategic sites within the Borough. The Council states at paragraph 4.11 that it considers '<i>its policies together</i> with its CIL charges are deliverable and allow development to be viable as defined by paragraph 173 of the NPPF '. We submit that this is not the case.</p> <p>Para 173 of the NPPF states that: '<i>Plans should be deliverable. Therefore, the sites and the scale of</i> development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'. The National Planning Practice Guidance (NPPG) (Paragraph 005 Reference ID: 10-005-20140306) states that viability assessment "<i>should not compromise the quality of development but should ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable</i>". Paragraph 007 (Reference ID: 10-007-20140306) further</p>	The viability evidence underpinning the Local Plan should be reviewed to ensure that the Local Plan, and importantly the key strategic sites, are deliverable and therefore that the Local Plan is effective and consistent with the NPPF.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>states that “<i>plan</i> makers should consider the range of costs on development” which includes costs imposed through national and local standards and local policies and “<i>their cumulative cost should not cause</i> development types or strategic sites to be unviable” .</p> <p>We submit that contrary to the Council’s statement, the Proposed Submission Local Plan is potentially not deliverable due to the combination of the CIL charge, together with other policy requirements including the proposal to seek 50% affordable housing contribution (an increase from 40% in the current Local Plan on the basis of which the CIL charge was established) and infrastructure. The regeneration of strategic sites comes with significant costs, which we submit have not been properly considered in the viability evidence submitted to inform this Local Plan.</p> <p>In this regard we submit that the Local Plan is not effective and is not consistent with the NPPF and is, therefore, unsound.</p>	
24	259	Home Builders Federation	Policy DEL1 - Delivery and implementation	NO			<p><u>The Council’s approach to viability is unsound because it is unjustified and contrary to national policy.</u></p> <p>The Council intends to operate a Viability Protocol (paragraph 4.12 and appendix 9). This requires all applicants for residential development to submit a viability assessment with a view to providing the ‘maximum reasonable level of affordable housing’.</p> <p>Policy HO3 – Affordable Housing – requires 50% of all dwellings built between 2015-25 on sites of ten units or more to be affordable.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							Paragraph 4.12 implies that the Council could expect that contributions to affordable housing will be in excess of 50%. The Council should clarify whether this is the case. If this is so, then the Council's approach would conflict with the NPPF which requires that Local plans ' <i>provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency</i> ' (paragraph 17). The Council's approach that relies on application specific viability assessments in every case would be the opposite of providing predictability and efficiency. In essence the Council's approach is at odds with the purpose of the plan-led system which requires that applications that accord with the development plan should be approved without delay (NPPF, paragraph 14). So long as applications are policy-compliant, there should be no need for recourse to application specific viability appraisals. These should be the exception not the rule, and should be used in those (hopefully rare) cases where applications are unable to provide 50% affordable housing. The NPPF also requires that Local Plan provide clear policies on requirements for affordable housing (paragraph 173). The Council's approach is unsound because it is in direct conflict with national policy and the efficiencies of the plan-led system.	
45	458	Berkeley Group (St James & St George) & St William	Policy DEL1 - Delivery and implementation	NO			<p>Our client supports the Council's recognition that there is a need to work with stakeholders to deliver the policies of the development plan and as already noted is willing and able to work with the Council in this regard.</p> <p>Our client welcomes that the borough has recognised the need to have regard to the financial viability of development in terms of plan making, CIL charge setting and negotiating S106 agreements.</p>	The affordable housing viability evidence prepared by BNP Paribas relies on generic data and excludes exceptional costs normally associated in bringing forward brownfield sites. The evidence must be tested more rigorously to ensure that the Local Plan, and importantly the key strategic sites, are deliverable and

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>However, we have concerns that the level of CIL charge along with obligations and policy burdens set out within the Local Plan has the potential to threaten deliverability of some of the key strategic sites within the Borough. The Council states at paragraph 4.11 that it considers that '<i>its policies</i> together with its CIL charges are deliverable and allow development to be viable as defined by paragraph 173 of the NPPF'.</p> <p>Para 173 of the NPPF states that: '<i>Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened</i>'.</p> <p>Further the National Planning Practice Guidance (NPPG) (Paragraph 005 Reference ID: 10-005-20140306) states that viability assessment "<i>should not compromise the quality of development but should ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable</i>" . Paragraph 007 (Reference ID: 10-007-20140306) further states that "<i>plan makers should consider the range of costs on development</i>" which includes costs imposed through national and local standards and local policies and "<i>their cumulative cost should not cause development types or strategic sites to be unviable</i>".</p> <p>We submit that contrary to the Council's statement, the Proposed Submission Local Plan is potentially not deliverable due to the combination of the CIL charge, combined with other policy requirements including 50% affordable housing contribution and site specific infrastructure provision secured through S106 agreements. The strategic sites in which our client holds an interest, and which would contribute</p>	therefore that the local plan is effective and consistent with the NPPF.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>towards a significant number of new homes across the borough, all have significant costs associated with them. These include high abnormal costs (remediation and infrastructure provision such as new services/utility connections) but also the necessary investment to create high quality places in which people can live. Such costs have not been properly considered in the viability evidence submitted to inform this Local Plan.</p> <p>In this regard we are concerned that the assumptions made in the supporting viability evidence to the Local Plan do not offer a realistic representation of the costs associated in bringing forward brownfield sites for development. As such, site specific viability appraisals are likely to show much less favourable outcomes and put at risk housing delivery undermining the housing targets set within the Local Plan.</p>	

5. Regeneration Area Strategies

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
68	96	Fulham Society	(5) Regeneratio n Area Strategies				<p>We were a little concerned at the reference to “The quantity of office floor space will need careful assessment in relation to the role of Hammersmith Town Centre as a preferred office location and the proposals for the Old Oak and White City Opportunity” (para5.85) and hope that does not mean that Fulham will be considered as of any less importance.</p> <p>The two regeneration areas are different with the SFRRA being earmarked as more residential but the Plan does state “Regeneration in the SFRRA provides opportunities to secure economic benefits for the wider community in the borough. Training and employment funding and initiatives, including through pre-employment support activity and local recruitment campaigns will be important. New employment would be expected to stimulate considerable investment in the surrounding area. All this will, in turn, increase local employment opportunities.” (Para 5.109). Yet so far the developments - including Imperial Wharf, Chelsea Creek, Baltic Sawmills, Lots Road, Fulham Wharf and Fulham Reach - have been overwhelmingly residential. There have been limited new employment development for “light industrial, office or storage uses”. The proposed employment opportunities planned at the Gasworks seem to be expensive decorators’ shops.</p> <p>Hopefully there will be more planned in the Earls Court development and yet here too, developers proudly talk of creating a “Marylebone High Street”. We know it is still early stages but there is no sign of substantive training and employment opportunities for those living in locality.</p>	

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17	127	Hammersmith Society	(5) Regeneratio n Area Strategies				<p>The Strategic Policy and Table 1 set out very ambitious targets for new homes and new jobs based around the four major regeneration areas excluding Old Oak Common. We have seen no evidence base for these target figures (See also below re Housing Policies).</p> <p>We have separately queried with the Mayor's office and the GLA whether the housing targets referred to in paragraph 5.5 for the OPDC area are achievable without excessive height and density, and unsustainable standards of development. We have seen no evidence base to support these target figures.</p> <p>We have seen and support the submission by St Quentin and Woodlands Neighbourhood Forum particularly in respect of Neighbourhood Planning. We also endorse their comments in respect of Tall Buildings, Housing Density, Student Accommodation and Transport.</p>	
18	191	Old Oak and Park Royal Development Corporation	(5) Regeneratio n Area Strategies				<p>In addition to making reference to former Old Oak Regeneration Area now being within the OPDC area, it is felt that a general statement of support recognising the benefits generated by the potential scale of development at Old Oak should be provided.</p>	<p>The suggested wording is:</p> <p>"OPDC is now driving the regeneration of Old Oak and neighbouring area of Park Royal. The Council is working closely with OPDC to ensure that the benefits generated by the potential scale of development are secured to deliver tangible benefits for local people and businesses within the borough."</p>
23	235	H&F Disability Forum	(5) Regeneratio				<p>We are disappointed to note that not one of the Regeneration Area Strategies, Strategic Policies, Strategic Site Policies includes any reference</p>	<p>We recommend that the council considers amending each Regeneration Area Strategy, Strategic Policy and Strategic Site Policy to include a clear reference to</p>

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			n Area Strategies				to accessible and inclusive design or housing despite our detailed drafting recommendations in our response to the Local Plan 2015.	access and inclusion. It is important that both public realm and housing in new developments are accessible and inclusive to benefit all sections of the community including disabled residents. <i>Justification: Local Plan 2016 needs to conform with London Plan policy 7.2 an inclusive environment and Mayor of London SPG: Accessible London (2014) and other London Plan SPGs.</i>
25	276	Tri-Borough Public Health	(5) Regeneratio n Area Strategies				<p>This section makes welcome references to a number of important health and wellbeing drivers: open and green spaces; active travel; mixed housing types and tenures.</p> <p>It isn't clear how the borough will work to secure greatest gain for the Borough's residents from the Old Oak Park Royal development. This is reference in 5.5, but given the scale of the development it could perhaps be expanded.</p>	<p>Each of these might be strengthened further through stronger general commitments, perhaps in the strategic objectives (3.2):</p> <ul style="list-style-type: none"> i. to increasing the ratio of open and green space per 1,000 residents, wherever possible through each regeneration area; ii. to greening (tree planting, green walls, green corridors etc) wherever possible; iii. to securing a net gain of legible, attractive pedestrian routes and cycleways across the borough wherever possible; iv. to securing net gain of social, affordable, family sized, accessible and age friendly housing with

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								each development – still aiming just as high in particular developments as outlined.
41	352	Thames Water Utilities Ltd	(5) Regeneration Area Strategies				<p><u>Water Supply</u></p> <p>The water network capacity in the regeneration areas may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Thames Water will deal with each site within this Regeneration Area on a case by case basis. For any proposed development site it may be necessary for us to undertake investigations of the impact of the development, and completion of this will take several weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. The developer will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure.</p> <p>Any developers are advised to contact Thames Water Developer Services as early as possible to discuss the infrastructure requirements for the site. Thames Water Developer Services can be contacted by post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court,</p>	

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							Rose Kiln Lane, Reading RG2 0BY; by telephone on: 0845 850 2777; or by email at: developer.services@thameswater.co.uk	
44	356	Hammersmith & Fulham Historic Buildings Group	(5) Regeneration Area Strategies				<p>page 29</p> <p>The redevelopment areas include conservation areas, listed buildings, buildings of merit as well as buildings on the Group's local list. We continue to be concerned that the historic environment and the specific heritage assets in the regeneration areas will be respected and sympathetically incorporated in new development.</p> <p>We repeat below our comments from the consultation on the Draft Local Plan 2015.</p> <p>'Given the range of sites and building noted in our opening comments, the Group believes that the concept of Heritage Led Regeneration originally proposed by English Heritage should inform the redevelopment proposals. The concept is wider than just ensuring that buildings of quality are retained. It includes the organic development of areas building on the past,</p> <p>the maintenance of some of the traditional uses, a respect for traditional materials and colours, and a fitting of the new into the old.</p> <p>The inclusion of conservation areas in regeneration areas is acceptable but the protection of them should be ensured. One aspect of a CA is that it should influence the height and appearance of the new build that surrounds it, and even more strongly if it includes the new build.</p>	<p>Add wording: respect for the historic environment so policy reads:</p> <p><i>... delivered to the highest standards of urban design, respect for the historic environment, environmental sustainability and social inclusion...</i></p> <p><i>Para 5.4 add wording and should follow the English Heritage concept of 'Heritage Led Regeneration' so it reads:</i></p> <p><i>...Development in each of the regeneration areas will need to respect and enhance the existing townscape context and heritage assets both within and around the area and should follow the English Heritage concept of 'Heritage Led Regeneration'.</i></p>

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							<p>Height of buildings is significant even in the development of brown field sites (such as parts of Old Oak) where the new build can be seen from outside the area. This is particularly important for areas seen from open space including the river and the canal.</p> <p>Continuation of use raises two aspects. One obvious case is the continuation of the Shepherds Bush Market and North End Market, and probably the street food market in Lyric Square. A wider form is the mixture of residential and industrial. Historically the Borough has had industrial building in back streets. Modern industry is more easily integrated into residential areas than some traditional heavy industries. We welcome in general the inclusion of shops, offices, food outlets, and health facilities (including gymnasia) in the ground floor of buildings. Not only will these be of use to new residents (and others) but will liveliness and action to the street scene.</p> <p>Open space, walk way, parks and play areas are an important part of street scene and of people's enjoyment of the environment. Many of the redevelopment areas are poorly provided with open space and we welcome the inclusion of new space in the redevelopments. The integrity of Wormwood Scrubs including Old Oak Common must be maintained.</p> <p>Having mentioned the earlier industries, we would emphasise the historical importance of the Borough's previous industries, many of which were based in the regeneration areas. These could be reflected by reusing old company and product names for new buildings and roads, by street monuments and by plaques.</p>	

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							We are not opposed to the use of modern material; we have been informed of successful examples from across London. What we seek in the very necessary regeneration is that what is new looks well with what remains, and soon is looked at as if it were always there. The new Old Oak station should be the most iconic and important building in the whole project.'	
48	446	London Borough of Richmond	(5) Regeneratio n Area Strategies				<p>2) Growth in housing and jobs will be mainly focused in the designated regeneration areas and the major town centres of Hammersmith and Fulham and Shepherd's Bush Metropolitan Centre and will include additional regeneration that would be secured in the South Fulham Riverside area, with the promotion of a Crossrail 2 station at Imperial Wharf. The regeneration of the Old Oak Common Area in the north of the borough has started under the guidance of the Old Oak and Park Royal Development Corporation with phased, comprehensive mixed use development centred on the major HS2/Crossrail and Great Western Main Line interchange. The strategy seeks that: <i>"New development will have created a high quality safe environment that respects and enhances local context and the borough's natural and built environment, including heritage assets, such as conservation areas, listed buildings, historic parks and gardens and archaeological priority areas"</i>.</p> <p>3) The <u>4 regeneration areas</u> are 1) White City; 2) Hammersmith Town Centre; 3) West Kensington; and 4) South Fulham Riverside. These</p>	

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							four regeneration areas have the capacity to deliver approximately 19,800 homes and 29,500 jobs up to 2035. The Regeneration Area nearest Richmond Borough is Hammersmith Town Centre and Riverside(HRA), which has an indicative 2,800 new homes and 10,000 new jobs by 2035. The Hammersmith Regeneration Area (HRA) is centred on King Street and Hammersmith Broadway, although the southern boundary extends to Hammersmith Bridge and the Thames. The HRA includes Hammersmith Town Centre, the A4 and its flyover.	
48	452	London Borough of Richmond	(5) Regeneratio n Area Strategies				White City, Fulham and north of the borough near Old Oak Common are Opportunity Areas , earmarked for growth in housing and jobs. They are unlikely to have direct adverse impacts upon LBR.	
45	459	Berkeley Group (St James & St George) & St William	Regeneratio n Area Strategies				Our client welcomes the Council's support for major regeneration and growth in the borough's four Regeneration Areas identified as White City Regeneration Area (WCRA), Hammersmith Regeneration Area (HRA), Fulham Regeneration Area (FRA) and South Fulham Riverside Regeneration Area (SFRRRA).	
38	485	Greater London Authority and Transport for London Planning Team	Regeneratio n Area Strategies				The Mayor acknowledges that Hammersmith & Fulham's four regeneration areas will provide significant opportunities for housing and job growth in the borough. Other Opportunities Areas in London have shown that they can provide much higher numbers of new homes than indicated in Annex I of the London Plan. The GLA will continue to work	The text at the bottom of Table 1 should be clarified. The Earls Court and West Kensington Opportunity Area (EC & EC) sits within the Fulham Regeneration Area. In the London Plan, this Opportunity Area has a minimum target of 7,500 homes and 9,000 jobs, not 6,500 homes as stated at the bottom of the table. The correct

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							with the borough to exceed the numbers of new homes and jobs indicated in Table 1 of the Hammersmith & Fulham Local Plan.	<p>numbers however are referred to in Local Plan paragraph 5.3.</p> <p>In addition, the Fulham Regeneration Area, being larger than the EC & WC Opportunity Area should be able to accommodate more than the 7,000 new homes and 9,000 new jobs indicated in Table 1, particularly as it is also a District Centre where higher capacities can be expected. It would be helpful to distinguish between the Fulham Regeneration Area and the EC & WC Opportunity Area in terms of the number of new homes and jobs expected.</p> <p>It would be helpful to distinguish between the Fulham Regeneration Area and the EC & WC Opportunity Area in terms of the number of new homes and jobs expected.</p>
38	525	Greater London Authority and Transport for London Planning Team	Regeneration Area Strategies				<p>The 4 regeneration areas have their own respective car parking standards for development. These are generally lower than overall parking standards for the Borough as a whole.</p> <p>The White City OAPF states that for residential development, car parking spaces should not exceed a ratio of 0.4 per unit, and parking is further limited for commercial development.</p>	

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							<p>In South Fulham, the SPD adopted in January 2013 states that residential development shall not provide more than 0.5 spaces per unit, and for commercial development London Plan standards are to be adhered to.</p> <p>For both the Hammersmith and Fulham Regeneration areas, there is not explicit guidance on parking standards, but it is noted in LBH&F's Core Strategy (2011) that these areas are highly accessible by public transport and car parking is already limited.</p> <p>TfL will support efforts to ensure that developments do not exceed these standards. Efforts in doing so will help the borough achieve its transport targets as set out in Policy T1.</p> <p>Additionally, the deletion of policies relating to the Old Oak Regeneration Area is noted where this area is now within the boundary of the Old Oak and Park Royal Development Corporation (OPDC). The council should ensure that any development in LBH&F which is close to this boundary, or located along transport routes into the OPDC area, should aim to harmonise with the car parking and cycle standards set out by the OPDC. Major development in LBH&F should also consider the potential transport impacts of their proposals on the OPDC area.</p>	
15	46	Mr. Jon Burden	Strategic Policy - Regeneratio n Areas	NO	YES	YES	<p>Based on comments made previously in the plan about the need for homes, employment levels and desire to reduce the impact of transport, we believe that the target for new homes should exceed those for jobs. The target for new jobs is twice the number of unemployed people in the borough. Thus, creating 29,500 will either increase travel into the borough or increase housing pressure as people getting those new jobs</p>	We would propose at least 25,000 new homes with jobs reduced appropriately based on land available.

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							want to move into the borough. Although 19,800 new homes matches the projected housing need, this number will not reduce the difficulty of residents finding suitable housing in the borough. It will only maintain the status quote.	
7	16	Sport England	Strategic Policy - Regeneratio n Areas	NO	YES		<p>Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Therefore, Sport England and Public Health England have produced Active Design Guidance that aims to inform the urban design of places, neighbourhoods, buildings, streets and open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities and it is strongly recommended that these principles and concepts are reflected in the Regeneration Areas policies, design and layout of the areas. More information, including the guidance, can be found via the following link;</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p> <p>Furthermore, the Regeneration Areas would provide significant housing for the Borough which would require sufficient infrastructure, including playing pitches and other indoor and outdoor sport facilities to support this growth.</p>	The future demand and needs of the Borough should be fully assessed in a Built Facility Strategy and Playing Pitch Strategy to ensure the right facilities are provided in the right places at the right time. In regard to a specific development, Sport England have developed a Sports Facility Calculator that can assist in calculating the built facility sporting need from a development. Information on this is available on request.

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58	166	Historic England	Strategic Policy - Regeneratio n Areas					<p><u>Strategic Policy – Regeneration Areas, p29</u></p> <p>Paragraph 5.4 acknowledges the need to respect and enhance the townscape context and heritage assets within and around the regeneration areas. We recommend that the first point in the policy includes ‘<i>and respecting local context</i>’ to strengthen the policy framework on the requirement for developments to be well integrated into their surroundings, including the borough’s historic environment.</p> <p>The Key Diagram on p19 identifies indicative locations for tall buildings in the regeneration areas. It is unclear what level of analysis has been done to justify tall buildings in the locations highlighted. We note that a background paper is available on your website, but would value clarity on the analysis for different areas of the borough.</p> <p>With respect to the individual policies for the regeneration areas (and noting that Old Oak Common now falls outside the coverage of this local plan) we welcome the references to the areas’ heritage assets. However, there is a lack of consistency in approach. In particular, Strategic Policy HRA for the Hammersmith Regeneration Area needs to be strengthened in this respect.</p>

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54	306	MP Kings Lyric S.A.R.L.	Strategic Policy - Regeneratio n Areas				<p>We support the recognition at paragraph 5.2 of the growth opportunities offered by the five regeneration areas identified within the Borough (including Hammersmith Town Centre Regeneration Area), and that future development within these areas will have the capacity to accommodate development to provide high levels of homes and jobs. While the submission version of the Local Plan goes some way to ensure that continued growth and development of this defined area is encouraged in line with the NPPF, we suggest that maximum flexibility in relation to development within these areas should be maintained to ensure that regeneration areas can reach their full potential in meeting and exceeding targets set by the Local Plan.</p> <p>The London Plan (The Spatial Development Strategy for London Consolidated with Alterations Since 2011, March 2016) identifies that LBHF has the capacity to deliver a minimum rather than absolute target of 10,312 new homes over the 10 year period from 2015 to 2025. We consider that there is an opportunity to deliver additional homes in the regeneration areas beyond the indicative 19,800 additional homes envisaged by the Council over the plan period which covers the next 20 years. This will help the Council to achieve its aim of exceeding the London Plan housing targets of 1,031 additional dwellings a year up to 2025, and will ensure the future viability and vitality of regeneration areas and Town Centres within them.</p>	
53	381	Land Securities	Strategic Policy -				We broadly support the aspirations and key themes of the Council's Regeneration Strategy.	

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			Regeneratio n Areas					
73	408	St Quintin and Woodlands Neighbourhoo d Forum	Strategic Policy - Regeneratio n Areas				At paragraph 5.2 Table 1, the table contains a note <i>In the London Plan (2016), the Earls Court & West Kensington Opportunity Area has a minimum target of 6,500 dwellings. In the figures above, 7,000 dwellings have been allocated to that part of ECWK Opportunity Area that is within LBHF and 1000 to the area that is within RBKC.</i> But there is no figure for the ECWK OA in the 'the figures above' (unless we are misunderstanding the table).	
52	375	Westfield Shoppingtown s Ltd	Table 1 Regeneratio n Areas and indicative homes and jobs targets				<p>WEL support the emerging Strategic Policy 5 – Regeneration Areas, which sets out support for major regeneration and growth in the borough's four regeneration areas. It is noted that in Table 1 (Regeneration Areas and indicative homes and jobs targets), the total number of indicative new homes has reduced from 37,800 to 19,800 and the total number of indicative new jobs from 79,500 to 29,500. This is a consequence of the former Old Oak Regeneration Area now falling within the Old Oak and Park Royal Development Corporation.</p> <p>We support the alignment of the figures for the White City Regeneration Area ("WCRA") (6,000 new homes and 10,000 new jobs) with the latest version of the London Plan (2016), as well as the clarification at paragraph 5.3 that the WCRA covers the same area as the White City Opportunity Are ("WCOA").</p>	

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14	51	Mr. Jon Burden	White City Regeneratio n Area	NO	YES	YES	We are concerned that the jobs created in this area will not be suitable for those in areas of deprivation or those currently unemployed. Tall commercial buildings and medical facilities tend to employ highly trained, skilled and educated staff. We support the provision of training facilities but do not believe these will be sufficient for the jobs mostly likely to be provided in the proposed buildings.	We would recommend reducing the the emphasis on making this area an "international town centre." Rather we would prefer an area that more closely fits the needs of the those living in the area. This would be development that caters for small businesses dealing with small scale manufacturing, retail, repairs, warehousing, artistic and cultrual work, social enterprises and industrial work with a large provision for training.
61	76	Imperial College London	White City Regeneratio n Area	YES	YES	YES	Paragraph 5.7 – in providing the context, it is clearly helpful to refer to the extent of the regeneration area and the key land holdings. It is simply requested that the second paragraph be amended to correctly refer to the extent of the Imperial land holding, which is no longer simply confined to the north of the A40.	A minor correction to the description of the development that is coming forward and is planned, is also sought. It is requested that the second sentence of paragraph 5.7 be amended to read: “Imperial College London is investing in sites on both sides of the A40, bringing research and academic uses, related to science, technology, enterprise and medicine, together with housing and other uses, to this area.”
17	128	Hammersmith Society	White City Regeneratio n Area				White City Many of the comments from St Quentin and Woodlands Neighbourhood Forum are specific to White City.	

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							<p>It is unclear whether White City is a Regeneration area or an Opportunity Area? Both terms are used : This should be clarified.</p> <p>There is no mention anywhere of the WCOAPF. In the 2011 Core Strategy LDF reference to it was included in policy WCOA; "All developments must have regard to, and be considered against, the White City Opportunity Area Planning Framework". It is also referred to in the policy justification in several locations. Development in the White City Opportunity/Regeneration Area is by no means complete, and outline plans may change in the face of economic circumstances in the coming years. Therefore in our view it is important to have reference to the WCOPF. The sentence quoted above should be included in Strategic Policy WCRA.</p>	
41	349	Thames Water Utilities Ltd	White City Regeneration Area				<p><u>Waste Water</u></p> <p>As this site falls within the highly flood sensitive Counters Creek Catchment, surface water attenuation to Greenfield run-off rates is a minimum requirement for Thames Water in this area. This is to facilitate the level of redevelopment proposed and reduce the risk of further property flooding.</p> <p>There are large areas of unmapped sewers in this area. This could be due to private ownership (i.e. Council Housing Stock) or transfer of these assets under Section 101a of the Water Industry Act in October 2011.</p> <p>There is one deep, large diameter storm relief sewer that passes through this area (north to south along Wood Lane and Shepherds Bush Green).</p>	

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							<p>No new connections into these sewers can be permitted. All existing connections on development sites will need to be considered and appropriately addressed as part of the site drainage strategy. Site configuration would need to take into account access requirements, appropriate build over agreements and piling restrictions due to these assets.</p> <p>The Counters Creek sewer (Acton Branch) passes through this area (Uxbridge Road). Site configuration would need to take into account access requirements, appropriate build over agreements and piling restrictions due to this asset.</p>	
52	376	Westfield Shoppingtowns Ltd	White City Regeneration Area				Paragraph 5.6 of the Local Plan notes that the WCRA has been identified as a potential future 'International Town Centre' in the London Plan 2016. The relevant extracts of the London Plan 2016 are Table A2.2 and Map A2.1, where it is noted that Shepherd's Bush Town Centre, which is currently classified under adopted policy as a Metropolitan Centre, has the potential to change to an International Centre over the plan period, subject to capacity analysis, impact assessments, land use and accessibility, planning approvals, town centre health checks and full implementation. We support this recognition within the draft Local Plan and would welcome the designation of Shepherds Bush Town Centre as an International Centre.	
38	527	Greater London Authority and	White City Regeneration Area					Within this section TfL request that greater emphasis is placed on the requirement for development to provide transport capacity and infrastructure.

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		Transport for London Planning Team						
61	78	Imperial College London	Strategic Policy WCRA - White City Regeneratio n Area	YES	YES	YES	<p>First sentence - The strategic policy is supported, but to more accurately reflect the research and academic uses which Imperial College London is bringing forward, it is requested that the word “educational” is replaced with “research/academic”, so that the first sentence includes reference to ‘the creation of a major research/academic facility...’</p> <p>Third bullet point – Imperial supports the range of residential, research, academic and the mix of other uses identified for the White City Regeneration Area. However, it is requested that specific reference is made to the type of housing needed to accommodate students, researchers and staff of Imperial College, who otherwise increasingly find themselves, priced out of London. This either necessitates people commuting for long distances which is neither sustainable nor time efficient, or to leave London altogether and to live and work elsewhere, thereby putting the future success of Imperial in jeopardy.</p>	<p>First sentence - it is requested that the word “educational” is replaced with “research/academic”, so that the first sentence includes reference to ‘the creation of a major research/academic facility...’</p> <p>Third bullet point - it is requested that it be amended to read:</p> <p>“include research and academic uses, together with accommodation for students, researchers and staff.”</p>
61	80	Imperial College London	Strategic Policy WCRA - White City Regeneratio n Area	YES	YES	YES	<p>Paragraph 5.14 – the supporting text to strategic Policy WCRA is supported, but two amendments are requested to paragraph 5.14. First, it is requested that in the first sentence the words “the business start-up companies within the UGLI building” be deleted, as it is not appropriate to give such emphasis to this one building, which Imperial College London is running in order to foster businesses in the area that could</p>	<p>Paragraph 5.14 – First, it is requested that in the first sentence the words “the business start-up companies within the UGLI building” be deleted.</p>

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							<p>potentially move into its translation hub being built just to the north of the A40, thereby enabling it to have a head start by achieving a certain critical mass on opening. The future of the UGLI building itself will then be reassessed. Therefore, it is not helpful to specifically refer to it, and give the impression that the existing dated and unattractive building is worthy of protection.</p> <p>Second, it is requested that the penultimate sentence within paragraph 5.14 be amended to more accurately reflect the proposals for the former Dairycrest site and to actively encourage such investment to come forward, as set out below.</p> <p>Paragraph 5.15 – Imperial welcomes having a paragraph in the supporting text referring to its proposals at White City however, three changes are required as there is a need to:</p> <p>(i) Accurately recognise that the ambitions of both the Council and Imperial, together with the permissions which have been granted to date, are not simply to create an educational campus, but a research/academic/business hub to attract investment into the area.</p> <p>(ii) The Council is not seeking that Imperial provides the primary and secondary schools referred to in the third paragraph. The need for additional school places would arise from the residential led developments, not from research or other academic uses. Therefore</p>	<p>Second, it is requested that the penultimate sentence within paragraph 5.14 be amended with the following wording:</p> <p>“Further research and academic uses will be actively encouraged on the former Dairycrest site as part a wider mix of uses to create a centre of excellence that will attract investment from related businesses and spin-off companies.”</p> <p>Paragraph 5.15 – It is requested that the second sentence onwards be amended to read:</p> <p>“The Council supports the opportunity to create a world-class research/academic/business hub, as it will bring much needed investment to the area. Some accommodation for students, researchers and staff will be appropriate as part of the overall mix of residential types, sizes and tenures within the WCRA.”</p>

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							<p>avoid the impression being given otherwise, this reference either needs to be deleted or moved.</p> <p>(iii) The reference to ‘accommodation’ should not be confined simply to students, as there is a desire to have the flexibility to be able to house researchers and other staff as well, who otherwise will find it difficult to live in the area.</p> <p>It is therefore requested that the second sentence onwards be amended as set out below.</p>	
17	129	Hammersmith Society	Strategic Policy WCRA - White City Regeneration Area				<p>Policy WCRA p34 (the umbrella policy) is missing/or weaker than the last 2 bullets of 2015 First Draft p47: The 2015 text is more specific on tall buildings and still refers to “medium rise” which the Society regards as a desirable goal.</p>	<p>We request the reinstatement of the following text :</p> <p>“Ensure that development extends and integrates with the urban grain and pattern of development in the WCRA and its surrounding area; and ensure that new development respects the scale of adjoining development along its edges, but with increased massing towards the centre of the site. The scale should be generally medium rise and aim to meet the regeneration objectives of the area. A limited number of tall buildings of exceptionally good design may be acceptable especially in locations close to the A40 and A3220 where they are not considered to have a detrimental impact on the setting of listed buildings, the character and appearance of the Wood Lane</p>

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								conservation area, or the setting of other neighbouring conservation areas and the local area in general". 5.23 Line 6 : Please add after 'tall buildings' - "provided they are of exceptional design quality". This wording was in 6.52 of the 2015 draft and we see no reason for omitting the goal of exceptional design.
18	192	Old Oak and Park Royal Development Corporation	Strategic Policy WCRA - White City Regeneration Area				Strategic Policy WCRA A justification paragraph should be added, justifying the final bullet of the policy and enhancements to Wood Lane. This should reference the need for close working with OPDC to consider an integrated approach to the planning of the wider corridor, including Scrubs Lane to the north.	
52	377	Westfield Shoppingtowns Ltd	Strategic Policy WCRA - White City Regeneration Area				Strategic Policy WCRA refers to the White City Regeneration Area, with the diagram within this policy showing the southern boundary line of 'WCRA 1 White City East' as following the northern limit of the existing centre, and thus the Westfield London Phase 2 site falling within the White City East Area. Map AM35 within the Proposed Local Plan Submission Map Changes 2016 then shows the boundary of Shepherd's Bush Town Centre extended to include land to the north of the existing centre. We fully support the inclusion of the Phase 2 site within the town centre and welcome the proposed changes to the Proposals Map as illustrated in Map AM35.	We request, however, for the avoidance of doubt, the addition of text within the Local Plan to clarify that the area of land to the north of the existing centre is considered to fall within <u>both</u> White City East and Shepherd's Bush Town Centre for the purposes of the emerging Local Plan. This is appropriate both in terms of the delivery of new retail floorspace and other uses on the site, and the potential of the site to contribute towards the strategic objectives for development within White City East.

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								<p>To avoid any confusion, we recommend that the wording following</p> <p><i>“Proposals for development in WCRA should” is amended to read “ contribute to the provision of 6,000 new homes across a variety of tenures and 10,000 jobs mainly within White City East, but also in smaller scale developments elsewhere in White City West and in Shepherds Bush Town Centre”.</i></p>
53	382	Land Securities	Strategic Policy WCRA - White City Regeneration Area				The ongoing recognition of the importance of WCRA with aspirations to bring forward new housing, shops, community and cultural facilities is supported.	
49	395	Royal Borough of Kensington & Chelsea	Strategic Policy WCRA - White City Regeneration Area				<p>We note the policy bullet points 1 & 2 state:</p> <ul style="list-style-type: none"> actively engage with local residents and community groups to ensure that the regeneration delivers benefits for the surrounding area; and work with the community and local enterprises, to establish ongoing partnerships and initiatives to provide sustainable public sector service delivery in the area. <p>We trust that this would include engagement with these bodies within RBKC as the development of the Imperial campus in particular has the</p>	<p>Bullet 14 – Our previous response requested with regard to "increased massing towards the centre of the site" – the centre should be identified or at least clarified as to whether this means the centre of White City East or of the whole Regeneration Area. Could amend to "The scale should be generally mostly medium rise..." and delete "and aim to meet the regeneration objectives of the area" as this is unnecessary / duplicating. Could also amend to "A limited number of tall buildings of exceptionally good design may be acceptable... where they are not</p>

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							<p>potential to bring benefits to the Latimer Road Employment Zone within RBKC and the subway under the West London Line will provide a new route for our residents to White City Tube Station, (we note this is acknowledged in 5.22). The St Quintin and Woodlands Neighbourhood Plan which references this has also passed referendum.</p>	<p>considered to have a detrimental impact on the setting of listed buildings, the character and appearance of the Wood Land conservation area, or the setting of other neighbouring conservation areas and the local area in general including the Norland Conservation Area and the Oxford Gardens / St Quintins Conservation Area". [Duty to Cooperate; Consistency with National Policy].</p> <p>Bullet 14 – Related to the above comment, LBHF should acknowledge the emerging St Quintin and Woodlands Draft Neighbourhood Plan which includes emerging policies related to the ratio of existing building heights and street widths of the St Quintin estate and the impacts on views and vistas within and from the St Quintin and Woodlands neighbourhood area. [Duty to Cooperate; Consistency with National Policy].</p> <p>Bullet 14 – The revised text has not taken account of our previous representations. It reads "ensure that new development recognises the substantial scope offered by the scale and location of the White City Regeneration Area to create a new sense of place and range of densities. There may be scope for tall buildings, however any tall buildings would need to be justified by a full urban design analysis" [Duty to Cooperate; Consistency with National Policy].</p> <p>Bullet 14 – We request that the following text is added to the end of the bullet point 'that pays particular</p>

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								<p>attention to impact on the setting of listed buildings and neighbouring conservation areas, including those in RBKC". [Duty to Cooperate; Consistency with National Policy].</p> <p>Paragraph 5.23 – We are very concerned by the statement that some parts of the area are less sensitive to the impact of building height due to rail infrastructure. Buildings adjacent to or close to the boundary zone on the LBHF side of the West London Line should respect the scale of the buildings on the RBKC side. [Duty to Cooperate; Consistency with National Policy].</p> <p>An additional bullet point should be added to Strategic Policy WCRA to require that new development proposals here should not worsen traffic conditions within the Regeneration Area or within its environs including RBKC. [Duty to Cooperate; Consistency with National Policy; Effectiveness].</p>
73	409	St Quintin and Woodlands Neighbourhood Forum	Strategic Policy WCRA - White City Regeneration Area				We support much of the content of Strategic Policy WCRA5 for the White City Regeneration Area, but have concerns that the wording provides no clear policy guidance on tall buildings (currently saying <i>There may be scope for tall buildings, however any tall buildings would need to be justified by a full urban design analysis</i>).	

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							<p>Paragraph 5.23 of the Draft Plan gives some further comment , saying <i>Development should respect the prevailing scale of the surrounding townscape along its edges, and be generally medium rise. However, parts of the area such as alongside the A40 and A3220 are less sensitive to the impact of building height due to large pieces of road and rail infrastructure that act to separate potential taller elements from nearby lower-rise residential areas. Some other limited locations within the regeneration area may also be acceptable for tall buildings, as long as it can be demonstrated that they enhance and do not have a negative impact on the character and setting of Listed Buildings, Conservation Areas and the local area in general.</i></p> <p>We have never understood the LBHF argument that '<i>large pieces of road and rail infrastructure separate potential taller elements from nearby low-rise residential development</i>'. If buildings are very tall, they dominate the skyline and stand well above the heights of road and rail infrastructure, including the Westway. Physical 'separation' at or near ground level is largely irrelevant to visual impact.</p>	
73	417	St Quintin and Woodlands Neighbourhood Forum	Strategic Policy WCRA - White City Regeneration Area				<p>Policy WCRA seeks to <i>provide further enhancements across the area to ensure high public transport use, along with provision for more pedestrian and cycle infrastructure, including an enhanced Wood Lane, a bridge across the A3220 adjacent to the Hammersmith & City and Circle Lines and the provision of an east-west underpass from the Imperial College former Woodlands site to land to the west in RBKC</i>(our emphasis). There is growing local concern that the underpass, a major 'community benefit' first promised in 2010, is continually being deferred and still has no firm timetable for construction. As the party which</p>	

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							initiated the S106 Agreement securing this much needed infrastructure, we look to LBHF to force the pace it getting it built.	
45	460	Berkeley Group (St James & St George) & St William	Strategic Policy WCRA - White City Regeneration Area				<p>Our client supports Strategic Policy WCRA and WCRA1 – White City East to deliver new homes at a range of densities and welcomes the recognition that this requires collaborative working with GLA, TfL and landowners.</p> <p>As the Council acknowledges in the justification to Policy WCRA, it is designated in the London Plan as an Opportunity Area. It would therefore be appropriate to include reference to the Opportunity Area Planning Framework and important Development Infrastructure Funding Study (DIFS) in this policy.</p>	The policy wording should include reference to the Opportunity Area Planning Framework and DIFS.
45	461	Berkeley Group (St James & St George) & St William	Strategic Policy WCRA - White City Regeneration Area				<p>Policy 2.13 of the London Plan (2016) states that development proposals in Opportunity Areas should ‘<i>seek to optimise residential and non-residential output and densities</i>’ and ‘<i>contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity</i>’.</p> <p>The policy wording for WCRA should clarify that the indicative additional homes of 6,000 is a minimum target.</p>	The policy wording should make clear that the 6,000 new homes anticipated in the Regeneration Area is a minimum target.

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45	462	Berkeley Group (St James & St George) & St William	Strategic Policy WCRA - White City Regeneration Area				Given the strategic policy support for maximising development opportunities in Opportunity Areas and particularly locations with good public transport accessibility, and that White City East is a part of the Opportunity Area where higher densities are accepted as appropriate in the OAPF, the wording of policies WCRA and WCRA1 should acknowledge this and specifically identify the area as one suitable for high quality, high density development.	The policy wording should more clearly acknowledge the potential for high density development in the Opportunity Area (reflecting the London Plan) and particularly White City East.
45	463	Berkeley Group (St James & St George) & St William	Strategic Policy WCRA - White City Regeneration Area				The policy wording makes no reference to the London Plan requirement to optimise housing potential (policy 3.4). We submit that given the strategic importance of White City East and the potential it has to deliver high density, high quality residential development it would be appropriate for the policy to include such wording.	An additional bullet point should be included to state that development of the site should seek to optimise housing output subject to design quality and taking account of local character and context.
47	655	Stanhope PLC	Strategic Policy WCRA - White City Regeneration Area				The CIL charging schedule will need to be amended to relate to the updated boundary as set out in the Strategic Policy WCRA- White City Regeneration Area.	
61	81	Imperial College London	Strategic Site Policy WCRA1 - White City East	YES	YES	YES	Imperial supports Policy WCRA1, but considers that the reference to the “educational hub” should more accurately reflect what is permitted and proposed with a “research and academic hub” and that the third bullet point be reworded to more accurately reflect the ambitions of both your Council and Imperial, as set out below.	Request that the third bullet point be reworded as follows: (a) The first bullet point be amended to replace the word “educational” with the words “research and academic”.

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							<p>Paragraph 5.26 – the supporting text to Policy WCRA1 is generally supported, but the text should be amended to reflect the fact that there are not proposals simply to create a large-scale educational campus, but a research/academic hub. It is therefore requested that the second sentence be amended to read as set out below.</p> <p>Paragraph 5.28 – Imperial has a strong desire to give priority to pedestrians and cyclists. Therefore, when referring to the connections either side of the A40 in the penultimate sentence, it is felt that the wording would be better if it did not simply ‘make provision for’ pedestrians and cyclists, but for there to be a focus on pedestrians and cyclists. It is therefore requested that the penultimate sentence be amended as set out below.</p>	<p>(b) The third bullet point be reworded to read: “ensure that on sites primarily developed for research/academic purposes, that a mix of uses is provided, with there being scope to attract in related companies in order to create a vibrant business hub. Accommodation for students, researchers and staff will be supported as part of the overall mix.”</p> <p>Paragraph 5.26 – It is therefore requested that the second sentence be amended to read:</p> <p>“The Council supports the development of these sites to create a research/academic hub, together with residential, employment and local retail...” The words “non-student” are not required, as the paragraph goes on to set out the circumstances when student accommodation would be acceptable.</p> <p>Paragraph 5.28 – It is requested that the penultimate sentence be amended to read:</p> <p>“Development on either side of the A40 must be well connected through provision of the primary north-south route, with a focus on pedestrians and cyclists,</p>

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								together with additional secondary vehicular roads that link to the west.”
17	130	Hammersmith Society	Strategic Site Policy WCRA1 - White City East				<p>White City East WCRA1- White City East p37:</p> <p>2ha of park is often referred to whereas the M&S/St James park comes in well under that – 1.6. The 2ha should be retained as a target in the Local Plan but point out the disparity. Now the Local Plan should set out what open space is intended to make up the loss.</p>	
38	529	Greater London Authority and Transport for London Planning Team	Strategic Site Policy WCRA1 - White City East				TfL does not object to the principle of opening up the East arches underneath the Hammersmith & City Line railway viaduct, however consultation would be needed with the London Underground Infrastructure Protection Unit before works can start.	
8	33	Hammersmith and Fulham Air Quality Commission	Strategic Site Policy WCRA2 - White City West					<p>Strategic Site Policy WCRA2 – White City West, p.41</p> <p>Last para – insert ‘... the council will seek residential <i>development, sports fields and open amenity space.</i>’</p> <p>To align with other policies and to promote clean air and good health.</p>

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17	131	Hammersmith Society	Strategic Site Policy WCRA2 - White City West					WCRA2 p41 – Replace ‘must’ with “should” in last line of policy re QPR/TA, see also 5.37 p42). It is essential that Open Space for community recreation be retained if these sites are redeveloped.
76	498	Queens Park Rangers Football Club	Strategic Site Policy WCRA2 - White City West	NO	YES	YES	<p>We welcome the inclusion of Loftus Road within the White City Opportunity Area. We also welcome the reference that if Loftus Road comes forward for redevelopment that this should be residentially led.</p> <p>However, the policy and supporting text in paragraph 5.37 contain too greater reference to the re-provision of community facilities and open space. As drafted, such a requirement could frustrate redevelopment proposals and should be amended to require that at any residentially led redevelopment should only include community facilities and open space that are directly necessary and proportionate to that development.</p> <p>If QPR do relocate from Loftus Road, it will only be to a new and expanded ground to provide the Club with a sustainable future. The Club want to remain in the Borough and to work with LBHF to achieve this. Therefore, the wider benefits of any new development should be taken into consideration as these will replace and enhance the facilities at Loftus Road, which will be released for redevelopment. It is also the case that the redevelopment of Loftus Road will play an important role in helping to enable and fund any new stadium.</p>	

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17	132	Hammersmith Society	Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land					WCRA3 – Shepherd's Bush Market etc p45 Insert reference to “affordable” high quality retail/business premises in 3 rd bullet. This is essential for retaining the character of the market. The Society would wish to see encouragement for the displaced shops and businesses to be able to return at affordable rents.
52	379	Westfield Shoppingtown s Ltd	Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land				WEL support the recognition within the emerging policy that development proposals for Shepherds Bush Market should “ <i>retain and improve the market, including its layout, to create a vibrant, mixed use area; include additional leisure uses, offices and residential development to ensure a more vibrant mix</i> ”. The reference to the retention of the existing market use is important, given the proximity to Westfield London and the need for the two centres to operate as complementary rather than competing centres.	
33	606	Shepherds Bush Market Tenants Association	Strategic Site Policy WCRA3 - Shepherd's Bush Market and adjacent land				As Chairman of the Shepherd's Bush Market Tenants' Association (SBMTA), I am writing on behalf of our members to express our concern regarding the proposed Submission Local Plan. There are approximately 107 leases / licenses in Shepherd's Bush Market.	There is pressing need to amend stipulations in the favour to the Shepherd's Bush Market Tenants and ensure that our Market Community can be protected and shielded. By implementing stronger and more fair, sensible and favourable stipulations, offering greater protection, the

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							<p>The Shepherd's Bush Market Tenants' Association (SBMTA) currently holds the support of 92% of the Market Businesses in Shepherd's Bush Market.</p> <p>As the London Borough of Hammersmith and Fulham is consulting on their proposed Submission Local Plan it has been noted that the terms and stipulations relating to the Shepherd's Bush Market area has not changed in retrospect to previous years.</p> <p>This lack of "modification" may be a concern as the Submission Local Plan may effect and guide the stipulations of any future Section 106 Document.</p> <p>The SBMTA wish for lessons to be learnt from our unfortunate recent history, and we view this consultation of the submission local plan to be an opportunity to implement mechanism to protect the market community and avoid any reoccurrences of unfortunate past errors.</p> <p>The Hammersmith & Fulham Council (under the Conservative constituency) had previously drawn up a Section 106 Agreement relating to the land in and around Shepherd's Bush Market and this was issued to redevelopers, Orion (OSBL) on the 30th March 2012.</p> <p>It is felt that this Section 106 document was very feeble to protect the welfare of the Market Tenants.</p> <p>Subsequently Orion's proposals and involvement in Shepherd's Bush Market led to severe disturbance and "siege" on the Shepherd's Bush</p>	<p>Council could attempt to eliminate the risk of any further threat to the existing market businesses.</p> <p>The SBMTA reiterate our concern and stress that the unique and valued businesses of Shepherd's Bush Market must be protected. Please amend stipulations in favour of the market tenants offering further support so to support and defend our businesses.</p>

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							<p>Market businesses, causing great uncertainty whilst threatening the livelihoods of many long-standing, hard working market traders.</p> <p>Many of the threats of the redeveloper's proposals were identified and documented in the Government Inspector's report. (CPO Report to the Secretary of State for Communities and Local Government by Ava Wood Dip Arch MRTPI (file refs APP/NCPU/CPO/H5390/71854)</p> <p>It is our intention not to delve into great detail in this letter, however the following are just a few examples of the concerns raised: -</p> <ul style="list-style-type: none"> • Potential unfair losses to the tenants. • Having expenses and overheads escalate, where by tenants would be forced to increase their prices, subsequently losing their competitiveness or / and having to change their product offer. • Tenants being "out priced" forcing them to leave the area and lose their businesses. • Failure to ensure that the original structure of the market (the arches and viaduct) would receive thorough repair and refurbishment. • The lack of assurances to preserve and maintain the unique character of Shepherd's Bush Market. 	

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							<ul style="list-style-type: none"> Inadequate compensation for possible disturbances and disruption. <p>The Government Inspector stressed that all in all there were inadequate mechanisms to protect and cradle the Market Tenants.</p> <p>It is the view of the SBMTA that "weak" and inadequate planning stipulations led to a Section 106 Agreement being drawn up in 2012, which failed to protect the market community and placed the long standing businesses of Shepherd's Bush Market in jeopardy and uncertainty.</p> <p>The SBMTA was distressed that the Section 106 Agreement failed to offer adequate protection to the original 138 market tenants.</p> <p>Schedule 15 (7.3) of the Section 106 merely stipulated that <i>"the owner shall provide no less than 25 stalls with Shepherd's Bush Market to be let or licensed on terms and conditions conducive to attracting local small to medium enterprises"</i>.</p> <p>25 stalls in a market encompassing, at the time, 138 tenants in Arches, Shops and Stalls is considered as derisory.</p> <p>The SBMTA believe strongly, that future planning stipulations and Section 106 Agreements must comprehensively protect all of the existing business within Shepherd's Bush Market.</p> <p>Stipulations should firmly cradle and safeguard our businesses and should ensure that the value and worth of our businesses be secure. A</p>	

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							<p>principle of always providing a minimum requirement of "like for like" should be set, so businesses will not fall victim to any bullying or mistreatment.</p> <p>Although the Government Inspector Ava Wood cast the view that a CPO should not be issued due the inadequacies of the redevelopers proposals, unfortunately the Secretary of State for Communities and Local Government chose to issue the CPO.</p> <p>It has been sadly apparent that the Hammersmith & Fulham Council were unable to fully protect the market businesses from the intentions and actions of the redeveloper, due to stipulations and agreements, therefore the SBMTA was forced, at great cost, to fight for the tenants' livelihoods and take legal action in the Court of Appeal.</p> <p>THE LORD CHIEF JUSTICE OF ENGLAND AND WALES,</p> <p>LORD JUSTICE LONGMORE and LORD JUSTICE LEWISON ruled on the case (Case No:</p> <p>C1/2015/2785) between:</p> <p>JAMES JOSEPH HORADA (ON BEHALF OF THE SHEPHERD'S BUSH MARKET TENANTS' ASSOCIATION) & OTHERS - and - SECRETARY OF STATE FOR COMMUNITIES AND LOCAL GOVERNMENT AND OTHERS and gave final judgment on the 22nd July 2016 ruling in favour of the market tenants and issuing a full quash of the Compulsory Purchase Order.</p>	

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							<p>It is the SBMTA's view that all parties must now learn from the recent events and we should ensure that the tenants of Shepherd's Bush Market are never caused this hardship again.</p> <p>Unfortunately the tenancy of Shepherd's Bush Market has decreased and subsequently poor management of Shepherd's Bush Market has caused a dramatic drop in footfall.</p> <p>This consultation presents opportunity to prevent unfortunate events from reoccurring.</p> <p>It is of concern that there seems to be little change to strengthen the protection to communities such as the Shepherd's Bush Market tenants.</p> <p>Why are planning stipulations being left unchanged when we are aware of the failings of the past?</p> <p>There is pressing need to amend stipulations in the favour to the Shepherd's Bush Market Tenants and ensure that our Market Community can be protected and shielded.</p> <p>By implementing stronger and more fair, sensible and favourable stipulations, offering greater protection, the Council could attempt to eliminate the risk of any further threat to the existing market businesses.</p> <p>The SBMTA reiterate our concern and stress that the unique and valued businesses of Shepherd's Bush Market must be protected. Please amend stipulations in favour of the market tenants offering further support so to support and defend our businesses.</p>	

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11	28	Hammersmith London BID	Hammersmith Regeneration Area				<p>HammersmithLondon is the brand name of the Hammersmith Business Improvement District (BID), a democratically elected, business-led and business-funded body, formed to improve a defined commercial area. First established in 2006, it is one of the oldest BIDs in the country, which has also successfully renewed its mandate in March 2011 and March 2016. Led by member businesses, the BID represents c. 325 businesses with rateable value over £40,000. Since 2006, the BID has already invested over £7.4m in Hammersmith town centre and is investing another £3.7m in its current five-year term.</p> <p>The team at HammersmithLondon work in close partnership with various public and community organisations including the Hammersmith & Fulham Council (the Council), Metropolitan Police and Transport for London (TfL). The BID is a partner in the Mayor's Economic Development Strategy (EDS) for London that places much importance on the BID to 'place-shape' local town centres in Partnership with business. Appendix 1 provides a quick overview of the number and type of businesses in Hammersmith town centre along with a list of the major stakeholders and the area covered by the BID.</p> <p>The BID has played an important role in lobbying for the replacement of the flyover since emergency structural repairs caused it to close in December 2011.</p> <p>Hammersmith Regeneration Area</p> <p>As per the local plan, the Hammersmith Regeneration Area (HRA) is centered on King Street and Hammersmith Broadway, with the southern</p>	

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							<p>boundary extending to Hammersmith Bridge and the Thames. The HRA includes Hammersmith Town Centre, the A4 and its flyover.</p> <p>The central area falls under the Hammersmith BID district (See Appendix 2). HammersmithLondon is working with various stakeholders to link all the developments that are transpiring and being proposed in and around the Hammersmith town centre. The BID has represented the voice of businesses for over 10 years. The feedback gathered from workers, residents and visitors over this period suggests that there is an appetite to maintain the regenerative drive.</p> <p>HammersmithLondon supports the local authority's objectives for the area and is committed to partnering with the council it whatever capacity it can to help deliver the regeneration of Hammersmith Town Centre so that the area can fully realise its potential as a transport, business, retail and culture hub.</p> <p>Business engagement</p> <p>The regeneration of Hammersmith Town Centre will have a huge impact on the office sector so we strongly believe that any engagement should include businesses and property owners in the area. The BID is happy to work alongside the council to provide forums for this engagement to take place as they will have a keen interest in the future prosperity of the town centre.</p> <p>Green initiatives</p>	

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							<p>The BID would like to see schemes that that encourage open space. HammersmithLondon has previously worked with the council to help develop a green corridor in Talgarth Road and a Roof Garden on the first floor at the Lyric Hammersmith, so further opportunities to develop green space in the town centre should be encouraged. This could be delivered through initiatives such as pocket parks and green walls containing architecture of the highest quality that would enhance the public realm and create a more sustainable town centre. Furthermore, we would to see more sustainable drainage systems installed within the town centre to help reduce the amount of surface water run-off.</p> <p>The BID also supports the improvement and enhancement of St Paul's Green and Furnival Gardens as additional green space would be a welcome boost to the area.</p> <p>Arts & Culture</p> <p>Expanding Hammersmith's arts and leisure offer is key to the regeneration of the town centre. As the home of the world famous Eventim Apollo and the innovative Lyric Hammersmith, Hammersmith has a strong background in supporting culture and the arts but more effort should be made to increase the offer for visitors. This could be achieved through innovative projects such as artist lighting schemes and projections which can invigorate the night-time economies, helping to bring aspects of a town centre's heritage to life.</p> <p>As part of its mandate, the BID offers a wide programming of events designed to help reinvigorate the high street and increase footfall. This cultural offer boosts place making by celebrating Hammersmith's</p>	

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							<p>heritage, engaging communities and revealing histories that may otherwise have been overlooked. The BID runs free monthly guided walks that highlight stories of Hammersmith's fascinating past, it runs the annual Summer Festival which contains a varied line-up including live outdoor theatre, streamed sports events and live opera and it promotes the work of other artistic organisations in the borough through its partnership with the HF ArtsFest.</p> <p>The BID will continue to strengthen its relationships with cultural partners to provide a programme of diverse events which reflect Hammersmith's rich artistic heritage. It will also be part-funding an Arts Officer who will be appointed to further enhance and boost the artistic offer within the town centre.</p> <p>Shopping offer</p> <p>As residential and office units are completed, bringing thousands of new people into the area, the lure of the high street needs to be relevant and high quality. Office workers are key to Hammersmith's economy so ensuring they stay and spend in the Hammersmith area is vital.</p> <p>That offers need to reflect a modern high street using state of the art technology. The BID is working on a number of projects that reflect the rise and influence of the digital high street so would welcome the opportunity to implement these as part of the council's plans. Initiatives such as free Wi-Fi and click and collect represent a modern shopping experience so the high street must adapt to ensure that residents and workers are being given a 21st century experience.</p>	

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							Empty units need to be utilised and appropriate tenants need to be brought in. The BID would support any partnership working with the council to develop a retail strategy to ascertain the right mix of tenants that would reflect the needs of both residents and office workers. As part of this strategy the BID can help the council with business engagement.	
28	293	Hammersmith Mall Residents Association	Hammersmith Regeneration Area				<p>DETAILED COMMENTS:</p> <p>We have confined the following detailed comments to the parts of the Proposed Submission Local Plan which specifically affect the Mall Conservation Area and/or its immediate neighbourhood. Where we have made no comments, we are in agreement with the policy as framed.</p> <p>Section 5: Hammersmith Regeneration Area:</p> <p>Strategic Policy HRA, Strategic Policy Site HRA1 and Strategic Policy Site HRA2:</p> <p>We welcome and support the policy of regenerating of Hammersmith Town Centre. We also support the replacement of the A4 flyover with a tunnel. This would greatly improve the environment and would enable the creation of a much-improved public realm, with links between Hammersmith town centre and the river.</p> <p>However, we feel that the policy could go further in protecting the unique character of the adjacent Mall Conservation Area.</p>	We would appreciate it if the policy could be strengthened to ensure that the unique character of this important part of Hammersmith is retained.

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							<p>Specifically, we would like to see the following taken into consideration:</p> <ul style="list-style-type: none"> - Partly because of its separation from the rest of Hammersmith, Hammersmith Mall has a unique character and sense of place, which is enjoyed by locals and visitors alike. It is essential that this unique character and sense of place is not lost. - To achieve this, the focus must be on improving the public realm between Hammersmith and the river, rather than on the development opportunities presented. - Any development which is considered should be of a height, bulk and massing which is sensitive to the scale and appearance of the riverscape through the Mall Conservation Area. Tall and/or overbearing buildings should not be allowed to form a backdrop to this beautiful stretch of the river. - Part of the charm of Hammersmith Mall is the fact that one comes upon it almost as a surprise. This sense of difference and separation from the bustle of town centre activity should be maintained by sympathetic use of the public realm to maintain a form of visual separation. - Currently there are no through-routes for vehicles, so there is very little traffic in the area and people can walk beside and enjoy the river safely. Improved pedestrian links are welcomed, but any new or re-connected road links should be done in such a way that it does not substantially increase traffic and/or create rat-runs for fast-moving vehicles. 	

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							<p>Improved pedestrian and cycling connections within the town centre are welcomed, but there needs to be much clearer cycling guidance and segregation of cyclists and pedestrians in pedestrian-only areas such as the river walk along Lower Mall, through Furnivall Gardens, and along Upper Mall.</p> <p>HAMRA have written at length to LBH&F in connection with the Cycling Strategy in the borough and would like to be consulted about any proposals which affect the Mall Conservation Area and the river walk in particular.</p> <p>Improved pedestrian and cycle access to Furnivall Gardens and the riverside is much needed, widening/upgrading the existing underpass is, in our view, a priority to ensure safe and pleasant access from the new civic campus to the south side of the A4.</p>	
41	350	Thames Water Utilities Ltd	Hammersmit h Regeneratio n Area				<p><u>Waste Water</u></p> <p>As this site falls within the highly flood sensitive Counters Creek Catchment, surface water attenuation to Greenfield run-off rates is a minimum requirement for Thames Water in this area. This is to facilitate the level of redevelopment proposed and reduce the risk of further property flooding.</p> <p>There are five deep, large diameter storm relief sewers that pass through this area. No new connections into these sewers can be permitted. All existing connections on development sites will need to be considered and appropriately addressed as part of the site drainage strategy. Site</p>	

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							<p>configuration would need to take into account access requirements, appropriate build over agreements and piling restrictions due to these assets.</p> <p>The Brook Green trunk sewer passes through this area. Site configuration would need to take into account access requirements, appropriate build over agreements and piling restrictions due to this asset.</p>	
37	480	Eastern & Oriental PLC	Hammersmith Regeneration Area				<p>Draft Strategic Policy 'HRA- Hammersmith Regeneration Area' identifies that LBHF will be seeking to deliver an indicative level of 10,000 new jobs and 2,800 new homes within the identified Hammersmith Regeneration Area ('the HRA') over the plan period. The Council intends to realise these objectives through building upon Hammersmith Town Centre's major locational advantages for office and retail development, and by seeking to secure 'more modern accommodation within this part of the Borough'.</p> <p>We are broadly supportive of this aspiration, and the creation of the HRA, albeit do highlight that the Council should also promote opportunities for new high quality hotel premises within this regeneration area, as a means of helping to ensure that the target concerning the creation of 10,000 new jobs is fully realised.</p> <p>Draft Strategic Policy HRA also identifies that the Council will seek to create an urban environment, with public spaces, architecture and public realm 'of the highest quality'. E&O are supportive of this aspiration, given that the creation of a new public realm network throughout the town</p>	As such, we propose that the draft Strategic Policy HRA should specifically refer to the appropriateness of the HRA as a hotel/tourism location.

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							centres will increase pedestrian permeability within the HRA, and will increase its connectivity and linkages with other parts of the borough.	
38	531	Greater London Authority and Transport for London Planning Team	Hammersmith Regeneration Area				A temporary bus station has been erected at Hammersmith Broadway pending permanent extension of both this bus station and Hammersmith tube station in the future. The bus station is already at full capacity and Hammersmith tube station will be at full capacity within a few years. It will be essential when the permanent expansion is implemented to work with all concerned stakeholders to integrate plans for this bus station with that of the Gyratory; the latter is undergoing work in November 2017 to create a kerb-segregated two-way cycle route across the northern section of the gyratory.	
35	595	Standard Life Investments	Hammersmith Regeneration Area				Draft Strategic Policy 'HRA- Hammersmith Regeneration Area' identifies that LBHF will be seeking to deliver an indicative level of 10,000 new jobs and 2,800 new homes within the identified Hammersmith Regeneration Area ('the HRA'). The Council intends to realise these objectives through building upon Hammersmith Town Centre's major locational advantages	As such, we propose that draft Strategic Policy HRA should specifically refer to the appropriateness of the HRA as a hotel/tourism location.

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							<p>for office and retail development, and by seeking to secure 'more modern accomodation' within this part of the Borough.</p> <p>We are broadly supportive of this aspiration, and the creation of the HRA, albeit do highlight that the Council should also promote opportunities for new high quality hotel premises within this regeneration area, as a means of helping to ensure that the target concerning the creation of 10,000 new jobs is fully realised.</p>	
26	640	Nadine Grieve	Hammersmith Regeneration Area				no specific mention within the Hammersmith Regeneration plan of improvement to air quality. Would be a good idea to put an air quality monitoring device near the start of the flyover.	
64	643	Nigel Hensman	Hammersmith Regeneration Area				<p>My comments concentrate on the sections on Hammersmith Town Centre, near which I have lived for nearly 50 years. I have been involved in local planning matters and consultations for much of that time and as the then Chairman of the Brook Green Association I orchestrated the BGA's response to an earlier LBHF development plan. I am impressed by the general high quality of the new plan. However . Two schemes threaten overall development.</p> <p>The new cycle lane proposed for the north side of the gyratory is designed to slow nearly all vehicular traffic, thus risking more congestion and indeed gridlock should the Heathrow expansion go ahead. It should only be installed as part of the wider plans. The cycle lane is also projected to slow a large proportion of the pedestrian journeys across the gyratory. The benefit to the relatively few cyclists projected to use</p>	

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							<p>the path are minimal. It directly contradicts the stated aims of improve pedestrian passage across King Street and towards the River.</p> <p>2 The projected " fly-under" is planned merely to replace the existing flyover so would do nothing to address the traffic congestion in central Hammersmith, Its construction would generate a massive amount of vehicle movements and disruption, especially if the land were built over.. Any such tunnel should be designed to improve traffic flows not just replace them.</p> <p>King Street East centre should be radically improved, preferably without demolition. However, many retail uses will continue to struggle in competition with Westfield at White City.</p> <p>The projected creation of a contraflow cycle path in King Street will make crossing King Street more hazardous for pedestrians and should still be challenged.</p>	
17	133	Hammersmith Society	Strategic Policy HRA – Hammersmith Regeneration Area				<p>Hammersmith Town Centre : Strategic Policy HRA : The Town Centre boundary and strategic objectives may need to be reconsidered to tie in with the Masterplans being developed by Grimshaw in conjunction with the Hammersmith Residents’ Working Party (HRWP), so that the SPD and Local Plan are consistent.</p>	

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							<p>It is not clear what is meant by the Hammersmith Centre West Island Site – Is this the same as the ‘Broadway Island Site’ which the Society prefers?</p> <p>There should be greater emphasis that most of the Town Centre is a Conservation Area.</p> <p>The Society considers that there should be more explicit support in this section and in the Transport Section T3 for the Cycle Super Highway through the Borough and around the Broadway.</p> <p>In the previous Core Strategy (HTC2) there was policy reference to King’s Mall and Ashcroft Square : This appears to be omitted from the current document? There is now only peripheral reference under HRA to King’s Mall but we consider that the previous policy should be retained.</p> <p>Concerns have been expressed by the HRWP as to whether the target of 2,800 homes within the currently defined Town Centre area is realistic, although it is noted that the target for the next 10 years is only 800 homes. The suggestion is that there may need to be a rebalancing within Table 2 between the different strategic areas. (see below)</p> <p>The Society supports the Council’s initiatives for the Town Centre as defined under Policy HRA. We support the principle of returning the gyratory to two way working with the provisos stated. We would welcome the integration of the Broadway site within the main town centre by means of the closure to traffic on its west flank, and to the north of St Paul’s Green.</p>	

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58	168	Historic England	Strategic Policy HRA – Hammersmit h Regeneratio n Area				<p>Strategic Policy HRA – Hammersmith Regeneration Area, p.45</p> <p>In view of the heritage significance of Hammersmith, reflected in the number of heritage assets and in its archaeological record, this policy should provide a clear lead in terms of promoting conservation and enhancement of this resource. This is all the more important given the level of change that is envisaged and that both the threats and opportunities need to be understood and managed from the outset. Without this we consider the policy is not compliant with the expectation in the NPPF of a positive strategy for the historic environment (paras 126 and 157(8)) in local plan policy. We also note the relevance of policy 7.9 of the London Plan promoting Heritage-led regeneration.</p>	<p>We therefore recommend the following changes and additional bullets to Strategic Policy HRA on page 45 to read:</p> <p><u>- ‘promote heritage-led regeneration to secure new development which responds positively to local character and history, conserving and taking opportunities to enhance the significance of heritage assets, including potential reinstatement of historic street patterns and townscape.’</u></p> <p>- It would be suitable to include an additional bullet point in the second part of the policy to take forward the above proposed addition.</p> <p>- Para 5.5 of the supporting text should identify that the heritage assets of Hammersmith are a key attribute to consider in bringing development forward, to positively promote a sense of place and human scale, and provide a basis for place-making where major changes provide opportunities to re-instate elements of lost townscape and the road network.</p>
44	357	Hammersmith & Fulham Historic	Strategic Policy HRA – Hammersmit h				<p>Map page 45</p>	

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		Buildings Group	Regeneration Area				<p>We repeat below our concerns expressed in the consultation on the Draft Local Plan in 2015.</p> <p>‘We note that the area north of the A4 in the section over the road from Furnivall Gardens is included in the regeneration area. This is in the King Street East CA which runs from the Town Hall in the west to Angel Walk in the east. It includes the Arts and Crafts Riverside Gardens flats. It also includes the listed buildings: Town Hall, Hope & Anchor pub, houses in Bridge Avenue and Angel Walk and BOMs: Macbeth Centre and Riverside Community Church. Development here could seriously affect the setting of Furnival Gardens and the river. We need to be assured that any development here is within conservation principles.’</p>	
38	523	Greater London Authority and Transport for London Planning Team	Strategic Policy HRA – Hammersmith Regeneration Area				Hammersmith Gyratory is a part of the Strategic Road Network (SRN). It is noted that there are planned cycle infrastructure Improvements to this junction to return it to a two-way working system, with works scheduled to commence in November 2017.	
40	575	Mr Prashant Brahmbhatt	Strategic Policy HRA – Hammersmith				<p>Strategic Policy HRA- Hammersmith Regeneration Area</p> <p>College Court is fronting the town centre and should be included into the Town Centre Regeneration plan.</p>	

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			Regeneration Area				St Pauls Green and Furnivall gardens- this section will increase the footfall in a residential area and the properties affected will require adequate compensation or mitigation from adverse effect.	
64	644	Nigel Hensman	Strategic Policy HRA – Hammersmith Regeneration Area				Hammersmith Town Centre should be the transport, commercial and entertainment centre with some retail; residential use should be on the periphery.	
11	29	Hammersmith London BID	Strategic Site Policy HRA1 - Town Hall Extension and adjacent land, Nigel Playfair Avenue				<p>HammersmithLondon is the brand name of the Hammersmith Business Improvement District (BID), a democratically elected, business-led and business-funded body, formed to improve a defined commercial area. First established in 2006, it is one of the oldest BIDs in the country, which has also successfully renewed its mandate in March 2011 and March 2016. Led by member businesses, the BID represents c. 325 businesses with rateable value over £40,000. Since 2006, the BID has already invested over £7.4m in Hammersmith town centre and is investing another £3.7m in its current five-year term.</p> <p>The team at HammersmithLondon work in close partnership with various public and community organisations including the Hammersmith & Fulham Council (the Council), Metropolitan Police and Transport for London (TfL). The BID is a partner in the Mayor's Economic Development Strategy (EDS) for London that places much importance on the BID to 'place-shape' local town centres in Partnership with business.</p>	

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							<p>Appendix 1 provides a quick overview of the number and type of businesses in Hammersmith town centre along with a list of the major stakeholders and the area covered by the BID.</p> <p>The BID has played an important role in lobbying for the replacement of the flyover since emergency structural repairs caused it to close in December 2011.</p> <p>Town Hall Extension and adjacent land, Nigel Playfair Avenue</p> <p>The Town Hall redevelopment presents an ideal opportunity to improve the western end of King Street and a successful retail strategy as mentioned in 2.12 would be a very effective way of connecting both the east and west ends of the town centre.</p> <p>This development also presents a wonderful opportunity to explore creative use of public spaces such as the pedestrianisation of King Street which could unlock the potential for more events, public realm and greening. This could help to give the west end of the town a clearer identity.</p> <p>The BID strongly believes that the addition of a new cinema will help to boost the night time economy in Hammersmith and with the added public piazza, presents an opportunity to replicate the popular café culture that is strongly implemented elsewhere within the capital. Any additional improvements to connect the town centre to the river would also be strongly supported as this would help improve footfall in the west end of Hammersmith.</p>	

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17	134	Hammersmith Society	Strategic Site Policy HRA1 - Town Hall Extension and adjacent land, Nigel Playfair Avenue				Strategic Site Policy HRA1 – Town Hall sites : The Society has supported with certain reservations the currently approved planning applications for these sites. We would be concerned if these proposals were not to proceed. We particularly wish to see that the proposed public realm elements including the cinema offering are retained. It is not clear whether the additional housing gained on these sites has been factored into the Council's overall housing target figures – see below re. Table 2.	
64	645	Nigel Hensman	Strategic Site Policy HRA1 - Town Hall Extension and adjacent land, Nigel Playfair Avenue				Town Hall extension should be demolished and replaced with a high quality scheme incorporating the cinema and car park sites and improved pedestrian access OVER the A4.	
2	3	Mr Leslie Thorne	Strategic Site Policy HRA2 - A4, Hammersmit h Flyover,Ham mersmith Gyratory and	NO	NO	NO	The plan states that a major issue is air and noise pollution which, in the case of the A4, has received no attention to mitigate or address the growing problem for over fifty years and then includes none of the solutions immediately available. It relies totally on an unfunded, unproven Flyunder utopia whilst ignoring all the issues yet to be addressed - even those raised in its own very limited "feasibility study". This is not a Plan it is just wishful thinking.	To be sound it needs to consider all available options and not to misrepresent the current completeness of the Flyunder idea.

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			adjoining land				<p>Where are the proposals for development which creates pollution shadows, where is there consideration of land usage so that unusable polluted open space is developed to shield replacement open space, where is there mention of simple pollution barriers where relatively low and lightweight screening can reduce road noise by 75% (equivalent to moving the source far away), where is the mention of the possibility of enclosing the road in an above ground tunnel with a linear park above linking all the severed pedestrian routes either side, whilst continuing to provide all the current vehicle access points. Such a solution would be far cheaper than a tunnel and would not increase traffic on local roads.</p> <p>Instead the "plan" misrepresents the Flyunder and totally relies on it. Yes, in principle, the idea of all the traffic going underground seems attractive but the more the consequences are examined the less attractive it becomes. This "plan" would result in the horrors of road pollution being suffered for many more years without any of the simple steps being done in practice to reduce them until sometime in the future the below ground tunnel is abandoned.</p> <p>Strategic Site Policy HRA2 is superficial, misleading and fiction.</p> <p>There has been nothing produced to show how the removal of the flyover structure creates redevelopment land - local traffic routes prevent it.</p> <p>The expectation that there will be no increase in traffic in the surrounding road network is contrary to the feasibility study. That clearly stated that as a tunnel has to be 50 feet deep it can only have access</p>	

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							<p>(long, noisy cuttings) at either end, it cannot therefore serve local traffic, only through traffic, 60,000 vehicles a day would not use it but would be displaced onto local roads. Not the A4 because that had to built on to partially fund the tunnel. So how do properties south of the A4 between Furnivall Gardens and Black Lion Lane South get vehicular access? There has been nothing produced to show how a redesigned local road network in a more intensively developed area with a 60,000 per day increase in vehicles would produce the reduced congestion and pollution the "plan" suggests is so easily achieved.</p> <p>Paras 5.61 to 5.70 need rigorous scrutiny as much relies on them.</p> <p>The Flyover does not sever Hammersmith from the river, the A4 does that. The Flyover (actually a relatively low source of pollution because noise rises) runs above roads which still have to exist as long as Hammersmith Bridge and Fulham Palace Road need a northern exit. Nor is it guilty of "...creating large amounts of traffic moving around the Hammersmith Gyratory.." it carries traffic which otherwise would have to use the gyratory. Nor does the existence of the Flyover reduce the potential for a public green space (has anything been produced re this?) around the town centre. Nothing has been produced to suggest that 5.62 is possible (and "reduce" below what?). Many statements made in paras to 5.63 to 5.70 cannot be made in the absence of any published draft masterplan, currently they have no factual basis.</p> <p>The "plan" proposes no practical proposals to address the pollution which is perhaps the single biggest challenge, it relies totally on an unfunded idea which, I regret I believe, cannot be made to work.</p>	

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11	30	Hammersmith London BID	Strategic Site Policy HRA2 - A4, Hammersmit h Flyover,Ham mersmith Gyratory and adjoining land				<p>HammersmithLondon is the brand name of the Hammersmith Business Improvement District (BID), a democratically elected, business-led and business-funded body, formed to improve a defined commercial area. First established in 2006, it is one of the oldest BIDs in the country, which has also successfully renewed its mandate in March 2011 and March 2016. Led by member businesses, the BID represents c. 325 businesses with rateable value over £40,000. Since 2006, the BID has already invested over £7.4m in Hammersmith town centre and is investing another £3.7m in its current five-year term.</p> <p>The team at HammersmithLondon work in close partnership with various public and community organisations including the Hammersmith & Fulham Council (the Council), Metropolitan Police and Transport for London (TfL). The BID is a partner in the Mayor's Economic Development Strategy (EDS) for London that places much importance on the BID to 'place-shape' local town centres in Partnership with business. Appendix 1 provides a quick overview of the number and type of businesses in Hammersmith town centre along with a list of the major stakeholders and the area covered by the BID.</p> <p>The BID has played an important role in lobbying for the replacement of the flyover since emergency structural repairs caused it to close in December 2011.</p>	

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							<p>A4, Hammersmith Flyover, Hammersmith Gyratory and adjoining land</p> <p>HammersmithLondon is a founder member of West London Link Design (WLL), which also includes a group of local architects. Together, as a group, we have been exploring alternative solutions/replacements ever since the flyover's emergency closure in 2011.</p> <p>The group was formed to look at how the replacement of a flyover would present an opportunity to build for the economic, social and cultural benefit of all by reconnecting the town centre with the riverside. The BID was involved in and sponsored the Hammersmith contribution to the London Festival of Architecture in the summer of 2012, where on Lyric Square, the architects unveiled their vision for a Hammersmith Flyunder. The tunnelled by-pass is also a popular project among our businesses and a topic which regularly gets brought up in our consultations.</p> <p>In March 2014, the BID published an Economic Study exploring the potential benefits of building a road tunnel under the A4 that was submitted to Transport for London alongside the Council's feasibility study. The BID's Economic Feasibility study showed just how much potential could be unlocked should a tunneled by-pass replace the flyover. Improved access to the river would be beneficial to all and the diversion of the A4 underground would not only improve air quality but could help to change the one-way system, which currently causes mass daily delays. The local business environment would undoubtedly change as more land could attract even more of the world's biggest companies, eager to have an office or branch near the Thames, the city and the airport. What is certain is that a tunnel would present us with fantastic</p>	

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							<p>opportunities to transform the area for decades to come. To read the report. (See Appendix 3)</p> <p>Given the positive opportunities and innovations for the area, the BID is fully behind plans for a tunneled by-pass and will support the option finally chosen by the Council, Transport for London and the Mayor.</p> <p>The removal of the flyover would present us with a fantastic and unprecedented opportunity to transform the area. The image of the area would be enhanced allowing Hammersmith to establish itself as a destination.</p> <p>The air quality would improve, noise emissions would be dramatically reduced and the removal of the flyover would reconnect the centre of Hammersmith back to the riverside allowing us to integrate and improve the urban realm, including the potential pedestrianisation of King Street, and create more open community or public spaces.</p> <p>The BID also supports plans to return the Hammersmith Gyratory to two-way and can assist the council by engaging with its member businesses regrading any future consultation and planned disruptions. The BID would support plans to pedestrianise arms of the gyratory with the hopes that this would improve traffic flow and increase the open space available to the public.</p>	

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15	59	Mr Alastair Hall	Strategic Site Policy HRA2 - A4, Hammersmit h Flyover,Ham mersmith Gyratory and adjoining land	NO			<p>A key proposal in the Plan is the widely discussed Hammersmith "Flyunder". While this is surely welcomed by residents and businesses alike, the details included in this Plan give us grave cause for concern.</p> <p>The West end of the new proposed Flyunder emerges from underground directly next to Latymer School. Having a tunnel entrance/exit directly adjacent will be worse from a noise and pollution perspective than even the current situation. The Plan appears to completely ignore the damage being done to hundreds of school children and we believe that a simple extension of the Flyunder tunnel a few hundred metres to the West would generate a huge additional environmental benefit for limited extra cost.</p> <p>Paragraph 5.65 states that "While the tunnel would significantly improve the air quality where the stretch of A4 will be moved underground, the air quality, noise and vibration implications at new entrances and exits will need to be investigated carefully."</p> <p>I would urge you extend the proposed Flyunder to the West for the sake of the school children's health and wellbeing.</p>	I would urge you extend the proposed Flyunder to the West for the sake of the Latymer school children's health and wellbeing.
17	135	Hammersmith Society	Strategic Site Policy HRA2 - A4, Hammersmit h				<p>Strategic Site Policy HRA2 – A4, Hammersmith Flyover, Gyratory and adjoining land : The Society very much welcomes this policy and will continue to support the Council in its discussions with the Mayor and the GLA. Although the proposals are currently being sidelined on economic grounds, we have seen no evidence to support claims that the proposals</p>	We request that the Proposals Map relating to HRA2 is extended so that the whole of the A4 route within the borough boundaries is covered : The possible advantages of the tunnel portals being beyond the boundaries must not be lost.

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			Flyover, Hammersmith Gyratory and adjoining land				<p>are unviable on solely development grounds : A case based on environmental considerations (eg. Air Quality) does not appear to have been investigated.</p> <p>We have seen no evidence base from TfL for its claims that the bus station has reached its capacity : We believe that the wholesale redevelopment of the Broadway and temporary loss of the major office space could have a detrimental effect on Hammersmith's attractiveness as an office hub.</p>	
58	171	Historic England	Strategic Site Policy HRA2 - A4, Hammersmith Flyover, Hammersmith Gyratory and adjoining land					<p>Strategic Policy HRA2 – A4 Hammersmith Flyover, Hammersmith Gyratory and adjoining land, p51</p> <p>In line with our comments on Strategic policy HRA we request that the following changes:</p> <p>- In the first set of bullet points on p.51 amend to <i>'Ensure that the tunnel entrances and exits <u>avoid, or where this is not possible</u> , have minimal impact on the amenity of residents and the <u>local environment</u>, including the significance and setting of heritage assets'</i></p> <p>- In the second set of bullet points on p.51 amend to: <i>'be of a coherent urban design that has regard to the setting and context of the regeneration area, <u>including in its approach to scale and character</u>.</i></p>

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								<u>heritage assets and archaeology, taking opportunities to re-unify areas of severed townscape sensitively.'</u>
51	388	Transport for London Commercial Development Property Team	Strategic Site Policy HRA2 - A4, Hammersmith Flyover, Hammersmith Gyratory and adjoining land				This element of the representation relates specifically to Hammersmith Centre West Island site ("the site"). We broadly welcome the inclusion of additional wording to this policy, which now specifically refers to the Island site and ensures that any future redevelopment of the site is not dependent on the delivery of other schemes set out in the proposed policy HRA2.	<p>We do, however, propose that the precise wording of the draft policy is further amended to ensure that any redevelopment of the site is not entirely dependent on the provision of the proposed two-way gyratory scheme during the same period, as currently implied. Whilst we would support such improvements to infrastructure and understand the desire to bring forward a comprehensive redevelopment of the wider context, the ability to develop the site itself from a commercial perspective should not be restricted where its programming is not in line with that of any nearby large scale infrastructure improvements. Given the above reasons, it is proposed that the wording of the policy is amended to provide greater flexibility and to allow for separate consideration of the two aspects if necessary, whilst still acknowledging the desired objective of the Council, as follows:</p> <p><i>"In respect of the Hammersmith Centre West Island site, the Council will work with Transport for London and other stakeholders to assess and bring forward the redevelopment of this site <u>as well as</u>. In addition, the council will work with Transport for London and other stakeholders to return the Hammersmith Gyratory to two way working and improve the capacity of</i></p>

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								<p><i>Hammersmith bus station. Development proposals for the site will be required, <u>where appropriate</u>, to:"</i></p> <p>It is noted that the policy also makes reference to the potential for a mixed-use approach to development, which is fully supported. However, it is considered appropriate that this list also includes <i>residential</i> use, in line with the aspirations of providing additional homes and retail floorspace within Hammersmith town centre. Additionally, the draft policy implies that all uses listed should be included in any future redevelopment, which may not prove viable or practicable. In the interests of providing greater flexibility, and for the avoidance of doubt, it should be made clear that any <i>combination</i> of the uses identified may be included. For these reasons, it is proposed that the wording of the following paragraph is amended as follows:</p> <p><i>"provide for mixed-use redevelopment, <u>which may include a combination of</u> including <u>residential</u>, office, retail, arts, cultural and leisure facilities and supporting infrastructure to help retain a strong commercial role for the town centre and increase its vitality and viability".</i></p>

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48	449	London Borough of Richmond	Strategic Site Policy HRA2 - A4, Hammersmit h Flyover,Ham mersmith Gyratory and adjoining land				<p>Strategic Site Policy HRA2 states “Development proposals for the strategic site released by the tunnel should:</p> <ul style="list-style-type: none"> • provide for mixed-use redevelopment, including housing for local people across a range of tenures and affordabilities, employment, hotels, retail and arts, cultural and leisure facilities and supporting infrastructure; • improve and enhance St Paul’s Green and Furnivall Gardens and their connections with the rest of the regeneration area; • provide new areas for public open space and improve physical connections between the town centre and the riverside; and • be of a coherent urban design that has regard to the setting and context of the regeneration area.” <p><i>There will be reduced road traffic generated in the borough and reduced impact of other road traffic on the local environment, particularly in terms of air quality and noise impacts. H&F will have worked with partners to improve sustainable transport in the borough, particularly north - south links, including the opportunities for cycling and walking.</i></p>	

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							<p>H&F also wish to return the Hammersmith Gyratory to two way working and improve the capacity of Hammersmith bus station. This is welcomed provided the points in the strategy are implemented especially to:</p> <ul style="list-style-type: none"> ensure that there will be no detrimental impact on cyclists or pedestrians or on the flow of traffic on this strategic route, and no increase in levels of traffic congestion in Hammersmith Regeneration Area and the surrounding road network, minimising the displacement impact; ensure that building height is generally consistent with the prevailing height in the townscape, whilst recognising the scope offered by the scale and location of the regeneration area to create a range of densities. Any tall buildings would need to be justified by a full urban design analysis; and be designed to help facilitate any future proposals to replace the flyover and A4 with a tunnel. 	
37	481	Eastern & Oriental PLC	Strategic Site Policy HRA2 - A4, Hammersmit h Flyover,Ham mersmith Gyratory and				<p>The Hammersmith Flyover, Hammersmith Gyratory and Adjoining Land Draft Strategic Site Policy 'HRA2 - A4, Hammersmith Flyover, Hammersmith Gyratory and adjoining land' asserts that the Council will work with Transport for London and other stakeholders to replace the Hammersmith Fly over and sections of the A4 with a tunnel, in order to release land for development which can contribute to the wider social, environmental and economic regeneration of Hammersmith Town Centre. Any proposals to replace the existing Hammersmith Flyover (and neighbouring part of the A4 road) with a tunnel will in tum, be supported</p>	

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			adjoining land				<p>by LBHF providing that various criteria are met, including a requirement to ensure no detrimental impact on the flow of traffic on this strategic route and no increase in levels of local traffic congestion.</p> <p>E&O broadly support this aspiration, and consider that the resultant release of land within this area for mixed-use redevelopment is welcome. Particularly, E&O consider that the Council's identification of this area as a location for employment and hotel development is appropriate given its proximity to Hammersmith Underground Station, and high levels of local public transport accessibility.</p>	
38	533	Greater London Authority and Transport for London Planning Team	Strategic Site Policy HRA2 - A4, Hammersmit h Flyover,Ham mersmith Gyratory and adjoining land				<p>The A4 Flyover forms part of the Transport for London Road Network (TLRN)</p> <p>There is no issue with the viability of the existing flyover. TfL has implemented a project which has repaired the flyover and extended its lifespan by 60 years. Tfl therefore request that the wording is amended.</p> <p>In 2015, Tfl conducted a feasibility study for tunnel options to replace Hammersmith Flyover, and a business case was submitted to the Government where such a project could support growth and regeneration in london. As a component of the 2016 Budget, the Chancellor invited Tfl to investigate proposals for financing transport infrastructure schemes in order to support projects such as the tunnel for Hammersmith. This investigation is ongoing.</p> <p>Simultaneously, LBH&F began to produce an SPD for Hammersmith town centre. Where the tunnel proposal could provide valuable land for</p>	

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							<p>regenerative uses, TfL are waiting for the SPD to be finalised as it will provide guidance on potential transport projects in Hammersmith town centre.</p> <p>It should be noted that funding for the tunnelling of Hammersmith Flyover is not included in the business plan that TfL submitted to the Government.</p> <p>Therefore, the proposal would need to be entirely funded by development on the site and/or by LBH&F.</p>	
64	646	Nigel Hensman	Strategic Site Policy HRA2 - A4, Hammersmith Flyover, Hammersmith Gyratory and adjoining land				<p>Re Flyover: I favour retaining the flyover. I challenge the superficially attractive scheme for a tunnel. It would do nothing in itself to mitigate the problems of traffic since the most favoured option would merely replace the existing route. Limited resources available for tunnelling should be devoted to schemes that improve things.</p> <p>Its construction would inevitably cause disruption. Subsequent economic construction on the released land would probably engender considerable opposition e.g. for its impact on river views. The flyover is not really a barrier between the Town Centre and the river as there are four routes underneath it. Much of the space underneath it could be enhanced and indeed exploited. The flyover may be favoured by many residents but certainly not all, especially those in Fulham and other local areas needing to pass central Hammersmith.</p>	

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							However, I would favour the suggested restoring two way traffic round the gyratory PROVIDED it really would work, that pedestrian routes would be safeguarded and demolition be restrained.	
41	348	Thames Water Utilities Ltd	Fulham Regeneratio n Area				<p><u>Waste Water</u></p> <p>As this site falls within the highly flood sensitive Counters Creek Catchment, surface water attenuation to Greenfield run-off rates is a minimum requirement for Thames Water in this area. This is to facilitate the level of redevelopment proposed and reduce the risk of further property flooding.</p> <p>There is one deep, large diameter storm relief sewer that passes through the southern end of this area (along North End Road and Barclay Road). No new connections into these sewers can be permitted. All existing connections on development sites will need to be considered and appropriately addressed as part of the site drainage strategy. Site configuration would need to take into account access requirements, appropriate build over agreements and piling restrictions due to this asset.</p> <p>The Low Level No 1 passes through the south of this area (Fulham Broadway). Site configuration would need to take into account access requirements, appropriate build over agreements and piling restrictions due to this asset.</p>	

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58	173	Historic England	Strategic Policy FRA – Fulham Regeneratio n Area					<p><u>Strategic Policy FRA – Fulham Regeneration Area, p.56</u></p> <ul style="list-style-type: none"> The recent development proposals at Seagrave Road demonstrate the need to take account of the setting of Brompton Cemetery (Historic Park and Garden, grade I) and associated heritage assets within it. We recommend that the final bullet point is amended to include consideration of the setting of this highly significant heritage asset with the Royal Borough of Kensington and Chelsea. Para 5.77 of the supporting text is helpful in supporting the historic core of Fulham town centre. In the second sentence it would improve clarity to amend the end to read: ‘..at an appropriate scale and in appropriate locations in relation to the character and significance of the centre’s heritage assets’. Para 5.82 – as expressed in relation to other policies the rationale for tall buildings here is unclear. This area in the draft local plan was previously identified as suitable for low-medium rise development and many parts of this area are sensitive to increased building

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								heights. We consider this paragraph requires revision to take account of existing character.
50	556	Capital and Counties on Behalf of Earls Court and Olympia Group	Strategic Policy FRA – Fulham Regeneration Area				<p>Paragraph 5.72</p> <p>Strategic Policy FRA, which includes the ECWKO, requires development proposals to, inter alia, enhance the vitality and viability of Fulham Town Centre.</p> <p>ECP supports this general policy objective, but note that this should be considered in the context of Policy FRA which supports a mix of uses within the ECWKO, including leisure and associated uses and retail uses, provided these have ‘no significant adverse impact on the vitality and viability of town centres.’ (our emphasis)</p>	
50	557	Capital and Counties on Behalf of Earls Court and Olympia Group	Strategic Policy FRA – Fulham Regeneration Area				<p>Paragraph 5.77</p> <p>ECP supports this objective. However, the reference to the scope for providing modern shop facilities as part of possible development in North End Road is unclear, given the emerging plan makes no reference to the current Strategic Site FRA 2, and this is no longer identified as an allocation.</p> <p>ECP’s understanding is this site is no longer available or likely to come forward at this time. As such, the emerging plan does not allocate a range, or indeed any suitable sites to meet the scale and type of retail</p>	

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							and other uses which are needed in Fulham town centre, other than within the ECWKO, which partly overlaps with the town centre.	
50	579	Capital and Counties on Behalf of Earls Court and Olympia Group	Strategic Policy FRA – Fulham Regeneration Area				<p>The current boundaries of Fulham Town centre are defined by high density residential accommodation, and it is evident that there is little scope for any physical extension of the existing centre, other than into the EKWKO area to the north.</p> <p>While there are a number of vacant units within the currently defined centre, these are generally smaller units, in secondary locations. With the exception of the former Fulham Town Hall site, there are no opportunities within the town centre which are suitable or available to accommodate any material scale of additional retail floorspace.</p>	The Local Plan should recognise the opportunities to accommodate the scale of additional retail development needed within Fulham Town Centre as currently defined are very limited, and acknowledge the scope to accommodate additional needs within the wider ECWKO, where significant capacity exists.
50	581	Capital and Counties on Behalf of Earls Court and Olympia Group	Strategic Policy FRA – Fulham Regeneration Area	NO			<p>Reflection of planning permissions and inclusion of ‘minimum’ in targets for additional homes and new jobs in the ECWKO / FRA</p> <p>Planning permissions are in place for the delivery of 7,057 new homes across the part of the ECWKO that falls within the FRA and significant progress has been made to date. To inform the preparation of the LBHF Local Plan, an up-to-date factual account of the housing numbers associated with these planning permissions is provided below. ECP also comments below on the potential for the ECWKO to be further optimised and a greater density of development achieved. It is important that Policy FRA is positively and effectively worded to accurately reflect the development capacity of the ECWKO and the aspiration of the London Plan to optimise development in Opportunity Areas.</p>	<p>ECP proposes the following alterations to the wording of the policy wording and supporting text of Policy FRA:</p> <p>FRA – Fulham Regeneration Area</p> <p>Indicative <u>Minimum</u> additional new homes - 7,000 <u>8,000</u></p> <p>Indicative <u>Minimum</u> new jobs - 9,000 <u>10,000</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> • <u>seek to optimise residential and non-residential development output and density;</u>

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							<p>The table below provides details of housing numbers derived from all extant planning permissions within the LBHF part of the ECWKO A only. These total 7,057 homes.</p> <p>Lillie Square (2011/02000/FUL, superseded by 2013/01213/VAR) - Permission granted on 30th March 2012 (superseded on 29th August 2013) - No. of Homes =807</p> <p>Earls Court Masterplan - LBHF 'OPP 2' (2011/02001/OUT) - permission granted on 14th November 2013 - No. of homes = 5,845</p> <p>1-9 Lillie Road (2013/02620/FUL) - Permission granted on 5th march 2014 - No. of homes = 65</p> <p>ESB Change of Use (2013/05175/FUL) - Permission granted on 22nd May 2014 - No. of homes = 340</p> <p>Totals= 7,057</p> <p>The locations of the above sites in relation to the ECWKO A boundary are shown on the ECWKO A Permissions Plan (ref. ECM35_SK0134 rev C) that is enclosed with these representations (see Appendix 4).</p> <p>Policy FRA only states a target for an 'indicative' 7,000 homes to be delivered within the FRA. However, this number has already been exceeded by approved developments on the sites identified in the above table alone and the London Plan identifies the ECWKO A for a minimum of 7,500 new homes.</p>	<ul style="list-style-type: none"> contribute to the provision of at least 78,000 homes and 910 ,000 new jobs; enhance the vitality and viability of Fulham Town Centre, particularly on North End Road and explore opportunities to secure the long term future of and enhance the North End Road street market <u>and potential for a new mixed use centre at Earls Court;</u> provide for the improvementregeneration of the West Kensington, Gibbs Green and Registered Provider estates; <p>"5.76 ... The largest development opportunity within the FRA is in the Earl's Court and West Kensington Opportunity Area, which is identified in the London Plan (2016) as having the capacity to deliver <u>a minimum of 7,500new</u> homes and 9,500 jobs across both LBHF and RBKC. It is anticipated that <u>a minimum of 6,500 8,000</u> homes and 8,500 <u>10,000</u> jobs could be accommodated in LBHF. In addition to this capacity in the Earl's Court and West Kensington Opportunity Area, the FRA is considered to have the capacity to deliver an additional <u>1, 500</u> homes and <u>1, 500</u> jobs making an overall total for the FRA of 7,000 <u>8,000</u> homes and 9,000 <u>10,000</u> jobs."</p>

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							<p>ECP contends that a target of 7,000 homes in the FRA does not accurately reflect the potential of the FRA to deliver more housing. The London Plan's target for housing delivery within the ECWKO is for a minimum of 7,500 new homes and ECP's representations in relation to draft Policy H01 at Appendix 3 set out that the LBHF Local Plan needs to accommodate an increased number of new homes (1,328 dwellings per annum compared to the currently proposed 1,031 dwellings per annum) to help meet identified housing need across London. Having regard to the soundness tests set out at NPPF para. 182, the Local Plan should be more positively and effectively worded to ensure that the development potential of the ECWKO / FRA is optimised given its status as a major strategic development site that represents a significant part of the Council's housing delivery pipeline.</p> <p>As stated above, the housing output of sites which form only part of the FRA within the within the LBHF part of the ECWKO already benefit from extant planning permissions is currently 7,057 homes. However, owing to numerous factors and changes in circumstances since these permissions were obtained – including property acquisitions, the growth in London's population and the increasingly critical need for new homes – the actual housing output for the ECWKO is expected to be higher than 7,057 new homes.</p> <p>Capco (on behalf of ECP) has submitted representations to the GLA in relation to its Strategic Housing Land Assessment (SHLAA) 2016 Call for Sites to identify that the ECWKO has significant potential to evolve and respond to London's future needs by optimising the development of the sites within the ECWKO that are the subject of extant planning</p>	<p>Supporting text to draft Policy FRA1</p> <p>It is proposed that the supporting text at paragraph 5.84 is amended by adding two new bullet points, as follows:</p> <p>"... <u>In order to realise this development potential, the Council will expect a comprehensive approach to be taken to the improvements to, and the redevelopment of, the Opportunity Area. This approach will have benefits in terms of:</u></p> <ul style="list-style-type: none"> • <u>Providing the opportunity to optimise residential and non-residential development output and density; and</u> • <u>Providing the opportunity to identify additional development capacity to supplement the minimum additional homes target of 8,000."</u>

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							<p>permissions. Capco's representations to the SHLAA Call For Sites state that initial masterplanning work has demonstrated that the ECWKOA could accommodate c.10,000 homes. Optimisation can have significant benefits to housing delivery for the emerging LBHF Local Plan (both in terms of overall total output as well as mix and tenure). Making the most of Opportunity Areas and realising the full development potential of public land (the ECWKOA includes land owned by TfL and LBHF) is clearly a fundamental component of meeting London's growth needs and fostering economic prosperity.</p> <p>The potential for a revised masterplan for the ECWKOA has been discussed with GLA and LBHF officers. It is considered that this could realise significantly more new homes, including more affordable homes for Londoners and other public benefits. The FRA should therefore be identified to accommodate a minimum of 8,000 new homes. This would represent a more realistic reflection of the development capacity of the FRA, while also providing flexibility for the development potential of this major strategic development site to be optimised. Furthermore, this approach will enable the Local Plan to plan positively and effectively to deliver as much housing as possible, in line with the soundness tests within the NPPF, and make the fullest possible contribution toward the London Plan and LBHF housing delivery targets.</p>	
50	591	Capital and Counties on Behalf of Earls	Strategic Policy FRA – Fulham	NO			Requirement for clarification of the Council's approach to 'estate regeneration' within FRA and FRA1 policies and supporting text	ECP proposes the amendment of supporting text at paragraph 5.79 as follows:

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		Court and Olympia Group	Regeneratio n Area				<p>2016 Draft Local Plan Policies FRA and FRA1, as currently drafted, do not include wording in relation to 'regeneration' and only refer to the 'improvement' of the West Kensington and Gibbs Green estates ('the estates'). This is considered to be misleading, vague, inconsistent with the Council's objectives and unreflective of evidence associated with extant land contracts and planning permissions that are being progressed and result in the comprehensive regeneration of the estates. The lack of clarity within the policies as they are currently worded prevent them from being approached positively and effectively, in accordance with the NPPF (para. 182).</p> <p>ECP is also concerned that the supporting text to FRA and FRA1 does not explain the significant amount of evidence in place which supports the principle of the redevelopment of the estates and the need for this to comprise comprehensive redevelopment. This evidence is very briefly summarised by the following:</p> <ul style="list-style-type: none"> The Council entered into a contract, known as the Conditional Land Sale Agreement (CLSA), with Capco to sell the estate land and enable its comprehensive regeneration on 23January 2013. This was done on the basis of significant evidence compiled by the Council to demonstrate that a comprehensive regeneration approach was the preferred approach to the future of the estates, which was reported to the LBHF Cabinet for their decision on 3September 2012 to proceed with entering into the CLSA. The key piece of evidence in this respect is the Proposed Estates Regeneration – Economic Appraisal Report prepared by Amion and JLL (dated November 2011); and 	<p>"5.79 The FRA and its surroundings are dominated by a number of large council housing estates. The redevelopment of the Earls Court Exhibition Centre could provides the opportunity for improvements to <u>regeneration</u> of the West Kensington and Gibbs Green estates, including the potential for renewal of and additions to all or parts of the estates, to enable improved housing opportunities for local residents and to support economic regeneration in this area. <u>The minimum number of additional homes anticipated to be delivered within the FRA assumes the West Kensington and Gibbs Green estates are comprehensively regenerated.</u>"</p> <p>Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area</p> <p>The Council will support the phased mixed use residential led redevelopment of the Earl's Court and West Kensington Opportunity Area. Development proposals should:</p> <ul style="list-style-type: none"> provide for improvement<u>regeneration</u> of the West Kensington, Gibbs Green and Registered Provider estates, as part of the comprehensive approach to the regeneration of the Opportunity Area;

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							<ul style="list-style-type: none"> The CLSA - and therefore the sale of the estates for the purpose of comprehensive regeneration - was confirmed by the Secretary of State on 18 April 2013 and Capco triggered its option over the estates on 14 November 2013; the same day on which planning permission was granted for the redevelopment of the majority of the ECWKO / FRA, including the regeneration of the estates. This permission has been implemented and is in the process of being delivered. <p>Having regard to the above, it is also unclear why the text previously set out at para. 6.125 of the Issues and Options version of the draft Local Plan regarding the current state and layout of the estates has been deleted. The estates have not altered since the last version of the draft Local Plan was published for consultation in January 2015. The circumstances surrounding their condition and layout are unchanged, so there is no reason for this text to have been deleted. Accordingly, ECP proposes that it should be reinstated at the end of the penultimate sentence of para. 5.90 of the current draft Local Plan in supporting text to Policy FRA (see proposed wording below).</p> <p>The lack of reference to 'regeneration' of the estates within draft policies FRA and FRA1 is not only inconsistent with the above evidence, but also corresponding supporting text and the Council's intentions to update the Local Plan in its September 2016 Consultation Responses report. Paragraph 5.91 of the 2016 Draft Local Plan states that the Council will encourage "comprehensive redevelopment proposals for the opportunity area". The policies need to focus on the regeneration of the estates as this is a substantial part of the comprehensive redevelopment of the</p>	<ul style="list-style-type: none"> provide green corridors and public open spaces including the provision of a centrally located local park of at least 2 hectares; and recognise the substantial scope offered by the scale and location of the Opportunity Area to create a new sense of place and range of densities. There may be scope for tall buildings, however any tall buildings would need to be justified by a full urban design analysis. <u>Development should recognise the substantial scope offered by the scale and location of the Opportunity Area to create a new sense of place and range of densities. The Opportunity Area is capable of accommodating high quality tall buildings. The potential impacts of the design, layout, massing and density of development on the character of the local context, the settings of designated heritage assets and on local views should be assessed.</u> <p>ECP proposes that the following alteration is made to para. 5.90:</p> <p>"5.90 The West Kensington and Gibbs Green housing estates lie to the west of the Opportunity Area. The West Kensington Estate was built between 1972-74 and</p>

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							<p>ECWKO A portion of the FRA that has already been granted planning permission. The number of new homes that will be developed in place of the existing estates forms a significant part of the Council's housing pipeline and has clearly been allowed for in the preparation of London Plan and draft Local Plan's housing delivery targets for the ECWKO A / FRA.</p> <p>The omission of reference to 'estate renewal' in Policies FRA and FRA1 was raised as a concern by ECP in its February 2015 representations and the Council responded in September 2016 stating that " <i>The Local Plan objectives are to promote estate renewal and the improvement of the estates. The council acknowledges that further clarification on the term 'renewal' is needed and will be included</i> ". However, Policies FRA and FRA1 of the 2016 Draft Local Plan do not reflect this objective insofar that they do not refer to renewal and no clarification of the term is provided. The Council has, therefore, failed to respond adequately to ECP's previous representations and has not undertaken to amend the 2016 Draft Local Plan consistent with actions advised in its Consultation Statement (September 2016).</p> <p>However, having regard to the rising need for housing in LBHF and across London, ECP considers that even the term 'estate renewal' does not go far enough in setting out a positive and effective plan for the optimised, comprehensive redevelopment of the ECWKO A / FRA. Clear reference to the 'regeneration' of the estates is required in the wording of Policies FRA and FRA1 to ensure that the development capacity of the ECWKO A / FRA that is discussed above can be realised and associated London Plan and LBHF housing delivery targets can be met. As is further explained</p>	<p>includes 604 properties in 5 tower blocks, low rise flats, maisonettes and terraced houses. Gibbs Green Estate has 98 properties built in 1961 and comprising 7 medium-rise blocks. There are also pockets of newer Housing Association development across the estates. <u>Overall the proportion of social rented housing is 78%. The estates suffer from discontinuous internal roads and there is poor integration with the surrounding area. The West Kensington Estate in particular has large areas of poorly laid out and underused communal land.</u> The eastern boundary is formed largely by the TfL depot which has an adverse effect on the estate environment."</p> <p>ECP proposes the following replacement wording for para. 5.91:</p> <p>"5.91 The council will encourage comprehensive redevelopment proposals for the opportunity area that include improvements to <u>regeneration of</u> the West Kensington and Gibbs Green estates. <u>The minimum number of additional homes anticipated to be delivered within the FRA and the minimum new homes allocated for the Earls Court and West Kensington Opportunity Area in the London Plan (2016) (as referred to at paragraph 5.84) assumes that redevelopment includes a phased comprehensive regeneration of the</u></p>

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							<p>below, both policies and supporting text must clearly explain that the Borough's housing pipeline and London Plan allocation for the ECWKOAs are dependent upon the regeneration of the estates – reference to renewal or improvement is too vague and uncertain in this context.</p> <p>The redevelopment of the ECWKOAs represents a substantial contribution towards the delivery of the new homes, jobs and supporting infrastructure that the Borough needs in order to meet objectively assessed targets over the plan period. The extant planning permission constitutes sustainable development, having been considered in the context of the NPPF, which was published in March 2012.</p> <p>As already explained, the regeneration of estate land represents a substantial part of the comprehensive redevelopment proposals for the ECWKOAs and FRA. Without regeneration of the estate land, the ability for the ECWKOAs and FRA to achieve the indicative additional homes figure stated in Policy FRA and, in turn, the Council's anticipated housing pipeline as set out in Table 2, page 187 of the 2016 Draft Local Plan would be put at risk.</p> <p>Any FRA or FRA1 policy which is unclear or ambiguous about the need to deliver substantial homes on estate land through regeneration is clearly inconsistent with the expected housing supply and pipeline associated with the FRA. It would also raise significant questions as to the consistency of the Local Plan with the adopted London Plan, which designates the ECWKOAs for the delivery of a minimum of 7,500 new homes. This minimum cannot be achieved without the comprehensive regeneration of the estate land and therefore any policy must be based</p>	<p><u>estates</u> This could potentially include renewal and additions to parts of the estates. There should be no net reduction in the amount of social rented housing in the opportunity area. Mixed and balanced communities should be created across the opportunity area and the existing community should be supported and strengthened through the provision of a variety of housing, including affordable housing, made available to local people."</p>

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							<p>on regeneration. Anything short of this – whether improvement or renewal – is not as positive or effective as is necessary.</p> <p>It is therefore vital that 2016 Draft Local Plan Policies FRA and FRA1 are clear in relation to the future regeneration of the estates to match the strategic objectives of the London Plan and the LBHF Local Plan for the ECWKO / FRA and to meet the requirements of the NPPF in order for the Local Plan to be sound.</p> <p>Conclusions & FRA and FRA1 Soundness Test Assessment</p> <p>ECP considers policies FRA and FRA1 as currently worded to be unsound having particular regard to the amount of development identified for the ECWKO / FRA during the Plan period and the approach taken in relation to the West Kensington and Gibbs Green estates. For the sake of clarity, we have set out the NPPF tests of soundness (NPPF para. 182) below, with commentary in relation to Policy FRA and FRA1's performance with regard to the regeneration of the estate land against each one (references to the soundness of the Plan in relation to other topic-specific representations are included where appropriate in Appendix 3).</p> <p><i>" A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:</i></p> <p><i>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring</i></p>	

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							<p><i>authorities where it is reasonable to do so and consistent with achieving sustainable development;</i></p> <ul style="list-style-type: none"> • Policies FRA and FRA1 have not been positively prepared. Reference to the ‘improvement’ of the West Kensington and Gibbs Green estates is ambiguous and lacks the clarity required to ensure that the nature of development that has been approved, and is intended to be accommodated within the FRA, is deliverable. The vague wording of Policies FRA and FRA1 in relation to the estates raises uncertainty over the Council’s objectives. Clarity on the Council’s approach, which makes it clear that ‘estate regeneration’ is planned for – and forms a significant part of - the comprehensive redevelopment of the FRA, is necessary to ensure Policies FRA and FRA1 are positively prepared and consistent with evidence. The policies themselves and supporting text need to reflect the fact that regeneration of the estates is necessary in order for minimum housing allocations for the FRA and ECWKO to be met. <p><i>Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</i></p> <p>The Council has not included explicit reference to ‘estate regeneration’ in Policies FRA and FRA1 or clarified its approach to estate renewal or regeneration t, despite stating in its responses to previous representations that it would do so. The weight of evidence referred to in these representations supports the regeneration of the West Kensington and Gibbs Green estates. Therefore, there is no justification</p>	

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							<p>or evidence base to support the omission of clear reference to estate regeneration in Policy FRA or FRA1 as part of the <i>'most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence'</i>. ECP contends that explicit reference must be made to 'estate regeneration' in Policies FRA and FRA1 in order for their content to be considered sound in the context of this test, having particular regard to the extant planning permission to redevelop the estates; the CLSA between Capco and LBHF in relation to the regeneration of the estates; the strategic objectives of the London Plan and the 2016 Draft Local Plan to deliver housing and jobs; the reference to estate renewal [proposed to be amended to 'regeneration'] in supporting text to Draft Policy FRA1 (para. 5.91); and the Council's stated intention to clarify its approach to estate renewal in the emerging Local Plan.</p> <p><i>Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</i></p> <p>As stated above, the current wording of Policies FRA and FRA1 in relation to estate renewal/regeneration is ambiguous and lacks the clarity required to ensure that the nature of development that is both approved and intended be accommodated within the FRA is deliverable. Without clarity on this point, the deliverability of the emerging Local Plan will be called into question.</p> <p><i>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p>	

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							The vague wording of Policies FRA and FRA1 in relation to estate renewal/ regeneration raises uncertainty over the Council's position in relation to the regeneration of the West Kensington and Gibbs Green estates. Clarity on its approach is required to make it clear that 'estate regeneration' is acceptable as part of the comprehensive redevelopment of the ECWKO / FRA. This is required to ensure the Local Plan will be capable of delivering development in line with objectively assessed London-wide and LBHF-specific needs (in accordance with national planning policy) for new housing delivery and job creation, and is consistent with approved development within the ECWKO (which includes the regeneration of the West Kensington and Gibbs Green estates) that has been granted planning permission in accordance with the requirements of national planning policy for the delivery of sustainable development. The evidence referred to in these representations demonstrates that the Council has clearly accepted that the regeneration of the estates must take place to deliver the wider regeneration of the ECWKO / FRA.	
58	176	Historic England	Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area					<p><u>Strategic Policy FRA1</u></p> <ul style="list-style-type: none"> We request that the rationale for tall buildings referred to in the final bullet point should be made clear, to ensure that such proposals are based on a plan-led approach and sound urban design analysis, including an analysis of the effect on the significance of heritage assets. This area is not identified on the Key Diagram as suitable for tall buildings,

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								or in policy DC3, and there are many areas where, in our view, they would be inappropriate.
55	305	West Ken Gibbs Green Community Homes, the West Kensington TRA and the Gibbs Green and Dieppe Close TRA	Strategic Site Policy FRA1 – Earl’s Court and West Kensington Opportunity Area	NO	YES	YES	<p>In order to be clear, Effective and Justified in meeting its own stated objectives and the wider Strategic Objectives set out in the Local Plan, Strategic Site Policy FRA1 should contain an additional bullet point stating that “Development proposals should avoid demolition of the West Kensington and Gibbs Green estates, unless demolition is demonstrably unavoidable”.</p> <p>Without this, the Strategic Site Policy FRA1 is unsound due to the reasons set out below.</p> <p>Paragraph 5.94 states that “In 2013, planning approval was granted for the redevelopment of the EC Exhibition Centre, Lillie Bridge transport depot and the West Kensington and Gibbs Green housing estates to provide a mixed use residential led development.”</p> <p>The approved plan to demolish the West Kensington and Gibbs Green estates:</p> <p><i>a) Is not guaranteed to be Effective or Justified in relation to Strategic Objectives 5 and 6, Policy HO3 and Paragraph 5.91 under Strategic Policy FRA1 which states that “There should be no net reduction in the amount of social rented housing”.</i></p>	<p>1. <i>In order to be Effective and Justified in meeting its own stated objectives and the wider Strategic Objectives set out in the Local Plan, Strategic Site Policy FRA1 should contain an additional bullet point stating that “Development proposals should avoid demolition of the West Kensington and Gibbs Green estates, unless demolition is demonstrably unavoidable”.</i></p> <p>Because: The Policy currently does not provide clarity to developers or residents as to whether or not the Council considers it suitable that demolition of the West Kensington and Gibbs Green estates should proceed and under which circumstances. We have set out above five reasons (see points 1a, 1b, 1c, 1d and 1e) why it would not be Effective or Justified for Policy FRA1 to permit demolition of the West Kensington and Gibbs Green estates if such an outcome can be avoided. Incorporating this change will ensure that the policy is Effective and Justified, and will provide clarity to developers and the local community as to the</p>

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							<p>If demolition of West Kensington and Gibbs Green takes place as per the 2013 planning approval, it is very likely there will be a net loss of social rented housing in the opportunity area for the following reasons:</p> <p>The developer is required under the CLSA to re-provide the 760 homes which it would demolish. However, aside from provisions for rehousing households with Secure Council Tenancies, there is no requirement as to the tenure or level of rent charged for the replacement homes.</p> <p>The CLSA entered into between the Council and the developer in January 2013 requires that vacated council properties be re-let not to Secure Council Tenants but to temporary licensees. The CLSA states that neither the Council nor the developer bears a responsibility to offer the temporary licensee households a replacement property at a social rent within the redevelopment, the opportunity area, or even the borough.</p> <p>As of April 2016 there were 462 properties let on a secure tenancy at social rent. As of April 2016, already 78 properties across both estates were let on a temporary licence. Our research identifies that no more than 18 of these could be properties which have been sold back to the Council by leaseholders and freeholders, so the remaining sixty are properties which, prior to January 2013, were let on a secure tenancy at social rent. This averages as a potential loss of just under 20 social rented homes per year between the signing of the CLSA and the completion of the redevelopment, should it be allowed to proceed. It should also be assumed that some secure council tenants would choose to move away from the area rather than continue their tenancy within the new development.</p>	<p>circumstances under which demolition of the West Kensington and Gibbs Green estates will be permitted.</p> <p><i>2. In order to provide clarity to developers and be Effective in relation to Strategic Objectives 5 and 6 and Policy HO3, the following should be included as a Policy (not a Justification) under Strategic Site Policy FRA1: "There should be no net reduction in the amount of social rented housing in the Opportunity Area. The minimum number of social rented units required within the Opportunity Area is 589, as per the current Section 106 agreement which was signed in November 2013."</i></p> <p>Because: Strategic Objectives 5 and 6 and Policy HO3 emphasise the importance of protecting social housing stock in the borough. As is explained in point 1a above, demolishing the West Kensington and Gibbs Green estates as part of the Earl's Court Masterplan is likely to cause to a net loss of social rented housing in the Opportunity Area. Incorporating this change will make it harder for a development to proceed with a net loss of social housing within the Opportunity Area. This will improve the Strategic Site Policy FRA1's precision and effectiveness with regard to achieving Policy HO3 and Strategic Objectives 5 and 6.</p> <p><i>3. In order to be Effective with regard to Strategic Objectives 16 and 17, Strategic Site Policy FRA1 should clearly state that "the amenity, quality of life, safety</i></p>

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							<p>The Conditional Land Sale Agreement (CLSA) currently in place between the local authority and the developer requires that the local authority cover the cost of buying back properties formerly purchased under the Right to Buy. By even a conservative estimate of property prices, the local authority should expect this cost to cause them to make a loss overall on the scheme should it proceed.</p> <p>It is realistic to expect that the local authority will attempt to recover losses made this way through letting the new 'affordable' homes provided under Section 106 and the replacement homes which are not inhabited by sitting secure tenants at 'affordable' rents rather than social rent, or to dispose of them on the market.</p> <p><i>b) Is not an environmentally sustainable approach to development and is thus not Effective or Justified in relation to Strategic Objective 13 and the Local Plan's Spatial Vision that "By 2035, Hammersmith and Fulham will be the greenest borough."</i></p> <p>In our January 2015 response, we argued that with regard to demolition schemes, the Council "needs to balance improved energy efficiency against the release of embodied carbon."</p> <p><u>The People's Plan for the West Kensington and Gibbs Green estates</u> has been produced by West Ken Gibbs Green Community Homes, the two TRAs for the estates and over one hundred local residents working with professional architects, quantity surveyors and valuers. This piece of work demonstrates that it is possible to achieve improved insulation and make use of sustainable energy such as solar panels through retrofit of existing properties. It shows that these improvements could be paid for</p>	<p><i>and security of residents of the West Kensington and Gibbs Green estates and the surrounding areas will be of highest priority to the local authority throughout any works done to the area. Should demolition proceed as a last resort, full and effective provision should be made for ensuring the security of the area twenty four hours a day."</i></p> <p>Because: According to Professor Anne Power, Head of Housing and Communities at the London School of Economics, the cost of demolishing an occupied estate includes "An increase in crime and vandalism while properties remain empty. There is also a risk of arson, theft of piping, wiring and radiators from those empty flats, causing more police action and higher security costs. It is in such conditions that on a Southwark estate, long targeted for demolition, that Damilola Taylor was murdered". (The blog can be read here: http://blogs.lse.ac.uk/politicsandpolicy/sink-estates-demolition/). These outcomes clearly threaten the safety, security, amenity and quality of life of residents and visitors to the Opportunity Area, objectives enshrined in Strategic Objectives 16 and 17 of the Local Plan. Making this change will ensure that Policy FRA1 is Effective in addressing this.</p>

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							<p>without the need for the waste of embodied carbon through demolition of decent, well-loved homes.</p> <p>A fact sheet by the Engineering department at University College London which highlights the relative costs and benefits of retrofit versus development can be found online here: http://www.engineering.ucl.ac.uk/engineering-exchange/files/2014/10/Fact-Sheet-Embodied-Carbon-Social-Housing.pdf</p> <p>The document states that:</p> <p>“When a building is demolished energy is used to deconstruct it, and remove, process and dispose of the waste. CO2 may also be released through associated chemical processes. Building a new replacement requires more materials and energy, creating more embodied carbon. When renewable energy is supplied to our homes, it becomes less important to improve our building’s energy performance and more important to avoid the embodied emissions of demolition and rebuilding.”</p> <p>A 2009 case study contained in the factsheet which looks at a development of 14 semi-detached homes in Peterborough showed that demolition would have produced 6% more life time emissions of carbon dioxide than the scenario of retrofitting of existing properties. It found also that the lifetime emission savings produced by energy efficiency measures in the new homes were 9% less overall than the efficiency savings calculated for the retrofit scenario.</p>	<p><i>4. In order to meet the requirement that the plan is Positively Prepared, delete the final bullet point in paragraph 5.84 (Justifications under Policy FRA1)</i></p> <p>Because: The phrase “an appropriate mix” and “a more even distribution of housing tenures across the opportunity area” are open to value judgements and mixed interpretations. They undermine the Policy’s claim to have been Positively Prepared. For clarity and fairness, this should be deleted.</p> <p><i>5. In order to be clear and Effective with regard to meeting regional policy ambitions, Policy FRA1 should include a Policy which states that “Development proposals which involve demolition of the West Kensington and Gibbs Green will not be encouraged if they lack the support of the majority of residents whose homes would be demolished.”</i></p> <p>Because: The Manifesto of the elected Mayor of London states that the Mayor will “Require that estate regeneration only takes place where there is resident support.” In order to be consistent with regional policy ambitions, Strategic Site Policy FRA1 should clearly state that the demolition of West Kensington and Gibbs Green estates will be avoided so long as there is not clear resident support. This principle should be</p>

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							<p>Whilst these figures are case dependent, it demonstrates the necessity of carrying out a study comparing retrofit to demolition which takes into account the far greater release of embodied carbon necessarily involved with large scale demolition. There has so far been no such study in relation to the proposed demolition of the West Kensington and Gibbs Green estates.</p> <p>The West Kensington and Gibbs Green estates have recently had £20million worth of Decent Homes and other works done to them. The majority of properties are roughly only fifty years old and some are no more than twenty years old. To demolish these homes without first comparing and taking into account the embodied carbon that would be released is not compatible with the Local Plan's Spatial Vision and Strategic Objective 13.</p> <p><i>c) Is not Effective in relation to achieving Strategic Objectives 16 and 17 within the Opportunity Area. These objectives are "To protect and enhance the amenity and quality of life of residents" and "To promote the safety and security of those who live, work and visit Hammersmith and Fulham."</i></p> <p><i>Strategic Site Policy FRA1 should clearly state that "the amenity, quality of life, safety and security of residents of the West Kensington and Gibbs Green estates and the surrounding areas should be of highest priority to the local authority throughout any works done to the area. Should demolition proceed as a last resort, provision should be made for ensuring the security of the area twenty four hours a day."</i></p>	<p>reflected throughout the Plan where council estate demolition is under consideration.</p> <p><i>6. In order to be Effective with regard to national best practice, Strategic Site Policy FRA1 should refer to actively engaging with The People's Plan and working with the three democratically elected residents' organisations which represent the community.</i></p> <p>Because: Lord Heseltine, Chair of the panel set up to look at how to implement the Prime Minister's initiative for council estates has said that estates regeneration "has to be locally led" and that he wants to "see local communities coming forward with innovative ideas to achieve desirable neighbourhoods that local people can be proud of".</p> <p>The West Kensington and Gibbs Green estates contain three community groups with democratically elected representatives. A majority of households on both estates are members of West Ken Gibbs Green Community Homes. We welcome the requirement for development proposals to "provide for improvement to the West Kensington and Gibbs Green and Registered Provider estates". All three organisations led in the production of The People's Plan. A summary of The People's Plan accompanied this response by email and can also be found here</p>

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							<p>There is a high number of elderly residents on the West Kensington and Gibbs Green estates. There is a wealth of e that forced relocation contributes significantly to stress, early death and other health problems, particularly among senior citizens.</p> <p>Should demolition go ahead, residents may be living on a development site for an indefinite period of time, but at least ten years. The desolation created by the decant process (which could extend over a significant timescale) risks resident safety.</p> <p>According to Professor Anne Power, Head of Housing and Communities at the London School of Economics, the cost of demolishing an occupied estate includes “An increase in crime and vandalism while properties remain empty. There is also a risk of arson, theft of piping, wiring and radiators from those empty flats, causing more police action and higher security costs. It is in such conditions that on a Southwark estate, long targeted for demolition, that Damilola Taylor was murdered”. The blog can be read here: http://blogs.lse.ac.uk/politicsandpolicy/sink-estates-demolition/</p> <p><i>d) Is not Effective or Justified with regard to assisting in achieving the target of 7,000 additional homes set for the Fulham Regeneration Area, under Strategic Policy FRA.</i></p> <p>The approved redevelopment (or any demolition and redevelopment scheme of such a size) will rely on the sale of luxury properties targeted at overseas and domestic investors. This market has been flagging and as such, according to the Financial Times, at the current rate it may take the developer 150 years to sell the properties it currently has planning</p>	<p>online: https://westkengibbsgreen.wordpress.com/the-peoples-plan/ .</p> <p>Over one hundred local residents came together in November and December of 2015 to produce the People’s Plan which outlines the most pressing improvements needed to the estates and how they might be paid for, without need for demolition.</p>

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							<p>permission for within the Earls Court Masterplan (https://www.ft.com/content/4c818f9e-6f98-11e6-a0c9-1365ce54b926).</p> <p>Deutsche Bank has made grim predictions for the future of the developer in question, Capital and Counties:https://westkengibbsgreen.files.wordpress.com/2016/10/capco-15-6-16.pdf . And between January and September this year, the developer's share price fell by 37%. They recently wiped 14% off the value of the whole Earl's Court scheme. This raises serious questions as to whether they can deliver what they are promising within a reasonable time frame.</p> <p>Experts predict that a housing market crash is a matter not of if but when. Should 'decant' and demolition commence and be followed by a housing market crash, then there would be a loss of social rented properties with no immediate gain. This would serve only to worsen the squeeze on social housing in the borough.</p> <p>Since the developer does not have to commence work on West Kensington and Gibbs Green estates until 2025, the developer may choose to build out few if any of the roughly 2,500 new homes promised for the estates area during the 20 year timescale covered by the Local Plan, whilst it waits for property prices to recover.</p> <p>e) <i>Is not an Effective approach with regard to addressing overcrowding in the Opportunity Area or the borough, an important issue which is acknowledged in Paragraph 2.22 of the Local Plan.</i></p>	

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							<p>Paragraph 2.22 of the Local Plan states that “Another key challenge in relation to housing supply is overcrowding”. This is acknowledged to be a particularly acute problem in the social rented and private rented sectors.</p> <p>We highlighted the issue of overcrowding on the West Kensington and Gibbs Green estates in our January 2015 response. In the social rented sector, the issue has grown in severity since then.</p> <p>A draft phasing plan sent to the council by the developer in March 2016 gave timescales for the rehousing of existing residents of between 2018 and 2027. Let’s assume this timescale can still be achieved. Imagine a family of four living in a two bedroom flat in the final phase of the development with an eleven year old girl and a ten year old boy sharing a bedroom. Were they to wait to receive a new and bigger home within the new development, they would be waiting for at least eleven years. Meanwhile their children have gone through puberty as well as secondary and perhaps further education without adequate room to develop and study. Clearly the promise of a new home within the approved scheme does not address the problem of overcrowding for the majority of residents on the estates.</p> <p>Meanwhile, prospects of achieving a transfer or mutual exchange are damaged by the uncertainty surrounding the future of residents’ homes. For instance, older residents who would ordinarily choose to downsize by swapping with a neighbour within the estates have been put off doing so due to the possibility that they may end up having to move twice.</p>	

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							<p>There is much evidence that redevelopment schemes such as this serve to worsen overcrowding conditions in the local private rented sector. Within the permitted scheme currently there is no provision for the assistance of private tenants to find suitable alternative accommodation when their home is demolished. There are several families with dependent children who have rented privately on the estates for ten years or more, some of whom are already overcrowded. Should demolition proceed, these families will most likely face the choice of having to leave the area or move into a smaller or poorer quality property in the area due to the local cost of private renting.</p> <p>2. Inclusion of the final bullet point in Paragraph 5.84 as a Justification for Policy FRA1 prevents the policy from being Positively Prepared. The paragraph states that “a comprehensive approach to all the area would enable estate renewal and provide more scope for development of an appropriate mix and a more even distribution of housing tenures across the opportunity area”.</p> <p>The phrase “an appropriate mix” and “a more even distribution of housing tenures across the opportunity area” are open to value judgements and mixed interpretations. They undermine the Policy’s claim to have been Positively Prepared. For clarity and fairness, this bullet point should be deleted.</p> <p>3. In order to be clear and Effective with regard to meeting regional policy ambitions, Policy FRA1 should include a Policy which states that “Development proposals which involve demolition of the West Kensington and Gibbs Green will not be encouraged if they lack the</p>	

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							<p>support of the majority of residents whose homes would be demolished.”</p> <p>The Manifesto of the elected Mayor of London states that the Mayor will “Require that estate regeneration only takes place where there is resident support.” In order to be consistent with regional policy ambitions, Strategic Site Policy FRA1 should clearly state that the demolition of West Kensington and Gibbs Green estates will be avoided so long as there is not clear resident support. This principle should be reflected throughout the Plan where council estate demolition is under consideration.</p> <p>4. In order to be Effective with regard to national best practice, Strategic Site Policy FRA1 should refer to actively engaging with The People’s Plan and working with the three democratically elected residents’ organisations which represent the community.</p> <p>Lord Heseltine, Chair of the panel set up to look at how to implement the Prime Minister’s initiative for council estates has said that estates regeneration “has to be locally led” and that he wants to “see local communities coming forward with innovative ideas to achieve desirable neighbourhoods that local people can be proud of”.</p> <p>The West Kensington and Gibbs Green estates contain three community groups with democratically elected representatives. A majority of households on both estates are members of West Ken Gibbs Green Community Homes. We welcome the requirement for development proposals to “provide for improvement to the West Kensington and Gibbs Green and Registered Provider estates”. All three organisations led</p>	

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							<p>in the production of The People's Plan. A summary of The People's Plan accompanied this response by email and can also be found here online: https://westkengibbsgreen.wordpress.com/the-peoples-plan/ .</p> <p>Over one hundred local residents came together in November and December of 2015 to produce the People's Plan which outlines the most pressing improvements needed to the estates and how they might be paid for, without need for demolition.</p>	
51	389	Transport for London Commercial Development Property Team	Strategic Site Policy FRA1 – Earl's Court and West Kensington Opportunity Area				<p>We welcome the reference to the approved planning consents for the site, relating to the redevelopment of the area and now reflecting an up-to-date planning position for the Earl's Court, Lillie Bridge Depot and West Kensington and Gibbs Green estate sites. We are supportive of a comprehensive redevelopment approach.</p>	<p>We reiterate comments relating to the need to ensure that the wording of the Local Plan aligns with that of the London Plan. The Local Plan makes reference to the delivery of 7,000 'indicative' additional homes, whereas Annex 1 of the London Plan refers to a 'minimum' rather than 'indicative' target. Annex 1 of the London Plan also states that <i>"the area presents a significant opportunity for regeneration comprising estate renewal and housing and employment growth"</i>, whereas the Local Plan only references improvement of the estates. For consistency and for the avoidance of doubt, the wording of the Local Plan should be amended to reflect these comments.</p>
49	396	Royal Borough of Kensington & Chelsea	Strategic Site Policy FRA1 – Earl's Court and West					<p>Bullet 5 – Our previous consultation response requested the previous text to be amended to: "Ensure that the design, layout, massing and density of development takes account of and respects the local</p>

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			Kensington Opportunity Area					<p>context and setting, local conservation areas, and local views <u>and (the setting of) heritage assets such as Brompton Cemetery</u>". This text has been replaced without reference to heritage assets such as Brompton Cemetery. In view of this we object to the current text which reads: "recognise the substantial scope offered by the scale and location of the Opportunity Area to create a new sense of place and range of densities. There may be scope for tall buildings, however any tall buildings would need to be justified by a full urban design analysis". [Duty to Cooperate; Justification; Effectiveness].</p> <p>Our previous consultation response requested paragraph 5.93 be amended to "Overall, the design, layout, massing and density of development <u>must take account of and respect the local context and setting, local conservation areas, and local views and (the setting of) heritage assets such as Brompton Cemetery</u>". The current text caters for Brompton Cemetery but not other heritage assets and we request this is amended. [Duty to Cooperate; Justification; Effectiveness].</p>
38	541	Greater London Authority and Transport for	South Fulham				TfL will continue working with LBHF and other relevant stakeholders to address transport issues, as the regeneration of sites including Fulham	

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		London Planning Team	Regeneratio n Area				Gas Works progresses with the aid of the South Fulham Riverside SPD and Strategic policy SFRRA of the Local Plan.	
10	22	CLS Holdings	Strategic Policy SFRRA - South Fulham Riverside Regeneratio n Area				<p>South Fulham Riverside Regeneration Area</p> <p>Our client welcomes the Council's support for major regeneration and growth in the South Fulham Riverside Regeneration Area (SFRRA).</p> <p>Strategic Policy SFRRA – South Fulham Riverside Regeneration Area</p> <p>Our client supports the SFRRA policy to work with landowners to secure the regeneration of the SFRRA to become a high quality residential area, together with a mix of other uses.</p> <p>Our client supports the policy aim that development proposals should be predominantly residential to contribute towards the target of 4000 additional dwellings by 2035. Our client's site has the potential to contribute towards this target providing high quality new homes. To align with the Council's aspirations to exceed the London Plan housing targets and strategic policy support to optimise housing potential (policy 3.4 of the London Plan) we suggest that the policy wording should make clear that the indicative 4000 additional homes is a minimum target.</p> <p>Our client supports the policy aim that development proposals should 'include employment based uses that will meet local business needs and are compatible with residential development in the most accessible parts of the area, particularly in the vicinity of Imperial Wharf Station . . . ' Our</p>	<p>The policy wording should make clear that the 4,000 new homes anticipated in the Regeneration Area is a minimum target.</p> <p>Suggested amendments to Para 5.100 to provide consistency with policy wording: It is important that employment floorspace should be located in the most accessible parts of the regeneration area, being <u>in the vicinity of</u> Imperial Wharf Station.</p>

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							<p>client's site has the potential to deliver new employment space to support local business needs in a location within walking distance of Imperial Wharf Station and within the same PTAL as those areas immediately adjoining the station.</p> <p>Para 5.100 of the supporting justification states that '<i>it is important that employment space should be</i> located in the most accessible parts of the regeneration area, being Imperial Wharf Station, with a secondary location around the junction at Wandsworth Bridge Road, Townmead Road and Carnwath Road . . '. To remain consistent with the policy wording we would suggest that the same wording is utilised in the supporting justification as in the policy.</p> <p>Summary</p> <p>Our client is broadly supportive of the policies contained within the Proposed Submission Version of the Local Plan, including the identification of key Strategic Sites, and acknowledgement of their ability to deliver regeneration, and a significant number of new homes contributing towards the Council's aim to exceed its housing target as well as additional jobs through new employment floorspace.</p>	
68	98	Fulham Society	Strategic Policy SFRRRA - South Fulham Riverside				<p>Para 5.109 refers to "local recruitment campaigns". We have heard comments that when local jobs are advertised applicants apply from all over London and often abroad but very few from Fulham. Could there be some local recruitment process, perhaps including the schools, to encourage this.</p>	

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			Regeneration Area					
58	178	Historic England	Strategic Policy SFRRA - South Fulham Riverside Regeneration Area				<p><u>Strategic Policy SFRRA – South Fulham Riverside, p63</u></p> <p>We are disappointed to note that earlier suggestions to integrate heritage and character have not been incorporated given that a substantial proportion of the area is conservation area. The final bullet point to policy SFRRA does not promote a positive approach to the historic environment as required by paras 8, 137 and 158 of the NPPF which seek to reconcile and avoid harm to the historic environment, taking opportunities to better reveal significance where opportunities arise.</p>	We strongly recommend that the final bullet to this policy is amended to refer to the earlier draft policy wording ‘ensuring the protection of heritage assets...’
30	316	Big Yellow Self Storage Company Ltd	Strategic Policy SFRRA - South Fulham Riverside Regeneration Area	YES	YES	YES	In this respect, the Plan is considered to be effective and the current wording of emerging Policy SFRRA is supported. It is considered that self storage (Use Class B8) floorspace would be a complementary land use within the residential led regeneration of this area.	
30	317	Big Yellow Self Storage Company Ltd	Strategic Policy SFRRA - South Fulham Riverside	NO	YES	YES	The target for the creation of 500 new jobs in the South Fulham Riverside Regeneration Area by 2035 is supported but the plan should also recognise that, while storage and distribution uses (Use Class B8)	Para 5.100- Amend supporting text to acknowledge the importance of storage and distribution uses (Use Class B8).

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			Regeneration Area				generally do not generate high employment densities, they make a positive contribution towards employment in the borough.	
31	335	Port of London Authority	Strategic Policy SFRRRA - South Fulham Riverside Regeneration Area				New River Crossing Policy SFRRRA, in addition to promoting opportunities for river related uses, supports the implementation of a pedestrian and cycle bridge, providing access south of the River. Any proposed pedestrian and cycle bridge over the river must not impact on navigation or river regime and will require the PLAs consent.	
31	337	Port of London Authority	Strategic Policy SFRRRA - South Fulham Riverside Regeneration Area				Safeguarded Wharves Matters relating to safeguarded wharves are dealt with under Policy SFRRRA and RTC1. There are three safeguarded wharves within the Borough, which are subject to the relevant Policies within the London Plan, notably 7.26: <ul style="list-style-type: none"> - Hurlingham Wharf - Swedish Wharf - Comley's Wharf (formally RMC Fulham). Whilst the fact the Borough is home to three safeguarded wharves is referenced, it is disappointing that their specific names has been given little documentation. It is noted that (paragraph 2.49) it is the Council's	

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							<p>view that vacant and underused Wharves should continue to be 'comprehensively assessed approximately every 5 years' to determine their longer term use by the Mayor of London. In addition, the review should look at opportunities to 'consolidate wharves'. Paragraph 5.103 continues that of the three safeguarded wharves, only "Comley's Wharf is still in use for waterborne freight transport. The adjoining Swedish Wharf is still used as an oil storage depot but does not currently use the river for transport. Hurlingham is currently vacant and has not been used as an operational wharf for some time".</p> <p>.104. Notwithstanding that the Secretary of State has yet to confirm the Mayor's recommendations, it must be noted that the three wharves within the Borough remain, as they have since 1997, safeguarded. Until the direction is removed, they remain safeguarded, which is not clear within this paragraph.</p> <p>5.105. The PLA notes that the Thames Tideway Tunnel main drive site at the safeguarded Hurlingham Wharf will be using the River Thames for the transport of materials to and from the site.</p> <p>5.106. The Council (as was the case with the Regulation 18 consultation) has not provided any evidence, either within the local plan or during the review of safeguarded wharves, as to the extent of wharf capacity to be consolidated and anything more than a vague location, downstream of Wandsworth Bridge. Whilst the paragraph is correct in noting the appropriate mechanism for assessment of wharves, there is nothing in the policy or justification to support the increasing use of safeguarded wharves for cargo handling. Such an approach is not, in the PLAs view, in general conformity with the London Plan. For the purposes of</p>	

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							<p>consolidation wharf space, it would be beneficial to understand where such activities would be moved too, in order for them to be maintained. With the high level of regeneration, particularly along waterfront locations, it is difficult to understand where these wharf activities would go? It is not enough to say 'the Council will continue to promote the consolidation of wharf capacity downstream of Wandsworth Bridge, without further justification or consideration as where and whether there is sufficient space.</p> <p>In addition to the above, and fundamental to the Council's position with regards to consolidation, is that the circumstances have very much changed (following the Regulation 18 consultation on the previous draft plan). Planning permission (reference 2014/03250/Ful) has been granted for the mixed use redevelopment of the sites to provide a raised podium and buildings of between 5 and 13 storeys to accommodate a 9,875 sq.m working wharf, 237 residential units and 579 sq.m of retail/café/restaurant/bar space. The scheme also included a new jetty to serve the Wharf use. With this in mind I would be grateful to understand where the opportunities for consolidation are? It would be helpful to understand this point further.</p> <p>The PLA is surprised by the general approach taken within the document with regard to safeguarded wharves, which in the main does not appear to fit comfortably with the approach within the London Plan. All of the Wharves are deemed to be viable or capable of being made viable for cargo-handling, must be protected from alternative development and indeed their use for waterborne transport promoted. It is not certain how this is being achieved within the draft document. Whilst the local</p>	

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							plan does not explicitly promote the redevelopment of the wharves for alternative uses, there is little to promote their protection either. In any event, Hurlingham Wharf is, as the local plan notes, to be used (and is being used) in connection with the TTT project for a decade (after which it must remain viable for water related, cargo handling uses).	
41	351	Thames Water Utilities Ltd	Strategic Policy SFRRRA - South Fulham Riverside Regeneratio n Area				<p><u>Waste Water</u></p> <p>There is a significant opportunity to discharge surface water directly to the environment and not the public sewer for the majority of this regeneration area. We would support implementation of</p> <p>the surface water disposal hierarchy as defined in the London Plan that prioritises surface water discharge to a river against connection into the public sewer system. We would also support strategic surface water systems being developed to accommodate multiple development sites that discharge directly to the river. If connection into the public sewer can be demonstrated as the only appropriate route, we would expect surface water attenuation to Greenfield run-off rates is a minimum as this site falls within the highly flood sensitive Counters Creek Catchment. This is to facilitate the level of redevelopment proposed and reduce the risk of further property flooding.</p> <p>There are combined sewers in the area that are of a very small diameter and may struggle to accommodate additional flow, even with significant (or all) of the surface water flow removed. We would require site by site</p>	

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							<p>consideration of the change in foul and surface water flow based on location to understand if capacity exists to accommodate the proposals.</p> <p>There are some areas of unmapped sewers in this area. This could be due to private ownership (i.e. Council Housing Stock) or transfer of these assets under Section 101a of the Water Industry Act in October 2011.</p> <p>This area contains an interception shaft for the Thames Tideway Tunnel at Carnwath Road and Thames Water owns some land.</p>	
49	397	Royal Borough of Kensington & Chelsea	Strategic Policy SFRRA - South Fulham Riverside Regeneration Area				<p>Bullet 1 – RBKC supports the policy to work with "Neighbouring boroughs, strategic partners, and landowners to secure regeneration of the SFRRA". [Duty to Cooperate; Effectiveness].</p> <p>Bullet 8 – RBKC supports the implementation of a pedestrian and cycle bridge that will provide access to the south of the river. [Duty to Cooperate; Effectiveness].</p> <p>The text has not been amended as requested it reads "be sensitively integrated with the existing townscape, ensuring no substantially harmful impact on heritage assets, and respect for the scale of the surrounding residential buildings. Building height can be gently stepped up toward the riverside, to provide a presence and give definition to the river frontage." 'Surrounding residential buildings' is too weak in this context. [Duty to Cooperate; Justification; Effectiveness].</p> <p>We understand that Transport for London is not considering a new Crossrail 2 station at Imperial Wharf. RBKC cannot support the proposal to seek a Crossrail 2 station at Imperial Wharf because it would be in</p>	<p>Bullet 11 – Our previous consultation response requested the text be amended to "Be acceptable in terms of their transport impact and contribute to the necessary public transport accessibility and highway capacity in the SFRRA <u>and surrounding areas, including RBKC</u>". The traffic impact assessment carried out to inform the production of the South Fulham Riverside SPD indicated that there would be significant traffic impacts beyond the SFRRA including within RBKC. Since we have seen evidence that deleterious traffic impacts would occur in this Borough this point is crucial. [Duty to Cooperate; Effectiveness].</p> <p>Bullet 12 – Our previous consultation response requested the text be amended to "ensuring the protection of no substantially harmful impact on heritage assets, and respect for the scale of the surrounding residential buildings, particularly to the</p>

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							conflict with our own proposals for a King's Road station. [Duty to Cooperate; Justification; Effectiveness].	<p>north and east of the regeneration area which are more medium- to low-rise in scale" in recognition of the low-rise scale of much of Lots Road in RBKC. It should also be noted that the Lots Road Village Conservation Area has recently been designated in RBKC. [Duty to Cooperate; Justification; Effectiveness].</p> <p>Paragraph 5.110 – Our previous consultation response requested the text be amended to "The amount and type of development will depend on the capacity of public transport and the road network in this <u>and surrounding areas</u> and the potential for their improvement". The requested change has not been made. The current text reads "The amount and type of development will depend on the capacity of public transport and the road network in this area and the potential for their improvement." We reiterate our request that this change is made. [Duty to Cooperate; Justification; Effectiveness].</p>
45	464	Berkeley Group (St James & St George) & St William	Strategic Policy SFRRA - South Fulham Riverside Regeneration Area				Our client supports the SFRRA policy to work with landowners and developers to secure the regeneration of the SFRRA to become a high quality residential area. As a significant landowner within this Regeneration Area our client is in a position to work with the Council to deliver the vision for the area and contribute towards the need for new homes. Our client has already delivered new housing and commercial space at Imperial Wharf and is now delivering Chelsea Creek.	Therefore, we consider that the wording in respect of building height in this policy should reflect that in the SPD, reflecting the Council's evidence base and being consistent with London Plan policies to optimise housing potential.

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							<p><i>Building Heights</i></p> <p>The policy wording in respect of building heights states that ‘ <i>building height can be gently stepped up</i> toward the riverside, to provide a presence and give definition to the river frontage’ .</p> <p>At paragraph 5.11 the Local Plan states that ‘ <i>the townscape analysis prepared as part of the previous Core Strategy SPD</i> for South Fulham Riverside suggests that the area has two key focal points of townscape significance, the first being at Fulham Wharf . . . the second is at Imperial Wharf/Chelsea Harbour ’. It goes on to say that ‘<i>These areas, in particular, in view of the townscape significance could accommodate increased massing and height</i>’.</p> <p>The document referred to is the South Fulham Riverside SPD (2013). This document states that ‘ <i>higher buildings could be accommodated on the Fulham Wharf / Sainsbury’s site and Chelsea Creek / National Grid sites on Imperial Road</i> ’. The current drafting of policy SFRRA does not reflect the Council’s previous intentions for the area and the adopted South Fulham Riverside SPD. The opportunity to maximise housing delivery on the key sites within the SFRRA should be a priority for the Council and the imposition of greater restrictions on building height potential should be avoided for this reason. The current SPD allows flexibility but also provides sufficient level of control for the Council in determining impacts from tall buildings on individual planning applications (through the submission of Townscape Visual Impact Assessments).</p>	The final bullet point of this policy in respect of building height should be amended to reflect the townscape analysis in the South Fulham Riverside SPD.

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38	549	Greater London Authority and Transport for London Planning Team	Strategic Policy SFRA - South Fulham Riverside Regeneration Area				<p>5.105 - 5.106</p> <p>The River Thames is instrumental in the construction of the Thames Tideway Tunnel and Northern Line Extension, and will be significant in works for the Garden Bridge. In the case of the Northern Line Extension, Lambeth Council was pleased with the amount of spoil that has been removed by river - to the extent that they have asked TfL to remove even more by river. This development represents an example of where using the Thames can be the best, sustainable course of action for freight purposes. We hope this could encourage firmer negotiations in future for use of the Thames for freight and construction purposes, which will reduce the strain on London's road network.</p>	
42	641	National Grid Property Ltd	Strategic Policy SFRA - South Fulham Riverside Regeneration Area				<p>Vision</p> <p>The Draft Local Plan states that major regeneration and growth will be focused in the four Regeneration Areas. These areas include the SFRA, within which the Site is located. The council's vision for the SFRA is to achieve phased regeneration of the area and for it to become a high quality residential area with a mix of uses. NGP continues to support this objective.</p> <p>Housing</p> <p>Strategic Policy SFRA sets out an indicative target of delivering 4,000 new homes and 500 new jobs by 2035. This differs from the adopted South Fulham Riverside SPD and the Strategic Policy for the South Fulham Regeneration Area (Core Strategy (2011) Policy SFR) which</p>	<p>Proposed Re-wording to Strategic Policy SFRA</p> <p>It is proposed that Strategic Policy SFRA is amended as follows (changes identified in bold):</p> <p><i>"Indicative Homes: At least 4,000</i></p> <p><i>Indicative jobs: 500</i></p> <p><i>The council will work with landowners and other partners to secure the phased regeneration of the area to become a high quality residential area together with</i></p>

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							<p>sought to deliver 2,200 additional homes and 300-500 new jobs by 2032. NGP welcomes the increased residential target, however, as raised in the previous stage of consultation, it strongly believes that Strategic Policy SFRRRA should state that the numbers for homes and jobs in each strategic policy should be stated as the minimum for each area.</p> <p>St William's Planning application confirms that the Site has the potential to deliver a high density residential led development. For reasons described below, it would be inappropriate for the Local Plan to establish targets before the detailed design of each site has been undertaken, without acknowledging that they represent the minimum achievable. As demonstrated for the Gasworks Site, St William has optimised the proposed scale of development to a level that is greater than originally anticipated in the SFRRRA SPG which proposed an indicative capacity of 1,100 units.</p> <p>St Williams Planning application proposes a maximum of 1,375 units, which demonstrates that higher densities can be achieved through a detailed design process. It is only at the design stage that the scale of development can be optimised in relation to the specifics of a site, and it is not appropriate to prejudge site capacity within a local plan policy. It should be in the interests of all parties to optimise the scale of development in SFRRRA rather than feeling constrained by a target set by the Strategic Policy.</p> <p>The second reason for including references to minimum targets is that the Strategic Housing Land Availability Assessment (SHLAA) identifies the site as having a maximum capacity of 1,000 homes. Work to date has shown that the Site has the capacity to accommodate significantly more</p>	<p><i>a mix of other uses. In order to achieve this, the council will work with:</i></p> <ul style="list-style-type: none"> <i>Neighbouring boroughs, strategic partners, and landowners to secure regeneration of the SFRRRA; and</i> <i>Actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area;</i> <p><i>Proposals for development in SFRRRA should:</i></p> <ul style="list-style-type: none"> <i>optimise the housing output from development sites;</i> <i>be for predominantly residential purposes to contribute to the South Fulham Riverside target of at least4,000 additional dwellings by 2035;</i> <i>include employment based uses that will meet local business needs and are compatible with residential development in the most</i>

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							<p>than 1,000 homes, as reflected in the indicative masterplan previously prepared by NGP and in St William's current planning application. The Strategic Policy should not set targets that are based on assumptions in the SHLAA.</p> <p>It is noted that NGP's previous representation has been taken into account which questioned the need to expressly refer to the scale of development to the north of the regeneration area. NGP welcomes the deletion of this reference.</p> <p>Tall Buildings</p> <p>NGP considers that the Site is a suitable location to accommodate tall buildings, particularly towards the south eastern corner of the Site.</p> <p>The surrounding skyline is punctuated by several tall buildings including the Belvedere Tower (18 storeys) at Chelsea Harbour. Planning permission has been granted for the Lots Road Towers (37 and 25 storeys) and the Chelsea Creek Tower (24 storeys). In this context and taking into account London Plan policy 7.7- Location and Design of Tall and Large Buildings, it is considered that well-designed tall buildings would complement the changing skyline in the area and would create a small cluster of tall buildings to give the Regeneration Area a new identity.</p> <p>It is noted that the revised version of the Strategic Policy SFRRRA omits specific reference to areas of tall building potential, therefore being less prescriptive. The potential to accommodate increased massing and height is contained within the supporting text at paragraph 5.111 which</p>	<p><i>accessible parts of the area, particularly in the vicinity of Imperial Wharf Station and on sites close to the Wandsworth Bridge Road, Townmead Road and Carnwath Road junction;</i></p> <ul style="list-style-type: none"> <i>include appropriate small scale retail, restaurants/ cafe's and leisure uses to support day to day needs. These uses are likely to be appropriate on the Thames frontage to provide activity adjacent to the river. Opportunities for river related uses will be encouraged in accordance with the objectives of the Local Plan River Thames policies;</i> <i>create a high quality urban environment. On the riverside, a very high standard of urban design will be necessary. Opportunities will be encouraged that maximise the permeability and connectivity between sites, including the extension of the Thames Path National Trail and provision of open spaces that create interest and activity;</i>

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							<p>identifies two key focal points of townscape significance, Fulham Wharf and Imperial Wharf/Chelsea Harbour.</p> <p>To reflect St William’s masterplan, which was subject of detailed pre-application discussion with LBHF, NGP considers that it would be appropriate to include the “Imperial Gasworks” site as a third key focal point with the potential for increased massing and height. This approach would be consistent with the SFR SPD’s acknowledgement that the National Grid site could accommodate higher buildings.</p> <p>Density</p> <p>Having regard for the relevant guidance as set out at <i>Policies 3.4- Optimising Housing Potential, 3.7- Large Residential Developments and 4.4- Managing Industrial Land and Premises of the London Plan</i>, and paragraphs 47 and 58 of the National Planning Policy Framework (NPPF), Strategic Policy SFRRA should seek to optimise the use of sites and the delivery of homes. Adopting this approach will assist LBHF in delivering <u>at least</u> 4,000 new homes in the SFRRA over the plan period and enable developments to come forward which respond to the scale of developments in SFRRA, such as Chelsea Creek and Imperial Wharf, reflecting the changing context of the area.</p> <p>Heritage</p> <p>We note that previous policy wording seeking to ensure the “protection of heritage assets” has been changed to “ensuring no substantially</p>	<ul style="list-style-type: none"> • <i>demonstrate how they integrate and connect with the surrounding context, particularly the river;</i> • <i>support the implementation of a pedestrian and cycle bridge that will provide access to the south of the river;</i> • <i>provide appropriate social, physical and environmental infrastructure to support the needs arising from development and the area as a whole;</i> • <i>secure economic benefits for the wider community around the South Fulham Regeneration Area by providing programmes to enable local people to access new job opportunities through training, local apprenticeships or targeted recruitment;</i>

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							harmful impact on heritage assets". NGP welcomes this approach, which is more consistent with the aims NPPF.	<ul style="list-style-type: none"> • <i>be acceptable in terms of their transport impact and contribute to necessary public transport accessibility and highway capacity in the SFRRRA; and</i> • <i>be sensitively integrated with the existing townscape, ensuring no substantially harmful impact on heritage assets, and respect for the scale of the surrounding residential buildings. Building height can be gently stepped up toward the riverside, to provide a presence and give definition to the river frontage. There may be opportunity for taller buildings at three key focal points at Imperial Wharf Station, Imperial Gasworks and Fulham Wharf.</i> <p><i>The council will work with Transport for London and other Stakeholders to seek a new Crossrail 2 station at Imperial Wharf."</i></p>

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49	398	Royal Borough of Kensington & Chelsea	Strategic Site SFRRRA1 - Imperial Gasworks National Grid				We support the aim to provide a pedestrian access under the West London Line at the southern end of the site connecting to Lots Road. [Duty to Cooperate; Effectiveness].	<p>Bullet 5 – Our previous consultation response requested the text be amended to "Be of high quality design which respects the character and appearance of the Imperial Square and Gasworks Conservation Area and protects the Grade II Listed Gasholder and other associated structures and its setting and the setting of other heritage assets, <u>namely the Brompton Cemetery and the Lots Road Village Conservation Area in RBKC</u>". The change requested has not been made. The current text reads "be of high quality design which respects the character and appearance of the Imperial Square and Gasworks Conservation Area and protects the Grade II Listed Gasholder and its setting and other heritage assets in the surrounding townscape". We reiterate our request that this change is made. [Duty to Cooperate; Justification; Effectiveness].</p> <p>Bullet 6 – Should be amended to reflect the text highlighted in paragraph 5.111 (below) of the strategic policy: "ensure building height and massing has an acceptable impact on the skyline and views from and to the riverside and waterways and heritage assets in the area, and contributes positively to the surrounding townscape context <u>reflecting the fact that this site is on the edge of the regeneration area and should have a closer relationship with the existing townscape.</u></p>

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								<p><u>particularly Lots Village Conservation Area in RBKC".</u> [Duty to Cooperate; Justification; Effectiveness].</p> <p>Paragraph 5.116 – Please add references to the Thames and Lots Village Conservation Areas. [Duty to Cooperate; Effectiveness].</p>
45	465	Berkeley Group (St James & St George) & St William	Strategic Site SFRA1 - Imperial Gasworks National Grid				<p>Strategic Site SFRA1 – Imperial Gasworks National Grid</p> <p>Our client has a current application with LBHF in respect of the redevelopment of the Imperial Gasworks site (Fulham Gasworks). They welcome the support for comprehensive residential-led redevelopment of the site. This site has potential to deliver a significant number of new homes for the borough contributing towards the borough’s objective to exceed its housing target.</p> <p>As noted above in relation to the Strategic Policy SFRA we consider that the policy wording should be amended to reflect the townscape analysis in the South Fulham Riverside SPD and acknowledge that this site could accommodate taller buildings.</p>	<p>The policy wording makes no reference to the London Plan requirement to optimise housing potential (policy 3.4). Given the strategic importance of this site and the potential it has to deliver high density, high quality residential development it would be appropriate for the policy to include such wording.</p> <p>An additional bullet point should be included to state that development of the site should optimise housing output subject to design quality and taking account of local character and context.</p>
45	466	Berkeley Group (St James & St George) & St William	Strategic Site SFRA1 - Imperial Gasworks National Grid				<p>Our client recognises the need for supporting infrastructure. It is important to consider practical issues around delivery and the impact upon development viability in seeking to balance the competing requirements of on-site infrastructure, affordable housing, Community Infrastructure Levy (CIL) and other S106 requirements.</p>	<p>We would welcome further discussion with the Council and GLA as to how these competing priorities can be rectified. We would consider that the policy wording needs to acknowledge this competing priority. We also recommend the Council reviews it’s CIL Charging</p>

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							The current CIL Charging Schedule adopted for the SFRA will significantly impact on the ability for the site to deliver other supporting infrastructure and affordable housing. As noted elsewhere in respect of Policy DEL1 and Policy HO3 we are concerned that the CIL charge combined with other policy requirements such as 50% affordable housing and supporting infrastructure threatens the viable redevelopment of this site.	Schedule alongside the new Local Plan to ensure CIL rates and policies are viable and compatible.
42	642	National Grid Property Ltd	Strategic Site SFRA1 - Imperial Gasworks National Grid				<p>The Gasworks Site has been identified as a Strategic Site. NGP supports this allocation and the backing it gives for the predominantly residential-led redevelopment of the Site. However, it considers that some elements of the policy and supporting text should be amended, as described in the following paragraphs.</p> <p>Density</p> <p>The Site has a Public Transport Accessibility Level of (PTAL) of 3/4 and as such the minimum density for residential development should be between 200-700 hr/ha in accordance with Table 3.2 of the London Plan.</p> <p>The Mayor of London's Housing SPG (2016) states that higher densities on individual developments may be acceptable where these can be clearly and robustly justified by local circumstances. Policy SFRA1 should replicate the Housing SPG in this respect, to allow the Policy to be consistent with Policy 3.4 of the London Plan and to encourage opportunities to accommodate development above the density ranges</p>	<p>The supporting text (para. 5.116) now acknowledges that where heritage assets cannot practicably be retained on the site, the building or structure should be fully recorded. While it is considered that this amendment is positive in supporting the redevelopment of the Site, it is recommended that the fifth bullet point of the Policy SFRA1 should be amended as follows to provide sufficient flexibility to determine the importance of each heritage asset at the application stage:</p> <p><i>"...be of high quality design which respects the character and appearance of the Imperial Square and Gasworks Conservation Area and protects the Grade II Listed Gasholder and its setting and other significant heritage assets in the surrounding townscape;"</i></p>

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							<p>set out in Table 3.2 to be explored as detailed proposals for the Site evolve.</p> <p>This approach would be consistent with planning permissions granted in the SFRRA including at Chelsea Creek (Ref: 2011/01472/COMB) which bounds the Site to the south. Chelsea Creek predominantly had a PTAL rating of 2 and as such the London Plan density range for residential development on the site was 200-450 hr/ha. The approved density exceeded this range on the basis that the development would assist the Borough in meeting its housing targets within a defined regeneration area, whilst optimising the use of the site. Other recently approved developments in SFRRA that exceed the relevant density range include Fulham Riverside West.</p> <p>As stated in NGP's previous representations, the policy should confirm that the Site should at the very least accommodate medium density development, as set out in the South Fulham Riverside SPD. The council reached this conclusion on the basis of the South Fulham Transport Study undertaken by Jacobs in 2010 (updated in 2012).</p> <p>Further transport modelling has informed NGP's Indicative Masterplan which supported the demolition planning application. The modelling, undertaken in consultation with LBHF, Transport for London (TfL) and the Royal Borough of Kensington and Chelsea (RBKC), considered the effects of the future redevelopment of the Site on surrounding highways links and junctions on Imperial Road and Kings Road. The modelling assessed a future redevelopment of up to 1,710 dwellings based on a high residential density of 750 habitable rooms per hectare (hrha).</p>	<p>Proposed Re-wording to Policy SFRRA1</p> <p>Based on the above comments, it is proposed that Policy SFRRA1 is reworded as follows:</p> <p><i>"The council supports comprehensive residential-led development of the site with supporting community facilities and open space. Development proposals for this site should:</i></p> <ul style="list-style-type: none"> <i>• Be predominantly residential with supporting social, physical, environmental and transport infrastructure;</i> <i>• Provide for a link road through the site connecting Imperial Road through to the New Kings Road together with a network of pedestrian and cycle connections;</i> <i>• Aim to provide In cooperation with adjacent landowners, explore opportunities for the provision of a pedestrian access under the West London Line at the southern end of the site connecting to Lots Road;</i> <i>• Provide an area of public open space to contribute towards meeting open space deficiency in the area;</i>

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							<p>The transport modelling exercise concluded that this scale of redevelopment of the Site would generate marginal increases in journey times and congestion on the highway network over and above the current traffic generated by existing on site uses. In addition, the Transport Assessment that supports St William’s hybrid planning application reaches the same conclusion. With this in mind, it is essential that the policy should state that the Site’s redevelopment should be design-led, rather than led by transport assessments.</p> <p>Furthermore, the scale of development on the Site should be optimised, consistent with neighbouring other developments in SFRRRA, including Chelsea Creek and Imperial Wharf.</p> <p>Scale of Development</p> <p>NGP supports the removal of the reference in Policy SFRRRA1 to building heights being "predominantly low to medium rise". However, for the reasons described above, it suggests that the policy expressly acknowledges the potential for the Site to include tall buildings.</p> <p>Mix of Uses</p> <p>Policy SFRRRA1 promotes a residential-led development with “supporting social, physical, environmental and transport infrastructure”. NGP reiterates its previous consultation comments that the Local Plan should include greater clarity on the mix of uses that should be included.</p> <p>Link Road</p>	<ul style="list-style-type: none"> • <i>Be of high quality design which represents the character and appearance of the Imperial Square and Gasworks Conservation Area and protects the Grade II Listed Gasholder and its setting and othersignificant heritage assets in the surrounding townscape;</i> • <i>Ensure that the building height and massing has an acceptable impact on the skyline and views from and to the riverside and waterways and heritage assets in the area, and contributes positively to the surrounding townscape context; and</i> • <i>Ensure any remaining gas operations that may be required are designed in such a way to ensure that the necessary health and safety requirements are met and integrated into the high quality design for the area with minimal impact”</i>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>Policy SFRRRA1 states that development proposals should provide for a new link road through the Site connecting Imperial Road through to the New Kings Road together with a network of pedestrian and cycle connections. The St William application includes a new two-way link road through the site which is designed as a local access road.</p> <p>NGP reiterates previous comments that the Local Plan should confirm that account will be taken of the road in the projects viability at planning application stage, particularly having regard to the design and specification of the road, and other benefits that will be provided. This is in accordance with paragraph 173 of the NPPF which relates to ensuring viability and deliverability of developments.</p> <p>Pedestrian Access</p> <p>Policy SFRRRA1 sets out an aim to provide a pedestrian access under the West London Line at the eastern end of the site connecting to Lots Road. NGP shares and supports this aim but cannot commit to the delivery of the pedestrian access given that the extent of their land ownership extends to the western boundary of the railway line only.</p> <p>Increased connectivity and permeability to and from the Site and the wider area is supported however the creation of the pedestrian access under the West London Line will be challenging. As such NGP confirms that greater flexibility should be applied to the third bullet point of the policy as shown below. In addition, the pedestrian access should be included in the Infrastructure Schedule, to be financed by CIL.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>Public Open Space</p> <p>NGP supports the removal of the specific requirement for the provision of 1hecatre of public open space has been omitted following the previous consultation.</p> <p>Notwithstanding, the St William planning application would contribute approximately 3.05 hectares of publicly accessible open space which comprises 47% of the site. This comprises of a new pubic park, village square, public amenity and green corridors.</p> <p>Heritage</p> <p>NGP acknowledges that the Site has important heritage characteristics, and supports the general principle of policy SFRRA1 to respect the character and appearance of the conservation area and the listed buildings.</p> <p>It is noted that the policy as been amended to refer to the setting of the Imperial Square and Gasworks Conservation Area and also more specifically to “other heritage assets” rather than “other associated structures”.</p>	

6. Meeting Housing Needs & Aspirations

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co-operate	Comments	Suggested amendments by representor
18	197	Old Oak and Park Royal Development Corporation	(6) Borough-wide Policies				<p>Chapter 6</p> <p>The chapter does not appear to have a policy on self-build, in accordance with the Housing and Planning Act. The chapter should acknowledge the potential need to provide starter homes.</p>	
10	67	CLS Holdings	Meeting Housing Needs and Aspirations				<p>Our client welcomes and supports that the Council seeks to exceed the London Plan housing target and welcomes their commitment to working with landowners and partner organisations to deliver this.</p>	
68	94	Fulham Society	Meeting Housing Needs and Aspirations				<p>Housing. The Fulham Society (FS) recognises that new housing is needed. We agree that it is essential that housing is not lost to other uses and that it is not allowed to remain vacant, are pleased to hear the Council supports the Mayor of London's 'New Homes for Londoners Concordat' and support the aims for rented retained/ shared ownership and the emphasis on rented accommodation.</p> <p>New developments need atmosphere. The danger is that purely residential sites of predominantly small, non-family flats become deserts with few families around during the day and the majority commuting to work. They also need schools, nurseries, medical centres, transport hubs and community centres – and these are needed early in the development. Imperial Wharf was one of the first to be built and this was a very bland area with little atmosphere until the station and the supermarket opened. Earls Court includes little provision for such</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co-operate	Comments	Suggested amendments by representor
							<p>amenities and so far there appears to be no mention of them in the proposals for Fulham Gasworks.</p> <p>Tower blocks. We accept that to reach the housing aims, it will be necessary to have some higher blocks but it is not just the view, it is also the shade and the wind that affect the neighbours. So please would the Planning Department take note of para 5.111 “[...] such developments should consider any potential impacts of increased height and/or massing on heritage assets in the surrounding area [...]. The general scale height and massing of any development along the edges of the regeneration area should have a closer relationship to the existing townscape.”</p> <p>Understandably there is an emphasis on the numbers of units built but consideration also needs to be given to size. Para 6.41 states “There is a particular need in this borough for more family sized housing (three or more bedrooms)”. We agree. We should not assume the 45% of the population who are now aged 20-40 will live alone, they will want family flats/ houses, and this is particularly so if we want people to remain in the Borough.</p>	
17	137	Hammersmith Society	Meeting Housing Needs and Aspirations				<p>We are concerned at the trend towards excessive density without the appropriate provision of genuine family units, social infrastructure (including medical and education facilities), private and public amenity and green spaces.</p> <p>The previous Core Strategy (White City Opportunity Area) contained the wording ‘New homes in the area will be expected to provide a local ladder</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co-operate	Comments	Suggested amendments by representor
							of housing opportunity': We consider this a laudable ambition which should be maintained for all new housing in the Borough.	
18	200	Old Oak and Park Royal Development Corporation	Meeting Housing Needs and Aspirations				Chapter 6 As has been done with student housing, given the rise in applications for build-to-rent typologies, it is suggested that the LBHF Local Plan should include a policy on the appropriateness of this form of accommodation.	
25	277	Tri-Borough Public Health	Meeting Housing Needs and Aspirations				This section is strong from a public health perspective.	
29	314	City and Docklands Ltd	Meeting Housing Needs and Aspirations				<p>I am writing to you in relation to the above on behalf of our clients, City and Docklands Limited in respect of their interest in the site at Scrubs Lane, and wish to express our comments on the draft Local Plan. It is the intention of the clients to deliver a residential-led development on the above site as purpose built rented homes "Build to Rent".</p> <p>Whilst it is acknowledged that the London Borough of Hammersmith and Fulham (LBHF) is not the determining Local Planning Authority for the planning application, as it is now the Old Oak and Park Royal Development Corporation (OPDC), it is noted that LBHF are a statutory consultee.</p> <p>Build To Rent</p>	<p>In summary, we would request that the Local Plan text be amended to:</p> <p>Provide positive support for purpose-built private rented housing development in accordance with regional policy.</p> <p>I hope that the above can be taken into account in order to ensure the Plan is in accordance with National and Regional policy.</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co-operate	Comments	Suggested amendments by representor
							<p>The private rented sector (PRS) is the only housing sector to have seen relative growth in recent years. It now houses 30% of all households in London, up from 14% in 2003/04. The sector is becoming increasingly important in supporting labour market mobility, accommodating over half of the one in eight households who move in London each year.</p> <p>In terms of private rented homes, the draft Local Plan makes no provision for supporting the construction of purpose built private rented homes (Build to Rent). This is in contrast to the recognition afforded to it by the latest iteration to the London Plan which states in Policy 3.8 that Boroughs should ensure:</p> <p><i>the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery.</i></p> <p>The previous Mayor's housing strategy (which has not yet been updated) also recognises the importance of this type of housing to assist in housing delivery noting:</p> <p><i>the Mayor will seek to ensure that private developers and registered providers build at least 5,000 long-term private rented homes a year.</i> This provision represented just over 10% of the 49,000 homes housing target for London.</p> <p>In order to meet the Boroughs housing targets, policy support in principal should be included within the Local Plan's housing policies for purpose built Build to Rent housing. Recognition should also be given to its wide ranging benefits, distinct economics and the need for on-site Affordable</p>	

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							<p>Housing to be Intermediate Rent to maximise outcomes. Build to Rent developments provide high quality professionally managed housing adding diversity and choice in the housing offer. As Build to Rent is delivered by institutional investors as opposed to traditional house builders, it represents 'net additional' housing delivery.</p> <p>The NPPG states (para Ref: 10-018-20150326):</p> <p><i>"Some privately rented homes can come from purpose built schemes held in single ownership which are intended for long term rental. The economics of such schemes differ from build to sale and should be determined on a case by case basis. To help ensure these schemes remain viable while improving the diversity of housing to meet local needs, local planning authorities should consider the appropriate level of planning obligations, including for affordable housing, and when these payments are required".</i></p>	
31	327	Port of London Authority	Meeting Housing Needs and Aspirations				<p>New Homes</p> <p>The need for new homes is a key topic within the new local plan. Whilst not specifically relevant to the interests of the PLA, I wish to take the opportunity in advising that should consent be granted at any riverside sites for mixed use or residential development, conditions should consider the need to maximise the use of the river for the transport of materials associated with riverside development, and the removal of waste. This is in accordance with London Plan Policy 7.26 and the PLA is pleased to note that development within the Borough, notably at Fulham Reach, have used the River in this way following the imposition of conditions. In addition, on</p>	

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							completion of future development, the use of the river as an alternative, and sustainable, form of passenger transport.	
73	413	St Quintin and Woodlands Neighbourhood Forum	Meeting Housing Needs and Aspirations				Self-build and custom build homes We cannot find any reference to self-build or custom-build within the draft policies on Housing. In light of the self-build register now in operation and the requirements of the Self-Build and Custom Housebuilding Act 2015, should there not be a policy to support Government objectives in encouraging self-build?	
73	414	St Quintin and Woodlands Neighbourhood Forum	Meeting Housing Needs and Aspirations				Accommodation for HS2 and Crossrail construction workforce Given the anticipated demand for local (and low-cost) housing for construction workers at Old Oak, over the next 20 years, should this be recognised via a set of bespoke policies? There is concern amongst local residents in areas close to the OPDC boundary (College Park, Old Oak Estate, Eynham Road that the demand for cheap and short-term accommodation will result in overcrowding in informal HMOs, and the increase in 'beds in sheds' and unsuitable outbuildings. While the OPDC and HS2 have primary responsibility for addressing this issue, the LBHF Local Plan should take account of it also.	
45	467	Berkeley Group (St James & St	Meeting Housing Needs				Meeting Housing Needs and Aspirations	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co-operate	Comments	Suggested amendments by representor
		George) & St William	and Aspirations				Our client welcomes and supports that the Council seeks to exceed the London Plan housing target and welcomes the commitment to working with landowners and partner organisations to deliver this.	
4	18	Royal Mail Group	Policy H01 - Housing Supply				<p>Royal Mail Properties</p> <p>Royal Mail has a statutory duty to provide efficient mail sorting and delivery services within the Borough of Hammersmith & Fulham. This service is currently provided from the following freehold and leasehold Royal Mail properties:</p> <ul style="list-style-type: none"> • Fulham Delivery Office • West Kensington Delivery Office • Hammersmith Delivery Office • Askew Road Enquiry Office <p>Royal Mail has confirmed there are no plans to relocate from any of the above properties in the foreseeable future.</p> <p>Representation</p> <p>Cushman & Wakefield has reviewed Hammersmith & Fulham Borough Council's <i>Proposed Submission Local Plan 2016 document</i> in the context of its impact on the operations of the Royal Mail's properties within the borough. The delivery offices are of strategic importance to Royal Mail in</p>	<p>Given the aforementioned, it is imperative that the ongoing role/functions of Royal Mail are duly considered throughout the forthcoming stages of the London Borough of Hammersmith & Fulham Council's Local Plan. In this way, Royal Mail must continue to be informed about proposals for strategic locations and growth areas to allow for appropriate and timely business development and planning.</p> <p>Conclusion</p> <p>Royal Mail would welcome further engagement with the London Borough of Hammersmith & Fulham Council.</p> <p>I trust that these representations are acceptable and would be grateful if you could acknowledge receipt and keep me informed of future stages of the adoption of the <i>London Borough of Hammersmith & Fulham Council Local Plan</i> and other planning policy documents.</p>

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							<p>ensuring they are able to continue to fulfil their statutory duty for mail collection and delivery.</p> <p>The subject of this representation is to make Hammersmith & Fulham Borough Council aware of Royal Mail's operations within the borough. These representations made on behalf of Royal Mail are in reference to the following two key issues:</p> <p>1) Housing Growth</p> <p>2) Employment</p> <p><u>Housing Growth & Future Postal Provision</u></p> <p>It is evident from the Proposed Submission Local Plan 2016 Consultation document that the London Borough of Hammersmith & Fulham has positive housing growth targets for the period up until 2035. The consultation document identifies one of the strategic objectives is to promote and manage growth stating the delivery of at least 1,031 additional dwellings across the borough until 2035 in order to exceed the London Plan housing growth targets. Such an increase in the number of dwellings is likely to have impacts on the capacity of Royal Mail's operations, including its ability to provide effective, universal postal services across the District.</p> <p>As an indicative guideline, for every 500 new dwellings proposed, one additional postal round (described by Royal Mail as a "walk") is required. As such, it is considered that the expected growth targets in the Proposed Submission Local Plan Consultation document will potentially have major</p>	

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							capacity implications for those existing delivery offices. As a result, Royal Mail, as a statutory provider, is likely to seek the expansion of its existing assets or require the allocation of sites for additional delivery offices, particularly in those locations where housing developments will be concentrated and where existing delivery offices are nearing capacity.	
47	71	Stanhope PLC	Policy H01 - Housing Supply	NO	YES	YES	Noted and agreed, with the exception of e. Whilst the importance of ensuring that new developments meet local needs and are occupied by people living in London, it will be difficult to secure this through planning obligations. Securing this requirement through a S106 could potentially impact on the mortgageability of a scheme, affecting the Developers finance for the longer term delivery.	Remove the requirement for development to be occupied by people living in London. In addition given the wide variations in market values and housing tenure composition throughout Hammersmith & Fulham, particularly between the north and the south of the borough, has the council considered applying a location specific affordable housing policy? For example, in areas with large concentration of existing social housing such as White City (over 50% of housing stock), there is an argument to suggest that the new supply should focus on diversifying the tenure and creating more mixed and balanced communities to appropriately meet housing need.
18	194	Old Oak and Park Royal	Policy H01 - Housing Supply					Para 6.9

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		Development Corporation						This references the Mayor's Housing SPG . The SPG is shortly to be updated and LBHF should ensure that references to this new SPG are provided as the LBHF Local Plan progresses to adoption.
24	260	Home Builders Federation	Policy H01 - Housing Supply	NO			<p><u>The housing requirement is unsound because it is unsupported by an NPPF-compliant assessment of the objectively assessed housing needs of the borough.</u></p> <p>The Council will provide 1,031 dwellings per annum (dpa). This reflects the benchmark target in table 3.1 of the London Plan. This is welcome. However, Policy 3.3Da of the London Plan requires that the London boroughs undertake NPPF-compliant assessments of housing need with the aim of closing the gap between the Mayor's OAN of 49,000 dpa for the period 2015-2036 and the capacity constrained benchmark targets that total up to 42,000 homes.</p> <p>We have noted the Council's SHMA dated 2014/15. This does not provide an OAN for Hammersmith & Fulham that reflects the requirements of the NPPF or the guidance contained in the NPPG. If the Council is relying on the Mayor's SHMA 2013 for its OAN then it should clarify this. However, the Mayor's SHMA, as the London Plan and the Mayor's Housing SPG acknowledges (see paragraph 3.1.3) is not NPPF-compliant. It is essentially just a demographic projection and a heavily discounted one at that for the reasons we have explained above.</p> <p>We are aware that that Hammersmith & Fulham is providing more homes than the household projections for Hammersmith & Fulham indicate might</p>	

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							<p>be needed (for example the DCLG 2014 Household Projections indicate that 650 households will form per year over the period 2015-2035). This is because the Mayor assesses the need on a London-wide basis and Hammersmith & Fulham is apportioned a higher housing requirement on the basis of its assessed capacity. Nevertheless this does not absolve the Council from undertaking an assessment of its housing need in line with the NPPF and the guidance contained in the NPPG. In view of the evidence of desperately poor affordability (see paragraph 6.23 of the Plan), the increasing problem of over-crowding, and poor past delivery (against the old London Plan target of 615 dpa), it would be helpful to see how an NPPF-based assessment of need compares to the London Plan benchmark.</p> <p>We also acknowledge that Hammersmith & Fulham is anticipating to provide slightly more homes than the benchmark target requires - 22,000 net new homes over the period 2015–2035 compared to the number implied by the London Plan benchmark – 20,620 (i.e. 1,031 x 20) but the increase is only marginal. This slight over-supply relative to the London Plan benchmark target must also be considered in the context of an emerging picture of under-supply across London as a whole. The table below provides the emerging picture based on emerging and examined plans:</p> <table><thead><tr><th></th><th>Local Plan</th><th>London Plan</th><th>Increase/Shortfall</th></tr></thead><tbody><tr><td>Bromley</td><td>641</td><td>641</td><td>0</td></tr></tbody></table>		Local Plan	London Plan	Increase/Shortfall	Bromley	641	641	0	
	Local Plan	London Plan	Increase/Shortfall													
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							<div> <div>Camden</div> <div>1120</div> <div>889</div> <div>231</div> </div> <div> <div>Croydon</div> <div>1592</div> <div>1435</div> <div>157</div> </div> <div> <div>Enfield</div> <div>798</div> <div>798</div> <div>0</div> </div> <div> <div>Ham' & Ful'm</div> <div>1100</div> <div>1031</div> <div>69</div> </div> <div> <div>Haringey</div> <div>1502</div> <div>1502</div> <div>0</div> </div> <div> <div>Hounslow</div> <div>822</div> <div>822</div> <div>0</div> </div> <div> <div>Lambeth</div> <div>1195</div> <div>1559</div> <div>-364</div> </div> <div> <div>RBKC</div> <div>535</div> <div>733</div> <div>-198</div> </div> <div> <div>Southwark</div> <div>2000</div> <div>2736</div> <div>-736</div> </div> <div> <div>Tower Hamlets</div> <div>2885</div> <div>3931</div> <div>-1046</div> </div> <div> <div>Wandsworth</div> <div>1812</div> <div>1812</div> <div>0</div> </div> <div> <div>Totals</div> <div>16002</div> <div>17889</div> <div>-1887</div> </div> <div> <p>These figures suggest that the Mayor will not be able to 'close the gap' between the need and capacity identified (confirming the doubts of the examining inspector). This also has implications for the duty to cooperate, particularly in connection with Kensington & Chelsea.</p> </div>	

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24	261	Home Builders Federation	Policy H01 - Housing Supply				<p>Housing land supply</p> <p>We have considered the Council's <i>Five Year Housing Land Supply</i> background paper of September 2016.</p> <p>We agree that the application of a 5% buffer is acceptable in the case of Hammersmith & Fulham (paragraph 3.2) because the Council has generally delivered in excess of its monitoring targets.</p> <p>There appears to be a small discrepancy between the figures for completions in year 2015/16 on page 2 and Table 1 of the report (1,250 units) compared to the number in Table 2 of the same report (1,442).</p> <p>There also appears to be a discrepancy between Table 2 in the Local Plan and Table 2 in the <i>Five Year Housing Land Supply</i> paper. The Local Plan indicates that a total of 5,200 homes will be built during the period 2015-20 while Table 2 in the <i>Five Year Housing Land Supply</i> paper says 6,341. The former figure would suggest a very marginal undersupply once a 5% buffer is factored-in (i.e. 1,031 per year x 5 = 5,155, + 5% buffer = a five year need for 5,412).</p> <p>We note the list of schemes in appendix 1. It would be useful if the Council provided information on how many of these schemes have detailed planning consent. Some of the build-out rates appear optimistic. It is also hard to locate the regeneration areas among this list of schemes. We recognise that the regeneration areas may be sub-divided into lots of</p>	

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							<p>smaller schemes but it would be helpful if the Council had grouped these together by regeneration area so that one could assess whether the Council's land supply assumptions were realistic and so one can relate this back to Table 2 of the Local Plan and the figures included in the <i>Five Year Housing Land Supply</i> background paper.</p> <p>We note in paragraph 6.7 of the Local plan that the Council does not rely on windfall supply to achieve its five year land supply. It would be helpful if the Council clarified whether there is a windfall assumption within Table 2 of the Local Plan, perhaps sitting within the "Rest of the Borough" category. If it does, evidence of past windfall delivery rates would be helpful to establish whether a windfall assumption is reasonable.</p> <p>We consider that the Council should consider applying a non-implementation allowance to allow for the very likely possibility that a number of the listed schemes will not come forward or deliver the numbers expected in time. We are aware from participating recently in Camden Council's Local Plan examination that it is applying a non-implementation allowance to its five year supply.</p>	
53	383	Land Securities	Policy H01 - Housing Supply	NO			<p>Policy H01 sets the Council's position on Housing Targets. The increase in housing targets to reflect the London Plan is welcomed in principle. It is important for the policy to emphasise that these are minimum targets.</p> <p>The policy suggests a restriction on the occupation of new homes to London residents. It is not appropriate for planning policy to restrict the</p>	There is no sound evidence base to underpin the draft policy and it should not be pursued.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co-operate	Comments	Suggested amendments by representor
							occupation of new homes to residents presently living in London, particularly when considered in relation to objectively assessed housing need, which includes migration from outside of London.	
51	392	Transport for London Commercial Development Property Team	Policy H01 - Housing Supply				We welcome the objectives of draft policy HO1 and note the changes to its wording.	<p>We reiterate our comments relating to the provision of further flexibility relating to point c of the policy, in order to encourage the full optimisation of sites, particularly where they are underutilised, and note the Council has acknowledged and accepted this point in its Consultation Statement. For the avoidance of doubt, the wording of policy HO1 should be amended to clearly reflect this, which would assist with the supply of housing within the borough during the plan period and would comply with the objectives of paragraph 14 of the NPPF. It is proposed that the wording of the following paragraph is amended as follows:</p> <p><i>"the development <u>or intensification</u> of windfall sites and the change of use of buildings where there is no reasonable prospect of that site and/or premises being used for that purpose <u>or it is underutilised</u>".</i></p>
49	399	Royal Borough of Kensington & Chelsea	Policy H01 - Housing Supply				The Council notes that LBHF has concluded that LBHF and RBKC are not within a single housing market area and this Council agrees [Duty to Cooperate; Justification; Effectiveness]. Since the Council's previous response on Regulation 18 consultation the Council has undertaken its own SHMA which was published in December 2015. The first stage of the SHMA	

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							<p>was to determine the geographical span of the housing market area (HMA). The Council agrees that LBHF and RBKC are identified within different housing market areas in the CLG Final Report, Map 2.1 of the Council's SHMA 2015 shows these areas. The Council's SHMA concludes that RBKC distinguishes itself from surrounding areas on a number of critical features. House prices are not only the highest in London, but have shown the greatest increases since 2008 (72%), drawing on buyers and investors from overseas as well as the UK. In terms of migration, it only has strong links with neighbouring Westminster and Hammersmith and Fulham, but shows no further linkages with those authorities' sectoral neighbours to the west and north; and has only very weak linkages elsewhere in London.</p> <p>The SHMA 2015 considers that while it could be argued that there is a case for considering RBKC, Hammersmith and Fulham and Westminster as a housing sub-market, the extreme nature of RBKC's house prices, and the self containment in terms of migration and commuting, justifies the case for considering the housing needs of RBKC as a single authority.</p>	
38	486	Greater London Authority and Transport for London Planning Team	Policy H01 - Housing Supply				<p>Housing</p> <p>The Mayor welcomes Hammersmith Fulham's overall ambitions for growth across the borough and the principle of exceeding its London Plan minimum housing supply target of 1,031 additional homes per year. Policy 3.3D of the 2011 London Plan states that "Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, and if a target beyond 2025 is required, roll forward and seek</p>	

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							<p>to exceed that in Table 3.1 until it is replaced by a revised London Plan target".</p> <p>The borough is proposing in Table 2 indicative Housing Targets to increase its 1,031 per annum target shown in Table 3.1 of the London Plan to 2,600 new homes per year in the period 2015-2025, which is welcomed. However, the indicative housing target for the period 2015-2035 is much lower (940 new homes per annum) than the London Plan target, going against the advice of the London Plan policy 3.3D.</p> <p>Despite this, the 20 year overall target of 1,110 new homes per annum does exceed the London Plan target making it in general conformity with the London plan, and it also acknowledged that the Council is likely to review its Local Plan after ten years with a more realistic indicative housing target.</p> <p>NPPF para 47 requires local planning authorities to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing, using their evidence base. As mentioned in the previous letter dated 18 February 2015, the Council's evidence base includes a 2014 Strategic Housing Market Assessment report (SHMA) which provides some detail on local housing need and but does not include an assessment of overall housing need. Without a full SHMA, it is not possible to assess how well the Plan will address the borough's housing need and how it is progressing towards closing the gap between need and supply both locally and strategically as required in London Plan policy 3.8B.</p>	

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50	500	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy H01 - Housing Supply	NO			<p>The London Plan (2016) identifies a need for 42,389 new home per annum between 2015/16 and 2024/25 of which 1,031 is allocated to LBHF. The London Plan's Housing Target is a minimum target based on the estimated availability and capacity of land. It does not therefore reflect: i) the need to significantly increase the supply of housing in order to improve affordability; or ii) the opportunities for increasing the capacity of existing residential land or approved planning consents.</p> <p>Whilst it is noted the GLA household projections (2015) estimate that there will only be a need for c.844 new homes per annum in LBHF until 2025, this estimate is only a trend based projection. As noted in the LBHF SHMA (2013) the borough lost 9,675 individuals due to migration between 2011 and 2015 of which a significant portion can be attributed to lack of housing choice.</p> <p>London Plan Policy 3.3 states that '<i>Boroughs should seek to achieve and exceed the relevant minimum borough housing annual average housing target</i>'. The London Strategic Housing Market Assessment (2013) estimates London's housing need could be in excess of 54,600 homes per annum. On this basis, assuming the same borough level distribution as adopted for the minimum targets, LBHF's housing target should seek to provide at least 1,328 new homes per annum.</p>	Increase the housing target from '1,031' new homes per annum to at least '1,328' new homes per annum in accordance with London Plan Policy 3.3.
50	502	Capital and Counties on Behalf of Earls	Policy H01 - Housing Supply	NO			Policy support should be provided for the intensification of existing sites and/or the intensification of existing planning permissions. This will optimise housing delivery in the borough by ensuring where development	Add bullet ' <i>the intensification of existing sites or planning consents having regard to the other policies contained within the Local Plan</i> '.

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		Court and Olympia Group					<p>is happening it is making the greatest contribution it can to the borough's housing needs.</p> <p>Whilst it is recognised other development plan policies would permit intensification where appropriate, a policy presumption in favour of intensification would be beneficial in encouraging land owners to bring forward underutilised sites for redevelopment.</p>	
50	503	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy H01 - Housing Supply	NO			<p>It is not appropriate for planning policy to restrict the occupation of new homes to residents presently living in London. This policy requirement would not enable the borough's supply of new housing to meet objectively assessed housing need which includes migration from outside of London.</p> <p>The Housing London SPG states that <i>'The Mayor of London is seeking to encourage developers to sign up to his New Homes for Londoners Concordat which commits them to making homes in their developments available for sale to Londoners before or at the same time as they are available to buyers from other countries'.</i></p>	Amend Criteria e. to replace <i>'Are available for occupation by'</i> with <i>'prioritise sale to people living in London before or at the same time as they are available to buyers from other countries'</i> .
50	504	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy H01 - Housing Supply	NO			<p>The Council's Housing background paper identifies that since 2001 there has been a significant fall in the number of owner occupiers (44% to 35.6%) and a significant increase in those renting (23.4% to 33.2%). This points towards growing demand and need for rental properties. Furthermore the paper identifies that 32% of households in the private rented sector are sharing (unrelated adults).The Borough's existing stock of rental properties is generally poor quality and has not been designed for sharing. Policy support should therefore be provided for professionally managed purpose</p>	Add bullet <i>'the delivery of Build to Rent housing'</i>

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							<p>built rental housing which is to be covenanted and held in single ownership by an institution.</p> <p>As Build to Rent housing is forward funded by institutional investment and has faster occupation and absorption rates than the sale of private housing, it can be delivered quickly providing a solution to housing need in the short to medium term. Build to Rent also provides high quality housing which is more affordable than private sale. For example the income required to rent the average priced property in the borough (£1,892 per month) is £68k whilst the income required to buy the average priced property (£795k) would be £160k with an £80k deposit. In this respect the Council's Housing Background Paper confirms that "<i>much of the affordable housing, particularly the need for intermediate housing will be met by the private rented sector</i>"(para 15.3). The benefits of Build to Rent are recognised in para ID: 10-018-20150326 of the NPPG and para 3.3.3 of the London Housing SPG.</p>	
50	505	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy H01 - Housing Supply	NO			<p>Policy support should be provided for the delivery of Starter Homes where appropriate. The Housing and Planning Act (2016) includes provision for the introduction of regulations that would require residential proposals to provide Starter Homes. Starter Homes can provide access to home ownership for those unable to afford market housing. In view of the challenge facing high value Boroughs the plan should encourage innovative solutions from developers. For example, it may be possible for the borough to take an equity share in order to improve affordability whilst ensuring subsidy can be recycled. Alternatively the borough could consider accepting payments in lieu to enable delivery of starter homes in more</p>	Add bullet: ' <i>the delivery of Starter Homes</i> '.

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							affordable parts of the borough. Each scheme should be assessed on its own merits having regard to the wider objectives of the NPPF to offer diversity and choice in housing tenure.	
50	506	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy H01 - Housing Supply	NO			Policy support should be provided for the flexible use of the development subsidy in order to maximise value for money where appropriate. Approaches could include off-site delivery, linkages to estate regeneration, cross borough collaboration, use of public grant and/or the pooling of commuted sums.	Add bullet ' <i>using available development subsidy efficiently to maximise housing delivery</i> '
52	677	Westfield Shoppingtowns Ltd	Policy H01 - Housing Supply				In terms of the delivery of housing, Policy H01 is supportive in principle, with Table 2 setting a target for the WCOA of 6,000 new units over the next 20 years. It is important that this emphasis on housing in the OA is maintained, notwithstanding the fact that the overarching target for the borough will reduce now the OPDC is a distinct area with its own targets to meet. This is particularly critical given that a housing target does not appear to have been identified for the OPDC area as yet.	
17	136	Hammersmith Society	Table 2 Indicative Housing Targets				We note that Table 2 Indicative Housing Targets is based upon the achievement of 1031 additional homes a year (excluding the OPDC area) : This is a considerable increase on the previous figure in the Core Strategy (2011) of 615 a year and we question its achievability. While we understand the pressures – particularly from the Mayor – to increase provision, we would not wish to see that these London Plan targets become figures 'to be exceeded'. As noted above, it is unclear for example whether the new housing around the Hammersmith Town Hall site,	

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							Sovereign Court/Glenthorne/Beadon Road and the Hammersmith Riverside (including Fulham Reach) have been factored in to the Hammersmith Town Centre or overall figures.	
18	193	Old Oak and Park Royal Development Corporation	Table 2 Indicative Housing Targets					The average/year row in the 'total ten years' column is incorrect and should read 1,300 instead of 2,600.
63	87	Mr Robin Bretherick	Policy HO2 - Housing Conversion and Retention	NO		NO	<p>Policy HO2 pays insufficient regard to the need for accommodation for single persons.</p> <p>This local housing need is explained in the LBH&F Strategic Housing Market Assessment 2014/15, which highlights the <i>"very high levels of single person households"</i> (SHMA p.9). With 28.7% of households consisting of a single person under pensionable age, this is the 6th highest of all authorities in England (p.15).</p> <p>The London Plan predicts a further increase in one-person households and identifies single-person households as one of the categories which need to be specifically addressed in planning for more homes (para 1.15c).</p> <p>Both the above should be reflected in the Council's housing conversion policies.</p>	As above.

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17	138	Hammersmith Society	Policy HO2 - Housing Conversion and Retention				HO2 (Para.6.12), HO3b and HO5 – Family Housing : We consider that 2 bedroom units are not always acceptable as family provision (except in the case of very young children) and there should be greater emphasis on the provision of 3 bedroom (and larger units). These units should have good access to private amenity and public open space.	
3	4	Octavia Housing	Policy HO3 - Affordable Housing	NO	YES	YES	Policy HO3 c - needs to be placed in context. What is the minimum level of compliance for a scheme to be judged to have "affordable housing located throughout a new development and not concentrated on one part of the site?" There must be an element of compliance that relates to the number of homes within the development. On smaller schemes it may not be practical to spread the affordable homes. At the other end of the scale if market sale homes occupy an access core serviced by a concierge it maybe preferable for the affordable housing to have a separate entrance to maintain affordability of service charge. Most developers are keen for the affordable housing to be of similar appearance from the outside to their market sale products. Pepper potting all affordable housing tenures with market sale homes, whilst laudable, risks a loss of value (in the eyes of valuers) with consequential additional pressure on viability and quantum of affordable housing produced. If valuers can be persuaded that pepperpotting of all tenures does not impact on values then it becomes less of an issue. We have successfully marketed private sales and shared ownership occupying the same access core and shared ownership and affordable rent on other schemes. Care is needed as child densities tend to be high for new affordable rented housing and much lower for sales products which can lead to tensions between neighbours. On larger schemes it may be possible to have blocks for differing tenures spread	

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							across the scheme with little or no impact on values in the eyes of the valuation experts.	
10	23	CLS Holdings	Policy HO3 - Affordable Housing	NO			<p>Policy HO3 seeks affordable housing on sites with a capacity for 10 or more self-contained dwellings. This is unsound as it is not consistent with national policy and is contrary to National Planning Practice Guidance (NPPG) which sets out that for sites of 10 or less, contributions should not be sought.</p> <p>This policy sets a borough wide target of at least 50% of all dwellings built between 2015 and 2025 being affordable. It also sets out that in negotiating affordable housing the Council will seek maximum reasonable amount of affordable housing and take into account site size and site constraints; and financial viability applying the principles set out in the Viability Protocol (Appendix 9) and having regard to the individual circumstances of the site and availability of public subsidy. The redevelopment of our clients' sites could deliver new homes and contribute toward regeneration in the borough and housing need. However, as noted earlier competing priorities will need to be managed and a flexible approach taken to ensure the opportunities for development are maximised and development is viable. Our client is keen to work with the Council to ensure that the cumulative weight of obligations and their timing are considered at an early stage and that practical models for delivery can be agreed which ensure that infrastructure requirements, including affordable housing, are certain, affordable and deliverable.</p> <p>Affordable Housing Target</p>	<p>The policy wording should be amended to seek affordable housing on sites with a capacity of more than 10 dwellings.</p> <p>Affordable Housing Target</p> <p>The viability evidence underpinning the Local Plan should be reviewed to ensure that the Local Plan and importantly the key strategic sites are deliverable and therefore that the local plan is effective and consistent with the NPPF.</p> <p>Viability Protocol</p> <p>The policy should include wording that acknowledges that the Viability Protocol is only a draft document and that there may be instances where the advice in the document is not appropriate to follow.</p> <p>Starter Homes</p> <p>The final sentence of paragraph 6.31 should be removed.</p>

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							<p>The proposed borough wide affordable housing target of 50% of all dwellings has been increased compared to the current Core Strategy policy H2 which seeks 40%. The increase in affordable housing sought comes with the same CIL charge rate. The increase in affordable housing requirement combined with the CIL charge rate and other infrastructure costs is considered to place an unreasonable burden on development sites which could threaten their viability and the deliverability of the policies in the Local Plan.</p> <p>We welcome that the Council accept there is a need for flexibility in negotiating affordable housing taking account of financial viability. It is important to acknowledge competing priorities and ensure that development can be delivered to contribute towards the wider aspirations of the Local Plan. However to be in accordance with the NPPF and therefore to be found sound the Local Plan policies must not be subject to such a scale of obligations and policy burdens that the ability of sites to be developed is threatened.</p> <p>Viability Protocol</p> <p>The policy wording seeks to apply the principles set out in the Viability Protocol. It should be noted that this is a draft document which has been through a round of consultation and its status in decision taking is not clear at this stage.</p> <p>We submit that there is some merit in an approach which provides greater clarity and consistency in the approach taken across London in regards to the viability process. However, it is important that individual site</p>	

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							<p>characteristics are taken into consideration and it is recognised that one model does not always fit all development types or sites. We submit that a flexible approach would still need to be taken on certain sites.</p> <p>Starter Homes</p> <p>Paragraph 6.31 of the Local Plan makes reference to the government measures being introduced in respect of Starter Homes. This paragraph states that ‘ <i>where Starter Homes are substituted for</i> affordable housing in development proposals, the council will expect them to replace affordable home ownership products (primarily shared ownership) rather than affordable rented housing’</p> <p>We accept that there is some level of uncertainty over the introduction of Starter Homes. However, the approach suggested by the Council in regard to the substitution of Starter Homes is inappropriate and inflexible. We understand that the government’s requirement will be for a certain percentage of Starter Homes to be provided on all eligible development sites and that this would be before consideration of any affordable housing types, not as a replacement for them.</p> <p>The introduction of Starter Homes is a further cost on development which needs to be appropriately weighed up against other policy burdens and infrastructure costs and is likely to impact on delivery of traditional affordable housing. Flexibility in approach to affordable housing delivery and mix must be maintained to ensure that the competing priorities of development can be appropriately delivered and site specific circumstances can be taken into account.</p>	

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							<p>Summary</p> <p>Our client is broadly supportive of the policies contained within the Proposed Submission Version of the Local Plan, including the identification of key Strategic Sites, and acknowledgement of their ability to deliver regeneration, and a significant number of new homes contributing towards the Council's aim to exceed its housing target as well as additional jobs through new employment floorspace.</p>	
47	73	Stanhope PLC	Policy HO3 - Affordable Housing	NO	YES	YES	<p>HO3 a. The current adopted Strategic Policy H2 states 40% of new housing should be affordable. Draft Policy HO3 a states that 50% of all housing should now be affordable. The policy goes on to state in e. that in negotiating for affordable housing, the council will seek the maximum reasonable amount of affordable housing taking into account: site, size and site constraints; financial viability applying the principles set out in the viability protocol (which we seek to address later in this document) and having regard to the individual circumstances of the site and the availability of public subsidy.</p> <p>HO3 b. sets out the requirement for affordable housing offers to include 60% social rent. It is considered that this will have an impact on the overall quantum provided due to the lower values derived from this product. However, the inclusion of affordable rent provides flexibility and enables the Developer to negotiate the type and mix on a site by site basis.</p>	<p>See comments on Viability Protocol</p> <p>HO3 b. sets out the requirement for affordable housing offers to include 60% social rent. It is considered that this will have an impact on the overall quantum provided due to the lower values derived from this product. This should be re-considered. However, the inclusion of affordable rent provides flexibility and enables the Developer to negotiate the type and mix on a site by site basis.</p> <p>We would encourage delivery of affordable housing to include provision for Build to Rent schemes particularly in certain parts of the Boroughs such as the White City Opportunity area.</p>

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							<p>HO3 c. Requires the affordable housing to be located ‘throughout the development’ and ‘not concentrated’. It is considered that this may not be practical.</p> <p>HO3 d. Requires the provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership. It should be noted that Developers do not always have this level of expertise in house and would obtain this from Registered Provider partners considering the potential acquisition of the units. However, in the early planning stages these partnerships are generally not yet in place.</p> <p>HO3 f advises that in exceptional circumstances, a financial contribution may be required to provide affordable housing off-site where other sites may be more appropriate. We would welcome further information on how the potential financial contribution could be calculated.</p> <p>The final point raised in the policy states that that there should be ‘no net loss of social/ affordable rented housing on development sites’. It is considered that is a very general statement.</p> <p>Justification Points associated with draft Policy HO3</p> <p>6.19 - When redeveloping sites to ‘improve the quality of housing stock or provide a better mix of housing’ the document states that there should be ‘no net loss of social/ affordable housing in terms of number of dwellings or habitable rooms’. However, this will not always be possible. For example if we consider the redevelopment of a block of studio flats for a more</p>	<p>HO3 c. Generally when Registered Providers acquire affordable housing their preference is for the affordable housing to be located together, in specific blocks, areas of a site. This enables a simpler management strategy for the scheme but also could potentially contribute to cost savings, more effective housing management etc. and therefore reduced service charges for residents. Flexibility should be built in to allow for requirements of the RPs to be met.</p> <p>HO3 d- Flexibility should be given on a case by case basis.</p> <p>HO3 f - We would welcome further information on how the potential financial contribution could be calculated.</p> <p>The final point raised in the policy states that that there should be ‘no net loss of social/ affordable rented housing on development sites’. It is considered that is a very general statement and should take account of instances for example, where there are wider regeneration projects that will inevitably result in this to enable wider benefits for the local area and its residents. This matter is discussed further in point 6.19.</p> <p>Justification Points associated with draft Policy HO3</p>

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							<p>sustainable and required mix of units, clearly this will result in the provision of larger family sized units, reducing the overall number of units.</p> <p>It is also noted on this point that ‘the local community should be fully involved’. Whilst this is supported it should be noted that engagement should not be at the expense of delivery.</p> <p>6.25 – It’s unfortunate that the intermediate housing figures are only recorded up to 2011. Given the change in political policy direction from 2010 onwards with more emphasis placed on intermediate, particularly Shared Ownership and Discounted Market Sale, with many significant developments completing in the past few years. It would therefore be interesting to see how this composition has changed both in overall numbers and percentages.</p> <p>6.26 – An increase in Social rented housing has been stated but the figures may need amending as currently stating ‘31.7% to 31.1%’which doesn’t demonstrate an increase.</p> <p>6.28- The specified income range required for Intermediate housing of £21,100 to £80,000 is not in line with the GLA affordability threshold of £90,000 per annum household income. Given that H&F is the 4th most expensive borough in terms of property values in London, it is extremely difficult for Developers and RPs to achieve these affordability levels, particularly in the high values of the borough.</p> <p>6.31 – The view on Starter Homes (SH) and the Council’s desire for this provision to be included within Intermediate housing is noted. However, it is difficult to comment on this proposal before the full Government</p>	<p>6.19 - A measure of Habitable rooms would appear to provide more flexibility in this area.</p> <p>It is also noted on this point that ‘the local community should be fully involved’. Whilst this is supported it should be noted that engagement should not be at the expense of delivery.</p> <p>6.25 – Obtain more up to date information</p> <p>6.26 – amend the figures as it currently states ‘31.7% to 31.1%’which doesn’t demonstrate an increase.</p> <p>6.28- The income range should be amended in line with the GLA.</p> <p>6.31 – The view on Starter Homes (SH) and the Council’s desire for this provision to be included within Intermediate housing is noted. However, it is difficult to comment on this proposal before the full Government guidance is released and the practical implications are understood. Although SH’s will be considered a form of affordable housing, its inclusion as an intermediate housing in the place of existing products such as Shared Ownership could result in developments becoming polarised with just owner occupied and social/ affordable rented properties, with limited households in the middle with part equity.</p>

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							<p>guidance is released and the practical implications are understood. Although SH's will be considered a form of affordable housing, its inclusion as an intermediate housing in the place of existing products such as Shared Ownership could result in developments becoming polarised with just owner occupied and social/ affordable rented properties, with limited households in the middle with part equity.</p> <p>6.33 – Whilst the principle of developments being 'tenure blind' is supported there may inevitably be instances where a reduced specification for the affordable blocks is required and more practical for successful long term management. For example, communal area specifications or landscaping around particular blocks kept to a minimum to reduce overall service charges for management and maintenance in line with affordability and income requirements.</p>	6.33 – Flexibility should be applied on a case by case basis.
17	139	Hammersmith Society	Policy HO3 - Affordable Housing				HO2 (Para.6.12), HO3b and HO5 – Family Housing : We consider that 2 bedroom units are not always acceptable as family provision (except in the case of very young children) and there should be greater emphasis on the provision of 3 bedroom (and larger units). These units should have good access to private amenity and public open space.	
17	141	Hammersmith Society	Policy HO3 - Affordable Housing				HO3 – Affordable Housing : The Society supports the policies in favour of provision of a range of genuinely affordable housing for local people including shared ownership to bridge the gap between expensive private housing and Council/housing association provision. We are concerned at	

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							the tendency for the provisions being annexed to 'other locations' which are not specifically identified.	
18	195	Old Oak and Park Royal Development Corporation	Policy HO3 - Affordable Housing				<p>Policy HO3 b)</p> <p>This policy accords with the current London Plan, but not with the new Mayor's manifesto and likely contents of the Mayor's Housing SPG. There may be a need to reflect on the contents of the Mayor's Housing SPG, once published and revise this part of the policy.</p>	
18	196	Old Oak and Park Royal Development Corporation	Policy HO3 - Affordable Housing				<p>Policy HO3</p> <p>The policy does not appear to deal with vacant building credit.</p>	
18	198	Old Oak and Park Royal Development Corporation	Policy HO3 - Affordable Housing				<p>6.27</p> <p>The paragraph quotes Housing Register data from October 2014, which is now outdated. It should be relatively straightforward to quote more recent data in this paragraph.</p>	
24	262	Home Builders Federation	Policy HO3 - Affordable Housing	NO			<p>Policy HO3 – Affordable Housing</p> <p><u>The policy is unsound because:</u></p>	The allowance of £1,000 per dwelling for S106 costs also appears to be on the low side (paragraph 4.28). It would helpful if the Council provided details of typical S106 contributions per unit for the last five years so

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							<p><u>a) The requirement for 50% affordable housing on schemes of ten unit or more of self-contained accommodation does not appear to have been justified in the supporting evidence base in viability terms; and</u></p> <p><u>b) the requirement for contributions from schemes of ten units or more is contrary to the Government policy threshold for affordable housing.</u></p> <p>In terms of (a) we have noted the Council's Viability Study of 2016. We note paragraph 6.11:</p> <p>"The results of our appraisals indicate that the adoption of a 50% affordable housing target is viable in some of the scenarios that we have tested. Due to the caveat in the emerging plan that determination of applications will have regard to scheme-specific viability, the Council is not required to demonstrate that every single site (or type of site) can meet the full 50% target. However, our appraisals indicate that this target can be delivered in some circumstances and setting a lower target would not result in the optimum outcome in terms of total numbers of affordable units delivered."</p> <p>Scrutiny of Figure 6.2.1 suggests that viability very much depends on what benchmark land value is assumed and the type of residential development involved (the typology). The report notes that schemes to the south of the borough with the higher benchmark land values will struggle with viability (paragraph 6.2). This could have consequences for the delivery of the Fulham and South Fulham Regeneration areas. Of course, we recognise that these regeneration schemes may already have planning approval with 50% affordable housing. This is suggested by the Council's five year</p>	<p>that one can judge whether this is a reasonable assumption.</p> <p>In terms of (b) the Council should revise its policy to reflect the national policy that allows for schemes of 10 units and fewer to be exempt from affordable housing and tariff type payments.</p>

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							<p>housing land supply paper since all the regeneration schemes are listed as having already provided 1,019 units in the first year of the plan in 2015/16 (see page 4, although we also note that on page 2 of the Five Year Land Supply Report it says that 1,250 were completed overall in the Borough compared to 1,442 in Table 2). It would be helpful if the Council could provide details on what levels of affordable housing have been agreed on these schemes in these regeneration areas.</p> <p>We also note that the Council's preference is for the rented element to be let at Target Rents and the Shared Ownership to be aimed at lower and middle incomes (paragraph 9.2 of the Viability report). As the report notes, this will tend to make schemes more unviable. This is illustrated in Figure 6.2.1. Schemes in the lower residential value band even in benchmark land value 1 are now affected.</p> <p>Overall we are not reassured that all the schemes in the Borough will be able to sustain a rate of 50% affordable housing. The Council should provide information on which benchmark land values relate best to where the majority of its housing sites will come forward. If most of its housing sites are located in areas with the benchmark land values 1 and 2 (the lower land values) then 50% affordable housing may not be an issue.</p> <p>The allowance of £1,000 per dwelling for S106 costs also appears to be on the low side (paragraph 4.28).</p>	

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29	315	City and Docklands Ltd	Policy HO3 - Affordable Housing				<p>Affordable Housing</p> <p>In terms of affordable housing, viability and the private rented sector it is well documented that build to rent homes and private homes for sale should be treated differently in respect of viability. The Investment model of Build to Rent, is one of long-term financial yields rather than the short-term capital value from sale of owner occupier properties.</p> <p>The Investment Property Forum (September 2015) carried out some comparative analysis between build-to-rent and build-to-sell. Through a worked example it highlighted the viability gap between the two, noting that a much lower annual rate of return is generated by the build to rent model (7.5% pa) compared to the traditional build-to-sell model (17.5%). As a result, it concluded that as investors and developers require a return between 10% and 12.5% pa to take the development risk, this underlies the challenges faced by institutional investors willing to invest in the sector to accelerate housing delivery.</p> <p>The London Housing SPG recognises this;</p> <p><i>"LPAs should recognise the distinct economics of the sector relative to mainstream market housing and take account of this when undertaking viability assessments for covenanted build to rent schemes."</i></p> <p>Therefore it is clear from government guidance and the industry that flexibility in negotiations is a key element for realising the increased need for institutional owned rented homes and therefore the Policy should be</p>	<p>In summary, we would request that the Local Plan text be amended to:</p> <ul style="list-style-type: none"> Indicate that intermediate rent will be acceptable as the affordable housing tenure within purpose built private rented development in line with regional policy. <p>I hope that the above can be taken into account in order to ensure the Plan is in accordance with National and Regional policy.</p>

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							<p>adjusted to reflect this and clearly distinguish between the traditional for sale housing and homes which are provided as Build to Rent.</p> <p>In setting an Affordable Housing tenure split, flexibility should be provided for purpose built PRS schemes to provide Intermediate rented units in lieu of Affordable Rented units. PRS schemes provide long revenue streams for institutional investors. The structure of the investment and management models mean it is not possible for third party registered provider to manage part of the site. Flexibility for Intermediate Rented tenure in Build to Rent schemes is supported by para ref 3.3.10 of the London Housing SPG (2016) which states:</p> <p><i>"Where viability suggests that traditional affordable housing products are unviable on covenanted schemes due to the distinct economics of such schemes, developers and LPAs could consider including only discounted market rent (intermediate rent) as the affordable offer."</i></p>	
53	384	Land Securities	Policy HO3 - Affordable Housing	NO			<p>Policy HO3 proposes to increase of the Affordable Housing target from 40% to 50%. We challenge the soundness of the evidence base underpinning this position. Affordable housing delivery in the borough has historically been significantly below the 40% level over the last 5 years, based on scheme viability. The Council's 'Affordable Housing Viability Study' (2016) concluded that the 50% target is unviable in many of the scenarios tested where the Council's standard affordability requirements are applied. The report does not demonstrate that the 50% target is achievable across the borough and we believe it is not sound for it to be applied in this respect to the Local Plan. We believe the approach adopted in contrary to the NPPF</p>	

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							<p>which identifies that " <i>plan makers should not plan to the margin of viability but should allow a buffer to respond to changing markets and to avoid the need for frequent plan updating</i>".</p> <p>Overall the increase in targets would be unviable in many instances and threatens to restrain housing delivery.</p>	
46	434	Hadley Property Group Ltd (HPG)	Policy HO3 - Affordable Housing				<p>HPG's Chelsea Island project on Harbour Avenue is currently under construction, and the company is keen to undertake future developments in the borough.</p> <p>HPG's comments on the draft local plan are made in a context of both Chelsea Island and its interest in developing in the borough</p> <p>In contrast to Policy H2 of the adopted Hammersmith & Fulham Core Strategy, the draft local plan proposes an increase in the borough wide affordable housing target from 40% to 50%. HPG recognises that the Council seeks to achieve the maximum reasonable amount of affordable housing having regard to site specific circumstances and the financial viability of the proposed development.</p> <p>However, the tone of the policy is set by the increased borough wide target, which could jeopardise the amount of housing that might be delivered in the borough, particularly as the high levels of Community Infrastructure Levy in the borough have been based on the current adopted target of 40% affordable housing.</p>	<p>HPG suggests that the requirement to assess the maximum reasonable amount of affordable housing should be introduced at the start of the policy alongside the statement about seeking a borough wide target of 50%.</p> <p>In addition, HPG suggests that the proposed viability protocol should be reviewed after the forthcoming GLA Housing Supplementary Planning Guidance (SPG) has been through its consultation stage. The new SPG is anticipated to propose a new approach to assessing the level of affordable housing in developments in London. It would be appropriate for the LBHF approach to viability assessment to be consistent with the Mayor of London's emerging approach in the revised SPG.</p>

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45	468	Berkeley Group (St James & St George) & St William	Policy HO3 - Affordable Housing	NO			<p>Policy HO3 - Affordable Housing</p> <p>This policy sets a borough wide target of at least 50% of all dwellings built between 2015 and 2025 being affordable. It also sets out that in negotiating affordable housing the council will seek maximum reasonable amount of affordable housing and take into account site size and site constraints; and financial viability applying the principles set out in the Viability Protocol (Appendix 9) and having regard to the individual circumstances of the site and availability of public subsidy.</p> <p>The redevelopment of our clients' sites would deliver new homes and contribute toward regeneration in the borough and meeting housing need. However, as noted earlier competing priorities will need to be managed and a flexible approach taken to ensure the opportunities for development are maximised and development is viable. Our client is keen to work with the council to ensure that the cumulative weight of obligations and their timing are considered at an early stage and that practical models for delivery can be agreed which ensure that infrastructure requirements, including affordable housing, are certain, affordable and deliverable.</p> <p>There are two key areas of concern in respect of this policy wording these relate to the 50% affordable housing target and the reference to the Viability Protocol.</p> <p><i>Affordable Housing Target</i></p> <p>The proposed borough wide affordable housing target of 50% of all dwellings has been increased compared to the current Core Strategy policy</p>	The policy should include wording that acknowledges that the Viability Protocol is only a draft document and that there may be instances where the advice in the document is not appropriate to follow.

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							<p>H2 which seeks 40%. The increase in affordable housing sought comes with the same CIL charge rate.</p> <p>The increase in affordable housing requirement combined with the CIL charge rate and other infrastructure costs is considered to place an unreasonable burden on development sites which could threaten their viability and the deliverability of the policies in the Local Plan. In particular, as noted earlier, in respect of the strategic regeneration sites which also come with a number of other high costs including infrastructure and decontamination, the impact on viability of these sites to deliver the requirements of the plan is questionable.</p> <p>We welcome that the Council accept there is a need for flexibility in negotiating affordable housing taking account of financial viability. It is important to acknowledge competing priorities and ensure that development can be delivered to contribute towards the wider aspirations of the Local Plan. However, to be in accordance with the NPPF and therefore to be found sound the Local Plan policies must not be subject to such a scale of obligations and policy burdens that the ability of sites to be developed is threatened.</p> <p><i>Viability Protocol</i></p> <p>The policy wording seeks to apply the principles set out in the London Borough Viability Protocol. This document was published for consultation but its status in decision making is not clear. Berkeley Group responded to the consultation and whilst generally supportive of a need for greater</p>	

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							<p>transparency in the viability process raised some concerns over the proposed approach within the protocol.</p> <p>We support an approach which provides greater clarity and consistency in the approach taken across London in regards to the viability process. However, care must be taken when dealing with commercially sensitive information which impact upon an applicant's commercial position. In addition, whilst early discussions on development proposals are critical, the extent to which the viability of development can be determined is less certain. This is because proposals can be subject to change both before and after a planning application is submitted.</p>	
45	469	Berkeley Group (St James & St George) & St William	Policy HO3 - Affordable Housing	NO			<p>Paragraph 6.31 of the Local Plan makes reference to the government measures being introduced in respect of Starter Homes. This paragraph states that '<i>where Starter Homes are substituted for</i> affordable housing in development proposals, the council will expect them to replace affordable home ownership products (primarily shared ownership) rather than affordable rented housing'.</p> <p>We accept that there is some level of uncertainty over the introduction of Starter Homes. However, the approach suggested by the Council does not conform with the requirements set out in the Starter Homes Regulations - Technical Consultation published by DCLG in March 2016. This document confirms that the first 20% of all affordable homes delivered within a development will be Starter Homes subject to viability. We understand that the expected secondary legislation and guidance will confirm that in cases where adopted Local Plan policy seeks in excess of 20% affordable</p>	Paragraph 6.31 should be revised to reflect the approach set out in the DCLG document.

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							housing, only in circumstances where the 20% Starter Homes requirement is met first can any remaining proportion of other tenure types of Affordable Housing be sought.	
38	487	Greater London Authority and Transport for London Planning Team	Policy HO3 - Affordable Housing				Affordable Housing The Mayor welcomes the borough wide target that at least 50% of all dwellings should be affordable. However, the target is only indicated for 2015-2025 and not the whole plan period. It would be useful to extend the strategic target for the whole of the plan period or provide an explanation for not extending the target to 2035. Referencce should also be made to affordable housing need as evidenced in the Council's SHMA.	
50	507	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO3 - Affordable Housing	NO			The previous version of the Draft Local Plan proposed an increase of the Affordable Housing target from 40% to 50% without the benefit of supporting evidence. The Consultation Statement noted the Council had ' <i>commissioned an affordable viability assessment to support the new borough wide target</i> '. The subsequently prepared 'Affordable Housing Viability Study (2016)' is however only able to conclude that the 50% target is viable in some of the scenarios tested. The report illustrates that that the proposed target is unviable in many of the scenarios tested where the Council's standard affordability requirements are applied. It does not therefore demonstrate the proposed target is achievable across the borough in accordance with the NPPG which states " <i>plan makers should not plan to the margin of viability but should allow a buffer to respond to</i> "	Replace the proposed 50% target with an evidence based target which allows for a buffer to respond to changing markets.

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							<p><i>changing markets and to avoid the need for frequent plan updating"</i> (paragraph 008 Reference ID:10-008- 20140306).</p> <p>Furthermore, historic delivery of affordable housing has been significantly below the currently adopted 40% target due to viability issues with an average delivery of just 11% over the last 5 year. This further evidences that an increased target of 50% would not be viable and deliverable in accordance with para 174 of the NPPF. The inclusion of a borough wide target which is not achievable risks reducing the number of housing sites brought forward for residential development during the plan period. This would lead to a reduction in overall housing delivery at a time when the Borough housing target has significantly increased.</p>	
50	509	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO3 - Affordable Housing	NO			The Affordable Housing Policy must include a policy compliant level of affordable housing. As presently drafted Policy H03 requires <i>‘the maximum reasonable amount of affordable housing’</i> be provided even where the borough wide target would be exceeded. This policy is not workable as it does not provide a suitable framework against which developers can consider an appropriate purchase price for land. This risks frustrating the delivery housing contrary to national and regional policy.	Add <i>‘up to the borough wide target’</i> to bullet e.
50	510	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO3 - Affordable Housing	NO			Flexible provisions should be included for the policy target to be met on the basis of the net additional homes delivered over and above existing and/or permitted homes. Setting the policy target on net additional homes will incentivise the intensification of underutilised sites. Intensification will	Add bullet <i>‘the net additional homes being provided over and above existing and/or permitted homes’</i>

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							be required in order for the Council to meet its objectively assessed housing need due to the limited availability of land.	
50	511	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO3 - Affordable Housing	NO			<p>The proposed borough wide tenure split (60/40) must be viable and deliverable in accordance with para 174 of the NPPF. The Affordable Housing Viability Study (2016) however demonstrates that the proposed split is unviable in many of the scenarios tested where the Council's standard affordability requirements are applied.</p> <p>The proposed borough wide tenure split (60/40) must also seek to meet objectively assessed housing need. The proposed tenure split however represents a significant shift from the Council's adopted policy which recognised the need to prioritise middle income earners and address the social polarisation which characterises much of the Borough. The 2011 census identified only 1,257 households living in Intermediate Housing (1.6%). Delivery of additional affordable housing has seen an equal increase in social rent: intermediate tenure indicating that the significant shortfalls in the intermediate housing have not been addressed.</p> <p>Recent increases in house prices also indicate there is a growing need for Intermediate Housing due to an increase in the number of households who cannot afford to buy private sale housing but would be ineligible for Council allocated housing. This conclusion is supported recent growth in the Private Rented Sector (50% over the proceeding 10 years) and the number of live applications on the H&F Home Buy Register (9,077) where the average household income is c.£35k. The Council's Housing Background Paper confirms that of the 2,282 household in housing need</p>	Amend bullet b. to provide flexibility for an alternative tenure mix to be provided where supported by site specific viability evidence and/or localised housing need and the scope for achieving more mixed and balanced communities.

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							<p>forming each year approximately 1,540 households (67%) would be able to afford and be eligible for intermediate housing.</p> <p>Encouraging greater diversity in tenure and type of Affordable Housing offers the potential to enable the existing social housing stock be better utilised and to provide choice for low to moderate incomes households. A greater proportion of Intermediate Housing on strategic sites such as Earl's Court would enable the delivery of more affordable housing (due to its lower subsidy requirements) which can be targeted at a range of incomes whilst supporting a more mixed and balanced community.</p>	
50	512	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO3 - Affordable Housing	NO			<p>Flexible provisions should be included which allow for an alternative tenure mix or distribution of affordable housing to be considered policy compliant in light of site specific circumstances including viability, feasibility, management and/or the potential to deliver benefits including additional units or housing which better meets local needs. This should be consistent with Policy 3.12 of the London Plan, which states that in negotiating affordable housing on individual schemes regard should be given to (inter alia) <i>"the need to encourage rather than restrain residential development (Policy 3.3), the need to promote mixed and balanced communities (Policy 3.9), the size and type of affordable housing needed in particular locations, the specific circumstances of individual sites, Resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor"</i>. In addition to this, the London Housing Design Guide recognises that "mixed-tenure cores, often raises</p>	<p>Add: <i>'where practically feasible'</i> to bullets b. and c.</p> <p>Amend bullet e. to include <i>' the need to promote mixed and balanced communities'</i> and <i>'the need to maximise affordable housing output'</i>.</p> <p>Delete <i>'applying the principals set out in the Viability Protocol (Appendix 9)'</i>.</p>

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							<p>management issues and can have implications for resident service charges, particularly where lifts are involved" (p31 LED)".</p> <p>The viability principals set out in the viability Protocol document (Appendix 9) do not have any planning policy status and are inconsistent with the National Planning Practice Guidance (NPPG).</p>	
50	513	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO3 - Affordable Housing	NO			<p>The affordable housing policy should, in accordance with national and regional policy, recognise the distinct benefits and challenges facing the delivery of covenanted Built to Rent Housing. The NPPG states (para Ref: 10-018- 20150326): <i>"Some privately rented homes can come from purpose built schemes held in single ownership which are intended for long term rental. The economics of such schemes differ from build to sale and should be determined on a case by case basis. To help ensure these schemes remain viable while improving the diversity of housing to meet local needs, local planning authorities should consider the appropriate level of planning obligations, including for affordable housing, and when these payments are required"</i>.</p> <p>The affordable housing policy should also recognise the benefits of providing affordable housing as Discounted Intermediate Rent in these schemes due to management efficiency savings, greater permanence and improved equality. The London Housing SPG (para 3.1.27) states <i>"where viability suggests traditional affordable housing products are unviable on covenanted schemes due to the distinct economics, developers and boroughs could consider including discounted market rent (intermediate rent) as the affordable offer"</i>.</p>	Add bullet 'the distinct benefits and economics of covenanted Built to Rent housing and the benefits associated with providing Discounted Intermediate Rent in these schemes'

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50	514	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO3 - Affordable Housing	NO			The policy requirement set out in bullet d for ‘ <i>the provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership</i> ’ is not considered achievable given the nature of these types of affordable product. No evidence has been provided to demonstrate how this policy requirement could be achieved.	Delete bullet d.
50	516	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO3 - Affordable Housing	NO			Flexibility should be added to the policy requirement for ‘ <i>no net loss of social/affordable rented housing on any development sites</i> ’ in order to allow housing outcomes to be maximised where appropriate and, in particular, where there are high concentrations of existing social/affordable rented housing to provide the opportunity for a more mixed and balanced community.	Add ‘unless appropriate’ to final sentence.
40	576	Prashant Bhrambhatt	Policy HO3 - Affordable Housing				6.19 COLLEGE COURT ESTATE WOULD BE A GOOD CANDIDATE FOR IMPROVEMENT	
42	647	National Grid Property Ltd	Policy HO3 - Affordable Housing				Affordable Housing Policy HO3 of the previous draft of the Local Plan set out a borough wide target of at least 40% of all new dwellings built between 2015-2025 should be affordable. Policy HO3 has now been amended to now include a borough wide target of at least 50%. It is considered that the increased target could potentially restrict the delivery of housing in the Borough if it is not applied flexibly. It will be	Policy 3.12 of the London Plan sets out the need to encourage rather than restrain residential development when determining the level of affordable housing. This approach should be explicitly included within the policy wording on Policy HO3, alongside a clearer statement at the start of the policy that the council will assess the maximum reasonable level of affordable housing.

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							important to ensure that site specific viability and CIL liabilities are taken into account when considering affordable housing provision in planning applications.	
52	678	Westfield Shoppingtowns Ltd	Policy HO3 - Affordable Housing				<p>In terms of the delivery of affordable housing, the emerging Local Plan proposes to increase the borough wide affordable housing target to 50% from 40% as per the last iteration of the draft Local Plan published in January 2015 and the adopted Core Strategy. The basis for this increase is the September 2016 Housing Viability Assessment prepared by BNP Paribas for the Council, which suggests that there a small number of sites within the borough on which it would be viable to deliver 50% affordable housing.</p> <p>To date, the redevelopment of major sites within the OA has delivered affordable housing below the target of 40%. The concern with increasing the target for affordable housing delivery above what could be considered to be already an undeliverable level is that this impacts LBHF's ability to meet the NPPF requirement to boost significantly the supply of housing (paragraph 47).</p>	<p>In general, WEL are supportive of the thrust of emerging policy contained within the draft Local Plan, and in particular they welcome the proposed inclusion of the Westfield London Phase 2 extension site within Shepherds Bush Town Centre.</p> <p>There are, however, concerns regarding the proposed increase of the borough wide target for affordable housing to 50%, given the potential impact this has on the delivery of housing, but also in terms of the need to set reasonable and deliverable targets for affordable housing at the local level. The current evidence is that targets of 40% affordable housing are not being met on the majority of sites, thus increasing the rate appears to be unjustified.</p> <p>Indeed, the Council's own evidence base demonstrates that a policy target of 50% affordable housing would not be achievable on a number of the scenarios</p>

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								that were tested. It is on this basis that we have concerns as to the soundness of the draft Local Plan. In particular, we do not consider that the emerging Local Plan meets the requirements of paragraph 182 of the National Planning Policy Framework in respect of the need for it to be 'justified' – i.e. to set out "the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence". For this reason, we consider that for the Local Plan to meet the tests of soundness, the identified target rate for affordable housing across the borough – currently identified as 50% - should be reduced
14	47	Mr. Jon Burden	Policy HO4 - Housing Quality and Density	NO	YES	YES	We support higher density housing, including taller buildings, in town centres and near transport hubs. Given the high percentage of young single people in the borough, high density dwellings would be attractive and may qualify as Starter Homes. The added density would allow (or compensate for) terraced homes being turned back into single family dwellings.	As above, we support higher density housing, including taller buildings, in town centres and near transport hubs. Given the high percentage of young single people in the borough, high density dwellings would be attractive and may qualify as Starter Homes. The added density would allow (or compensate for) terraced homes being turned back into single family dwellings.
10	24	CLS Holdings	Policy HO4 - Housing Quality and Density				Our client supports the Council's intention to promote well- designed residential development. We welcome the acknowledged flexibility in respect of the application of standards within London Plan policy and the	The policy should include wording to reflect the approach set out in the London Plan to optimising housing potential and residential output particularly in

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							<p>Housing SPG in circumstances where not meeting these standards can be justified.</p> <p>The final two paragraphs in respect of Housing Density do not accurately reflect the London Plan Policy 3.4 Optimising Housing Potential which seeks to optimise housing density.</p> <p>Summary</p> <p>Our client is broadly supportive of the policies contained within the Proposed Submission Version of the Local Plan, including the identification of key Strategic Sites, and acknowledgement of their ability to deliver regeneration, and a significant number of new homes contributing towards the Council's aim to exceed its housing target as well as additional jobs through new employment floorspace.</p>	relation to the identified Strategic Sites within the Local Plan.
47	74	Stanhope PLC	Policy HO4 - Housing Quality and Density	NO	YES	YES	<p>In general terms on schemes that include affordable housing where the design and layout is particularly restricted, the council should give the Developer the opportunity to seek feedback on different elements of the design with Registered Providers (RPs) and then have regard for these comments to ensure that appropriate standards of design are achieved. This will ensure that a sustainable scheme that can be effectively managed is delivered. For example RPs often require bin stores at ground level to reduce maintenance/ service charge costs and usual design standards require these items to be provided in the basement.</p>	It needs to be recognised that in order to deliver a sustainable scheme in the longer term and meet all of the council's planning requirements, there will need to be flexibility and consideration on a case by case basis.

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63	88	Mr Robin Bretherick	Policy HO4 - Housing Quality and Density	NO			<p>The London Plan internal space standards are very high, particularly for studios and single person units. They unnecessarily reduce the number of flats/dwellings which can be provided in any given floorspace. Policy HO4 and its justification should recognise this and provide greater flexibility, allowing more modest-sized units to provide higher densities in accessible locations. This is particularly so in order to meet the need for accommodation for single persons.</p> <p>LBH&F Strategic Housing Market Assessment 2014/15 highlights the “<i>very high levels of single person households</i>” (SHMA p.9). With 28.7% of households consisting of a single person under pensionable age, this is the 6th highest of all authorities in England (p.15).</p> <p>The London Plan predicts a further increase in one-person households and identifies single-person households as one of the categories which need to be specifically addressed in planning for more homes (para 1.15c).</p> <p>The need justifies greater flexibility which should be reflected in the Council's ho quality and density policies.</p>	As above
68	92	Fulham Society	Policy HO4 - Housing Quality and Density				<p>Density . All planning applications, almost without exception, are too high and too dense. Perhaps this is a bargaining ploy but we do hope that the Council will remember its comments on green space, tall buildings and bulk.</p>	

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17	142	Hammersmith Society	Policy HO4 - Housing Quality and Density				HO4 – Housing Quality and Density : Clarity is needed over the Council’s policy for Private Amenity Space. For many years, the policy requirement has been for 36 square metres for new build family units at ground floor level. This was successfully challenged in the Appeal for 271 – 281 King Street where no justification could be found for this being in excess of the London Plan standard of 5 square metres for 1 – 2 bedroom flats plus 1 square metre for each additional occupant.	This Society would support a greater figure but the policy needs to be robust and justifiable.
23	244	H&F Disability Forum	Policy HO4 - Housing Quality and Density				<p>We do not support the following Borough Wide policies:-</p> <p>Policy HO4 Housing Quality and Density</p> <p>We note that neither the HO4 policy on quality nor the narrative includes accessible and inclusive design or compliance with Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings as an essential requirement for achieving housing quality.</p> <p>We are concerned that Local Plan 2016 may assume that compliance with London Plan internal space standards enables developers to comply with Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.</p> <p>This year we have noticed that developers can struggle to fit detailed drawings compliant with both Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings within the footprint and building envelope based on minimum space standards. It is a</p>	<p>We recommend</p> <p>Policy HO4 para 2 line 3: deleting “London Plan internal space policies” and replace with “Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings”.</p> <p>Para 6.35: line 4: insert “compliant with Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings”</p> <p>Justification:</p> <p>Developers need to exceed minimum space standards to comply with London Policy 3.8 on Housing Choice and Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings”</p>

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							<p>particular issue with M4(3) wheelchair user dwellings where the footprint required exceeds London Plan minimum space standards.</p> <p>We welcome para 6.35 that “developers are encouraged to exceed minimum space standards to assist in providing a mix of sizes”.</p> <p>However, we recommend that Local Plan 2016 goes further and encourages developers to exceed minimum space standards to assist in providing a mix of sizes compliant with both Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.</p>	
53	385	Land Securities	Policy HO4 - Housing Quality and Density	NO			<p>Policy HO4 outlines that development should be consistent with the London Plan density matrix. The policy should recognise that the London Plan density ranges should be seen as guidance and not ‘applied mechanistically’ to all development. Although this is hinted upon in HO4 clarity is required to ensure consistency with the London Plan. A large majority of the emerging schemes within Central London are in excess of the London Plan density ranges. The intent of these developments are to optimise the intensity of the uses compatible with the local context and good design principles. Due to their urban locations, many sites are highly constrained and in order to provide a viable and high quality mixed use development with associated amenity and play space they need to be at a higher density than the guidance set out within the London Plan.</p>	<p>The policy should be explicit that appropriate sites, including those within Opportunity Areas, may merit higher densities.</p>

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73	411	St Quintin and Woodlands Neighbourhood Forum	Policy HO4 - Housing Quality and Density				<p>Housing Density</p> <p>We support much of what is said at paragraph 6.49, including the comment that <i>Although most of Hammersmith and Fulham is within 800m of a Metropolitan or Major town centre, only limited areas meet the remaining criteria of the 'central' areas definition</i> . And that <i>Much of the development in Hammersmith and Fulham, including within and around the town centres, is primarily residential with small building footprints and buildings of less than 4 storeys</i> . The LBHF part of the OPDC area will return to the Borough's planning control at the end of the Development Corporation's lifetime. In the meantime LBHF should use its maximum influence to moderate proposed housing densities (of up to 600 housing units per hectare) as included in the current OPDC Draft Local Plan.</p> <p>These densities will not achieve development that proves sustainable (in all senses of the term) nor successful. We ask LBHF to help to bring about a rethink of the 24,000 housing target for Old Oak, in the forthcoming review of the London Plan. We will be asking RBKC to do likewise in forthcoming comments on the Partial Review of the RBKC Local Plan.</p>	
46	435	Hadley Property Group Ltd (HPG)	Policy HO4 - Housing Quality and Density				<p>HPG's Chelsea Island project on Harbour Avenue is currently under construction, and the company is keen to undertake future developments in the borough.</p> <p>HPG's comments on the draft local plan are made in a context of both Chelsea Island and its interest in developing in the borough.</p>	In presenting the Council's approach to the residential density of new developments, it is essential that Policy HO4 should be consistent with Policy 3.4 of the London Plan "Optimising Housing Potential". The policy should explicitly require that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the

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								London Plan. Policy HO4 should also reference the guidance in section 1.3 of the GLA's Housing SPG on optimising housing potential.
45	470	Berkeley Group (St James & St George) & St William	Policy HO4 - Housing Quality and Density				<p>Policy HO4 – Housing Quality and Density</p> <p>Our client supports the Council's intention to promote well- designed residential development, which is entirely consistent with the approach of the Berkeley Group. We welcome the acknowledged flexibility in respect of the application of standards within London Plan policy and the Housing SPG in circumstances where not meeting these standards can be justified.</p> <p>The final two paragraphs in respect of Housing Density do not accurately reflect the London Plan Policy 3.4 Optimising Housing Potential and 2.13 Opportunity Areas which seek to optimise housing density, particularly on the Strategic Sites identified in the Plan.</p>	The policy should include wording to reflect the approach set out in the London Plan to optimising housing potential and residential output particularly in relation to the identified Strategic Sites within the Local Plan.
50	517	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO4 - Housing Quality and Density	NO			Recognition should be included in Policy H04 for the differing design requirements of Built to Rent Housing. For instance, these types of development will not require as much private amenity space due to the availability of communal facilities.	Add ' <i>for instance in Build to Rent proposals</i> ' to the end of final sentence of the second paragraph.
50	518	Capital and Counties on Behalf of Earls	Policy HO4 - Housing	NO			Flexibility should be added to this policy in recognition that certain sites may merit higher densities above London Plan matrix (i.e Opportunity Area Sites) in accordance with the London Plan Policy 2.13.	Add ' <i>certain sites including those within Opportunity Areas and/or Regeneration Areas may merit higher densities</i> '.

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		Court and Olympia Group	Quality and Density				This policy should also recognise that regeneration areas may require a different approach and that area specific policy will therefore take preference. It is noted that the Consultation Statement confirms that it is 'appropriate to refer to regeneration areas in this Policy' in light of the potential for policy conflict.	Add 'the approach set out in area specific policies will take preference over this policy'.
5	601	Hammersmith Community Gardens Association	Policy HO4 - Housing Quality and Density	NO			<p>HCGA objects to the lack of policies to support the provision of local food growing spaces within new development and considers this makes the plan unsound in the light of the evidence on the mental and physical health needs of current and future residents to be housed at high densities, conformity with NPPF & the London Plan.</p> <p>We request policies which specifically call for major new development to include amenity space identified for their potential for residents to grow food.</p> <p>HCGA suggests amendments can be made to the Local Plan to make it sound and to meet the needs of current and future residents by either amending draft policies (see below)</p>	<p>Policy HO4 – Housing Quality and Design</p> <p><u>For housing to be of a high quality, the design should provide access to gardens and amenity space that include areas for growing food.</u></p> <p>6.32: Justification – <u>This enhances residential amenity and helps to deliver high quality design. Residential amenity of neighbours and the impact on the environment is very important in new high density schemes. Community food growing contributes to ensuring local residents are engaged in the management of their amenity space. A design that includes areas suitable for food growing also helps prevent flooding.</u></p>
10	68	CLS Holdings	Policy HO5 - Housing Mix				Our client welcomes that the Council will work with developers to increase the supply and choice of high quality residential accommodation to meet local resident needs and aspirations. Our client supports the approach to housing mix and particularly that the policy acknowledges there is a need for flexibility taking account of viability, location and site constraints.	

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							Where the Council is seeking greater numbers of affordable housing, flexibility in terms of tenure mix is likely to help to achieve this.	
47	75	Stanhope PLC	Policy HO5 - Housing Mix	NO	YES	YES	<p>HO5 a - Whilst the need for a mixture of unit sizes across tenures is accepted, there are often many design constraints that will prevent the specified mix being achieved. In addition, the requirement to deliver 50% 3 and 4 bedroom units will have a major impact on the overall number of affordable housing units being delivered in terms of space and financial viability. RPs can often be reluctant to take on schemes where there are a large number of family sized units. This is due to the potential management problems which could impact on the longer term sustainability and success of the scheme. This suggests that due consideration should be given on a site by site basis.</p> <p>HO5 b - It is questionable how the 15% requirement for 3 bed intermediate units will be delivered at an affordable level in line with the Council's income thresholds, particularly in the more expensive areas of the borough. If 15% of all the units were delivered as Shared Ownership, this could be a concern for an acquiring RP due to the minimal rental revenue stream that would be achieved on such units (i.e. zero or very low rent % on un-owned equity). It is noted that this point is also discussed in point 6.43 where the Council appears to recognise these difficulties.</p> <p>Justification Points in association with HO5</p> <p>6.41 – as per point 'a' above</p>	<p>HO5a - due consideration should be given on a site by site basis.</p> <p>HO5b - Further consideration and evidence required</p> <p>6.42 It should be noted that where 2 beds are provided in Shared Ownership it is generally considered more appropriate to provide a 2 bed/ 3P flat and likewise with the 3 beds to ensure maximum affordability of the units.</p> <p>6.43 - As above point b</p>

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							<p>6.42 – Noted and agreed. It should be noted that where 2 beds are provided in Shared Ownership it is generally considered more appropriate to provide a 2 bed/ 3P flat and likewise with the 3 beds to ensure maximum affordability of the units.</p> <p>6.43 –as above, point b.</p>	
63	89	Mr Robin Bretherick	Policy HO5 - Housing Mix	NO			<p>The need for a mix of ho types and sizes is not appropriate in all development schemes. Policy HO5c should refer to larger schemes (or, say, schemes in excess of 10 units). More emphasis should be put on small units and accommodation for single people</p> <p>LBH&F Strategic Housing Market Assessment 2014/15 highlights the “<i>very high levels of single person households</i>” (SHMA p.9). With 28.7% of households consisting of a single person under pensionable age, this is the 6th highest of all authorities in England (p.15).</p> <p>The London Plan predicts a further increase in one-person households and identifies single-person households as one of the categories which need to be specifically addressed in planning for more homes (para 1.15c).</p> <p>This needs to be recognised in the HO5 policy wording and justification. Mixing suitable smaller units with larger family dwellings is not always necessary, practicable or appropriate within a single development, especially in conversions.</p>	As above.

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17	140	Hammersmith Society	Policy HO5 - Housing Mix				HO2 (Para.6.12), HO3b and HO5 – Family Housing : We consider that 2 bedroom units are not always acceptable as family provision (except in the case of very young children) and there should be greater emphasis on the provision of 3 bedroom (and larger units). These units should have good access to private amenity and public open space.	
18	199	Old Oak and Park Royal Development Corporation	Policy HO5 - Housing Mix				Paras 6.41-6.44 It is not clear what the justification is for the very specific percentages in Policy HO5. If these arise from LBHF's SHMA, this should be clarified in the justification text.	
23	245	H&F Disability Forum	Policy HO5 - Housing Mix				<p>We do not support the following Borough Wide policies:-</p> <p>Policy HO5 Housing Mix</p> <p>We do not support applications from developers who wish to change the housing mix for market housing because insufficient space was approved at outline or FUL planning permission stage.</p> <p>This year we noticed that developers can struggle to fit detailed drawings compliant with Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings within the footprint and building envelope based on minimum space standards. It is a particular issue with M4(3) wheelchair user dwellings where the footprint required exceeds London Plan minimum space standards.</p>	<p>We recommend that planning approvals at Outline or FUL application stage include the correct footprint and building envelope to comply with detailed residential standards in Policy H12.</p> <p>Justification</p> <p>Developers need the correct footprint and building envelope to comply with London Policy 3.8 on Housing Choice and Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings”</p>

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							<p>A developer will obtain planning permission for a particular housing mix at outline or full application stage. However, when it comes to detailed drawings at reserved matters stage they may discover they do not have the footprint to comply with M4(3) wheelchair user dwellings. To solve this problem the developer may propose a reduction in the number of bedrooms, persons or major structural works to comply with M4(3) wheelchair user dwellings. We do not consider this is acceptable.</p> <p>We are concerned that a future occupier of a M4(3) wheelchair adaptable dwelling sold on the open market who becomes a wheelchair user may discover that in order to use it as a wheelchair user dwelling they may have to lose a bedroom or person space or undertake major structural works.</p>	
25	278	Tri-Borough Public Health	Policy HO5 - Housing Mix				See also the comment regarding ageing in place (Spatial Vision). This might best be covered by Policy HO5 (p.79) with an additional clause to the first paragraph: 'and accommodation which can be readily adapted to enable ageing in place'.	
45	471	Berkeley Group (St James & St George) & St William	Policy HO5 - Housing Mix				Our client welcomes that the Council will work with developers to increase the supply and choice of high quality residential accommodation to meet local resident needs and aspirations. Our client supports the approach to housing mix and particularly that the policy acknowledges there is a need for flexibility taking account of viability, location and site constraints. Where the Council is seeking greater numbers of affordable housing, flexibility in terms of tenure mix is likely to help to achieve this.	

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50	522	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO5 - Housing Mix	NO			<p>High proportions of 3 and 4 bed Social/ Affordable Rented accommodation is not suitable in all locations. Furthermore, 3 bed intermediate units are less affordable than smaller sized units and in certain locations cannot therefore support 1st time buyers who are unable to access housing market.</p> <p>The individual unit size mix of each tenure should therefore take into account local needs and market characteristics.</p>	Add ' <i>local housing need</i> ' to paragraph 2.
23	238	H&F Disability Forum	Policy HO6 - Accessible Housing				<p>We support the following Borough Wide Policies because they include accessible and inclusive designs, facilities or services. We also make comments where necessary.</p> <p>We are particularly concerned that every effort is made during the lifetime of the development to ensure wheelchair user dwellings are occupied by households with a wheelchair user.</p> <p>Marketing Wheelchair accessible housing: current situation</p> <p>LBHF policy; London Plan SPG: Housing and LBHF Development Management Local Plan 2013 Policy DM A4 require that M4(3) wheelchair user dwellings be built across all tenures. This includes the private sector and raises the issue of how developers can provide and positively market well designed, wheelchair adaptable properties that also incorporate a degree of flexibility and take into account future use.</p> <p>Our concern is that this does not guarantee that they are occupied by wheelchair users or people with mobility impairments particularly if they</p>	<p>Drafting note:</p> <p>P 81 para 6.48: insert a new para. " The council will also work with developers and estate agents to ensure wheelchair housing is proactively marketed and occupied by wheelchair users or people with mobility impairments that need them."</p> <p>Justification for additional strategies for Marketing wheelchair housing units :</p> <p>We strongly recommend that the council works with developers, landowners and estate agents to maximise sales of wheelchair user dwellings to households that will benefit from them. We want to see wheelchair housing marketed proactively in mainstream marketing media for the duration of the development .</p>

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							<p>are market housing. The council has gone some way to address this in response to Disability Forum advice with two conditions (see next para)</p> <p>Current LBHF policy also includes conditions on planning approvals that: wheelchair user dwellings be pre-marketed only to wheelchair users or older people for 6 months prior to going on the open market wheelchair housing units be marked up in perpetuity on plans/drawings shared with prospective purchasers so they do not disappear if they are not sold to a wheelchair user.</p> <p>However, we do not consider these conditions go far enough to ensure many more purchasers are aware of the potential of wheelchair user dwellings. We believe it is a waste of a scarce resource if wheelchair user dwellings are not occupied by the very people they are designed for.</p>	<p>When marketing wheelchair user dwellings, everyone should recognise that this is an attractive and scarce resource that should be promoted proactively for the duration of the development not just the first 6 months. The features of additional space, inclusive design, and general ease of access provide real flexibility for future use and benefit the wider population. These include households with older people or people with long term health conditions with mobility issues and/or medical equipment who need the extra space. The Disability Forum Planning Group are happy to have conversations with councilors and officers on an appropriate way forward for possible inclusion in the Local Plan 2016.</p>
24	263	Home Builders Federation	Policy HO6 - Accessible Housing				<p>The Council is reflecting the London Plan policy on accessible homes in its Plan. It is not clear from the Viability Report whether the Council has assessed the cost of this policy requirement. For its build costs the Council has assumed BCIS costs adjusted for local circumstances (paragraph 4.18). This would not necessarily reflect the cost of this new London Plan policy. The cost of building to Part M4 (3) is particularly expensive as the DCLG's 2014 report titled <i>Housing Standards Review: Cost Impacts</i> (EC Harris) indicates. We are aware that the Mayor has argued that because the previous London Plan already required wheelchair homes this will already tend to be reflected in the BCIS costs. However, this is only true if Hammersmith & Fulham Council's Core Strategy reflected this London Plan policy. It would also depend on the extent to which past schemes have</p>	

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							provided wheelchair accessible homes. It would be helpful if the Council provided figures for the number of wheelchair accessible homes provided in the last five years (i.e. since the London Plan of 2011 introduced the policy) so that one can ascertain the extent to which the cost of this policy might already be embedded within the BCIS costs for the borough. We have searched for data on this but have been unable to locate any.	
40	577	Prashant Bhrambhatt	Policy HO6 - Accessible Housing				6.45 COLLEGE COURT ESTATE NEEDS TO BE UPGRADED TO HAVE LIFTS AND WHEELCHAIR ACCESS.	
23	239	H&F Disability Forum	Policy HO7 - Meeting Needs of People who Need Care and Support				<p>We support the following Borough Wide Policies because they include accessible and inclusive designs, facilities or services. We also make comments where necessary.</p> <p>We understand that Tri-Borough Public Health JSNA on housing for vulnerable and older people provided evidence and information on the number and tenure of supported housing required to meet the needs of vulnerable adults and older people to support this policy.</p> <p>We note that there are no targets for social rented or affordable rented supported housing. This does not meet the needs of vulnerable adults and older people who need rented housing at rents within the housing benefit cap.</p>	We recommend that there should be a target for social rented or affordable rented supported housing.

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72	428	Hammersmith and Fulham Clinical Commissioning Group (CCG)	Policy HO7 - Meeting Needs of People who Need Care and Support				<p>6.50 – 6.53 and Policy HO7 - Meeting Needs of People who Need Care and Support</p> <p>The CCG is supportive of the proposed policy to <i>"encourage and support applications for new special needs and supported housing, including specialist housing for older people"</i> and would emphasise share the ambition of the Council to "...create more sustainable communities to enable residents to remain in their communities through different stages of their life."</p> <p>Currently the CCG recognises that a shortage of nursing home beds and recovery facilities for those residents recovering from a mental health crisis in Hammersmith & Fulham affects our ability to offer such facilities for our residents to be near their families and remain in their communities. Similarly, we would wish to emphasise the need for appropriate community accommodation for people with Learning Disabilities who are currently placed in accommodation outside of Hammersmith & Fulham</p>	
45	472	Berkeley Group (St James & St George) & St William	Policy HO7 - Meeting Needs of People who Need Care and Support				<p>HO7 – Meeting Needs of People Who Need Care and Support</p> <p>Our client supports the Council's approach to encouraging supported housing and specialist housing for older people. As a significant developer in the borough our client has the ability to help to contribute towards this and help the Council achieve its aims in this regard.</p>	

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38	488	Greater London Authority and Transport for London Planning Team	Policy HO7 - Meeting Needs of People who Need Care and Support				Specialist and Student Housing The Mayor welcomes the reference to the London Plan's monitoring indicative benchmark for the provision of specialist housing for older people set out in Table A5.1 of the London Plan.	
63	90	Mr Robin Bretherick	Policy HO8 - Hostels and Houses in Multiple Occupation	YES	YES	YES	None. Expression of support for policy HO8.	None. Expression of support.
23	240	H&F Disability Forum	Policy HO8 - Hostels and Houses in Multiple Occupation				We support the following Borough Wide Policies because they include accessible and inclusive designs, facilities or services. We also make comments where necessary. We consider that the HO8 criteria for new hostels and HMOs housing should also include meeting BS 8300:2009 para 12.8 – 12.8.12	Drafting Note: additional criteria: “ d) the accessibility of accommodation assessed against BS 8300: 2009 standards for communal residential accommodation”. Justification: HO8 to conform with London Plan policy 7.2 an inclusive environment and BS 8300 para 12.8 – 12.12; Mayor of London SPG: Accessible London (2014) See also justifications in para 13 and 20 above.

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14	48	Mr. Jon Burden	Policy HO9 - Student Accommodation	NO	YES	YES	Universities and medical facilities often have visiting professorships or other programmes for short-term (1-3yr) work arrangements. Some space for such workers, who are usually in the middle or late part of their careers and therefore have families, needs to be provided as part of any housing developments for these institutions. This is to reduce housing pressure on local residents.	Provide housing suitable for visiting professorships or other researcher arrangements within any student housing developments.
61	82	Imperial College London	Policy HO9 - Student Accommodation	YES	YES	YES	Imperial College London supports Policy HO9 in allowing student accommodation within the White City Opportunity Area.	
17	143	Hammersmith Society	Policy HO9 - Student Accommodation				HO9 – Student Housing : We support the concerns voiced by the St Quintin and Woodlands Neighbourhood Forum in their submission. Student housing should be linked to an educational institution.	
24	264	Home Builders Federation	Policy HO9 - Student Accommodation				The Council should clarify whether the provision of bed-spaces will contribute to the housing targets (i.e. 1,031 dpa). We consider that the Council should maintain a separation between Use Class C3 dwellings and Use Class C2 accommodation. The Mayor of London in the 2013 SHMA recognises that student accommodation is not identified separately in the official household projections (see paragraph 8.23). If the student body is planned to increase over the plan period 2015-2035 this will not have been	

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							reflected in the household projections of either the DCLG projections or the GLA's Central Variant.	
73	412	St Quintin and Woodlands Neighbourhood Forum	Policy HO9 - Student Accommodation				<p>Student Accommodation</p> <p>We welcome draft policy HO9 on Student Accommodation, and the supplementary text that explains in more detail the adverse effects that concentrations of student housing can have on an area. These are becoming evident at nearby North Acton, where such a concentration has seriously diminished the prospect of a regenerated area that succeeds for families and long-term residents.</p> <p>Paragraph 6.62 states <i>To ensure that accommodation specifically designed for the occupation by students is not subsequently used for general residential use, or some other form of hostel accommodation ,there will need to be a planning agreement ensuring that the accommodation is occupied only by students of specified educational institution(s), normally a London based education institution in easy commuting distance of the accommodation .</i></p> <p>This form of covenant or condition will need to be negotiated robustly. The S106 Agreement for the four blocks of student accommodation at Imperial West did not achieve the last part of the above, leaving the accommodation open and available to any graduate student from any London borough. Student housing in the capital has become a major</p>	

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38	489	Greater London Authority and Transport for London Planning Team	Policy HO9 - Student Accommodation				He also welcomes the policy for student accommodation which recognises the London-wide need for this type of accommodation and policy support for student accommodation as part of schemes within the White City and Earls Court and West Kensington Opportunity Areas to address local need too.	
50	526	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO9 - Student Accommodation	NO			A policy compliant level of affordable student accommodation housing should be included. As presently drafted Policy H09 requires ' <i>an element of affordable accommodation</i> '. This policy is not workable as it does not provide a suitable framework against which developers can consider an appropriate purchase price for land. This risks frustrating the delivery student accommodation. The policy target should be informed by viability evidence.	Add an evidence based target which is supported by borough wide viability assessment.
49	400	Royal Borough of Kensington & Chelsea	Policy HO10 - Gypsy and Traveller Accommodation					<p>Policy wording: The policy should be amended to refer to the site as Stable Way Traveller Site.</p> <p>Policy wording: The Policy should be amended to include criteria for temporary and permanent sites, or at the very least make reference to the criteria in the Planning Policy for Traveller Sites.</p> <p>Number of pitches: there are currently a total of 20 pitches, of which 1 is taken up by 'The Hut' centre, resulting in 19 available authorised pitches. The justification wording should reflect that there are</p>

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								<p>currently 20 pitches on the site, albeit only 19 are occupied by residents.</p> <p>Pitch need / GTANA: Paragraph 6.63 refers to a need for extra pitches for an additional five families by 2020. The wording should be amended to accurately reflect the conclusions of the current draft GTANA (December 2015) <i>"The GTANA concludes that there will be a total need for 5 additional pitches across RBKC and LBHF between 2015 and 2020, and a requirement for 10 new pitches between 2015 and 2025"</i>. [Duty to Cooperate; Justification; Effectiveness].</p> <p>Pitch need / GTANA: The reasoned justification should make reference to meeting need in the most up to date needs assessment available, this is to reflect that the pitch figure may change when the draft GTANA is finalised and if it is further updated in the future.</p> <p>The reasoned justification should also reference ongoing joint work on a Site Appraisal Study which will establish if there are opportunities to provide new Traveller sites within the two Boroughs. [Duty to Cooperate; Justification; Effectiveness].</p> <p>Footnote 38 incorrectly refers to the Planning Policy for Traveller Sites. This should instead refer to the Draft GTANA (December 2015).</p>

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10	25	CLS Holdings	Policy HO11 - Detailed Residential Standards				Our client supports the promotion of well-designed and high quality new housing. As noted above we support the acknowledgement in policy HO4 in respect of flexibility in the application of internal space standards, this should be reflected in policy HO11 to ensure consistency.	The ability to flexibly apply internal space standards, where justified, should also be reflected in this policy wording. .
8	34	Hammersmith and Fulham Air Quality Commission	Policy HO11 - Detailed Residential Standards					<p>Policy HO11 – Detailed Residential Standards , p.85</p> <p>Insert at new e – ‘ <i>air quality neutral construction, development and operation of buildings</i> ’</p> <p>To align with air quality measures stated elsewhere, and to promote clean air and good health.</p> <p>c – insert ‘... amenity and <i>green</i> garden space...’</p> <p>To align with other policies and to promote clean air and good health.</p> <p>And 6.66, p. 86 – insert ‘... if not consistently managed <i>under sound environmental principles</i> .’</p> <p>To support good practice for small developments.</p>
47	77	Stanhope PLc	Policy HO11 - Detailed	NO	YES	YES	Detailed Residential Standards refers to ensuring there is no detrimental impact on daylight and sunlight to rooms in adjoining properties. This is	The policy should be amended to differentiate between impacts on key living spaces and those secondary

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			Residential Standards				very stringent as often in urban environments it is impossible to have no impact on neighbouring sites. This approach as worded will stifle development.	spaces such as bathrooms, hall ways, and secondary windows to habitable rooms. Flexibility is needed to enable balanced decisions to be made weighing up the positive benefits of the scheme against any perceived impacts. Adequate retained levels of daylight would be a more appropriate measure.
17	144	Hammersmith Society	Policy HO11 - Detailed Residential Standards				HO11 – Detailed Residential Standards : It is noted that these used to form an Appendix to the Development Management Document but are to be contained within a separate Planning Guidance SPD. It is essential that the publication of this document is not delayed.	
23	246	H&F Disability Forum	Policy HO11 - Detailed Residential Standards				<p>We do not support the following boroughwide policie:-</p> <p>Policy H12: Detailed Residential Standards</p> <p>We do not support para a) on meeting <i>Nationally Described Space Standard</i> for the following reason:</p> <p>We are concerned that Local Plan 2016 assumes that compliance with <i>Nationally Described Space Standards</i> enables developers to comply with Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.</p> <p>This year we noticed that developers can struggle to fit detailed drawings compliant with Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings within the footprint and</p>	<p>We recommend Policy HO11 should delete “<i>Nationally Described Space Standards</i>” and replace with “Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings”.</p> <p>Drafting Note:</p> <p>Policy HO11 a) delete “ <i>Nationally Described Space Standards</i> and replace with “Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings”</p> <p>Justification</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co-operate	Comments	Suggested amendments by representor
							<p>building envelope based on minimum space standards. It is a particular issue with M4(3) wheelchair user dwellings where the footprint required exceeds London Plan minimum space standards.</p> <p>Para 6.65: We note that the government introduced a Nationally Described Space Standard in 2015 as a minimum standard for new dwellings. We welcome the council's plan to adopt detailed residential standards in the Planning Guidance SPD. We expect this guidance to include advice on exceeding London Plan 2016 minimum space standards to assist developers to comply with Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.</p>	<p>H12 to conform with London Policy 3.8 on Housing Choice and Building Regulations M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings"</p> <p>Para 6.65: penultimate line: recommend removing reference to Lifetime Homes and replace with Building Regulations M4(2) and M4(3)</p>
45	473	Berkeley Group (St James & St George) & St William	Policy HO11 - Detailed Residential Standards				Our client supports the promotion of well-designed and high quality new housing. As noted above we support the acknowledgement in policy HO4 in respect of flexibility in the application of internal space standards, this should be reflected in policy HO11 to ensure consistency.	The ability to flexibly apply internal space standards, where justified, should also be reflected in this policy wording.
50	528	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy HO11 - Detailed Residential Standards	NO			Recognition should be included in Policy H11 for the differing design requirements of Built to Rent Housing. For instance these types of development will not require as much private amenity space due to the availability of communal facilities.	Add Bullet ' <i>flexibility will be provided for Built to Rent proposals which provide communal amenity space</i> '.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co-operate	Comments	Suggested amendments by representor
5	602	Hammersmith Community Gardens Association	Policy HO11 - Detailed Residential Standards	NO			<p>HCGA objects to the lack of policies to support the provision of local food growing spaces within new development and considers this makes the plan unsound in the light of the evidence on the mental and physical health needs of current and future residents to be housed at high densities, conformity with NPPF & the London Plan.</p> <p>We request policies which specifically call for major new development to include amenity space identified for their potential for residents to grow food.</p> <p>HCGA suggests amendments can be made to the Local Plan to make it sound and to meet the needs of current and future residents by either amending draft policies (see below)</p>	<p>Policy HO11 – Detailed Residential Standards</p> <p>c. amenity and garden space provision – <u>which includes access to growing food.</u></p> <p>6.63 Justification: <u>food growing areas enhance design and residential amenity space.</u></p>

7. Local Economy & Employment

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
14	56	Mr. Jon Burden	Local Economy and Employment	NO	YES	YES	No mention is made of the increase in working from home and the affect this may have on home conversions and the need for particular types of office space.	Review employment trends for working at home to see if they will impact on the proposals in the Local Plan.
68	95	Fulham Society	Local Economy and Employment				Employment opportunities. We completely agree with the vision to build a strong local economy. "It will be home to centres of innovation, a skilled workforce and a growing number of businesses and jobs providing opportunities for local people" (chapter 3). However so far the employment opportunities offered seem likely to be in the hospitality and retail industries and there is much talk of smart shopping malls and of coffee shops. It is hoped that in the future more emphasis will be placed on higher grade employment opportunities such as those mentioned in the Plan - "the growth sector of Science, Technology, Engineering and Maths; Culture, Media, Arts companies; and inward investment to support new enterprises and start-up businesses."	
17	145	Hammersmith Society	Local Economy and Employment				Local Economy and Employment: Policies E1 – E4: We note that this section has been largely re-drafted and in much clearer format since the previous draft. Offices: We understand that the Council has commissioned a background paper on the provision of Office Space within the borough: We have not seen this document: What is its status? Will it be a formal DPD?	
25	279	Tri-Borough Public Health	Local Economy and Employment				This section is strong from a public health perspective.	

71	432	London Borough of Wandsworth	Local Economy and Employment			<p>Industrial Land</p> <p>Given the loss of industrial premises across the FEMA, Wandsworth are keen to ensure that neighbouring boroughs are seeking to retain or re-provide industrial (B1c, B2 or B8) premises where possible.</p> <p>We recognise that industrial premises in Hammersmith & Fulham are generally in mixed-use areas scattered throughout the borough, rather than forming clusters of industrial sites that could be designated as protected industrial land. Given this, Wandsworth Council encourage Hammersmith & Fulham to explore whether policy E2 in the proposed submission local plan (Sept 2016) could be given further strength to resist the loss of industrial premises. The wording of clause 2, which allows for an alternative use that would give a demonstrably greater benefit, would appear to allow more flexibility than is perhaps intended, and it may be appropriate to give further guidance in the supporting text to address and strengthen this clause.</p> <p>There are also limited opportunities for significant new industrial premises to be developed in Hammersmith & Fulham, as is the case in Wandsworth. We would therefore encourage the Council to seek opportunities to provide a range of employment floorspace, including industrial uses where appropriate, as part of the significant regeneration schemes coming forward in the borough.</p>	The wording of clause 2, which allows for an alternative use that would give a demonstrably greater benefit, would appear to allow more flexibility than is perhaps intended, and it may be appropriate to give further guidance in the supporting text to address and strengthen this clause.
71	433	London Borough of Wandsworth	Local Economy and Employment			<p>Regeneration and Office Floorspace</p> <p>Wandsworth Council welcome the strategic objectives set out in the Proposed Submission Local Plan, particularly those that will contribute toward building a stronger economy, and the redevelopment of regeneration areas to deliver substantial quantities of new jobs, with a target of 29,500 new jobs up to 2035. Given the high office floorspace needs projected in Hammersmith & Fulham's Employment Study (Feb 2016) of between 383,000-511,000 sq ms, Wandsworth Council would encourage Hammersmith & Fulham to seek to maximise all opportunities for office floorspace growth in the borough, so that the needs of businesses in the wider FEMA can be supported.</p>	

68	97	Fulham Society	Policy E1 - Providing for a Range of Employment Uses				Para 6.8 states that “In addition, the replacement of existing, well used small business premises will be sought in redevelopment schemes”. We strongly support the retention of local shops, small workshops, artist studios and local industries. The commercial sector is unlikely to provide for these without Council insistence and we hope they can be provided in both the Gasworks and the Parsons Green Depot developments.	
10	26	CLS Holdings	Policy E1 - Providing for a Range of Employment Uses				<p>Our client supports the approach in paragraph 2 of policy E1 which states that ‘<i>the council will also</i> support the retention and intensification of existing employment uses.’ However, the final paragraph of this policy causes some confusion and is contradictory as it states that ‘the borough’s three town centres and the White city and Earl’s Court and West Kensington Opportunity Areas will be the preferred locations for new office development above 2,500m². Proposals outside of these areas will generally be discouraged unless it can be demonstrated that provision cannot be provided within the town Centres or the White City and Earl’s Court and West Kensington Opportunity Areas’.</p> <p>We would suggest that the current wording is contradictory and that to overcome this and avoid potential confusion the final paragraph should include additional wording to clarify that it excludes development seeking retention and intensification of existing employment uses.</p> <p>Our client supports the delivery of affordable employment space as advocated in paragraph 2 of Policy E1 which states that ‘<i>it will require flexible and affordable space suitable for small and medium</i> enterprises in large new business developments, unless justified by the type and nature of the proposal’.</p> <p>However, we submit that this is an additional cost on development which would have an impact on the overall viability of a development and ability to deliver regeneration and the policy wording needs to acknowledge this.</p>	<p>Amend final paragraph to read:</p> <p><u>Except where the proposal is for the retention and intensification of an existing employment use</u> the borough’s three town centres and the White City and Earl’s Court and West Kensington Opportunity Areas will be the preferred locations for new office development above 2,500m.</p> <p>Suggested amendments to paragraph 2 of policy E1:</p> <p>It will require flexible and affordable space suitable for small and medium enterprises in large new business developments, unless justified by the type and nature of the proposal <u>and having regard to the financial viability of the development.</u></p>

61	83	Imperial College London	Policy E1 - Providing for a Range of Employment Uses	NO	YES	YES	<p>Whilst Imperial invests considerable amounts of energy and resources into fostering new businesses, it objects to Draft Policy E1, with the new requirement to provide flexible and affordable business space in large new business developments, as it is not justified and this places an additional burden on development proposals. It is unacceptable for the following reasons:</p> <p>1 There is no market failure that needs to be addressed by this planning policy. The London Borough of Hammersmith & Fulham has business units in a wide range of sizes, locations and prices.</p> <p>2 Unlike affordable housing, where there is a specific social need to help those who are less fortunate, businesses do not have the same social needs.</p> <p>3 The policy would not be workable in practice. For example, who would decide when a business has become “too successful” to be allowed to occupy such accommodation and it is clearly counter-intuitive for those businesses which are successful to then be penalised by having to move out of their accommodation.</p> <p>4 Subsidised employment space distorts the market, giving an unfair advantage to businesses who benefit from it compared with those that do not. Related to the point above, it also provides a perverse dis-incentive for a business to succeed and it is not in the interests of the economy to focus resources on weak businesses.</p> <p>5 The requirement imposes an additional cost on larger scale business developments and “taxing” them in this way will not only reduce the amount of business space that comes forward, but will also make it more expensive for companies who occupy the unsubsidised space.</p>	The second sentence in the second paragraph needs to be deleted.
67	108	Parsons Green Depot Tenants and the Andrew	Policy E1 - Providing for a Range of	NO			<p>The draft Plan does not meet the test of soundness as it is not effective in meeting the local needs of small business enterprises and privately run facilities that meet a community need which were identified in the evidence base. Furthermore the chosen strategies do not reflect all the options available to the</p>	This policy is generally supported but it should provide a clearer definition of what is considered to be a creative industry and small and medium businesses that support the local economy. With respect to creative industries this should also

		Robson Bridge Club	Employment Uses				Borough to protect these uses even though they are acknowledged as making an important contribution to the social and economic well being of the Borough.	include creative design and design businesses (for example, architecture, interior design and design-related industries and business). These industries are highlighted as a national planning priority in the NPPF.
18	201	Old Oak and Park Royal Development Corporation	Policy E1 - Providing for a Range of Employment Uses				Para 6.70 It is not clear whether the Council's Employment Study projections are based on boroughwide statistics/data sets, such as the London Office Policy Review which is also referred to in this paragraph. If this is the case, it would mean that there is an overlap with the OPDC area and the Employment Study report would need to acknowledge the full extent of potential supply proposed within the OPDC area as this will contribute towards meeting demand. This paragraph would also need to be amended to clarify this point.	
54	311	MP Kings Lyric S.A.R.L.	Policy E1 - Providing for a Range of Employment Uses				We encourage the Council's support for the retention and intensification of existing employment uses within Policy E 1	but suggest that the Council take a flexible approach to the provision of flexible and affordable space to ensure that that a variety of high quality office employment accommodation can be provided within the Borough.
30	318	Big Yellow Self Storage Company Ltd	Policy E1 - Providing for a Range of Employment Uses	NO	YES	YES	Emerging Policy Approach to Employment Land Emerging Policy E1: 'Providing for a Range of Employment Uses' confirms that the Council will support the retention and intensification of existing employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services, bio-medical, and other research based industries. The support in this policy for the extension and intensification of existing employment uses is welcomed by BYSS. However, it is considered that the supporting text to this policy should be amended to recognise the strategic importance of self storage (Use Class B8), including for the support they can	It is suggested that emerging Policy E1 should be amended to specifically clarify that warehouse and distribution (Use Class B8) uses should not be subject to the requirement to provide affordable workspace. However, if this amendment is not made, it is suggested that this policy should be varied to clarify that such workspace can be suitable for occupation by SMEs either by virtue of its design <u>and/or</u> the rent charged. This would provide developers with the flexibility to either let floorspace at a reduced rent and/or design the

							<p>offer to SMEs, as detailed by the Big Yellow - 'Helping Local Business to Grow' document enclosed with this letter.</p> <p>It is understood that emerging Policy E1 also requires that proposals for the retention and intensification of existing employment uses in large new business developments will require the provision of flexible and affordable space suitable for SMEs, unless justified by the type and nature of the proposal. It is considered that the nature of self storage B8 is such that it already provides significant support for SMEs and therefore should not be required to also provide flexible and affordable floorspace.</p>	workspace so it can be let in an affordable manner (e.g. micro office space).
	319	Big Yellow Self Storage Company Ltd	Policy E1 - Providing for a Range of Employment Uses	NO	YES	YES	<p>The plan should recognise that while storage and distribution uses (Use Class B8) generally do not generate high employment densities, such uses are of strategic importance.</p>	Para 6.68- amend supporting text to acknowledge the importance of storage and distribution uses
51	390	Transport for London Commercial Development Property Team	Policy E1 - Providing for a Range of Employment Uses				<p>As previously stated, we welcome the intention of policy E1 in supporting proposals for new employment uses, particularly where the scale and nature of employment opportunities generated in new developments are taken into account.</p>	<p>We do, however, remain of the opinion that the wording of the policy should be amended as follows:</p> <p><i>"The Council will support proposals for new employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services and bio-medical research, and the retention, <u>replacement</u> and intensification of existing employment uses".</i></p>
65	454	Travis Perkins	Policy E1 - Providing for a Range of	NO	YES		<p>This Policy is focuses on the mix of employment uses but we do not feel its protecting of the range goes far enough. It would be beneficial to amend the policy to more specifically relate to <i>sui generis</i> employment generating uses to protect Travis Perkins current and future operation in Hammersmith and</p>	<p>As such, we request that this policy provides certainty of the protection of the existing use by</p>

			Employment Uses				<p>Fulham. TP's operating under a traditional employment use and in fact lawfully operates as a <i>sui generis</i> builders' merchants.</p>	<p>adding the following wording to this policy, set out in red italics below:</p> <p>"The council will support proposals including mixed use schemes for new employment uses, especially those that recognise the existing strengths in the borough in creative industries, health services, bio-medical and other research based industries, such as those at Imperial College in Shepherd's Bush.</p> <p>The council will also support the retention and intensification of existing employment <i>uses including sui generis employment generating uses such as builders' merchants within mixed use developments</i>. It will require flexible and affordable space suitable for small and medium enterprises in large new business developments, unless justified by the type and nature of the proposal. When considering new employment floorspace or the extension of existing floorspace the council will also take into account:</p> <ul style="list-style-type: none"> a. whether the scale and nature of the development is appropriate, having regard in particular to local impact, the nature of the surrounding area, and public transport accessibility; b. impact upon small and medium sized businesses that support the local community; c. scale and nature of employment opportunities generated in the new development;
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								<p>d. whether there will be displacement of other uses such as community facilities or housing; and</p> <p>e. the Hammersmith and Fulham Economic Growth Plan and the council economic strategies.</p> <p>The borough's three town centres and the White City and Earl's Court and West Kensington Opportunity Areas will be the preferred locations for new office development above 2,500m2 .</p> <p>Proposals outside of these areas for large new office development (above 2,500m2) will generally be discouraged unless it can be demonstrated that provision cannot be provided within the town centres or the White City and Earl's Court and West Kensington Opportunity Areas."</p> <p>By including a reference to employment generating <i>sui generis</i> uses, our client will be given certainty that their successful builders' merchant business is protected going forward. Furthermore, this will also give the Council certainty that the existing employment generating <i>sui generis</i> use will continue to operate if the Site is redeveloped. It will also mean that Travis Perkins', a respected local business, can continue to provide an essential service to the local trade for the lifetime of the Plan.</p>
38	490	Greater London Authority and Transport for	Policy E1 - Providing for a Range of				Employment	It would be useful for the supporting text to clarify how the affordable part of the workspace policy will be implemented.

		London Planning Team	Employment Uses				<p>The Mayor supports the Borough's approach to focus the retention of employment uses in key strategic locations, including the borough's three town centres and White City and Earl's Court and West Kensington Opportunity Areas.</p> <p>Support for flexible and affordable workspace is particularly welcome.</p>	
66	569	Charlotte Dexter	Policy E1 - Providing for a Range of Employment Uses				<p>I note that on pages 87/88 of the Draft Local Plan that Parsons Green small businesses are mentioned. But I am concerned that these business will soon perish unless the LOCAL PLAN defines them as necessary to the fabric of LBHF.</p> <p>Let's strengthen the language here to SAVE the existing artisan workshops and unique businesses housed in the Parsons Green railroad depot and surrounds on Parsons Green Lane and even suggest EXPANDING them into the area called 'land adjacent to 64 Barclay Road'.</p> <p>Fulham needs more unique small businesses. These need to be protected in the local plan. If they are not protected they will be torn down in the name of promised 'new business/new jobs'.</p> <p>320 people are employed there already. Can we please encourage EXPANSION?!</p> <p>These still surviving small businesses need to be named specifically as an example of the type of still existing artisan</p> <ul style="list-style-type: none"> -one of the last artisan foundries in London, -carpentry workshops, -stone mason workshops, -picture framers to the Queen, -studios of photographers working locally for local businesses, -furniture makers 	

							<p>-metal bashers creating award-winning designs placed in the latest London skyscrapers</p> <p>-goldsmiths plying their talent</p> <p>-unique home designers</p> <p>- as well as new economy businesses that are keeping pace with local needs</p> <p>Save our exports! Several of these businesses export their unique output to places as far as South Africa and Thailand. Parsons Green needs to KEEP these businesses. LBHF needs to safeguard them now, in the final Local Plan. Please establish in the local plan that the type of employment uses on the PARSONS GREEN site/IN THE AREA are of a particular niche that LBHF wants to keep, support and augment.</p> <p>PLEASE GIVE THE AREA/THESE BUSINESSES a special employment designation for the site.</p> <p>PLEASE prevent future development from imposing on, or limiting these uses.</p> <p>Please protect the Parsons Green Depot (an 'under the arches'/'on the sidings'-type unique location) and the uses within due to their unique nature.</p> <p>Please designate in the final Local Plan a special employment area that compliments the out of centre location (just beyond the Mayoral priority Fulham Broadway town centre). There is a huge opportunity here for the LBHF to preserve a still unique, thriving area of Fulham.</p> <p>Please could someone be in touch with me about these requests. An economic study has been done that we would like to show to you in support of stronger language in the final Local Plan.</p>	
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43	619	Church Commissioners of England	Policy E1 - Providing for a Range of Employment Uses					<p>I. Local Economy and Employment:</p> <p>We suggest paragraph 2 of policy E1 should be amended to read as follows:</p> <p><i>"The council will also support the retention and intensification of existing employment uses or for an alternative use should an employment use not be viable or if the site would be better suited for residential use".</i></p>
4	9	Royal Mail Group	Policy E2 - Land and Premises for Employment Uses				<p>Royal Mail Properties</p> <p>Royal Mail has a statutory duty to provide efficient mail sorting and delivery services within the Borough of Hammersmith & Fulham. This service is currently provided from the following freehold and leasehold Royal Mail properties:</p> <ul style="list-style-type: none"> • Fulham Delivery Office • West Kensington Delivery Office • Hammersmith Delivery Office • Askew Road Enquiry Office <p>Royal Mail has confirmed there are no plans to relocate from any of the above properties in the foreseeable future.</p> <p>Representation</p> <p>Cushman & Wakefield has reviewed Hammersmith & Fulham Borough Council's <i>Proposed Submission Local Plan 2016 document</i> in the context of its impact on the operations of the Royal Mail's properties within the borough. The delivery offices are of strategic importance to Royal Mail in ensuring they are able to continue to fulfil their statutory duty for mail collection and delivery</p>	<p>It is considered that additional policy wording is introduced to similarly robustly safeguard those Royal Mail properties and other employment uses which are located outside of designated strategic employment areas against the implementation of residential development or other insensitive land uses which would be contrary to, and which do not provide direct, ongoing support to, existing business operations.</p> <p>This approach accords with adopted Government guidance set out in the NPPF which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF also advises that local planning authorities should support the existing business sectors, taking account of whether they are expanding or contracting.</p> <p>Conclusion</p>

						<p>The subject of this representation is to make Hammersmith & Fulham Borough Council aware of Royal Mail's operations within the borough. These representations made on behalf of Royal Mail are in reference to the following two key issues:</p> <p>1) Housing Growth</p> <p>2) Employment</p> <p><u>Employment</u></p> <p>The aforementioned Royal Mail sites are well established, having operated successfully for a number of years, serving a wide catchment area. Due to the nature of use, operations extend well beyond the normal working day, including associated vehicular movements. The potential juxtaposition of alternative, possibly sensitive land uses particularly residential uses adjacent or within close proximity to the sites is of direct concern to our client. Given the business functions of Royal Mail, operations often take place in sensitive hours in the early mornings and late evenings which sees delivery times and the constant movement of delivery vehicles and could therefore result in significant amenity issues should sensitive land uses, particularly new dwellings, be located nearby.</p> <p>Royal Mail are generally supportive of <i>Policy E2: Land & Premises for Employment Uses</i> where the Council will protect existing employment sites against alternative uses unless it can be clearly demonstrated that there is no reasonable prospect of the site being used for employment use.</p>	<p>Royal Mail would welcome further engagement with the London Borough of Hammersmith & Fulham Council.</p> <p>I trust that these representations are acceptable and would be grateful if you could acknowledge receipt and keep me informed of future stages of the adoption of the <i>London Borough of Hammersmith & Fulham Council Local Plan</i> and other planning policy documents</p>
10	69	CLS Holdings	Policy E2 - Land and Premises for Employment Uses			<p>Our client supports the Council's criteria based approach in policy E2 in respect of a change of use from employment use and that the Council acknowledge that there are situations where this is appropriate and acceptable.</p>	
66	109	Parsons Green Depot Tenants	Policy E2 - Land and	NO		<p>The draft Plan does not meet the test of soundness as it is not effective in meeting the local needs of small business enterprises and privately run facilities</p>	<p>This policy states that alternative use would be allowed if it would provide a demonstrably greater</p>

		and the Andrew Robson Bridge Club	Premises for Employment Uses				that meet a community need which were identified in the evidence base. Furthermore the chosen strategies do not reflect all the options available to the Borough to protect these uses even though they are acknowledged as making an important contribution to the social and economic well being of the Borough.	benefit. The evidence required to demonstrate benefit and whether an existing use is prepared to go into a new development should be clearly set out in a similar way to the evidence base required to demonstrate that a property is no longer required (paragraph 6.74). In addition the policy should state what premises are considered to be suitable for small and medium scale businesses. A net floorspace of less than 1500 square meters is proposed in this response.
30	320	Big Yellow Self Storage Company Ltd	Policy E2 - Land and Premises for Employment Uses	NO	YES	YES	Emerging Policy E2: 'Land and Premises for Employment Uses' states that the Council will require the retention of land and premises capable of providing continued accommodation for employment or local services and confirms that permission will only be granted for a change of use under specific circumstances. The protection of existing employment uses within the borough is supported by BYSS, as is the acknowledgement that mixed use redevelopment of employment sites may be acceptable where these are underutilised, subject to the satisfactory retention or replacement of employment uses as appropriate.	
30	321	Big Yellow Self Storage Company Ltd	Policy E2 - Land and Premises for Employment Uses	NO	YES	YES	Paragraph 6.75 in the Plan states that, <i>"The borough is currently identified in the London Plan (2016) as an area where transfer of industrial and warehousing land to other uses should be 'restricted (with exceptional planned release)'. Applications for change of use of industrial and warehousing (Use Classes B1(c), B2 and B8) sites and premises will be subject to consideration of this classification."</i> BYSS support this reference to Map 4.1 in the London Plan (2016) and the clarification that this will be considered when determining proposals which would result in a transfer of industrial and warehousing land to other uses.	

51	391	Transport for London Commercial Development Property Team	Policy E2 - Land and Premises for Employment Uses				<p>Draft policy E2 seeks to retain land and premises capable of providing continued accommodation for employment and local services, which in principle, we support.</p> <p>However, we must reiterate that, as currently drafted, the draft policy does not provide sufficient flexibility to encourage a fluid change of employment uses to meet the changing circumstances and employment need in the borough, and wider London economy.</p>	<p>To respond to changing circumstances, it is proposed that the wording of the following paragraph is amended as follows:</p> <p><i>"The council will require the retention <u>or replacement</u> of land and premises capable of providing continued accommodation for employment or local services unless. Permission will only be granted for a change where..."</i></p> <p><i>The mixed-use enhancement of employment sites will be considered acceptable where these are underutilised, subject to the satisfactory retention or replacement of employment uses in the scheme where this continues to be appropriate, <u>having regard for the regenerative and environmental benefits alternative uses may bring.</u></i></p>
65	455	Travis Perkins	Policy E2 - Land and Premises for Employment Uses	NO	YES		<p>Policy E2 specifically refers to land and premises capable of accommodating employment uses. Again the policy does not go far enough insofar that it protects <i>sui generis</i> builders' merchants.</p>	<p>The policy should therefore be amended to state:</p> <p>"The council will require the retention of land and premises capable of providing continued accommodation for employment uses including <i>sui generis</i> employment generating uses such as builders' merchants or local services. This includes existing employment sites that are promoted for mixed-use development. Permission will only be granted for a change where:</p> <p>1 . continued use would adversely impact on residential areas; or</p>

								<p>2. an alternative use would give a demonstrably greater benefit that could not be provided on another site; or</p> <p>3. it can be evidenced that the property is no longer required for employment purposes.</p> <p>Where the loss of employment use is proposed in line with sub para.3 above, the council will have regard to:</p> <p>the suitability of the site or premises for continued employment use with or without adaptation;</p> <p>evidence of unsuccessful marketing over a period of at least 12 months;</p> <p>the need to avoid adverse impact on established clusters of employment use;</p> <p>and the need to ensure a sufficient stock of premises and sites to meet local need for a range of types of employment uses, including small and medium sized enterprises, in appropriate locations."</p> <p>To specify the use to include Travis Perkin's bespoke <i>sui generis</i> use will ensure this employment land is better protected.</p> <p>Furthermore, TPP are already involved in a number of residential-led mixed use developments on both existing and new sites. Two recent examples are a Travis Perkins builders' merchant operating alongside private residential units in Battersea, LB Wandsworth and a Travis Perkins builders'</p>
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								<p>merchant operating alongside student accommodation near Kings Cross, LB Camden. This model has been very successful and can be replicated elsewhere on sites throughout London. As such, TPP wish to promote this option in the early phases of planning policy to aid the Council in achieving housing numbers and retaining its employment floorspace.</p>
38	491	Greater London Authority and Transport for London Planning Team	Policy E2 - Land and Premises for Employment Uses				<p>Policy E2 protecting land and premises capable of providing continued accommodation for employment and local services is also supported.</p>	<p>Criterion 1 of the policy stating that permission for change of use will only be granted where "continued use would adversely impact on residential areas" requires explanation. Are the residential areas referred to established residential areas and how would the continued use of existing employment or local services be assessed as an adverse Impact?</p>
38	492	Greater London Authority and Transport for London Planning Team	Policy E2 - Land and Premises for Employment Uses				<p>Paragraph 6.75 refers to the borough's identification in the London Plan as an area where transfer of industrial and warehousing land to other uses should be "restricted (with exceptional planned release)" The 'exceptional planned release' was intended for the White City and Old Oak Common & Park Royal Opportunity Areas, with restricted release elsewhere in the borough.</p>	<p>This should be made more explicit in the text.</p>
23	241	H&F Disability Forum	Policy E3 - Provision for Visitor Accommodation and Facilities				<p>We support the following Borough Wide Policies because they include accessible and inclusive designs, facilities, or services. We also make comments where necessary.</p> <p>We recommend that planning applications are also assessed against guidance on visitor accommodation and facilities in BS 8300: 2009.</p>	<p>This policy should include a provision that wherever possible conversions, changes of use and extensions to hotels be accessible to all.</p> <p>Justification</p> <p>E3 to conform with London Plan policy 7.2 an inclusive environment and BS 8300 para 12.8 –</p>

							We consider that existing hotels as service providers should be expected to think about disabled guests.	12.12; Mayor of London SPG: Accessible London (2014) 4.9 accessible visitor facilities; para 4.8.17. and Appendix 9 Accessible hotels . See also justifications in para 13 and 20 above.
17	146	Hammersmith Society	Policy E4 - Local Employment, Training and Skills Development Initiatives					E4 : Local Employment, Training and Skills Development : The council will 'require' : Reinstate previous wording "council will insist".
25	280	Tri-Borough Public Health	Policy E4 - Local Employment, Training and Skills Development Initiatives				See also the comment (spatial vision) regarding employment support for those with particular barriers to employment. This might best be covered by Policy E4 (p.91).	From spatial vision: 'This too is a weaker section. Reference to commitments in other sections to facilitating active play, addressing overcrowding and the proposed inclusions (see above) to facilitating a strengthened Early Years provision and increasing parental employment rates would be worthwhile additions. This would be strengthened through the addition of the following at the end of the sentence 'addressing inequalities in health and social outcomes'.

8. Town & Local Centres

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
17	147	Hammersmith Society	Town and Local Centres				Town and Local Centres : Policies TLC1 – TLC7 : We also note that this section has largely been redrafted and clarified.	
25	281	Tri-Borough Public Health	Town and Local Centres				<p>This section is strong from a public health perspective. See also the comment (Spatial Vision) regarding the contribution town and local centres make to social inclusion. This might be covered in each of the Policies TL2 ,3 and 4 through reference to ensuring that any development must take maximise on this potential.</p> <p>The same policies might also be strengthen with reference to ensuring that residents have access to a range of fresh fruit and vegetables and that the number of fast food outlets is controlled and that public/community toilets (including accessible ones), baby changing facilities and sufficient opportunities to rest (public benches etc) are provided.</p> <p>In the Public Health response to the Local Plan in 2014 a particular request was submitted regarding betting shops, pawnbrokers and payday loan shops so Policy TLC6 (on p.105) is particularly welcome.</p>	
52	378	Westfield Shoppingtowns Ltd	Town and Local Centres				<p>As per the emerging Local Plan, this area no longer falls within the jurisdiction of LBHF, instead falling within the boundary of the Old Oak and Park Royal Development Corporation ("OPDC"). In previous representations to the draft Local Plan, WEL have been supportive of the Council's assertion that any retail floorspace delivered in the Old Oak Common area should only support the predominant development function of the area – the delivery of residential floorspace and jobs.</p> <p>The emerging OPDC Local Plan identifies aspirations for a new Major Town Centre at Old Oak. The glossary to the document notes that 'Major Centres' "<i>Typically serve a borough wide catchment, and contain over 50,000 sqm of retail, leisure and service</i></p>	

							<p><i>floorspace with a relatively high proportion of comparison goods. They may also have significant employment, leisure, service and civic functions". In justifying the aspiration for a Major Centre, paragraph 9.14 of the OPDC Draft Local Plan states that:</i></p> <p><i>"The draft Retail and Leisure Needs Study (RLNS) has tested the impact that the designation of Old Oak High Street as a 'major' centre would have on the surrounding retail hierarchy. This shows that negative impacts are likely to be minimal and that most if not all centres are likely to significantly benefit from the additional expenditure brought to the area by the new residents, employees and visitors".</i></p> <p>Paragraph 9.15 goes on to state that:</p> <p><i>" OPDC will also work closely with the London Borough of Hammersmith and Fulham to consider how this new major town centre in Old Oak can complement the existing metropolitan town centre designated at Shepherd's Bush, which has undergone rapid expansion in recent years, with the opening of the Westfield London shopping centre and which is currently being further extended".</i></p> <p>It is understood that LBHF have made comments to the OPDC in terms of the anticipated impact of such retail provision on existing centre within Hammersmith and Fulham, including Westfield London. While WEL welcome the principles of development at Old Oak, we do wish to stress that the delivery of retail floorspace in particular will need to be carefully managed to ensure there is no detrimental impact on the existing town centre hierarchy –including what is acknowledged to be an emerging International Centre in the case of Shepherds Bush Town Centre, anchored by Westfield London.</p>	
14	52	Mr. Jon Burden	Policy TLC1 - Hierarchy of Town and Local Centres	NO	YES	YES	<p>Converting shop and retail units to community facilities should be made easier. Community facilities, such as doctor's surgery, dentist surgery, creche, place of worship, or space for community groups to rent and meet, can draw residents to a declining shopping parade. It can also meet community needs.</p>	Make it easier for shops and retail space to be converted to community facilities.

68	102	Fulham Society	Policy TLC1 - Hierarchy of Town and Local Centres			<p>Town Centres, retail . “6.90 Fulham Town Centre will be supported to re-establish its historic role in the locality and maintain its status as a major town centre in the London Plan (2016). The Local Plan policies will seek to provide further shopping and leisure uses at an appropriate scale to meet locally generated needs. One opportunity for improvement is in the northern part of the centre, along North End Road and Lillie Road. Regeneration in this locality should link with the regeneration of the Earls Court/West Kensington Opportunity Area.”</p> <p>This paragraph means nothing. We would all like Fulham town centre to be improved but nothing in the Local Plan is likely to do this. As in the transport section, the target is fine but merely an aspiration with no practical policies as to how improvements in congestion, pollution and quality can be achieved.</p>	
28	294	Hammersmith Mall Residents Association	Policy TLC1 - Hierarchy of Town and Local Centres			<p>We particularly support the policy of improving the type and mix of retail outlets in Hammersmith town centre and along King Street. This would go a long way towards achieving greater coherence between the east and west ends of King Street. The aim should be to make the whole street an interesting and attractive area to visit rather than a main road leading to Chiswick with a motley array of shops on either side of it.</p>	
38	493	Greater London Authority and Transport for London Planning Team	Policy TLC1 - Hierarchy of Town and Local Centres				<p>Town and Local Centres</p> <p>Policy TLC1 d. should include the word "redevelopment" to allow for the intensification of development on a site and increased housing, where appropriate.</p>
50	558	Capital and Counties on Behalf of Earls	Policy TLC1 - Hierarchy of			ECP supports Policy TLC1 and the content of this part of supporting paragraph 6.84.	

		Court and Olympia Group	Town and Local Centres					
50	559	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy TLC1 - Hierarchy of Town and Local Centres	NO			<p>Paragraph 6.84 recognises the need to plan for substantial extra space in some centres, while it may be appropriate to plan for the status quo, or even decline in other centres.</p> <p>While acknowledging the general proposition, ECP does not consider it is appropriate to plan for status quo or decline in Fulham, given the objective to reinforce its role, and the opportunity within the wider FRA (including the ECWKOA) to accommodate significant retail and leisure uses.</p> <p>In this context, ECP has significant concerns about the evidence base which underpins the draft Local Plan, and specifically how this applies to the FRA, Fulham Town Centre, and the ECWKOA.</p>	
54	675	MP Kings Lyric S.A.R.L.	Policy TLC1 - Hierarchy of Town and Local Centres				<p>We acknowledge the importance of maintaining a high level of AI frontage in core areas of the town centre, however we would suggest that policies TLC 1 and TLC2 should recognise the importance of maintaining flexibility in relation to the above variety of land uses in order to improve the vitality and viability of the town centre. The retail sector is currently going through changes and it is unclear how things will stand in the future. Policy should remain as flexible as possible to encourage a wide range of retailing and supporting uses within town centres to ensure the future success and growth of these areas, especially where there are other competing factors and centres close by.</p> <p>Paragraph 6.89 confirms that Hammersmith will continue to be designated as a major town centre which we support. We also support recognition within paragraph 6.89 that the Council will look to support development that improves the vitality and viability of the centre, and which strengthens its role as a centre for offices, local government and for arts, cultural, leisure and shopping. A number of sites that fall within the Hammersmith Town Centre designated boundary are recognised within paragraph 6.89 as being key to meeting this objective.</p>	<p>Kings Mall is not currently referenced, and we would suggest that due to both the sites current contribution to the town centre, and the potential role the site could play in helping to improve and strengthen Hammersmith as a shopping, cultural and leisure destination in the future, that the text should be updated to include reference to Kings Mall.</p>

18	202	Old Oak and Park Royal Development Corporation	Map 5 Shopping Hierarchy				<p>Map 5</p> <p>As with some of the other maps in the document, within the OPDC area, OPDC is responsible for designating town centres, so this map should show the part of the borough covered by OPDC.</p>	
17	148	Hammersmith Society	Table 3 Estimated Retail Need				<p>TLC1 – Table 3 : We query why the figures in this table are so different from those in the previous table in the 2015 draft (p.123)?</p>	
50	560	Capital and Counties on Behalf of Earls Court and Olympia Group	Table 3 Estimated Retail Need	NO			<p>Table 3 of the draft Local Plan estimates a retail need of 35,700 sq m gross of comparison retail floorspace and 3,400 sq m gross of convenience floorspace across the borough for the period up to 2031.</p> <p>This need forecast is broken down between the three centres of Shepherds Bush, Hammersmith and Fulham. No specific estimate of the need for additional Retail and leisure floorspace within the ECWKO A is provided, which ECP considers is a serious omission given the scale of population growth and development opportunities within this area.</p> <p>The need for Fulham is estimated as 4,300 sq.m gross comparison floorspace and 3,600 sq.m gross convenience floorspace by 2031. This area partly overlaps with the ECWKO A, and provides an indication of potential capacity within this area, although it does not include the specific additional needs likely to be generated by additional people living and working within the ECWKO A or visitors to this area.</p> <p>Based on the identified figures for Fulham, the draft Local Plan identifies a significant need for additional retail (A1-5) floorspace. However, even leaving aside the additional capacity generated by the ECWKO A, which has been ignored, ECP considers the draft Local Plan significantly underestimates the full extent of need in the Fulham area.</p>	<p>ECP considers that in order to be found sound, the plan needs to:-</p> <p>i) Incorporate updated capacity figures which take into account current and future quantitative and qualitative needs, including the additional needs generated within the ECWKO A; and</p> <p>ii) Incorporate additional clarification that needs which cannot be accommodated within the town centre as currently defined should be accommodated within the ECWKO A, provided they do not have a significant adverse impact on existing centres.</p>

						<p>No explanation is given to justify the reduction in comparison retail needs for Fulham since the 2010 study and 2011 Core Strategy, which identified a need for 7,800 sq. m of additional comparison floorspace need by 2021, (i.e. over the next five years, given there has been no significant new comparison retail development in Fulham town centre since 2011). Nor is there any explanation of the inconsistency between the emerging draft plan and the London Plan need forecasts, or consideration given to qualitative needs.</p> <p>The Experian floorspace needs assessment which underpins the 2015 London Plan identifies a gross comparison goods floorspace requirement for 115,784 sq.m in LBHF by 2031, based on low productivity levels, which ECP considers the most realistic assumption given wider economic conditions.</p> <p>The emerging plan is based on the 2016 Retail Needs Study, prepared by PBA, which is dated May 2016 but was only published in September 2016.</p> <p>ECP considers this study is seriously flawed. The study uses an updated household survey, but for the reasons explained in paragraph 5.2.2 PBA acknowledge this appears to have overstated the market share of Fulham, which they have therefore had to adjust manually. As such, the survey basis is itself subject to margins of error.</p> <p>The study identifies a need for 3,600 sq.m of additional convenience floorspace in Fulham by 2031. This represents more than 100% of the total borough wide convenience retail need, and represents an increase of more than 300% on the 2011 Core Strategy figure. This is despite the opening of Wholefoods since 2011; and the evidence that that the centre is already very well provided with large foodstores.</p> <p>Even if this figure is concluded to be sound, having regard to the level of local population and expenditure growth in the Fulham catchment, and in particular within the ECWKO, the plan fails to identify sufficient sites within the Town centre and wider FRA policy area to accommodate this scale of additional convenience goods floorspace.</p> <p>ECP is also concerned that the draft plan materially underestimates the scale of additional comparison goods retail floorspace required in the FRA in the period up to 2031, and fails to identify sufficient sites and opportunities to accommodate the</p>	
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						<p>amount of additional retail development which is likely to be needed, over and above commitments.</p> <p>The study sets out two sets of comparison retail needs forecasts for Fulham; Scenario A is based on a 'constant market share', using the PBA 'adjusted' figure, which assumes Fulham maintains its current, low market share. This identifies a need for 7,500 sq. m of comparison retail floorspace by 2031.</p> <p>Scenario B forecasts need based on a further adjusted market share, to reflect the impact of new development at Shepherds Bush (Westfield) and Earls Court which further reduces Fulham's market share (ignoring the fact that part of the ECWKO is actually within Fulham Town centre) . This suggests a need for 4,300 sq. m gross by 2031.</p> <p>The emerging Local plan adopts this lower figure i.e. it plans for a declining Fulham market share, and takes no account of the additional capacity generated within the ECWKO.</p> <p>ECP considers these forecasts materially understate the scale of comparison retail need in the Fulham area for a number of reasons.</p> <p>First, they adopt a base year of 2015, and only consider needs arising from population and spending growth since then. In other words they ignore the significant unmet need identified in the 2010 study and the failure to deliver any new comparison retail floorspace since then. As reflected in the current Core Strategy, the previous JRSU identifies a significant retail need in Fulham town centre, which has not been met.</p> <p>Second, by assuming a low current market share, and that this will fall further as a result of commitments, the approach is inconsistent with the local plan objective to restore the historic role of Fulham as a major centre, and enhance its viability. On the contrary the approach assumes an inbuilt cycle of decline and consolidation.</p> <p>Third, as outlined above, the forecasts specifically ignore the additional needs arising within the ECWKO as a</p>	
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						<p>consequence of new residents and workers, and visitors to the area.</p> <p>Fourth, they take no account of qualitative factors, which include:-</p> <ul style="list-style-type: none"> • the lack of any recent investment in additional retail floorspace; • the absolute, and relative, deficiency of comparison goods floorspace in Fulham as a Major centre when compared to other centres; and • specific gaps in the range of comparison goods and representation of key retailers, <p>Even ignoring the flaws and contradictions in the analysis, the PBA study still identifies a quantitative need for 4,300 sq. m gross comparison, 4,300 sq. m gross convenience, and 4,800 sq. m gross of food and drink floorspace, in Fulham town centre by 2031.</p> <p>This gives a total quantitative need for an additional 13,400 sq. m of A1/A3-5 retail floorspace within Fulham. This takes no account of the significant, additional need arising within the ECWKO as a consequence of new residents and workers, and visitors to the area.</p> <p>As a consequence, the plan significantly underestimates the scale of retail floorspace needed within the FRA. This also ignores the need for additional D2 leisure floorspace, which has not been assessed.</p>	
54	307	MP Kings Lyric S.A.R.L.	Policy TLC2 - Town Centres			<p>We support the recognition within policy TLC2 of the need to regenerate LBHF's town centres to improve their viability and vitality, and welcome the acknowledgement at paragraph 2.28 that</p> <p><i>'it will be important to ensure the continued provision of a wide range of high quality retailing, services, arts, cultural and other leisure facilities, including those that contribute to a vibrant night time economy to serve local residents, visitors and workers. '</i></p> <p>4.0 We acknowledge the importance of maintaining a high level of AI frontage in core areas of the town centre, however we would suggest that policies TLC 1 and</p>	<p>Kings Mall is not currently referenced, and we would suggest that due to both the sites current contribution to the town centre, and the potential role the site could play in helping to improve and strengthen Hammersmith as a shopping, cultural and leisure destination in the future, that the text should be updated to include reference to Kings Mall.</p>

							<p>TLC2 should recognise the importance of maintaining flexibility in relation to the above variety of land uses in order to improve the vitality and viability of the town centre. The retail sector is currently going through changes and it is unclear how things will stand in the future. Policy should remain as flexible as possible to encourage a wide range of retailing and supporting uses within town centres to ensure the future success and growth of these areas, especially where there are other competing factors and centres close by.</p> <p>5.0 Paragraph 6.89 confirms that Hammersmith will continue to be designated as a major town centre which we support. We also support recognition within paragraph 6.89 that the Council will look to support development that improves the vitality and viability of the centre, and which strengthens its role as a centre for offices, local government and for arts, cultural, leisure and shopping. A number of sites that fall within the Hammersmith Town Centre designated boundary are recognised within paragraph 6.89 as being key to meeting this objective. Kings Mall is not currently referenced, and we would suggest that due to both the sites current contribution to the town centre, and the potential role the site could play in helping to improve and strengthen Hammersmith as a shopping, cultural and leisure destination in the future, that the text should be updated to include reference to Kings Mall.</p>	
39	344	Power Leisure Bookmakers Ltd	Policy TLC2 - Town Centres	NO	YES	YES	<p>Policy TLC2 notes that within town centres, no more than 40% of the length of the prime retail frontage as a whole will be permitted to change to non-class A1 uses (Part 1). The policy also notes under Part 2 that 'betting shops' amongst a number of other uses ' will not be permitted on the ground floor of prime retail frontages'.</p> <p>The Council have not provided an explanation as to why the threshold figure of 40% for non-class A1 uses has been set for the prime retail frontage. We had expected the document to provide an explanation as to why this specific threshold figure has been chosen to assess concentration of uses, but disappointingly the document is silent on this point. In addition, there is no assessment on how this threshold will affect existing uses within the town centres in the borough. For example, many town centres may already be in breach of this threshold, and therefore new operators will not be able to locate in many of the boroughs town centres.</p>	<p>We suggest that the Council review its position and demonstrate clear evidence as to why the specific threshold figure is appropriate. The evidence presented does not cover this matter.</p> <p>The policy should include all town centre uses and should allow betting shop uses within prime retail frontage at ground floor level.</p>

						<p>On review of the documentation provided by the Council, there is no reference to an evidence base document which could support the above policy control threshold. This is concerning, and signifies that the policy is not Sound as it is not justified or based on a robust and credible evidence base. We suggest that the Council review its position and demonstrate clear evidence as to why the specific threshold figure is appropriate. The evidence presented does not cover this matter.</p> <p>Of particular concern is that part 2 of policy TLC2 restricts betting shops (amongst other uses) from the ground floor of prime retail frontages of town centres. If adopted, this part of the policy will restrict legitimate town centre uses that would like to operate from a ground floor unit and who do not fall within the A-Class use category (such as Betting Shops) out of the borough's main centres. There is a real danger that adopting such an approach will effectively place a moratorium on such new uses in centres and potentially encourage new operators and uses out of centres within the borough. Clearly such an approach is inappropriate and would fly in the face of the town centres first policy as set out in the NPPF which seeks to encourage town centre shops and services to locate within centres, rather than in out of centre locations.</p> <p>We are concerned that the document will conflict with paragraph 23 of the NPPF which states that policies should be positive</p> <p>and promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should "promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres". Clearly the document is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre.</p> <p>It is important to highlight that since the Use Class Order changed in April 2015, Betting Shop Uses are now considered under the 'Sui Generis' use class (rather than A2) and an application is now always required for the change of use to Betting shop uses. Policy TLC2 restricts the use completely from the ground floor units of its town centres which is completely unreasonable and unsubstantiated. Again, regard needs</p>	
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							<p>to be had to the very real impact that the policy is likely to have on a number of different industries and the clear conflict that would arise with the NPPF.</p> <p>We note that the policy states that in non-prime retail frontages, criteria 3-6 will apply (effectively betting shops can locate there), however, as discussed later in the letter, this would be almost impossible for betting shop operators, as they would still need to comply with Policy TLC6.</p> <p>If this policy and particularly parts 1 and 2 are not revised to include all town centre uses (including those within the Sui Generis category), we consider that the Plan would be unsound on the basis that it is not positively prepared (it effectively discriminates against legitimate town centre uses and particular uses such as Betting Shops) nor is it consistent with national policy (as it is not compliant with the NPPF as outlined above).</p>	
53	387	Land Securities	Policy TLC2 - Town Centres				Policy TLC2 outlines that development in Town Centres should provide for active ground floor uses. We are supportive of the Policy in providing for vibrant mixed use developments.	
40	578	Mr Prashant Brahmbhatt	Policy TLC2 - Town Centres				<p>Table 4</p> <p>Why is Queen Caroline Street excluded?</p>	
40	582	Mr Prashant Brahmbhatt	Policy TLC2 - Town Centres				Para 6.100- APOLLO and COLLEGE COURT	
39	345	Power Leisure Bookmakers Ltd	Policy TLC3 - Local Centres	NO	YES	YES	<p>Policy TLC3 states that change of use applications in local centres will be permitted subject to a number of criteria including proving that the use will not have an 'adverse impact on the local area'. The policy also sets out a number of thresholds for neighbourhood parades (no more than 40% permitted to change to non-class A1</p>	We suggest that the Council review its position and demonstrate clear evidence as to why the specific threshold figure is appropriate. The evidence presented does not cover this matter.

							<p>uses), key local centres (no more than 50% permitted to change to non-class A1 use) and satellite parades (no more than 60% permitted to change to non-class A1 uses).</p> <p>If the quotas cannot be reached, the Council then state that they 'may consider' granting permission if the unit has been vacant for at least 1 year with evidence of marketing subject to a number of 'other factors'. Importantly, it is noted that in calculations applicants must take into account 'unimplemented extant permissions'.</p> <p>It is considered that this policy is overly onerous for applicants and unsound for the following reasons:</p> <ul style="list-style-type: none"> • The policy is unmeasurable and therefore not 'effective'. It is difficult to measure adverse impacts on local areas. This is subjective. What is the criteria on which this assessment will be based? It is considered that this part of the policy should be removed. • As noted for policy TLC2, the Council have not provided an explanation as to why the threshold figures chosen for each centre have been set. Many of the borough's centres may already be in breach of these thresholds already, and therefore new operators will not be able to locate in many of the boroughs centres. In addition, there is no reference to an evidence base document which could support the policy control thresholds. This is concerning, and signifies that the policy is not Sound as it is not justified or based on a robust and credible evidence base. The policy does not account for the fact that some of the outlined thresholds will have already been breached in many of these centres • The request for marketing information is overly onerous and will discourage operators from locating within the centres. It is therefore not in conformity with national policy which seeks to promote competitive town centres that provide customer choice and a diverse retail offer. • The Council also require applicants to calculate 'unimplemented extant permission' for change of use applications within the frontages where the site is located. This requirement is overly onerous for the applicant and 	<p>In addition, we consider that certain parts of the policy should be removed i.e. reference to marketing information and the desire for applicants to calculate 'unimplemented extant permissions' as this is an overly onerous approach and it is also unmeasurable and therefore not 'effective'.</p>
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							<p>would take a substantial amount of work. It is considered on this basis that the policy is not measurable or effective .</p> <p>It is considered that Policy TLC3 is unsound on the basis that the policy is not effective, justified or consistent with national policy.</p>	
39	346	Power Leisure Bookmakers Ltd	Policy TLC4 - Small Non Designated Parades, Clusters and Corner Shops	NO	YES	YES	<p>Policy TLC4 seeks to retain shops and other local services in order to meet local needs. It is noted within the policy that in assessing an application for such areas, changes of use to other non-Class A Uses will be permitted, except where this will result in a demonstrable shortage of class A1 uses in the locality. Interestingly, the policy discriminates against betting shop uses by stating that in assessing a change of use from class A1 uses, the Council will take into account (part c) the number of uses that may adversely impact on the quality of the parade or cluster, such as betting shops and amusement centres.</p>	<p>It is considered that the policy is negatively worded towards betting shops. The Council have not produced any evidence to suggest that betting shops ‘adversely’ impact against the quality of centres, and on this basis, the policy should be re-worded to exclude this negative connotation or the policy will be unsound and it is not positively prepared.</p> <p>The policy should be re-worded to exclude this negative connotation or the policy will be unsound and it is not ‘positively prepared’.</p>
54	308	MP Kings Lyric S.A.R.L.	Policy TLC5 - Managing the Impact of Food, Drink and Entertainment uses				<p>6.0 We recognise the need to protect the amenity of local residents, but suggest that further flexibility should be provided under policy TLC5 when considering the management of food, drink and entertainment uses. We would suggest that reference to specific closing hours within the aforementioned policy is too prescriptive, and that sites should be assessed on the basis of their own characteristics and context, with opening and closing hours agreed according to the impact they would have on the surrounding area.</p>	
40	583	Mr Prashant Brahmabhatt	Policy TLC5 - Managing the Impact of Food, Drink and				<p>6.107- APOLLO Noise offence</p>	

			Entertainment uses					
40	584	Mr Prashant Brahmbhatt	Policy TLC5 - Managing the Impact of Food, Drink and Entertainment uses				6.111- APOLLO inadequate parking management and crowd control	
60	72	Kentucky Fried Chicken (Great Britain) Limited	Policy TLC6 - Betting Shops, Pawnbrokers and Payday Loan Shops and Hot Food Takeaways	NO	YES	NO	<p>POSITIVELY PREPARED</p> <p>The draft policy is not based on any objectively assessed development requirement. In combination with adopted SPD, it effectively assesses the requirement for hot food takeaways within 400 metres of anywhere "where children and young people are likely to congregate, such as schools, parks and youth facilities" as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.</p> <p>In fact, the distance chosen could have the effect of banning hot food takeaways from a significant area of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.</p>	Delete the final paragraph of Policy TLC6.

						<p>The policy is negative in its assumptions, assuming the hot food takeaways must necessarily have health impacts, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food.</p> <p>We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.</p> <p>JUSTIFIED</p> <p>There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to any of the example uses cited and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified.</p> <p>The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater, nor any threshold distance. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.</p> <p>It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units.</p> <p>As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.</p> <p>In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy</p>	
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						<p>offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning.</p> <p>On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.</p> <p>EFFECTIVE</p> <p>Some hot food takeaways, together with restaurants, pubs and some shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.</p> <p>The area that would be affected by the policy could cover a large and variable part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal?</p> <p>Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.</p> <p>CONSISTENT WITH NATIONAL POLICY</p> <p>We consider that no regard has been given to national policy and advice in preparing Policy TLC6 because no National Planning Policy Framework (NPPF) policies deal with dietary issues.</p> <p>Specifically, taking into account proximity of hot food takeaways to schools has no basis in national policy and national practice guidance simply refers to a briefing</p>	
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						<p>paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy and will tend to encourage unsustainable travel.</p> <p>The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.</p> <p>DUTY TO CO-OPERATE</p> <p>There is no evidence of any discussion with adjoining Boroughs about their policies in this regard or about how relevant land uses across boundaries might be taken into account in determining applications or any boundary effects the policy might have.</p>	
17	203	Old Oak and Park Royal Development Corporation	Policy TLC6 - Betting Shops, Pawnbrokers and Payday Loan Shops and Hot Food Takeaways			<p>Again, the policy would benefit from numbering or lettering of the paragraphs.</p>	
54	309	MP Kings Lyric S.A.R.L.	Policy TLC6 - Betting Shops, Pawnbrokers and Payday Loan Shops and Hot			<p>We support the approach to betting shops, pawnbrokers and payday loan shops within draft Policy TLC6 and encourage the increased control placed on the location of these to ensure clustering (especially within prime retail frontages of the Town Centre) does not continue.</p>	

			Food Takeaways					
39	347	Power Leisure Bookmakers Ltd	Policy TLC6 - Betting Shops, Pawnbrokers and Payday Loan Shops and Hot Food Takeaways	NO	YES	YES	<p>Policy TLC6 states that the Council will seek to limit the amount and concentration of betting shops in areas of high concentration. It is also noted that planning permission for new betting shops, pawnbrokers and payday loan shops will not be permitted in prime retail frontage of town centres or within 400 metres of the boundary of an existing or permitted betting shops, pawnbrokers or payday loan shops. In addition, outside of these areas, planning permission will only be granted for the uses in accordance with the quotas that apply.</p> <p>Firstly, we assume that the policy relates to each use separately, i.e. a betting shop should not locate within 400 metres of the boundary of an existing betting shop (rather than all uses). However, the Council should ensure that this is clarified in the supporting text if the policy is found sound.</p> <p>We have already provided comments on the Council's intention to exclude betting shops from prime retail frontages within town centres. However, of further concern, is the reference to the 400 metre radius and the fact that there is nothing within the supporting text or within the Council's background evidence base documents explaining why such a policy (or a specific distance) is necessary.</p> <p>The London Plan forms part of the Development Plan and was adopted in March 2015. The Local Plan should be in general conformity with the London Plan. Policy 4.8 is concerned with Supporting a Successful and Diverse Retail Sector and Related Facilities and Services and states that the Mayor will, and boroughs and other stakeholders should, support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need. The London Plan Town Centres SPG (July 2014) states that Councils are encouraged to manage over-concentrations of activities, for example betting shops, hot food takeaways and pay day loan outlets. The supporting text outlines current and potential mechanisms for managing the over-concentration of such uses. In particular, paragraph 1.2.28 states that "if the concentration of a use has reached</p>	Remove reference to 400 metre radius.

						<p>saturation levels where the negative impacts outweigh benefits, local authorities can set thresholds at this level of saturation”.</p> <p>We consider that in line with the London Plan and Town Centres SPG (2014) the starting point for Plan policy making is whether there is an existing over concentration or cluster of uses (including betting shops) which has reached saturation levels where positive impacts are outweighed by negative impacts.</p> <p>In their justification text, the Council state that the borough has ‘a high concentration of betting shops’ (para 6.115) and an ‘over representation’ in the most ‘deprived parts of the borough’ which can have an impact on the health and finances of vulnerable members of the community (para 6.116). It is clear that the Council’s intention is to limit the amount of concentration of betting shops in areas of high concentration by setting the 400 metres radius around existing uses.</p> <p>Although the Council’s background paper on betting shops, pawnbrokers and payday loan shops (September 2016) states that the number of betting shops has increased in the UK in recent years (para 2.1), the Council do not provide the evidence document that the information is taken from. It should be noted that betting shops actually represent less than 4% of the country’s retail units and in most inner London areas less than 3%. Indeed, numbers of betting shops have in fact decreased by about a half across the country since the 1970s. In Hammersmith and Fulham alone, there are currently 43 betting shops (a decrease from 46 pre-2007) which is far less than many other London boroughs.</p> <p>It is clear that the Council have a perception of what constitutes an over-concentration that is not shared when analysis of its centres is comprehensively undertaken. This is evident not only from the omission of any justified identification of existing over concentrations within the Council’s evidence base but also from recent appeal decisions we refer to below.</p> <p>Within their evidence base document, (Betting Shops – Key Survey findings – page 6) it is clear that most betting shops are found in the boroughs town centres (21 units), which is not unusual as betting shops constitute a main town centre use. In terms of figures, it is clear that Fulham Broadway has 7 units in betting shop use, and</p>	
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						<p>Hammersmith Broadway and Shepherds Bush Green have 8 and 6 units respectively. However, this cannot be classed as an over-concentration of units.</p> <p>An appeal was allowed at 620 High Road, Leytonstone on the 22 April 2015 (reference: APP/U5930/A/14/2229533). The proposals would result in 6 betting shops in the centre, meaning betting shops would account for just 3.5% of the overall centre, a figure which the Inspector considered to be “a low figure when compared with a comparison of other non-A1 uses in the centre”.</p> <p>The inspector also states that “the proposal would not result in any significant clustering concerns”. Although a further appeal at 64 Kilburn High Road (reference: APP/X5210/W/15/3140916) was refused on the basis that it had not been demonstrated that the unit could not continue in A1 use, the Inspector was clear in that she did not consider that 8 units in the centre represented an overconcentration of betting shops or gambling facilities in the area despite the Council’s concerns (para 26). The inspector commented, “even if there was a cluster, it does not necessarily mean that harm would arise”(para.41) and that “consideration of whether a ‘saturation point’ has been reached must be made taking into account whether there are negative effects arising from such a cluster and if so whether the negative effects would outweigh the benefits” (para 41). She then concluded that she did not feel that an over-concentration had arisen which would have an adverse effect on community safety or fear of crime (para 47).</p> <p>The Council clearly have a negative view of betting shops. Paragraph 6.102 of the Local Plan states that ‘in respect of betting shops and pay day loan shops, it is important that too many do not concentrate in any area and detract from the vitality and viability of the centres’ The Council state in their betting shop evidence base document that the increase in betting shops in the borough is of concern to local residents and that the Council feel that the proliferation of the use can ‘damage the function and character of town centres’ para 2.2, but they have not provided evidence to suggest that the ‘apparent’ cluster of units would lead to a saturation levels where negative impacts outweigh benefits. Indeed, evidence they do present by the House of Commons is clear in that the “correlations and associations between gaming machines and gambling related harm are poorly misunderstood” (para 5.2). In addition, at paragraph 5.10, the Council note that there is concern over clusters of</p>	
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						<p>betting shops and refer to the Committee report of a former Director of Sales and Lettings at property firm Grosvenor. However, the quote used states “actually, it does not matter whether it is a betting shop or a mobile phone shop. It is the users. You just do not want six out of ten shops the same”. It is therefore unclear why the Council feel the need to discriminate against betting shop use (which is already within its own use class) when there is not an identified cluster of units within the borough’s centres.</p> <p>Within their ‘Betting shops – Key survey findings’ part of the report, the Council note that ‘39% of betting shops are within the most deprived areas of the borough, showing a strong correlation between the location of betting shops and socio-economic deprivation’ (page 6). We disagree with this comment and do not consider there to be a correlation. The Council present a map in Appendix 1 which provides information on multiple deprivation alongside betting shops (including a 400 metres buffer).</p> <p>It is clear when interrogating the map that there are only 2 betting shops in the most deprived areas of the borough, but conversely there are 5 betting shops in the least deprived areas. In the contrary to the Council’s information on deprivation, an</p> <p>ABB report “an independent analysis of betting shops and their relationship to deprivation along with their profile relative to other high street business occupiers” by the Local Data Company 2014 states:</p> <ul style="list-style-type: none"> • Betting shops have not targeted deprived areas or the poorest socioeconomic groups (page 6); • The majority of shops are in average deprivation towns (page 7); and • The most and least deprived areas have similar numbers of betting shops (page 7). <p>Indeed, the document concludes that there is no evidence of poorer populations being targeted by betting shop operators (page 12). Interestingly, this report</p>	
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						<p>produced by the Local Data Company is more recent than the 2013 report the Council refer to in paragraph 2.1 of their evidence base document.</p> <p>It is clear from the map which shows 400 metres around the existing betting shops within the borough that if the Council adopt the 400 metre radius exclusion of betting shops (alongside exclusion from prime retail frontages), betting shop use will be excluded from the majority of the borough. Taking this information into consideration and to re-iterate, there is no evidence to suggest that drawing a 400 metre radius 'exclusion zone' around every existing betting shop in the borough should be applied in this case, and it is considered that the local authority should not be setting such policies on distances and proximity of uses without a robust evidence base to suggest that it is necessary. In this respect, it is considered that the Local Plan is not in conformity with the NPPF or the London Plan and is not Justified (not based on a robust and credible evidence base) and is therefore unsound. It is also considered that it has not been positively prepared as it discriminates against betting shop use.</p>	
17	149	Hammersmith Society	Policy TLC7 - Public Houses			<p>TLC7 – Public Houses : We welcome this policy in connection with the protection of public houses. We note that other local authorities have adopted the use of Article 4 directions.</p>	We also consider that the definition of pubs as 'Assets of Community Value' should be made clearer in the main policy statement.
18	204	Old Oak and Park Royal Development Corporation	Policy TLC7 - Public Houses			<p>Policy TLC7</p> <p>In accordance with the CAMRA guidance, the policy should reference the need for exploration of diversification options.</p>	
69	445	Campaign for Real Ale	Policy TLC7 - Public Houses			<p>Policy TLC7 - Public Houses response</p>	

							<p>The wording of this policy should make it clear that when a property is marketed for sale or lease as a pub, that the rent or property value is a fair reflection of the going rate for a pub and not artificially inflated.</p> <p>It could, for example, compare the property with other examples of properties that are occupied as pubs or have been recently let as pubs to ensure the marketing exercise has been fairly undertaken. Historic trading accounts should also be considered. Our CAMRA national “model text” for Council pub protection policies includes the phrases:</p> <ul style="list-style-type: none"> - if marketing has been based wholly or partly on an alternative community or employment use, there has been prior discussion with the Council on the principle of the proposal; - the public house has been offered for sale in the region, in appropriate publications and through specialised licensed trade agents; - it can be demonstrated that the public house is not financially viable; in order to determine if this is the case, the Council will require submission of trading accounts for the last three full years in which the pub was operating as a full-time business; - the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes (to be shared with the Council) have demonstrated that the public house is no longer economically viable. <p>Traditionally pubs occupy spacious and often self-contained premises, and have become the target of developers, particularly for residential conversion or demolition and redevelopment. Pub company owners are often complicit in this process by deliberately running down pubs by poor management and then claiming 'unviability'. Their agents then market them as development opportunities at values way beyond those which could sustain continued pub use.</p> <p>Given that pubs are recognised as having a strong place at the centre of any community, these communities are more often than not local, and in the more</p>	
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						residential areas. We submit that Protection needs to be spelt out, in terms of a <u>presumption against</u> any major change of use; active encouragement of registration of pubs as Assets of Community Value; active use as community hubs (and not just in shopping centres); and active use of Article 4 directions.	
38	494	Greater London Authority and Transport for London Planning Team	Policy TLC7 - Public Houses			<p>Public Houses</p> <p>The Mayor Is pleased to see Policy TLC7 supporting the protection of public houses In the borough which provide valued assets for the local community in line with policy 4.8 of the London Plan.</p>	
50	580	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy TLC7 - Public Houses	NO		<p>Policy TLC7 sets out a range of assessment criteria which restrict the change of use or redevelopment of a public house. ECP contends that the policy as it is currently worded is overly prescriptive and does not allow sufficient flexibility for Policy TLC7 to be positively worded to take account of potential wider benefits associated with the development proposals that include the change of use or redevelopment of a public house. This is of particular relevance to public houses within major strategic development areas such as LBHF Regeneration Areas and London Plan Opportunity Areas that have been identified for comprehensive redevelopment.</p> <p>To be consistent with the aims of strategic Local Plan and London Plan policies, flexibility for the redevelopment of public houses as part of wider redevelopment proposals should be included in Policy TLC7. This approach is similar to that taken to the wording of draft Policy DC3, which makes specific exception to the Council's general policy regarding the location of tall buildings in 'appropriate' locations such as the Borough's Regeneration and Opportunity Areas.</p>	<p>Insert wording at the beginning of Policy TLC7(1) to state "<i>With the exception of designated Regeneration and Opportunity Areas, where benefits associated with wider redevelopment proposals, will be taken into account...</i>"</p>

9.Community Facilities, Leisure & Recreation

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
17	153	Hammersmith Society	Community Facilities, Leisure and Recreation				Community Facilities, Leisure and Recreation : Policies CF1 – CF4 :We note that these are generally new policies which the Society can support in principle.	
7	670	Sport England	Community Facilities, Leisure and Recreation	NO	YES		<p><u>Supporting Community Facilities and Services</u></p> <p>Sport England welcome the general thrust of Policies CF1, CF2 and CF3 but these policies should fully reflect Sport England's objectives to protect, enhance and provide and, as outlined above, should be based on an established and robust assessment of need. The policies are not specific about which facilities to protect, enhance and provide, why such actions should be undertaken and where new facilities should be located. The policy should also specifically reference indoor and outdoor sports facilities. This section should therefore be revised to fully reflect Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' (http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf), which is in line with the NPPF. This statement details Sport England's three objectives in its involvement in planning matters;</p> <p>1) To prevent the loss of sports facilities and land along with access to natural resources used for sport.</p> <p>2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.	
1	2	The Theatres Trust	Policy CF1 - Supporting Community Facilities and Services	YES	YES	YES	<p>The Theatres Trust supports <i>Policy CF1 - Supporting Community Facilities and Services</i>.</p> <p>It reflects guidance in para. 70 and 156 of the NPPF regarding the need to safeguard and promote cultural facilities and cultural opportunities through the local plan.</p>	
	49	Mr. Jon Burden	Policy CF1 - Supporting Community Facilities and Services	NO	YES	YES	The borough is becoming ever more diverse, particularly in the religious practices of its residents. A large number of churches exist in the borough as a legacy of the past, though church attendance is falling. On the other hand, Muslims are an increasing percentage of the borough's population and they are generally more observant than Christians.	Places of worship and community centres for newer communities should be included in the development of regeneration areas.
7	11	Sport England	Policy CF1 - Supporting Community Facilities and Services	NO	YES		In particular, Policy CF1 (3) should just advocate the protection and enhancement of existing facilities to meet an established current and future need and for new indoor and outdoor provision to be provided to meet current and future demand. In terms of replacement facilities, the policy should make clear that the replacement must be of at least equivalent quantity, quality and accessibility as the playing field/pitch/facility to be lost and must be identified, secured and provided prior to the loss of any facility.	To overcome the objections raised Sport England recommend that the Council develop Playing Pitch and Built Facility Strategies to establish a clear and robust evidence base and strategy for playing pitches and built sport facilities and revise the Community Facilities and Services Policy to fully

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>Sport England is also concerned with the terms used throughout the Local Plan but specifically within this section. Sport England would seek references to playing field, playing pitch and ancillary sport facilities in addition to indoor sport and leisure facilities. This would align with the terms used in the Sport England's policies, statute and the NPPF. It is noted that the glossary states that leisure, recreation and sports uses includes sports halls, pitches, courts, professional sports clubs etc. but there is no specific mention of playing pitches and fields and indoor and outdoor facilities, Artificial Grass Pitches, Multi-Use Games Areas and ancillary facilities such as pavilions.</p> <p>Sport England note that Policy CF1 also seeks the improvement of school provision. Schools have a considerable contribution to community sport as the indoor facilities and outdoor playing pitches can be used outside of school hours. Indeed, if there is a deficit of playing pitches in the area community use of the schools should be secured. Sport England have a statutory role in protecting playing field and will object to any development that proposes to prejudice the use of playing fields, which includes school playing fields, unless it meets one of five exceptions. These exceptions align with the NPPF, paragraph 74, and can be found within Sport England's playing field policy via the following link;</p> <p>https://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>However, Sport England welcome the enhancement of sport and leisure provision for schools and in parks.</p>	<p>reflect Sport England's policy to protect, enhance and provide.</p> <p>Sport England also strongly advise the rewarding of the open space policy, the glossary and references to sport facilities and the regeneration area policies as explained in the preceding text.</p>

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8	35	Hammersmith and Fulham Air Quality Commission	Policy CF1 - Supporting Community Facilities and Services					<p>CF1 – Supporting Community Facilities and Services , p.111</p> <p>5 – insert ‘... public use in suitable local parks, <i>pocket parks and sports facilities.</i>’</p> <p>To widen the provision of open space and sports opportunities. The borough is well below standard in open space and with an increasing population needs to find more.</p>
67	110	Parsons Green Depot Tenants and the Andrew Robson Bridge Club	Policy CF1 - Supporting Community Facilities and Services	NO			<p>The draft Plan does not meet the test of soundness as it is not effective in meeting the local needs of small business enterprises and privately run facilities that meet a community need which were identified in the evidence base. Furthermore the chosen strategies do not reflect all the options available to the Borough to protect these uses even though they are acknowledged as making an important contribution to the social and economic well being of the Borough.</p>	<p>This policy fails to reflect the diversity of community facilities and services that are provided in the Borough. It is therefore unclear as to whether the same level of protection is being afforded to community leisure providers within the private sector, for example members clubs. These clubs, for example chess, reading, and bridge clubs, make an important contribution to the fabric of the Borough not least because of the increasing amount of leisure time that older residents now have. Limited consideration is given within the draft Plan to this type of organization or club with much of the focus on established sports related activities or community facilities.</p> <p>They should be afforded the same level of protection and included within the scope of CF1</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<p>3 and 6 as they make a valid contribution to promoting healthy communities and play an important role in social interaction and community cohesion. It is therefore proposed that community facilities/uses should be defined as:</p> <p>“facilities and uses generally available to and used by the local community at large for the purposes of leisure, social interaction, health and well-being or learning”.</p>
17	154	Hammersmith Society	Policy CF1 - Supporting Community Facilities and Services				Sports facilities para 6.128 : We are concerned that despite there being limited amount of open space, parks are being over-used for sport by both schools and sports organisations to the detriment of the ability to keep up the standard of upkeep of the grassed areas and to the use of the park by other users. Makes policy OS1 (c) difficult.	
23	242	H&F Disability Forum	Policy CF1 - Supporting Community Facilities and Services				We support the following Borough Wide Policies because they include accessible and inclusive designs, facilities or services. We also make comments where necessary.	<p>We have drafting comments on the health section:</p> <p>P 113: Para 6.130 to 6.138 Health: This needs to be corrected in conjunction with H&F CCG and NHS England who replaced NHS Commissioning Board in April 2013.</p> <p>E.g. NHS England oversees all CCGs and directly commissions some specialised services. NHS</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<p>England expect to give CCGs delegated responsibility for primary care services from April 2017.</p> <p>para 6.133: line 3: delete “National Commissioning Board (NCB)” and replace with “NHS England. P 114:Line 3: delete “ The NCB” and replace with: “NHS England</p> <p>P114: para 6.136: 2nd bullet point: delete White City Collaborative Centre and replace with Park View Centre for Health and Well Being.</p>
25	282	Tri-Borough Public Health	Policy CF1 - Supporting Community Facilities and Services				<p><i>Healthcare</i></p> <p>The emphasis on reducing health inequalities and on the social determinants of health are particularly welcome.</p> <p><i>Education</i></p> <p>As suggested on page 2, Early Years provision is a gap in this Local Plan. In order for potential education attainment to be achieved and inequalities in health and social outcomes to be reduced, early years’ development is key. There is currently a deficit of childcare places. It would be invaluable for the Local Plan to promote increased provision and to facilitate the incorporation of outdoor place space to improve health and reduce child obesity levels.</p>	<p><i>Community facilities and services</i></p> <p>Enhancing existing community facilities and services would be preferable to ‘protecting’ them.</p> <p><i>Healthcare</i></p> <p>Reference to the opportunities for co-location of health and social care provision to maximise use of the public sector estate may be fruitful here.</p>

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28	295	Hammersmith Mall Residents Association	Policy CF1 - Supporting Community Facilities and Services				<p>Policy CF1: Health:</p> <p>We fully support and welcome the council's commitment to ensure the retention and enhancement of existing healthcare facilities to support the current and future population of the borough, particularly the retention of A&E and maintenance of full services at Charing Cross. Mall CA residents are heavily reliant on Charing Cross for medical care and travel to more distant hospitals can be difficult and even dangerous if urgent medical care is required.</p>	
72	423	Hammersmith and Fulham Clinical Commissioning Group (CCG)	Policy CF1 - Supporting Community Facilities and Services				<p>"6.130 The council wishes to see the improved health and wellbeing of the community and will work with the Imperial College Healthcare NHS and other partners to achieve this objective. The council recognises there are changing health needs as a result of factors such as people living longer and more people living with long-term conditions like diabetes, heart disease, asthma and dementia. However, whatever the needs, the priority must continue to be to improve the health of all residents, to reduce health inequalities and to deliver new and improved health facilities in the borough."</p>	The CCG would fully endorse this ambition and will continue to work in partnership with LBHF, our service providers and local residents toward this goal.
72	424	Hammersmith and Fulham Clinical Commissioning Group (CCG)	Policy CF1 - Supporting Community Facilities and Services				<p>"6.131 The Imperial College Healthcare NHS' s strategy has led to the reorganisation of hospital facilities and other health services in the borough, including the closure of A&E services at Hammersmith Hospital. The council is concerned that such changes should not lead to the reduction of NHS services and particularly supports the continuation of A&E services at Charing Cross. The council supports the enhancement of existing facilities and provision of new</p>	The reorganisation of local services referenced are consistent with the agreed vision and plans for NHS across NW London. It is important to recognise that the focus of the CCG is on improving the health of local residents and improving the experiences and clinical

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							services with capital receipts from sales of land and buildings where release has been justified."	outcomes for our patients through improved local services and consistent high quality hospital services. We fully recognise the importance of enhancing existing facilities and estate and we will continue to work with the Borough to do this where it is both practical and effective in relation to the delivery of high quality health care.
72	425	Hammersmith and Fulham Clinical Commissioning Group (CCG)	Policy CF1 - Supporting Community Facilities and Services				"6.133 In terms of primary care, the Hammersmith & Fulham Clinical Commissioning Group (CCG) is responsible for commissioning local health care services in conjunction with the NHS Commissioning Board. The CCG commissions local community and acute services and works with GP's to support primary care. The ambitions of the CCG are set Proposed Submission in its Out of Hospital Care Strategy 2012-2015 which aims to shift the emphasis towards providing more care in GP surgeries, people's homes, local communities, and in children's centres and schools. The NHS Commissioning Board develops and oversees all CCG's and directly commissions primary care services and some specialised services."	At the time of writing this response, the CCG jointly commissions primary care and some specialised services with NHS England (NHSE) through a coordinated approach. It is highly likely that additional responsibilities for commissioning services will pass from NHSE to the CCG over the course of the next 1-2 years. The ambitions of the CCG are described within the Sustainability and Transformation Plan (STP). The references to the NHS Commissioning Board are now out of date and should be replaced by NHS England.
72	426	Hammersmith and Fulham Clinical Commissioning Group (CCG)	Policy CF1 - Supporting Community Facilities and Services				"6.136 The council also has a Health & Wellbeing Board (HWB) which has statutory duties including promoting integrated working, the production of a Joint Strategic Needs Assessment (JSNA) and a Joint Health and Wellbeing Strategy (JHWS) which is informed by the JSNA. The JHWS has been developed which sets out the following priorities: integrated health and social care services which support prevention, early intervention and reduce hospital admissions;	The Joint Health and Wellbeing Strategy referenced is currently being refreshed (the consultation finished on the 18th October). It would be helpful if subsequent iterations of the plan were to reference the refreshed strategy.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							delivering the White City Collaborative Care Centre to improve care for residents and regenerate the White City Estate; every child has the best start in life; tackling childhood obesity; supporting young people into Healthy Adulthood; better access for vulnerable people to Sheltered Housing; improving mental health services for service users and carers to promote independence and develop effective preventative services; and better sexual health across Tri-borough with a focus on those communities most at risk of poor sexual health."	
72	427	Hammersmith and Fulham Clinical Commissioning Group (CCG)	Policy CF1 - Supporting Community Facilities and Services				"6.137 In the council' s regeneration areas it will be important for new health services to be provided as part of supporting social infrastructure. The council will also seek other ways of of improving the health of residents, including access to new and existing parks and play areas, recreation facilities, opportunities to walk and cycle, community safety, access to shops, controls on hot food takeaways, educational attainment and access to jobs, and management of air quality and noise and light pollution. It is also important to the council that existing health and community facilities are protected and improved, such as those at Park View Centre for Health and Wellbeing, Parsons Green Health Centre, White City Community Centre and Milson Road Health Centre."	It is vital that the CCG continues to work in partnership with LBHF to ensure adequate provision of health facilities in these areas. Further details on our plans are referenced within the Infrastructure Delivery Plan (IDP).
76	499	Queens Park Rangers Football Club	Policy CF1 - Supporting Community Facilities and Services	NO	YES	YES	<p>We welcome the support offered by this policy to providing high quality facilities.</p> <p>We support the reference in part 3 of the policy to improving the provision and range of leisure, recreation, sports, arts, cultural and entertainment facilities.</p> <p>We also welcome part 4 of the policy and the support it provides for the continued presence of major sports venues. However, this could also be</p>	However, we feel that this reference should be extended with an additional point (or an amendment to point b.) that recognises that the re-provision of facilities could more appropriately take place in a different location,

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							extended to include the appropriate expansion, redevelopment or relocation of such facilities, where this would enhance provision.	with the existing location being redeveloped for an alternative beneficial use. However, this could also be extended to include the appropriate expansion, redevelopment or relocation of such facilities, where this would enhance provision.
5	603	Hammersmith Community Gardens Association	Policy CF1 - Supporting Community Facilities and Services	NO			<p>HCGA objects to the lack of policies to support the provision of local food growing spaces within new development and considers this makes the plan unsound in the light of the evidence on the mental and physical health needs of current and future residents to be housed at high densities, conformity with NPPF & the London Plan.</p> <p>We request policies which specifically call for major new development to include amenity space identified for their potential for residents to grow food.</p> <p>HCGA suggests amendments can be made to the Local Plan to make it sound and to meet the needs of current and future residents by either amending draft policies (see below) or by inserting a new policy on local food growing as you have for playspace and biodiversity.</p>	<p>Policy CF1 – Supporting Community Facilities and Services</p> <p><u>3d. Protect existing community gardens, encourage the provision of temporary spaces and identify new space for local food growing.</u></p> <p>Justification – <u>promotes social inclusion and targets issues of deprivation and the inequality gap.</u></p>
12	613	Imperial College Healthcare NHS Trust	Policy CF1 - Supporting Community Facilities and Services				<p>2.3 Section 6: Borough-wide Policies: Health</p> <p>The Trust welcomes the Council’s commitment to work together with our Trust as set out in Section 6 headed "Borough-wide Policies" where it is stated in paragraph 6.130 on "Health":</p>	

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							<p><i>"The council wishes to see the improved health and wellbeing of the community and will work with the Imperial College Healthcare NHS and other partners to achieve this objective. The council recognises there are changing health needs as a result of factors such as people living longer and more people living with long-term conditions like diabetes, heart disease, asthma and dementia. However, whatever the needs, the priority must continue to be to improve the health of all residents, to reduce health inequalities and to deliver new and improved health facilities in the borough."</i></p> <p>In the same section the document goes on to state in paragraphs 6.131 and 6.132:</p> <p><i>"The Imperial College Healthcare NHS' s [sic] strategy has led to the reorganisation of hospital facilities and other health services in the borough, including the closure of A&E services at Hammersmith Hospital. The council is concerned that such changes should not lead to the reduction of NHS services and particularly supports the continuation of A&E services at Charing Cross. The council supports the enhancement of existing facilities and provision of new services with capital receipts from sales of land and buildings where release has been justified."</i></p> <p><i>"In terms of secondary care, the three main hospitals operating in the borough (Queen Charlotte's Hospital, Hammersmith Hospital and Charing Cross Hospital) are managed by the Imperial College Healthcare NHS Trust which is one of the largest NHS trusts in the country. As part of the 'Shaping a Healthier Future' service re-modelling, due to be implemented in 2017, it has been announced that Charing Cross Hospital will become a world-class elective (non-emergency) surgery centre and will retain its local Accident and Emergency (A&E) service, along with other changes. The council will continue to work with</i></p>	

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							<p><i>its health delivery partners to protect hospitals and A&E units and to ensure adequate services are provided to support the existing and future population of the borough."</i></p> <p>The Trust welcomes the Council's position as set out in this section that it:</p> <p><i>"supports the enhancement of existing facilities and provision of new services with capital receipts from sales of land and buildings where release has been justified."</i></p> <p>As explained above, the closure of the emergency unit at Hammersmith Hospital in September 2014 was an entirely clinically driven decision. And as also stated above, Charing Cross Hospital will retain a 24/7 A&E appropriate to a local hospital and there will be no changes to the A&E at Charing Cross Hospital until 2021 at the earliest.</p> <p>While Section 6 makes reference to the 'Shaping a Healthier Future' programme to reshape hospital and out of hospital health and care services in North West London, the Proposed Submission Local Plan document is lacking in providing any further detailed information on these changes and the current development of the North West London Sustainability and Transformation Plan (see section 3 of this paper below).</p>	
25	283	Tri-Borough Public Health	Policy CF2 - Enhancement and Retention of Community Uses					<p><i>Policies CF2 and 3</i></p> <p>These would each be stronger for health and wellbeing if they referenced the contribution to social inclusion and community cohesion.</p>

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56	666	London Fire and Emergency Planning Authority	Policy CF2 - Enhancement and Retention of Community Uses				<p>We write in order to make further comment on the above named document. Please note that we act on behalf of the London Fire And Emergency Planning Authority (LFEPA) and that this representation is made on their behalf. For your information, the following LFEPA sites are within the borough:-</p> <ul style="list-style-type: none"> • Hammersmith Fire Station- 190/192 Shepherd's Bush Road, W6 7NL. • Fulham Fire Station- 685 Fulham Road, SW6 5Uj . <p>We note that Policy CF2 refers to the resistance of the loss of a community facility and the</p> <p>requirement for such a site or building to be reused for an alternative community use, or prove that such a use would not be viable.</p>	<p>We strongly resist this and request that the following wording be added:-</p> <p>'This is with the exception of fire station sites, which will not be subject to such restrictions on use.'</p> <p>This is requested as it is not appropriate for LFEPA to be bound by such restrictions regarding use. Whilst we understand that fire stations do provide a function with significant local benefit, the location of any fire station within a particular area is determined by strategic planning, including response times, fire cover, and other operational matters, with the purpose of ensuring that the whole of London is properly covered and is therefore quite often not located in a position suitable for other community uses. Furthermore, the sale of any surplus sites by LFEPA provides much required funding for the continued development of fire-fighting facilities to enable the London Fire Brigade to provide their essential services. In this context a fire station should not be considered in the same way as other community uses.</p>

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23	676	H&F Disability Forum	Policy CF2 - Enhancement and Retention of Community Uses				<p>We support the following Borough Wide Policies because they include accessible and inclusive designs, facilities or services. We also make comments where necessary.</p> <p>However, we consider that Policy CF 1 on high quality accessible and inclusive facilities should also apply to CF2</p>	
25	284	Tri-Borough Public Health	Policy CF3 - Enhancement and Retention of Arts, Culture, Entertainment, Leisure, Recreation and Sport uses					<p><i>Policies CF2 and 3</i></p> <p>These would each be stronger for health and wellbeing if they referenced the contribution to social inclusion and community cohesion.</p>
54	310	MP Kings Lyric S.A.R.L.	Policy CF3 - Enhancement and Retention of Arts, Culture, Entertainment, Leisure, Recreation and Sport uses				<p>We welcome the encouragement of the enhancement of arts, culture, entertainment, leisure and recreation and sports uses within Policy CF3.</p>	

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37	483	Eastern & Oriental PLC	Policy CF3 - Enhancement and Retention of Arts, Culture, Entertainment, Leisure, Recreation and Sport uses				<p><u>LBHF Support for Arts/Cultural Uses within the Borough</u></p> <p>Draft Policy CF3 asserts that the Council will support development proposals concerning the enhancement of arts, culture, entertainment, leisure, recreation and sport uses within the Borough. The supporting text regarding Policy CF3 also identifies that such arts/cultural facilities will be important elements of town centres and will be essential in supporting the Borough's wider growth, especially within the four regeneration areas.</p> <p>E&O are supportive of the Council's promotion of Cultural/Arts facilities within the Borough's regeneration areas and town centres, in association with new development. This approach will help to ensure linkages between new development and the Borough's existing Arts/Cultural assets, therefore resulting in a sustainable pattern of development/regeneration throughout the Borough. Specifically, this approach will help to cement the attractiveness of the Borough's regeneration areas to new visitors and future businesses.</p>	
76	501	Queens Park Rangers Football Club	Policy CF3 - Enhancement and Retention of Arts, Culture, Entertainment, Leisure, Recreation and Sport uses	NO	Yes	YES	<p>We welcome the support this policy gives to the enhancement of these uses, particularly for sport, leisure, recreation and entertainment.</p>	<p>However, we suggest that this policy should go further and give greater encouragement to the expansion, through relocation if appropriate, of the facilities that provide these uses. It should also acknowledge that appropriate enabling development could play an essential role in funding these facilities and then provide them with sustainable long-term futures.</p>

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40	585	MR PRASHANT BRAHMBHATT	Policy CF3 - Enhancement and Retention of Arts, Culture, Entertainment, Leisure, Recreation and Sport uses				Hammersmith by its name indicates an environment of creative engineering, entrepreneur, innovation, the planning has to have a focus on the overall image of the borough.	
23	247	H&F Disability Forum	Policy CF4 - Professional Football Grounds				We could not support this policy because it does not consider the needs of disabled spectators, workers or visitors. We consider policy CF4 should also include providing new or improving existing facilities so they are accessible and inclusive.	<p>Drafting Note: p117: Policy CF4: line 2: insert “accessible and inclusive” between “suitable” and “facilities”.</p> <p>Justification</p> <p>Policy CF4 to conform to LP policy 3.19 and para 3.114; LP policy 4.6; Accessible London para 4.11 and Implementation Point 37; See also guidance and standards in Accessible Stadia (2004); Olympic Delivery Authority Inclusive Design Standards (2008) and BS 8300: 2009; Accessible Sport Facilities (2010).</p> <p>This year we noticed planning applications for the new 60,000 seat Chelsea football ground are not fully meeting the needs of disabled football fans or visitors.</p>

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25	285	Tri-Borough Public Health	Policy CF4 - Professional Football Grounds					It might be fruitful to add in here a requirement for social and community gain from such redevelopments.
76	508	Queens Park Rangers Football Club	Policy CF4 - Professional Football Grounds	NO	YES	YES	<p>We welcome the recognition the supporting text of this policy gives to the important role that professional football plays in the Borough. However, as drafted, the wording of the policy could frustrate attempts to expand these activities. This is particularly the case where such an expansion would involve the relocation of the professional football club. Where this is the case, the redevelopment of the existing ground floor for an alternative use is likely to be the most beneficial outcome, both to avoid the retention of unsustainable and obsolete facilities and to provide enabling development to facilitate the relocation.</p> <p>Furthermore, it is also the case that this policy as drafted directly contradicts Strategic Site Policy WCRA2- White City West. As referred to above, this specifically states that any redevelopment of Loftus Road should be residentially led.</p>	If the wording of policy CF4 remains unchanged for other reasons, it should be expanded within text that specifically excludes Loftus Road from it to avoid frustrating the overall regeneration aims of the plan in White City.

10.Green & Public Open Space

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
17	155	Hammersmith Society	Green and Public Open Space				Green and Public Open Spaces : Policies OS1 – OS5 : We support these policies in principle with the following exceptions:	
38	495	Greater London Authority and Transport for London Planning Team	Green and Public Open Space				The Mayor welcomes the borough's proposed continued protection of its Metropolitan Open land and other open spaces and it's commitment to improving existing parks and recreational facilities throughout the borough. The Parks and Open Spaces Strategy 2008-2018 identifies several areas of existing deficiency in open space, nature conservation and children's play areas throughout the borough. There will be opportunities for providing new open spaces and play areas for children in the borough's regeneration areas, and this should help reduce the deficiency of open space in the borough overall and in areas on the eastern border of the borough.	
5	599	Hammersmith Community Gardens Association	Green and Public Open Space	NO			<p>The Hammersmith and Fulham draft Local Plan does not fully reflect the national planning policy framework with regard to community health and food growing; nor does it apply relevant food growing policies of the London Plan.</p> <p>Our submission illustrates how incorporating policies on providing space for community food growing into the Local Plan will make it a <i>sound</i> plan.</p> <p>National Planning Policy Framework</p> <p>The significance of food growing to healthy communities is reinforced in the Guidance to the NPPF where a healthy community is defined as a place where active healthy lifestyles are made easy through "the pattern of development,</p>	<p>HCGA suggests amendments can be made to the Local Plan to make it sound and to meet the needs of current and future residents by either amending draft policies (see below) or by inserting a new policy on local food growing as you have for playspace and biodiversity.</p> <p>New Policy</p> <p>A new Local Plan policy would cover the following points:</p>

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							<p>good urban design, good access to local services and facilities" and there are "green open space and safe places for active play and food growing".</p> <p>The National Planning Policy Framework (NPPF) sets out twelve core planning principles for delivering sustainable development that should underpin plan-making. Community food growing can make a contribution towards the following priority headings in the Framework:</p> <p>Delivering a wide choice of high quality housing</p> <p>Requiring high quality design and a good standard of amenity</p> <p>Promoting healthy communities</p> <p>Meeting the challenge of climate change and flooding</p> <p>Conserving and enhancing the natural environment</p> <p>Community food growing can specifically contribute towards principle 9 of the National Planning Policy Framework:</p> <p>"promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)." Principle 9, National Planning Policy Framework, Paragraph 17</p> <p>The NPPF also recognises food production as one of the benefits of providing natural environments (ecosystem services) (paragraph 109).</p>	<p><u>a) Protect existing community food growing spaces.</u></p> <p><u>b) Encourage the temporary use of vacant sites and land awaiting development.</u></p> <p><u>c) Require all development to incorporate measures that will contribute to on-site sustainable food production (from productive landscaping through to spaces suitable for food growing) commensurate with the scale of development.</u></p> <p><u>d) Use planning conditions or Section 106 agreements to secure space for food growing in new development as part of the essential infrastructure required for that development.</u></p> <p><u>e) Request landscape plans demonstrate the potential use of any open space for community food growing. Integrate community food growing spaces, productive trees and plants in any landscaping proposal as part of a cohesive design of the development – recognising that these are good for wildlife and people.</u></p> <p><u>f) Ensure the design and layout of open space in new development is flexible so that spaces may be adapted for growing opportunities in the future.</u></p>

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							<p>The London Plan</p> <p>The London Plan aims to protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure and specifically supports the use of land for growing food. The Plan recognises the health and social benefits of the use of land for growing food near to the communities it serves.</p> <p>Two policies within the London Plan encourage boroughs to increase the provision and protect spaces for food-growing.</p> <p>London Plan Policy 2.18 states that enhancements to London's green infrastructure should be sought from development when planning decisions are taken. Moreover this policy seeks borough open space strategies to identify priorities for addressing open space deficiencies. Open space strategies should set out positive measures for the management of green and open space. Boroughs' Development Plan Document (DPD) policies should aim to realise the current and potential value of open space to communities. Local policies should seek the widest range of linked environmental and social benefits including as a place for local food production, in line with the Mayor's Capital Growth strategy.</p> <p>London Plan Policy 7.22, Land for Food, encourages local authorities to protect existing allotments. They should also identify other potential spaces that could be used for commercial food production and community food-growing, including for allotments and orchards. Innovative approaches to the provision of spaces may need to be followed, particularly in inner and central London; these could include the use of green roofs.</p>	<p><u>g) Include maintenance plans as part of an application to ensure spaces will be managed successfully.</u></p>

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							<p>Sustainable Design and Construction – Supplementary Planning Guidance (SPG) 2014</p> <p>The London-wide SPG applies to London Plan Policies 2.18, 3.2, 5.3, 5.10, 5.11, 5.21, 7.18 & 7.22. The SPG recognises that growing food locally involves a range of activities that have health and community benefits. Developers should investigate the demand and opportunities for providing food growing space on their site. Food growing space should be secured when opportunities arise. This could be temporary or permanent. Low maintenance herbs and other edible plants can be incorporated into roof gardens or landscaping schemes; non-active parts of large construction sites have been used for food growing.</p> <p>The Mayor’s best practice is to provide space for individual or communal food growing, where possible and appropriate, and to take advantage of existing spaces to grow food, including adapting temporary spaces for food growing.</p> <p>We object to the lack of consideration of how to apply the NPPF and London Plan to encourage food growing as the key to a health community for current and future residents of Hammersmith and Fulham. Without this the Local Plan is missing out on contributing to some of the key priority headings within the NPPF.</p> <p>The draft local plan does not represent the London Plan’s strategy that the local plan should aim to realise the current and potential value of open space to communities for local food production that is linked to social and environmental benefits (London Plan Policy 2.18).</p> <p>Community food growing spaces contribute to high quality design and the provision of a good standard of amenity for existing and future residents within</p>	

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							<p>housing developments. Community food growing spaces are places where residents feel more involved with their surrounding open space and take more care of their environment. Provision of food growing spaces at the very local level provides residents with a wider range of amenity land to meet differing needs and interests. Local food growing spaces designed into residential development helps makes settlements more liveable. This is most relevant on high density developments with little or no private open space. Amenity spaces should be designed flexibly so that food growing may be incorporated in the future.</p> <p>Hammersmith Community Gardens Association (HCGA) is a local environmental charity who manages community gardens in Hammersmith and Fulham. We run several projects that show how community food growing is beneficial to the borough, including "Grow Well" and "Get Out There" which are valuable tools to promote social inclusion.</p> <p>- Get Out There - targets unemployment that is a noted issue in the draft local plan. It gives them the opportunity to learn new skills</p> <p>- Grow Well – therapeutic gardening sessions to give carers a break and to support people with physical and mental disabilities.</p> <p>In 2015, approximately 3,500 residents across the Borough took part in community gardening, developing community spaces and community and food growing activities https://www.lbhf.gov.uk/community/information-voluntary-sector/currently-funded-organisations/3rd-sector-performance-category#safer</p> <p>There is a thriving interest in local food growing and the regeneration areas should also provide opportunities for future residents to engage in food growing</p>	

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							<p>with their immediate neighbours. https://www.lbhf.gov.uk/community/information-voluntary-sector/currently-funded-organisations/hammersmith-community-gardens-association</p> <p>The draft Local Plan mentions the difficulty of the community uses meeting the needs of vulnerable households. The work of HCGA and other community growers in the borough provides evidence of how community food growth can help. HCGA are currently managing a community food growing programme in Normand Park where 30 local families have the opportunity to grow their own food in purpose built raised beds.</p> <p>Urban developers are increasingly realising the environmental and social benefit of community gardens. Within the Borough, HCGA participates in the White City Forum that meets on a regular basis with developers in the White City Area. St James and BBC developers have expressed interest in incorporating high quality green space into their developments. Mite and Mace and Taylor Woodrow have all supported development of Phoenix School Farm</p> <p>The benefits of food growing are recognised in local primary schools. HCGA is currently working in Ark Swift, Randolph Beresford Children's Centre and Family Annex, Flora Gardens School, Sullivan School, St Augustines. Hammersmith Academy have also recently created a food production area</p> <p>A good example of community action and beneficial use of land on the Borough border is the greenhouses and 30 growing beds on Olympia Station.</p> <p>Local Examples of Food growing are attached to representation.</p>	

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							<p>HCGA objects to the lack of policies to support the provision of local food growing spaces within new development and considers this makes the plan unsound in the light of the evidence on the mental and physical health needs of current and future residents to be housed at high densities, conformity with NPPF & the London Plan.</p> <p>We request policies which specifically call for major new development to include amenity space identified for their potential for residents to grow food.</p> <p>To summarise, HCGA would like to see provision for food growing spaces within the landscaping plans of all new major housing developments so that future residents will have the option to engage in gardening whilst socialising with neighbours, learning new skills and keeping healthy.</p> <p>Sustain has published a practice guide for local plan makers with examples from across the UK. <i>Planning sustainable cities for community food growing: A guide to using planning policy to meet strategic objectives through community food growing</i> http://www.sustainweb.org/publications/?id=295</p>	
	53	Mr Jon Burden	Policy OS1 - Parks and Open Spaces	NO	YES	YES	<p>We welcome the provision of public open spaces as part of private developments. We want residents to have the same access rights to any private green spaces given planning approval or planning benefits to the developer. It is not reasonable for a private developer to control something that has been designated as Public Open Space.</p>	Enusre privately provided Public Open Space is governed by public access arrangements that apply to public spaces.

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8	36	Hammersmith and Fulham Air Quality Commission	Policy OS1 - Parks and Open Spaces					<p>Hierarchy and status of parks and open space , p.118</p> <p>6.148 – insert and amend ‘.... open space is important for <i>quality of life, clean air, reduction of urban heat</i> and enhancing biodiversity...’</p> <p>Include open space as a multipurpose benefit.</p>
68	100	Fulham Society	Policy OS1 - Parks and Open Spaces				<p>Green and Public Open space . Para 6.147 “ In a densely built up area like Hammersmith and Fulham, the local environment and public spaces are very important” and para 6. 149 “the Council’s 2006 Open Spaces Audit reveals that Hammersmith and Fulham has relatively little open space per person and with more people living and working in the borough, the improvement of existing parks and open spaces and facilities within them, and the provision of more public open space and private amenity space as part of new developments will be important, particularly in areas of deficiency”. Developers always make much play of the amount of green planting between blocks of houses and along the pathways. Areas between large residential buildings tend to be viewed as private not public space, and being overlooked are not attractive relaxing spaces and so tend not to be used. They are not the same as park area where there are opportunities for games and outdoor playing space, the importance of which in a densely built up area such as Fulham is stressed in para 2.47.</p>	

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							<p>The suggestion is that a park of a minimum of 2 hectares should be included in major developments. No developer will provide more than the minimum - and in the enormous Earls Court development I am not sure they are even planning that. This area is seriously short of green space now and the proposed development provides for very little.</p> <p>We strongly support para 6.163 which states the loss of trees will not be acceptable without good cause, particularly if subject to a Tree Preservation Order.</p>	
9	114	Mr Nicolas	Policy OS1 - Parks and Open Spaces				<p>Having now read your draft Local Plan and having been asked to provide my comments please find these below.</p> <p>I find that the Plan has not been positively prepared particularly in relation to the protection of The West London Railway Corridor.</p>	

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		Crosthwaite					Again, the Map on page 119 Map 6 Open Space does not highlight the West London Railway Corridor at all. The corridor is without question an 'open space'.	
17	156	Hammersmith Society	Policy OS1 - Parks and Open Spaces					Policy OS1 : We consider that there should be a para.(d) to the effect that all existing open space be retained and not build on.
23	248	H&F Disability Forum	Policy OS1 - Parks and Open Spaces				We could not support this policy as it stands because it does not consider the parks and open space recreation needs of disabled people or require proposals for new public and private open space to be accessible and inclusive in contrast to policy OS2.	Drafting Note: p 118: Policy OS1: b: 1 st line: insert : “accessible and inclusive” between “new” and “public” Justification: consistency with policy OS2 OS1 to conform with <i>London Plan</i> policy 7.2 an inclusive environment; 3.6 children and young people’s play and <i>BS 8300</i> ; <i>Mayor of London SPG: Accessible London (2014)</i> see 4.1. Lifetime Neighbourhoods; 4.2 Public realm, amenity and play space; 4.11 Access to sport.
25	286	Tri-Borough Public Health	Policy OS1 - Parks and Open Spaces					<i>Policies OS1 and 2</i> These would both be strengthened with a commitment to increasing the Borough’s ratio of open space to residents at every opportunity

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44	358	Hammersmith & Fulham Historic Buildings Group	Policy OS1 - Parks and Open Spaces					<p>p118</p> <p>Add – <i>endeavour to ensure a high level of maintenance throughout the Borough’s open spaces, where necessary by planning conditions or sponsorship.</i></p> <p>Justification. Poor maintenance gives rise to abuse, litter, disrespect and vandalism.</p> <p>6.148 Agree, add - hierarchy <i>to be kept under regular review</i></p> <p>Designation is important when defending open space against development</p>

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								6.150 /6.151 Agree. <i>Add - any open space provided/ created as part of new development should have maintenance funding ensured either by planning conditions or sponsorship.</i>
5	605	Hammersmith Community Gardens Association	Policy OS1 - Parks and Open Spaces	NO			<p>HCGA objects to the lack of policies to support the provision of local food growing spaces within new development and considers this makes the plan unsound in the light of the evidence on the mental and physical health needs of current and future residents to be housed at high densities, conformity with NPPF & the London Plan.</p> <p>We request policies which specifically call for major new development to include amenity space identified for their potential for residents to grow food.</p> <p>HCGA suggests amendments can be made to the Local Plan to make it sound and to meet the needs of current and future residents by either amending draft policies (see below) or by inserting a new policy on local food growing as you have for playspace and biodiversity.</p>	<p>Policy OS1 – Parks and Open Spaces</p> <p>d. <u>protect and provide space for community food growing.</u></p> <p>Justification – <u>food growing spaces provide access to open space and provide areas to improve biodiversity and flood management.</u></p>
7	672	Sport England	Policy OS1 - Parks and Open Spaces		YES		<p>Open Space</p> <p>Parks and open space have a significant contribution to formal and informal sport participation, especially as most open spaces are considered playing fields and provide playing pitches. Sport England therefore welcomes Policy OS1 that seeks to protect, enhance and create open space provision.</p>	

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18	205	Old Oak and Park Royal Development Corporation	Map 6 Open Space				Map 6 This should show and grey out the OPDC area.	
70	444	Friends of Margravine Cemetery	Map 6 Open Space				Map 6 – Open spaces This map is misleading as certain areas are designated as ‘open spaces’ such as Queens Club which is a private members’ club. This high density area thus looks as if it has greater areas of accessible open space than is the case. Wormwood Scrubs has no colour.	
7	13	Sport England	Policy OS2 - Access to Parks and Open Spaces	NO	YES		<u>Open Space</u> The stance of Policy OS2 is supported, in that development on public open space and other green space would be refused unless the sport, leisure and recreational function is preserved.	However, Sport England strongly advise that this policy is reworded to ensure that development would not result in the loss of all, or part of, a playing field. This would then align with Sport England’s statutory role and playing field guidance mentioned above.
8	37	Hammersmith and Fulham Air	Policy OS2 - Access to					6.153 , p.120 – delete entire paragraph as too loosely worded. Policy on open space and development is clearly stated in OS2, and the

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
		Quality Commission	Parks and Open Spaces					justification in 6.153 opens loopholes and is potentially ambiguous.
17	157	Hammersmith Society	Policy OS2 - Access to Parks and Open Spaces				6.154 : We support the principle but not the suggestion that the provision should be secured 'if appropriate, elsewhere in the borough'.	OS2 (a) text including and after 'unless' should be deleted and OS2 text deleted. Reason: The current wording offers encouragement to seek ways of inserting development on open space. As open space becomes an increasing small proportion of the borough resources, there are few if any circumstances where such development could be envisaged.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<p>OS2(e) should be added in re allotments, eg “seeking inclusion of allotments in open space on new developments”. Reason: there is only one allotment site in the borough, at Fulham Palace, which has long waiting lists, and the ability of allotments to contribute to well-being and biodiversity is well attested.</p> <p>6.153 should be considered for deletion while retaining the last sentence.</p> <p>6.155 “In some cases a contribution to secure improvements in existing open space rather than provision of new open space, will be appropriate”.</p> <p>We are opposed to this policy and consider it should be deleted because (i) such contributions seem now to go into general funds and are rarely translated into visible “improvements” (ii) the practice is so widespread that the borough’s exiting open spaces should by now be all in an exemplary</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								state if the policy were properly implemented, and (iii) the idea that “better signage” (line 5) is equivalent to provision of new open space, highlights the inadequacy of this policy.
25	287	Tri-Borough Public Health	Policy OS2 - Access to Parks and Open Spaces					<i>Policies OS1 and 2</i> These would both be strengthened with a commitment to increasing the Borough’s ratio of open space to residents at every opportunity
28	296	Hammersmith Mall Residents Association	Policy OS2 - Access to Parks and Open Spaces				Policy OS2: Access to Parks and Open Spaces We welcome the presumption against development on existing open green space and fully support the protection of existing parks and open spaces and the creation of new green and open spaces where opportunities arise. These areas make a significant contribution to improving quality of life and the environment in the borough.	
44	359	Hammersmith & Fulham Historic	Policy OS2 - Access to Parks and Open Spaces				p120 The Group is strongly in favour of making Public open spaces accessible to residents and visitors	<i>b. add including those with limited mobility</i>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
		Buildings Group						<p>6.153 'the council will restrict their use for private events and use by out of borough school' add <i>unless reciprocal arrangements are in place,</i></p> <p>This could result in reduced traffic and associated pollution.</p>
43	620	Church Commissioners of England	Policy OS2 - Access to Parks and Open Spaces					<p>II. Green and Public Open Space</p> <p>We suggest paragraphs A and B of policy OS2 should be amended to read:</p> <p><i>" A. refusing development on public open space and other green open space of borough-wide importance (see Appendix 3 of Proposals Map) unless it can be demonstrated that such development would not substantially harm its open character..."</i></p> <p>After bullet point one under B, another bullet point be added:</p> <p><i>"the redevelopment of existing developed sites on the edge of green spaces or parks will be supported."</i></p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
17	159	Hammersmith Society	Policy OS3 - Playspace for Children and Young People					Policy OS3 We consider that facilities for teenagers should be included.
25	288	Tri-Borough Public Health	Policy OS3 - Playspace for Children and Young People					<i>Policy OS3</i> This should be strengthened, offering a commitment to ensuring that any development enhances children and young people's playspace and secures a reduction of the Borough's deficient in provision whenever possible; no net loss or increased deficit becoming the minimum requirement.
44	360	Hammersmith & Fulham Historic Buildings Group	Policy OS3 - Playspace for Children and Young People				Policy OS3 Playspace for children and young people p121 6.156 Is the programme for refurbishment of Play Areas dependent on S106 or other monies from nearby developments?	
7	671	Sport England	Policy OS3 - Playspace for		YES		Open Space	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
			Children and Young People				The protection and provision of playspace for children and young people, set out in Policy OS3, would help create a sporting and active habit from a young age and in this regard reflects Sport England's Strategy 'Towards an Active Nation'.	
9	113	Mr Nicolas Crosthwaite	Policy OS4 - Nature Conservation				<p>Having now read your draft Local Plan and having been asked to provide my comments please find these below.</p> <p>I find that the Plan has not been positively prepared particularly in relation to the protection of The West London Railway Corridor. While it is acknowledged that 'the railway corridor is designated partly as a green corridor and SINC of Borough wide importance and it is important these ecological resources are protected and enhanced'(5.89), the map numbered 7 on page 123 does not show/define the FULL length of the green corridor.</p> <p>The map indicates that the green corridor stops short of the designated LBHF Conservation Area -The Billings and Brompton Conservation Area No 31 and then picks up again at the end of The north end of The Brompton Cemetery. This would appear to be contradictory by definition and needs rectifying.</p> <p>The Local Plan makes the statement that it 'honours the protection afforded by Conservation Areas' and seeks 'to expand the Borough's green infrastructure, increase biodiversity and enhance the Borough's natural and built environment'; it is therefore most important that maps and drawings indicating these existing green corridors and spaces are accurate.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<p><u>The GLA documents mentioned above in Box 6 are added to the list of London policy documents ;</u></p> <p><u>Appropriate wording gleaned from Box 56 above is added in the relevant places in paragraphs 6.159 – 6.163.</u></p>
17	160	Hammersmith Society	Policy OS4 - Nature Conservation					Policy OS4 – We consider that a. and b. should be deleted (see comment on OS2 (a) and (b))
19	220	Natural England	Policy OS4 - Nature Conservation				Natural England welcomes the inclusion of Green Infrastructure (GI) in your policies OS4 and OS5	
28	297	Hammersmith Mall Residents Association	Policy OS4 - Nature Conservation				HAMRA fully supports Policy OS4 for the protection of nature conservation areas and green corridors, particularly with respect to the River Thames. We welcome the strengthening and improvement of green corridors along the river and throughout the borough.	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
44	361	Hammersmith & Fulham Historic Buildings Group	Policy OS4 - Nature Conservation					<p>Policy OS4 Nature Conservation p122</p> <p>a) Disagree this is not a practical alternative and should be deleted.</p> <p>b) Disagree this is not a practical alternative and should be deleted.</p> <p>6.158 ' <i>Equal nature conservation value</i>' is hard to quantify, provision is insufficient, correct long term management is essential all of which should be guaranteed by planning conditions. Ecosystems and natural regenerating areas cannot easily be created artificially.</p>
18	206	Old Oak and Park Royal Development Corporation	Map 7Nature Conservation Areas				<p>Map 7</p> <p>This should show the OPDC area and grey it out. OPDC will through its Local Plan policies map be responsible for designating nature conservation areas.</p>	

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
70	437	Friends of Margravine Cemetery	Map 7 Nature Conservation Areas					<p>Map 7 – Nature Conservation Areas</p> <ol style="list-style-type: none"> Margravine Cemetery should be coloured as of Borough Importance (listed correctly as Grade II Borough -wide importance in Appendix 4). It's status was raised in an earlier plan after submission of substantial and factual evidence of its rich biodiversity. <p>(See under comments on Appendix 3 and 4 that it should now be referred to as Margravine Cemetery not Hammersmith.)</p>
8	38	Hammersmith and Fulham Air Quality Commission	Policy OS5 - Greening the Borough					6.161 , p.124 – insert ‘... improved local air quality. <i>Walking in green areas has also been shown to improve the physical and mental health of participants.</i> ’
19	221	Natural England	Policy OS5 - Greening the Borough				Natural England welcomes the inclusion of Green Infrastructure (GI) in your policies OS4 and OS5	
27	290	Mrs Louise	Policy OS5 - Greening the Borough				<p>On Greening the borough , initiatives which I particularly welcome are:</p> <p>-recent schemes to make local council estates greener and more environmentally friendly - in conjunction with Groundwork: a fantastic project,</p>	<p>-your wanting to protect existing trees: great. Please add to the 'greening borough' section your commitment (stated at the introduction of your local plan) your commitment to also plant more</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
		Rowntree					<p>which I note you have already started to deliver on. One, cheap, proposal for adding to it: the greening process can be vertical too: use building facades to add to the 'greening' process: it's cheap to grow climbers on building facades, and if you choose one like star jasmine, it doesn't affect the brickwork,</p> <p>-your commitment to greener back and front gardens: ideally (as we discussed by phone) the council would impose a minimum percentage of front garden space which needs to be devoted to green space. This would help (cleaner air, rain water can drain whereas now, with the fashion for tiling or concreting over front gardens, it can't) the environment, and make the borough more attractive</p> <p>-borough-wide gardening day: we started this scheme in Brussels and it was a huge success, both in terms of building a community, and making spaces greener. The council committed to fund some plants, and residents would arrive - gardening tools and shovels in hand - to plant them. You could start with one scheme, and build on that throughout the borough.</p>	<p>trees. I realise this is a constant tug of war between residents who don't want any outside their house, but so many more do.</p> <p>Finally, I'd welcome the opportunity to attend one of the council meetings debating this plan, and perhaps answer any questions the council might have about my ideas, or explain in more detail how a Local Gardening Day could work. Warning, I am a Liberal Democrat (although, again, these views are my personal views).</p>
44	362	Hammersmith & Fulham Historic Buildings Group	Policy OS5 - Greening the Borough					<p>p124</p> <p>6.163 ' <i>Trees indigenous to this country</i>' suggest <i>primarily</i> is inserted.</p> <p>Add <i>Where trees are planted on development sites or in the public realm due consideration should be given to their future welfare, and should include the provision for their ongoing maintenance. Trees planted within paved areas should be surrounded by</i></p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<i>a porous surface as detailed in the LBHF's 'Street Smart' document.</i>
5	607	Hammersmith Community Gardens Association	Policy OS5 - Greening the Borough	NO			<p>HCGA objects to the lack of policies to support the provision of local food growing spaces within new development and considers this makes the plan unsound in the light of the evidence on the mental and physical health needs of current and future residents to be housed at high densities, conformity with NPPF & the London Plan.</p> <p>We request policies which specifically call for major new development to include amenity space identified for their potential for residents to grow food.</p> <p>HCGA suggests amendments can be made to the Local Plan to make it sound and to meet the needs of current and future residents by either amending draft policies (see below) or by inserting a new policy on local food growing as you have for playspace and biodiversity.</p>	<u>f. requiring new development to include provision for local food growing within their landscape plans.</u>
59	673	Woodland Trust	Policy OS5 - Greening the Borough	NO			<p>The Local Plan is not sound as it doesn't reference the Access to Nature principle of London Plan Policy 7.19.</p> <p>Section F) of this policy directs borough LDFs to " <i>identify areas deficient in accessible wildlife sites and seek opportunities to address them</i> ".</p>	<p>Therefore, I suggest that:</p> <p><u>Areas of Deficiency in Access to Nature are added to the Proposals Map;</u></p> <p><u>The following line is added to Policy OS5 - Greening the Borough:</u></p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>Section C states: “ <i>Development Proposals should: ...b prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites</i> ”</p> <p>The Mayor of London’s Biodiversity Strategy <i>Connecting with London’s Nature</i>(GLA, 2002) ^[1] sets out the principles of access to nature, and the <i>All London Green Grid</i> SPG (GLA, 2012) ^[1] has further detail on mapping and addressing areas of deficiency. The London Plan Implementation Report <i>Improving Londoners’ Access to Nature</i> (GLA, February 2008) ^[1] is the definitive practical document on how areas of deficiency could be addressed.</p> <p>The Trust has produced the Woodland Access Standard (<i>Space for People</i>, Woodland Trust, 2015: www.woodlandtrust.org.uk/publications/2015/02/space-for-people/), now adopted by the Forestry Commission, and has information at a London borough level of where deficiencies in access to woodland lie, which should help inform the creation of new wooded open spaces as part of your approach to reducing areas of deficiency.</p>	<ul style="list-style-type: none"> • <u>“Development within areas deficient in accessible wildlife sites and accessible woodland should contribute to addressing those deficiencies.” ;</u> <p><u>The GLA documents mentioned above in Box 6 are added to the list of London policy documents ;</u></p> <p><u>Appropriate wording gleaned from Box 56 above is added in the relevant places in paragraphs 6.159 – 6.163.</u></p>

11.River Thames

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
17	163	Hammersmith Society	River Thames				<p>Grand Union Canal</p> <p>While it is accepted that the Canal falls within the OPDC area, this is briefly mentioned in para2.51 on p17, it should be included in this part of the Plan too as the part of the Grand Union Canal which runs through the Borough, is a very important feature. It was declared a designated Conservation Area by the Council in 2002 in recognition of its industrial archaeological importance and contribution to the amenities of this part of the borough and its importance as a nature conservation resource. There should be mention of it in the Hammersmith and Fulham Local Plan to stress the importance of a high standard of design of any redevelopment and a presumption against tall buildings adjacent to the canal with improved linkages where appropriate. Opportunities for watersports and public access for leisure, tourism and educational use should also be mentioned and encouraged.</p>	
31	326	Port of London Authority	River Thames				<p>As advised above, it is important that the River Thames is embedded within a strategy, as part of the new Local Plan, which recognises and exploits the opportunities provided by the Borough's location by the river. It is also important that the protection and enhancement of the distinctive riverscape is incorporated within river related policies (and it is pleasing to note that there has been a specific river related policy included). The river is also an important environment, which should be preserved.</p> <p>The new Local Plan provides the Borough the opportunity to adhere to the aims and objectives of the Thames Vision. The PLAs Thames Vision is about planning for the river's future, so that we can make the most of its potential, for the benefit of all. The Vision seeks to consider all Thames uses together: trade, travel, leisure and pleasure. The PLA would encourage the new Local Plan for Hammersmith & Fulham to seek to promote the river in a</p>	<p>Going forward, priorities around the development of the river and its foreshore (albeit access to the Foreshore is included) should be given, which will vary depending on location and will lend themselves to different opportunities. This could take the form of maximising the potential of the Safeguarded Wharves, promoting and protecting the environment, creating an attractive place to live or encouraging people to travel by river.</p>

						comparable way, setting a growing river use in its context as a great natural asset, which must be conserved and improved – in terms of its water quality, wildlife and attractiveness as an open space. It is disappointing that more has not been made of these opportunities to date.	
48	660	London Borough of Richmond	River Thames			<p>River Thames</p> <p>The river is a major asset in the environmental quality of Hammersmith and Fulham and LBRuT. In Hammersmith & Fulham (H&F) there are a number of vacant and underused sites and premises along the Thames which have significant potential for more intensive development. However, H&F recognise any development of riverside sites will need to respect the unique character of the river and will need to enhance the vitality of the riverfront whilst improving public access to the Thames for recreation and sporting activities.</p> <p>The Thames Strategy Kew to Chelsea document provides detail of the character of riverside environment to be preserved. The parts of H&F visible from LBRuT along the river are all designated as Conservation Areas. H&F's Spatial Vision, which states: “ <i>Developments along the River Thames will have respected the special character of this waterway and will have increased both public access and the use of the waterways, as well as enhancing biodiversity and improving flood defences where required</i>” can be supported .</p>	
7	64	Sport England	Policy RTC1 - River Thames			<p><u>The River Thames</u></p> <p>The River Thames provides an opportunity for water based sport and activities therefore Sport England are pleased to note Policy RTC1 seeks ‘<i>new developments to provide opportunities for water based activities where appropriate</i>’ which could be applied to sport and recreational activities in and around the river.</p>	

17	162	Hammersmith Society	Policy RTC1 - River Thames			<p>River Thames RTC1 – p125</p> <p>We generally welcome the provisions of this policy but there is no longer any mention in the draft Plan of the requirement outlined in the 2011 Plan (Core Strategy Para. 8.66 – Page 116 – Last bullet) that there will be a presumption against tall buildings along the river, with the exception perhaps of the South Fulham regeneration area. We would urge that this be included in the revised Plan.</p> <p>6.169 : There are Conservation Areas adjacent to the river with important historic residential buildings which need to be recognised in the policy.</p>	Further details of the qualities and character of the river and riverside are included in the Thames Strategy Kew to Chelsea and mention of it should be incorporated into the Plan here as well as being in the overview in para 2.49 p17.
28	298	Hammersmith Mall Residents Association	Policy RTC1 - River Thames			<p>Protection of the River Thames is of primary importance to HAMRA. To a large part, the river is the key feature which makes Hammersmith Mall so special and unique.</p> <p>HAMRA support the aims of Policy RTC1 in relation to: protecting existing water dependent uses of the River Thames; requiring new development to provide opportunities for water-based activities; safeguarding and enhancing flood defences; encouraging public access to the river; and ensuring the provision, improvement and greening of the Thames Path in all riverside developments.</p>	
31	328	Port of London Authority	Policy RTC1 - River Thames			<p>Again, whilst not specifically relevant to the PLAs interests, it seems appropriate to reiterate the fact that the river provides leisure opportunities and so where practicable (Paragraph 6.166), it would be beneficial to consider development which utilises the Thames in terms of the leisure and recreational opportunities. This would accord and further boost the Boroughs ability to reach its aims and objectives in river use promotion, as well as being in line with the Thames Vision itself. This would also aid in achieving the Borough’s goals in achieving a healthy and active community.</p>	

31	338	Port of London Authority	Policy RTC1 - River Thames				<p>Safeguarded Wharves</p> <p>Within Policy RTC1, the policy only appears to seek to protect existing uses, rather than the promotion of new ones, particularly the transport of passengers and freight. This is not, in the PLAs view, in general conformity with the London Plan. Indeed, paragraph 6.164 notes the importance of the river as a transport resource.</p>	The Policy must include a reference to supporting the expansion of the river in accordance with the London Plan, particularly for the transport of freight and passengers.
31	339	Port of London Authority	Policy RTC1 - River Thames				<p>Paragraph 6.166. The PLA would contend that the particular issue (if indeed there is an issue) with the safeguarded wharves and the development of land adjoining these sites. The Council's approach to Sites adjacent to safeguarded wharves as outlined in this paragraph appears in accordance with the London Plan, although development next to wharves should have more than 'regard' to the relevant policies within the London Plan. Further emphasis on this matter is given within paragraph 6.179.</p>	
43	621	Church Commissioners of England	Policy RTC1 - River Thames					<p>III. River Thames Policy</p> <p>We suggest that the word 'public' is inserted into paragraph 6.1.64:</p> <p>"The River Thames is of considerable benefit to Hammersmith and Fulham and is of strategic importance to London as a whole. The Thames Policy Area designation and associated policies aim to protect the features of the riverside and of the river, including the Chelsea Creek, particularly its environmental quality and importance as:</p> <ul style="list-style-type: none"> • A major linear <i>public</i> open space which is particularly important in an area with limited parks and open spaces."

77	623	Environment Agency	Policy RTC1 - River Thames	YES	YES	YES	<p>We welcome the requirement to engage with the Environment Agency in respect to development adjacent to the River Thames outlined in paragraph 6.167.</p>	<p>We request that the following wording be included as a minor amendment to ensure that the policy guides development to take into account both the flood risk and biodiversity aspects of the Thames Estuary 2100 plan and the requirements of the Water Framework Directive set out in the Thames River Basin Management Plan.</p> <p>Development adjoining the River Thames must:</p> <ul style="list-style-type: none"> - Maintain and where necessary enhance or raise flood defences in line with the requirements of the Thames Estuary 2100 Plan, - Seek improvements to the tidal foreshore in line with the requirements of the Thames River Basin Management Plan and the Thames Estuary 2100 Plan
28	299	Hammersmith Mall Residents Association	Policy RTC2 - Access to the Thames Riverside and Foreshore				<p>Policy RTC2: Access to Thames Riverside and Foreshore:</p> <p>HAMRA broadly supports the aims of improving public access to the riverside and foreshore; enhancement of the Thames Path; and promotion of enjoyment of riverside heritage assets and open spaces.</p> <p>However, HAMRA have considerable concerns about the policy of making the entire riverside walk accessible to cyclists. We wish to stress the importance of the policy text: <i>if this can be achieved without risk to the safety of pedestrians and river users.</i></p> <p>The riverside walk along Lower Mall, though Furnivall Gardens, Dove Passage, Upper Mall, past the Old Ship pub and through the Upper Mall open space is heavily used by many different users: pedestrians, rowers, pub</p>	<p>In our view, the policy needs to be much stronger and should place much greater emphasis on the use of traffic calming measures and/or the introduction <u>and enforcement</u> of 'walk your bike' sections, in order to ensure that the Thames Path can be properly enjoyed by all its users.</p>

							<p>goers, parents with small children, dog walkers, etc. – and cyclists speeding and weaving along the Mall, often with scant regard for other users constitute a long-standing problem for the area.</p> <p>HAMRA welcomes responsible cyclists and we acknowledge that the Thames Path is an extremely pleasant cycle route, but experience tells us that achieving safe shared use of the riverside walk by cyclists, pedestrians and river users is nigh on impossible.</p>	
31	340	Port of London Authority	Policy RTC2 - Access to the Thames Riverside and Foreshore				<p>Access to the Foreshore</p> <p>Whilst the PLA support improvements to the Thames Path and riverside walk, Policy RTC2 relates specifically to access to the foreshore. The foreshore is a potentially dangerous environment, which, as paragraph 6.170 notes, is primarily in the ownership of the PLA. The Policy appears to require access to the foreshore to be safe, regardless of whether the foreshore in the vicinity of any access is actually safe to be on.</p>	
77	624	Environment Agency	Policy RTC2 - Access to the Thames Riverside and Foreshore	YES	YES	YES	<p>We welcome the requirement in Policy RTC2 that all proposals for enhancements to access to the Thames riverside and foreshore do not adversely affect flood defences.</p>	<p>We request that the following minor amendment to the wording be included to ensure that the policy guides development to take into account the specific actions outlined in the Thames Estuary 2100 plan</p> <p><u>All proposals must:</u></p> <p><u>Maintain and where necessary enhance or raise flood defences in line with the requirements of the Thames Estuary 2100 Plan</u></p>
58	180	Historic England	Policy RTC3 - Design and					Policy RTC3 Design and Appearance of Development within the Thames Policy Area

			Appearance of Development within the Thames Policy Area					In line with Historic England's comments above, we recommend that the third bullet in this policy is amended to read 'natural, built and historic environment'. The present wording is not normally understood to encompass archaeology or historic parks and gardens. The above amendment would ensure compliance with the NPPF, paras 61 and 157(8).
28	300	Hammersmith Mall Residents Association	Policy RTC3 - Design and Appearance of Development within the Thames Policy Area				<p>Policy RTC3: Design and Appearance of Development within the Thames Policy Area</p> <p>We fully support the policy that development should respect the character of the riverside, including the foreshore and heritage assets, and we welcome the fact that reference will be made to the conservation area character profiles and to Thames Strategy Key to Chelsea 2002 (6.175) when assessing the relevant parameters for new developments.</p>	
77	625	Environment Agency	Policy RTC3 - Design and Appearance of Development within the Thames Policy Area	YES	YES	YES	<p>We welcome the requirement in Policy RTC3 that all proposals maintain or enhance the natural environment, and the requirement set out in paragraph 6.174 for mitigation and justification to be provided where sites are proposing not to provide a 16m buffer between development and the Thames tidal defences.</p>	<p>We request that the following wording be included as a minor amendment to ensure that the policy guides development to take into account both the flood risk and biodiversity aspects of the Thames Estuary 2100 plan and the requirements of the Water Framework Directive set out in the Thames River Basin Management Plan.</p> <p><u>Development adjoining the River Thames must:</u></p>

								<p><u>Maintain and where necessary enhance or raise flood defences in line with the requirements of the Thames Estuary 2100 Plan,</u></p> <p><u>Seek improvements to the tidal foreshore in line with the requirements of the Thames River Basin Management Plan and the Thames Estuary 2100 Plan</u></p>
13	60	West London River group	Policy RTC4 - Water-Based Activity on the Thames	NO	NO		<p>The West London River Group is a co-ordinating group of local amenity societies and residents' groups which seeks to draw attention and respond to the river aspects of development proposals and planning applications in west London.</p> <p>We think the plan is unsound in that it does not address pertinent issues, and is possibly illegal in that it does not conform to the policies of the London Plan.</p> <p>Residential boats on the Thames</p> <p>1. In places on the Thames moored craft add character and atmosphere to the river: elsewhere they threaten navigation and the recreational use of the river, block the view of the river from the shore, and adversely impact river views. We say they should be in the right place, and should not be unsuitable nor unsightly.</p> <p>2. Several places along the Thames have had moored residential craft for many years. In west London these include at Cheyne Walk in Chelsea and Mr See's moorings at Hammersmith. They are thought to add character to the river. When houseboats were few and far between they were an interesting feature. Now there is a threat of long lines of floating houses, sometimes as tall as two stories, which block views of the river. In addition gated entrances and waste bins obstruct the Thames Path – the National Trail, and rubbish collects around them. There are concerns that they do not have appropriate facilities for the disposal of sewage.</p>	<p>We would propose that RTC4 be amended to read:</p> <p><i>Developments that include provision in the river for water based and river-related activities and uses, including new permanent moorings and the craft for which they are designed, passenger services and facilities associated therewith, particularly where these would be publicly accessible, will be welcome, provided:</i></p> <p>.....</p>

							<p>3. London's growth has led to an increasing demand for residential property. Some piers were sold off and are now used almost solely to berth boats for residential use. There have been applications to develop additional piers and moorings for similar use.</p> <p>4. In the past PLA regulations have required all vessels to be able to manoeuvre under their own power, but it is not clear if these regulations are being enforced.</p> <p>5. We strongly support the provision of berths for unbooked, casual, short-term users. They should be a requirement on all pontoons. These should not be called "visitor moorings", and then used for semi-permanent residential use.</p> <p>6. The public has a right to expect that the impact the presence of residential craft will have on sight lines, local landscape and character is thoroughly assessed before approval is given. We believe that riparian boroughs should include in their local plans guidance and regulations which address the siting, construction, size and detailing of any vessel moored permanently or semi-permanently and used as a residence. These regulations should have in mind the impact the vessel will have on sight lines etc at the highest ides.</p> <p>7. The river is under the jurisdiction of the riparian Boroughs which can control the, design and appearance of a building. Its local plans should control the design and appearance of permanently moored vessels within its borough.</p> <p>8. We propose that maximum lengths and heights above waterline of craft should be strictly imposed. This will be subject to agreement with the PLA and the individual borough.</p> <p>Relevant Planning Guidance</p> <p>The following planning guidance is relevant:</p>	
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							<p>The London Plan July 2011</p> <p>POLICY 7.27 page 244</p> <p><i>Planning decisions</i></p> <p><i>A Development proposals should enhance the use of the Blue Ribbon Network, in particular proposals:</i></p> <p><i>c New mooring facilities should normally be off line from main navigation routes, i.e. in basins and docks.</i></p> <p>POLICY 7.28 page 245</p> <p><i>Planning decisions</i></p> <p><i>A Planning proposals should restore and enhance the Blue Ribbon Network by:</i></p> <p><i>c preventing development and structures into the water space unless it serves a water related purpose</i></p> <p><i>f protecting the open character of the Blue Ribbon Network.</i></p> <p>The supporting text states</p> <p><i>7.84 The range of permanently moored vessels, for example residential barges, restaurants, bars and offices, can add to the diversity and vibrancy of waterways and London in general. However their siting needs careful consideration so that the navigation, hydrology and biodiversity of the waterways are not compromised..... The BRN should not be used as an extension of the developable land in London nor should parts of it be a continuous line of moored craft.</i></p> <p>POLICY 7.29 page 246</p>	
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							<p>THE RIVER THAMES</p> <p><i>Planning decisions</i></p> <p><i>B Development proposals within the Thames Policy Area identified in LDFs should be consistent with the published Thames Strategy for the particular stretch of river concerned.</i></p> <p>The relevant Strategy is the <i>Thames Strategy – Kew to Chelsea</i></p> <p>The following policies of the Strategy are relevant.</p> <p>Policy Recommendation RC13 page 3.15 <i>The construction of new floating structures, such as pontoons and jetties, to provide residential and visitor moorings for small boats should be encouraged in appropriate location (taking into account potential impacts). ... As a general principle, any residential moorings should be for vessels capable of navigation and should be permanently occupied. All new moorings should be assessed against the criteria set out in policy RC18.</i></p> <p>Policy Recommendation RC18 page 3.17 <i>Essential river infrastructure and river dependent activities that encroach onto the foreshore will normally be acceptable provided that there is no alternative and they would not have any adverse impact on the ecological interest and storage capacity of the River or damage local landscape character or archaeological heritage or reduce opportunities for river based recreational pursuits. Other than in exceptional circumstance all other forms of encroachment will be resisted. In any case which the principle of encroachment is accepted, the developer will be expected to conduct appropriate surveys and design any works to mitigate their effect and compensate for any harm.</i></p> <p>Policy Recommendation RT9 page 3.71 <i>All river users should recognise that the Thames is a shared resource and that tolerance of other activities is required.</i></p>	
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68	103	Fulham Society	Policy RTC4 - Water- Based Activity on the Thames			<p>River Thames . Unlike the targets to increase use of the river for passengers and freight or for aquatic sports, areas where the Council has little power, there are where it does have power:</p> <p>It can prevent further development over the river – “inappropriate development extending onto the foreshore or into the river will be resisted unless these serve a water based purpose.” (para 6.178). The Fulham Society strongly hope that the precedent set by Fulham Football Club to build over the river will not be allowed elsewhere.</p>	
23	249	H&F Disability Forum	Policy RTC4 - Water- Based Activity on the Thames			<p>We do not support the following Borough Wide policies:-</p> <p>Policy RTC4: Water based activity on the Thames</p> <p>We consider this policy should also include providing new or improving existing passenger services and facilities so they are accessible to disabled people or make reasonable adjustments.</p>	<p>Drafting Note:</p> <p>P129 Policy RTC4: 2nd para; 2nd line: insert “accessible and inclusive” between “moorings” and “passenger”</p> <p>Justification</p> <p>RTC4 to conform with London Plan policy 7.2 an inclusive environment and</p> <p>Mayor of London SPG: Accessible London (2014)</p>
31	329	Port of London Authority	Policy RTC4 - Water- Based Activity on the Thames			<p>Policy RTC4 considers water based activity on the Thames. Again, the PLA now congratulate the Borough for insisting on riparian leisure facilities schemes within the Borough..</p> <p>Paragraph 6.179 advises that proposals for the use of the river, consultation will be carried out with the PLA. This is agreed and welcomed. It is important to retain and improve the river infrastructure, but this must have regard to other issues such as ecological and navigational interests.</p>	<p>Further consideration should be given (although it is briefly mentioned) to the River’s provision as a home for a ‘number of boat dwellers’</p>
31	332	Port of London Authority	Policy RTC4 - Water- Based			<p>Paragraph 6.180 advises that the Council will work with TfL and the PLA to encourage the development and provision of passenger riverboat services for both leisure and commuting, not only eastwards between Putney Bridge</p>	

			Activity on the Thames				and Central London, but also westwards towards Hammersmith and Chiswick. This objective provides the perfect opportunity to reflect on the aims of the PLAs Thames Vision in this regard. Further emphasis on the Blue Ribbon Network is provided under 6.311.	
44	363	Hammersmith & Fulham Historic Buildings Group	Policy RTC4 - Water-Based Activity on the Thames				The Riverside in the Borough, (including the foreshore and the water to the Borough boundary), is all in conservation areas and contains many historic buildings. It is important that permanent moorings and the craft moored there should not damage the character or appearance of the conservation areas or the setting of historic assets	<p>p129</p> <p>We support the additional wording proposed by the West London River Group with regard to permanent moorings: and the craft for which they are designed so the policy reads:</p> <p><i>Developments that include provision in the river for water based and river-related activities and uses including new permanent moorings and the craft for which they are designed, passenger services and facilities associated therewith, particularly where these would be publicly accessible, will be welcome, provided:</i></p> <p>.....</p>

12. Design & Conservation

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
68	105	Fulham Society	Design and Conservation				<p>Conservation .</p> <p>Fulham has an important industrial heritage and we would like it to be remembered and featured in as many ways as possible. Please ensure the history of the gasworks, for example, is featured in the development and historical documents and archives affecting the borough are preserved.</p>	
17	170	Hammersmith Society	Design and Conservation				<p>There is no reference in the Plan to the role of the Design Review Panel in the process of determining applications.</p> <p>With regard to the Design and Heritage section we would remind the Council that it has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 S66 to protect the setting of listed buildings and under S72 to protect and enhance conservation areas, and though it need not go in the policy, it would be helpful to have it in the supporting text.</p>	<p>StreetSmart : Although StreetSmart is occasionally mentioned within the document, we would like to see it accepted as a default design standard for all works in connection with highways and public open spaces.</p> <p>We would like to see reference included so that site developers are aware that high quality of design is a major requirement for all developments.</p> <p>With regard to the Design and Heritage section we would remind the Council that it has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 S66 to protect the setting of listed buildings and under S72 to protect and enhance conservation</p>

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								areas, and though it need not go in the policy, it would be helpful to have it in the supporting text.
50	534	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy DC1 - Built Environment	NO			<p>Paragraph 6.183</p> <p>This is unnecessarily restrictive and could stifle innovative approaches to urban design particularly where ‘traditional streetscape’ may not be the only or the best solution. NPPF para 58 states that planning policies should aim to ensure that developments...</p> <p><i>"respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation"</i></p>	Many residents value the human scale of the traditional streetscape in the borough and often want to see this maintained in new development. <u>Where this is appropriate</u> the council will seek this form of design in development proposals."
44	656	Hammersmith & Fulham Historic Buildings Group	Policy DC1 - Built Environment				<p>We note and support the aim of the first sentence that:</p> <p>‘All development within the borough, including within the regeneration areas, should create a high quality urban environment that respects and enhances its townscape context and heritage assets’ .</p>	<p>The following comments made on the draft Local Plan in 2015 were aimed at strengthening detail to help achieve the stated aim.</p> <p>Line 1 add ‘ <i>and opportunity areas</i>’ so it reads: <i>including in the regeneration areas</i>and the opportunity areas...’ We again propose this addition.</p>

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								<p>line 5 add ‘ <i>heritage assets</i>’ so it reads’ <i>...landscaping, heritage assets and land use...</i>’ We welcome this addition</p> <p>line 6 add at end: ‘ Where appropriate heritage led regeneration should be encouraged’ We again propose this addition. We consider it important to include in the plan the concept of ‘ <i>heritage led regeneration</i>’ , originally conceived by English Heritage.</p>
54	312	MP Kings Lyric S.A.R.L.	Policy DC2 - Design of New Build				10.0 We welcome the approach taken at Policy DC2, and support the requirement for development of a high standard of design, with proposals designed to respect the historical context and townscape setting of a site, as well as the scale, mass, form and grain of surrounding development and connections to it.	
44	364	Hammersmith & Fulham Historic Buildings Group	Policy DC2 - Design of New Build					<p>page 132</p> <p>We regret that ‘ <i>the principles of ‘good neighbourliness</i>’ have been replaced by ‘ <i>the principles of ‘residential amenity</i>’ .</p> <p>We propose that the concept of good neighbourliness should be restored to this policy in addition to <i>residential amenity</i> as they are different concepts.</p>

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16	61	Romulus Construction Ltd	Policy DC3 - Tall Buildings	NO			<p>Policy DC3 (Tall Buildings) of the Proposed Submission Local Plan states that a proposal will need to demonstrate that it: <i>"has no harmful impact in terms of the setting of, and views to and from, heritage assets"</i>.</p> <p>This policy needs to recognise that in accordance with the NPPF harm to the significance of designated heritage assets may be outweighed by the public benefits of a proposal as stated above in 133-134. It is also necessary to recognise that policy should be concerned with the significance of the heritage asset, not simply with the visibility of new development.</p> <p>In summary, to be sound, changes are necessary to ensure consistency with the clear terms of the NPPF</p>	
61	84	Imperial College London	Policy DC3 - Tall Buildings	NO	NO	YES	<p>Imperial supports the majority of the policy, including the recognition that the regeneration areas may be appropriate for tall buildings, subject to the criteria set out.</p> <p>However, criterion D goes well beyond the tests set out in both the NPPF and the London Plan in terms of considering the effects on heritage assets. The NPPF explains that it is the "degree of harm" rather than the scale of development that is to be assessed when looking at heritage assets. It advocates a thorough assessment of the impact of proposals upon the setting of a heritage asset and to be proportionate to the significance of that asset. It should be noted that even where developments affecting the setting result in "substantial" harm, that harm can still be justified if that development delivers substantial public benefit. The London Plan states in Policy 7.7 that tall buildings should not have an unacceptably harmful impact on their surroundings and</p>	In order to bring criterion D into line with the NPPF and the London Plan, it is requested that it be amended to read "does not have an unacceptably harmful impact on the setting of, and views to and from, heritage assets."

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>goes on to state that where tall buildings are proposed in sensitive locations, such as in conservation areas or near Listed buildings, they should be given particular consideration.</p> <p>The draft wording in criterion D goes much further and simply states that a proposal must have “no harmful impact”.</p> <p>In order to bring criterion D into line with the NPPF and the London Plan, it is requested that it be amended as set out below.</p>	
17	164	Hammersmith Society	Policy DC3 - Tall Buildings				DC3 : Tall Buildings : What is the status of the previous (2015) Draft Paper on Tall Buildings? It should be clarified whether an official DPD or merely advisory.	
28	301	Hammersmith Mall Residents Association	Policy DC3 - Tall Buildings				<p>Policy DC3: Tall Buildings:</p> <p>A number of inappropriately tall developments have been permitted along the river in recent years, those which specifically affect the Mall Conservation Area being Fulham Reach and the new Queens Wharf/Riverside Studios development. Both these developments have already had a serious negative impact on the setting and views of Hammersmith Bridge. They also tower over and dominate the low-rise properties in surrounding streets.</p> <p>The heights of current developments such as these must <u>not</u> be allowed to set a precedent for acceptable building heights for future development on or close to the river - or indeed anywhere else in the</p>	<p>We would like to see greater emphasis placed on Points c. and d. We have concerns that in practice the impact of tall buildings from more distant viewpoints is not given due consideration.</p> <p>Particularly in relation to tall buildings on and close to the riverfront, we would like to see a policy on building heights adopted which uses the original townscape building heights as a reference point, rather than any more recently built tall buildings.</p>

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							borough where important views or heritage assets have already been harmed by inappropriately tall buildings.	
54	313	MP Kings Lyric S.A.R.L.	Policy DC3 - Tall Buildings				We also support the recognition within Policy DC3 that tall buildings may be appropriate within regeneration areas, including Hammersmith Town Centre.	We would suggest that a flexible approach is taken in relation to the location and height of tall buildings within the Borough, and that future development proposals within the areas recognised within Policy DC3 is assessed on a site by site basis, rather than being restricted to similar heights of existing tall buildings within the surrounding area (as currently referenced within paragraph 6.194).
44	365	Hammersmith & Fulham Historic Buildings Group	Policy DC3 - Tall Buildings					<p>page 134</p> <p>Add to list of matters that any proposal must demonstrate that it:</p> <p><i>has no harmful impact on the character and appearance of a conservation area should comply with the criteria in the English Heritage/CABE guidance on tall buildings</i></p>
53	386	Land Securities	Policy DC3 - Tall Buildings				The continued recognition of the WCRA as an appropriate location for Tall Buildings is supported. A continued recognition of this is considered important with regards to meeting the borough housing targets.	

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49	401	Royal Borough of Kensington & Chelsea	Policy DC3 - Tall Buildings				<p>See RBKC responses to Regeneration Area policies. The proposed policy approach must consider the potential harm tall buildings may have on the setting of RBKC's Conservation Areas, Listed Buildings and protected gardens and squares.</p> <p>RBKC supports the amended wording in Policy DC3 (a), (b), and (d) to reflect our previous comments. [Duty to Cooperate; Justification; Effectiveness].</p>	<p>RBKC's comments on the supporting Background Paper on Tall Buildings are as follows:</p> <p>The paper does not contain any maps, illustrations or three-dimensional townscape analyses supporting the evidence presented and it seems to rely on work undertaken for each of the Opportunity Areas. That work has not always been published and should at least be summarised in one place to ensure the 'strategic' approach in the Core Strategy is justified.</p> <p>Paragraph 3.4 – Reference is made to the residential towers of the Edward Woods Estate and Clem Atlee Estate which "appear" in residential areas as part of "wider" redevelopment. The analysis could also consider whether these have been successful developments.</p> <p>Paragraphs 3.6-3.8 – RBKC acknowledges the character of LBHF as predominantly residential with continuous street blocks, enclosed spaces and homogeneous heights and that these areas are much-valued and their contribution to the townscape recognised by being designated Conservation Areas. This is very similar to much of RBKC, including areas located adjacent to the Borough boundary. Reference could be made to this and that inappropriately-</p>

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								<p>located tall buildings could equally impact upon sensitive areas beyond LBHF's boundaries. A similar point can be made regarding those treasured open spaces located within RBKC and not too far from the boundary that could equally be affected by tall building proposals. They include Brompton and Kensal Cemeteries, Cremorne Gardens and Westfield Park in the Lots Road area, and communal private garden squares, such as Nevern and Edwardes Square.</p> <p>Paragraph 6.2.2 – The paper should provide evidence of the statement that it is "widely accepted that tall buildings can help regenerate an area by attracting investment" and how this would differ for lower- and medium rise buildings.</p> <p>Paragraph 6.2.4 – RBKC supports the statement "The random pattern of pepper-potting tall buildings across the Borough would therefore be inappropriate" which could be elaborated to say "The repetition and reinforcement of earlier pepper-potting of the 1960s and 1970s, e.g. isolated residential towers and estates, would also be inappropriate".</p> <p>Paragraph 6.2 – RBKC would like to know which local views relating to Conservation Areas within RBKC close to the Borough boundary were included in the</p>

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								<p>analysis e.g. Brompton Cemetery, Kensal Cemetery, Oxford Gardens / St Quintin, Edwardes Square, Lots Road Village etc. A buffer zone around Conservation Areas could be adopted to help define their setting and reduce their impact on views in and out.</p> <p>Paragraphs 7.6 and 7.16 – RBKC questions the value of creating ‘gateway’ landmark buildings into central London as there is no singular gateway point to central London.</p> <p>Paragraph 7.21 – RBKC supports the statement "Care needs to be taken to protect and enhance the character and appearance of Brompton cemetery in the Royal Borough of Kensington and Chelsea which is a Grade I Registered Historic Park and Garden of Historic Interest" when plotting for tall buildings at Earls Court and West Kensington, but a consistent approach should be taken for the cemetery when plotting for South Fulham Riverside and for the Kensal Cemetery when plotting Old Oak.</p>
73	410	St Quintin and Woodlands Neighbourhood Forum	Policy DC3 - Tall Buildings				We strongly support the overall thrust of Policy DC3 on Tall Buildings which commits the Council to <i>resist buildings which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline</i> . But as with the current Local Plan, the subsequent section of this policy provides a long list of potential exceptions to this approach. Despite the current excess of supply of high rise apartments across the London	

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							<p>property market, we fear that developers will continue to exploit these exceptions.</p> <p>As in the current Local Plan, paragraph 6.193 of the new version continues to target the White City Regeneration Area as a location <i>less constrained</i> and where <i>tall buildings may be appropriate, providing a distinctive recognisable landmark</i> . The concept of <i>landmarks</i> is one regularly used by developers (and accepted by LPA planners) as a justification for excessive density and building height, driven largely by commercial gain. The White City area will soon have a whole series of <i>landmark</i> buildings, justified on this spurious ground.</p> <p>The OPDC Local Plan is now well down the path of encouraging super-densities, and hence very tall buildings at Scrubs Lane and at Old Oak. Applications from at least three developers for new <i>landmark</i> and <i>gateway</i> buildings along Scrubs Lane are now surfacing. The public, especially in an era of maps on mobile phones, do not need these <i>landmarks</i>.</p> <p>Justification statements such as at 6.193 of the Regulation 19 Plan only serve to increase the current wide disconnect between the planning /architectural professions and the general public, on the subject of tall buildings.</p> <p>Residents in North Kensington look to LBHF to operate similar policies on tall buildings as those in RBKC. Policies contributing to a renewed wave of very tall buildings, in the one quartile of London largely spared to date, will not bring credit (nor future electoral support) to LBHF. If justifications for building height are to be made, they should at least be</p>	

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							couched in more honest terms of a planning system unable to match the strength of the commercial development industry in a dysfunctional London property market.	
48	447	London Borough of Richmond	Policy DC3 - Tall Buildings				<p>Tall Buildings</p> <p>All 4 regeneration areas are identified as suitable for tall buildings. It is noted however, that in the western end of Hammersmith town along King Street, taller buildings are not appropriate for this part of the town centre. An existing permission allows for development no higher than the existing town hall extension, with the exception of a clock tower which is proposed to assist in identifying its civic location and the end of the town centre.</p>	LBRuT would seek to be consulted on any applications for buildings likely to be visible from the Borough and supports H&R Policy DC3 - Tall Buildings .
45	474	Berkeley Group (St James & St George) & St William	Policy DC3 - Tall Buildings				<p>Policy DC3 – Tall Buildings</p> <p>Our client supports the promotion of tall buildings in the White City Regeneration Area, Earls Court and West Kensington Opportunity Area, South Fulham Riverside Regeneration Area and Hammersmith Town Centre.</p>	
37	482	Eastern & Oriental PLC	Policy DC3 - Tall Buildings				<p><u>Proposed Approach towards Tall Buildings</u></p> <p>Draft Policy DC3 identifies that Hammersmith Town Centre is an appropriate location for the development of tall buildings, subject to</p>	

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							<p>various design-led tests and criteria being suitably addressed within 'tall building' development proposals.</p> <p>We are supportive of this approach towards tall building development, given that it will help ensure that high-density schemes are located within central accessible locations, which will help to ensure that Hammersmith attracts high-quality investment and associated employment opportunities in the future.</p> <p>Whilst we agree that proposals for tall buildings should be assessed against a robust set of townscape and design criteria, we would highlight that other important material considerations (i.e. the public benefits of a scheme, or its ability to act as a catalyst for local regeneration), should also be considered by the Council, when assessing a site's appropriateness as a tall building location.</p>	
50	535	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy DC3 - Tall Buildings	NO			DC3 states that a proposal will need to demonstrate that it: " <i>has no harmful impact in terms of the setting of, and views to and from, heritage assets</i> ". The policy needs to recognise that in accordance with the NPPF harm to the significance of designated heritage assets may be outweighed by the public benefits of a proposal as stated in NPPF para 133-134.	"has no harmful impact in terms of the setting of, and views to and from, heritage assets, <u>unless it can be demonstrated that the harm is necessary to achieve public benefits that outweigh the harm caused</u> "
50	536	Capital and Counties on Behalf of Earls	Policy DC3 - Tall Buildings	NO			The wording of this paragraph is overly and unnecessarily negative. While it is accepted that some areas of the borough may be sensitive to the <i>siting</i> of tall buildings, para 6.197 suggests that the visual impact of	6.197: "The council recognises and values the variation in character across the borough, and is committed to the preservation of the borough's built

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		Court and Olympia Group					tall buildings on the <i>settings</i> of conservation areas and on the skyline of views from open spaces and the river is intrinsically harmful irrespective of the existing established quality and sensitivity to change of the conservation area setting or view, or the scale, form and design quality of a proposed tall building. Use of the words 'intrusive' and 'intrude' should be replaced to remove negativity and ambiguity; use of the word 'impact' would provide consistency with the terminology of the NPPF and LVMF	heritage and overriding townscape character found in large swathes of the borough of tree-lined street blocks of traditional family housing with rear gardens. In these areas of consistent townscape character, the potential impacts of tall buildings would be seriously intrusive <u>could be significant</u> . In addition, in other areas of the borough, some parts of which are protected by conservation area designation, higher buildings can detrimentally impact <u>could have significant impacts</u> upon the character and skyline <u>or setting</u> , especially where they intrude <u>impact</u> on established views and skylines from open spaces, the river, riverside or bridges. The impact of tall buildings in sensitive locations should be given particular consideration."
35	604	Standard Life Investments	Policy DC3 - Tall Buildings				<p><u>Proposed Approach towards Tall Buildings</u></p> <p>Draft Policy DC3 identifies that Hammersmith Town Centre is an appropriate location for the development of tall buildings, subject to various design-led tests and criteria being suitably addressed within 'tall building' development proposals.</p> <p>We are supportive of this approach towards tall building development, given that it will direct high-density schemes to central accessible locations, which will help to ensure that Hammersmith attracts high-quality investment and associated employment opportunities in the future.</p>	

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							Whilst we agree that proposals for tall buildings should be assessed against a robust set of townscape and design criteria, we highlight that other important material considerations (i.e. the economic benefits of a scheme, or its ability to act as a catalyst for local regeneration and to attract high quality business operators), should also be considered by the Council, when assessing a site's appropriateness as a tall building location.	
17	165	Hammersmith Society	Policy DC4 - Alterations and Extensions (including Outbuildings)				DC4 : Alterations and Extensions : What has happened to presumption against front mansards/extensions in streets where none exist at present?	
44	366	Hammersmith & Fulham Historic Buildings Group	Policy DC4 - Alterations and Extensions (including Outbuildings)					<p>p135</p> <p>6.203</p> <p>There should be a presumption against impervious hard standing being introduced into front gardens which could result in flooding, loss of on-street parking, loss of visual amenity of front garden.</p> <p>6.204</p> <p>We propose that there should be a specific reference to <i>the need for sensitive integration of alterations and extensions with a heritage asset</i> . This can be</p>

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								especially relevant when there is a proposed change of use of a heritage asset.
44	368	Hammersmith & Fulham Historic Buildings Group	Policy DC5 - Shopfronts				<p>p137</p> <p>Internally illuminated fascias should be discouraged in conservation areas.</p> <p>Corporate shopfronts should conform where possible to the prevailing street style where one exists in terms of stall risers, pilasters and fascia size.</p>	<p>6.211 Agree but include:</p> <p><i>Where a former retail unit is converted to another use, such as residential use, the original windows and glazing bars should be retained. There should be the facility for the owner/occupier to occlude a portion of the glass.</i></p>
44	369	Hammersmith & Fulham Historic Buildings Group	Policy DC6 - Replacement Windows					<p>Policy DC6 – Replacement Windows p138</p> <p>Additional policy is required to ensure that inappropriate windows are not inserted in front elevations in locations outside the conservation areas.</p>
32	633	Mr Dean Wright	Policy DC6 - Replacement Windows				<p>I would be grateful if you would consider taking action re the following issues. These issues are, in part, wider than H+F Borough, but hopefully you can raise with the appropriate person or tell me who to contact. In short, i want it to be easier for people to be able to replace single pains of window glass with double glazing. The benefits of double galzing are multiple and currently the planning system acts as a barrier and disincentive to these improvements. I explain in more detail below.</p>	

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							<p>Context: I have a 1 bed (owner occupied) period conversion in W Ken typical of the Victorian housing in the area and much of west London. I was considering replacing my original very thin glass in my very tall and wide sash windows with double glazing. This would significantly improve heat retention, noise reduction and safety (eg for tenants). The cheapest over the phone quote i received was 5k. Despite this very hefty cost i wanted to do it to improve my flat.</p> <p>My road is in a Conservation Area and so i phoned the Council and found out that i need planning permission. It appears that a planning application would cost me at least 200,, plus the time and stress of making the application. Further, the online 'guidance provided was so bewildering and unclear that i did not know what type of application i needed to make. i have decided not to make this improvement because of these factors - they were the straw that broke the camels back.</p> <p>I would like to emphasise that i accept that there has to be building control of some form as i also don't want people making ugly dangerous improvements.</p> <p>1. A guiding 'procedural justice' principle should be that the system shouldn't be a disproportionate disincentive for making very beneficial improvements. For example, the carbon footprint saving would be very significant. It is notable that very few flats in my area have double glazing.</p> <p>2. As a general principle, the system should ENCOURAGE improvements that lead to carbon footprint savings. Granted the cost would be prohibitive for some, but I believe that if it was easier more people would</p>	

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							<p>make these worthwhile improvements, ie if the planning controls over double glazing was simplified. As it became more common, buyers would ask for it and so this would encourage sellers to invest.</p> <p>3. At first sight, it seems that planning control of single occupation residences are subject to less planning control than multi-occupied. this appears to be a pointless double standard for the work i want done. It also appears the cost of a planning application could be double. In my view, these things should be changed</p> <p>4. I am degree educated and have to read complex law as part of my job. The planning guidance available via a link on the LBHF website was unclear and i could not understand it. Some of this guidance is not written by lbhf which makes sense as it is national, but lbhf have a responsibility to ensure guidance they refer to is clear. Fundamentally, i wasn't sure which type of the numerous types of planning applications i would need to make. This is absurd and has a negative impact, ie its discouraged me from applying</p> <p>4. On a related point, the guidance on pricing was unclear</p> <p>5. Note, i was told my a local estate agent that i would not be able to recoup the full investment if i sold my property, although it would make it easier to sell. In other words, the planning application costs are an absolute cost to householders. The system should be as cheap as possible to avoid introducing a barrier to action.</p> <p>6. A confusing expensive time consuming planning system is disproportionate, and consequently, encourages people not to respect it and therefore break the rules. There are examples near me (near the</p>	

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							<p>Bhavan centre not specifically to do with windows) where i assume permission wasn't sought because they have made the character of the street worse.</p> <p>I appreciate that i raise issues that are not easily or cheaply solveable and some things are national, but hopefully you could consider trying to find some improvements. In case they are of use, the things that immediately come to mind:</p> <p>a. special advice online for improvements that would reduce carbon footprint. Further, it should be clear what type of application is required. (ideally the number of types of applications would also be reduced)</p> <p>b. Ideally, such improvements would warrant a free planning application on the grounds of community benefit.</p> <p>c. Alternatively, suppliers could be approved by the Council rather than each householder getting planning permission. If a supplier made a change that planners were dissatisfied with they could be contractually obliged to improve. This is more an audit approach to planning (neighbours are busy but if someone made a change that reduced their house price they would be straight on the phone). The suppliers, eg glaziers, are the experts, not individual householders that have lots of other responsibilities.</p> <p>With the hope that you recognise that at a household, borough and city level these issues are important and that change is required. Specifically, re climate change, society needs to take substantial action NOW!</p>	

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							On a political note, sensible changes could be a winner with voters and show a pragmatic considerate green party.	
16	62	Romulus Construction Ltd	Policy DC7 - Views and Landmarks	NO				<p>Policy DC7 (Views and Landmarks)</p> <p>– supporting text paragraph 6.217 states that: <i>The Council will ensure that significant views in and out of conservation areas remain unharmed from new development and are preserved and enhanced.</i></p> <p>Additional text should be inserted to read as follows:</p> <p>The Council will ensure that significant views in and out of conservation areas remain unharmed from new development and are preserved and enhanced , unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss".</p> <p>In summary, to be sound, changes are necessary to ensure consistency with the clear terms of the NPPF.</p>

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68	104	Fulham Society	Policy DC7 - Views and Landmarks				It is vital to protect views across and along the river which are important to the local scene. The Council can prevent development that could affect those views (para 6.218) and we hope they will do so.	
28	302	Hammersmith Mall Residents Association	Policy DC7 - Views and Landmarks				We fully support Policy DC7 regarding protected views and landmarks.	<p>We would like to see this policy extended so that each new development is considered on its merits and any existing developments are not used as a precedent.</p> <p>We feel that Policies RTC3, DC3 and DC7 could all be strengthened with respect to protecting views of the riverside from prominent key locations.</p> <p>Currently, planning policy appears to focus too closely on the impact of developments on the relatively immediate vicinity. The impact of tall buildings and the bulk/massing of developments from more distant viewpoints tends to be overlooked.</p> <p>For example, planning policy regarding tall buildings in Hammersmith town centre has failed to take into account views of the historic buildings of Hammersmith Mall from further upstream. Looking towards Hammersmith from the raised river walk by Chiswick Reach, the end of Upper Mall and the cluster of houses in Dove Passage is completely dominated and overwhelmed by the increasingly tall Hammersmith town centre skyline.</p>

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								Similarly, when the Riverside Studios development is completed, the span of Hammersmith Bridge will have finally entirely disappeared against the backdrop of the various Fulham Reach developments when viewed from the river walk in Upper Mall. The view downstream from the end of Hammersmith Terrace by the Black Lion pub is one of the most spectacular views of Hammersmith Mall and Hammersmith Bridge and it has now been completely destroyed.
48	448	London Borough of Richmond	Policy DC7 - Views and Landmarks				<p>Views</p> <p>The Strategic Linear View from King Henry's Mound in Richmond Park to St Paul's Cathedral as identified in the London View Framework crosses the borough of H&F. The view corridor is shown on the Proposals Map and will be protected. H&F council is aware that the landmarks identified are also enjoyed in important views from outside the borough boundary, and will ensure that these are fully considered when assessing the impact of any development which may impinge on these views.</p> <p>LBRuT welcomes this approach.</p> <p>4) H&F will, in conjunction with the GLA/TfL, have pursued options for replacing the Hammersmith Flyover and other sections of the A4 with a tunnel ("Flyunder") coupled with redesigning the local road systems in order to reduce congestion and noise, improve air quality and allow pedestrian re-connections with the river. This could impact upon the north of LBRuT and the strategic routes through this borough, however Strategic Site Policy HRA2 states the Council will expect any proposal to</p>	

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							ensure that there will be no detrimental impact on the flow of traffic on this strategic route and no increase in levels of traffic congestion in Hammersmith Regeneration Area and the surrounding road network, minimising the displacement impact. Reduced congestion, noise, and improved air quality are welcomed.	
50	537	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy DC7 - Views and Landmarks	NO			The wording of para 6.217 is ambiguous. Where 'preserve' means 'cause no harm' in this paragraph, the policy needs to recognise that in accordance with the NPPF harm to the significance of designated heritage assets may be outweighed by the public benefits of a proposal as stated in the NPPF	"...The council will seek to ensure that proposed development does not harm <u>the character and quality of</u> these views in terms of through its location, scale and massing. The council will ensure that significant views in and out of conservation areas remain unharmed from new development and are preserved <u>and/or</u> enhanced <u>unless it can be demonstrated that the harm is necessary to achieve public benefits that outweigh the harm caused...</u> "
50	538	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy DC7 - Views and Landmarks	NO			Paragraph 6.220 Use of the word 'impinge', could have negative connotations and we propose changing to a consistent terminology of impact to remove ambiguity and provide consistency with the NPPF and LVMF	The council is aware that the landmarks identified are also enjoyed in important views from outside the borough boundary, and will ensure that these are fully considered when assessing the impact of any development which may <u>impinge</u> <u>impact</u> on these views.
16	63	Romulus Construction Ltd	Policy DC8 - Heritage and Conservation	NO				point C – this should be adjusted as follows:

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								<p>"Development should conserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset</p> <p>or where there is harm or loss the harm or loss is outweighed by the public benefits of the proposal.</p> <p>The presence of heritage assets should inform high quality design within its setting."</p> <p>In summary, to be sound, changes are necessary to ensure consistency with the clear terms of the NPPF.</p>
17	167	Hammersmith Society	Policy DC8 - Heritage and Conservation				<p>Conservation Areas : We support the proposed changes identified in the Proposals Map Changes. .</p>	<p>DC8 : Heritage and Conservation : We would remind the Council has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 S66 to protect the setting of listed buildings and under S72 to protect and enhance conservation areas, and though it need not go in the policy, it would be helpful to have it in the supporting text.</p> <p>Listed Buildings : We request that the Council works in conjunction with the Hammersmith and Fulham Historic Buildings Group to regularly review the Local List of Buildings of Merit, to ensure the list is up to date.</p> <p>Conservation Areas : We would ask the Council to keep the boundaries under review and ensure that</p>

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								the Conservation profiles are regularly reviewed and kept up to date.
58	182	Historic England	Policy DC8 - Heritage and Conservation					<p><u>Policy DC8 Heritage Conservation, p142</u></p> <p>Part b) is currently not compliant with the NPPF in that the policy should seek to avoid harm and actively promote developments that reconcile heritage significance and economic and social aspirations to achieve sustainable development. We recommend that part b) is divided to express the need to avoid harm in the first instance. The policy can then go on to say that exceptionally where fully justified harm to heritage assets may be permitted where the public benefit outweighs the harm.</p> <p>Part h) should then refer to 'proposals which involve substantial harm ...'</p>

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								<p>Part g) – we recommend the following is added: Where archaeological remains of national significance may be affected applications should also be supported by an archaeological field evaluation’.</p> <p>Para 6.221 – This section should mention that the current the Archaeological Priority Areas are due to be reviewed in 2020. In the interim GLAAS should be consulted as part of any pre-application discussions to ensure that archaeology is appropriately scoped. Further guidance on archaeological priority areas can be found at https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/</p> <p>Para 6.227 – substitute’ Historic England’ for ‘English Heritage’</p>
44	371	Hammersmith & Fulham Historic Buildings Group	Policy DC8 - Heritage and Conservation					<p>Policy DC8 Heritage and Conservationpage 142</p> <p>We propose that the list of assets should specify locally listed buildingsas well as statutory listed buildings.</p>

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50	539	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy DC8 - Heritage and Conservation	NO			Point C: the policy should be clear that harm to the setting of a designated heritage asset, where it contributes to the significance of that asset (as well as to the fabric covered in point b) may be acceptable where the harm is outweighed by the public benefits of a proposal as stated in NPPF para 133-134.	"development should conserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset <u>or where there is harm the harm is outweighed by the public benefits of the proposal.</u> The presence of heritage assets should inform high quality design within its setting;
50	540	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy DC8 - Heritage and Conservation	NO			Paragraph 6.225 As above the justification should be clear that harm to the setting of a designated heritage asset, where it contributes to the significance of that asset may be acceptable where the harm is outweighed by the public benefits of a proposal as stated in NPPF para 133-134.	The council will protect its listed buildings from demolition or harmful alteration and from development which has a harmful impact on their setting <u>or where there is harm ensure that the harm is outweighed by the public benefits of the proposal.</u>
50	551	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy DC8 - Heritage and Conservation	NO			Paragraph 6.230 The statement contradicts point d of Policy DC8 and should therefore be omitted or amended to remove ambiguity on this issue. Para 134 of the NPPF states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."	
40	586	MR PRASHANT BRAHMBHATT	Policy DC8 - Heritage and Conservation				COLLEGE COURT Mansion Block requires to be restored and upgraded to reflect this policy (note the property was damaged in the war by being bombed).	

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	79	Mr Ben Kelly	Policy DC9 - Advertisements	NO	YES	YES	<p>Broadly speaking the policy approach is welcomed. However, it remains unclear in parts and does not provide enough guidance to be considered as positively prepared, justified or effective. As such it can be considered to be unsound as currently worded.</p> <p>The policy states that the Council will resist excessive or obtrusive advertising and illuminated signage which adversely affects the character and appearance of the neighbourhood. It is accepted that this will always involve the officer's professional judgement and in some cases the judgement of the planning committee with respect to individual applications. However, without a clearer steer as to what constitutes "excessive or obtrusive" advertising there will be inconsistency in the application of the policy.</p> <p>The policy goes on to state that advertisements should normally be located at ground floor level and relate to the street frontage. This appears to relate to shop signage rather than, for example, hoardings and other large format advertising, but this needs to be made clear in order to avoid being misinterpreted. Almost all large format advertising would be located above ground floor level and as such, if this were to be applied it would render the next part of the policy ineffective.</p> <p>The specific advice in relation to hoardings and other large format advertisements is welcomed, but again could be expanded upon and worded more positively to clarify the areas where such proposals would be more likely to be acceptable (e.g. Retail and commercial areas, adjacent to major roads).</p>	<p>The Policy should require a high standard of design for advertisements and their supporting structure.</p> <p>The second paragraph of the policy should clarify that it is applicable to shop front advertisements rather than all types of advertisement including large format, which would typically be located above ground level.</p> <p>Paragraph three of the policy should be positively worded to identify appropriate locations for large format advertising such as retail and commercial areas, entertainments venues, town centres and major arterial routes. It should be noted that often such locations are within sensitive areas such as conservation areas, and where this occurs special care will be taken to assess whether this has an adverse impact on the designation or whether it remains consistent with the character of the area.</p> <p>The approach towards scaffolding shrouds should be amended to provide a further steer on what size of advert is acceptable. Other authorities have introduced a percentage rule of thumb which would</p>

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							The policy approach towards scaffolding shrouds is supported in principle but further guidance could be provided to explain what an appropriately sized advert is (e.g. Percentage of building façade).	be appropriate here (e.g. maximum of 40% of the shroud dedicated to advertising). This would ensure that applications are appropriate.
38	565	Greater London Authority and Transport for London Planning Team	Policy DC9 - Advertisements				TfL request that in addition to the reasons for refusal of advertising consent detailed in this policy, the unacceptable impact on road safety should be specifically included.	
68	106	Fulham Society	Policy DC10 - Telecommunications				Mobile communications . While supporting the Council's aim to minimise any detrimental impacts on the visual amenity of the boroughs townscape, fast communications are an integral part of the success of most business operations and individual lifestyles. It is up to BT how fast the superfast fibre is available but the Council should actively encourage them to expand across the whole borough.	
23	250	H&F Disability Forum	Policy DC10 - Telecommunications				<p>We do not support the following Borough Wide policies:-</p> <p>Policy DC10: telecommunication</p> <p>Our concern has always been to ensure sufficient space on the footway for all pedestrians including wheelchair users and buggies can navigate the space safely. This year we noticed applications for electric charging</p>	

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							points that may encroach on the footway and dropped kerbs that raise similar concerns.	
44	373	Hammersmith & Fulham Historic Buildings Group	Policy DC11 - Basements and Lightwells					<p>page 148</p> <p>We welcome this section and propose an additional requirement that basements and extensions do not damage the character and appearance of a heritage asset.</p>

13. Environmental Sustainability

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17	174	Hammersmith Society	Environmental Sustainability					Policies CC1 - CC12 : We fully support the submission by the Hammersmith and Fulham Air Quality Commission dated 20 October 2016 and request that their recommendations/amendments be incorporated in the Submission Local Plan.
31	330	Port of London Authority	Environmental Sustainability				Pollution & Air Quality It goes without saying that the promotion of river transport (for freight and passengers) support the aims of the Borough for improving CO2 emissions and helping air quality through the promotion of modal shift. Indeed there is a great potential to make further use of the Blue Ribbon Network within the Borough for some freight movements, which would accord with the provisions set out within the London Plan itself.	
38	497	Greater London Authority and Transport for London Planning Team	Environmental Sustainability				Environmental Sustainability The Mayor welcomes the Borough's continued approach to protecting the environment and addressing climate change through minimising energy use and carbon dioxide emissions in new developments As a large part of the borough sits within Flood Zones 2 and 3, the Mayor supports the boroughs's approach to flood risk from both the River Thames and other sources, and its commitment to mitigation measures to protect both existing and new development from flooding.	

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14	54	Mr. Jon Burden	2035 Vision - Delivering an environmentall y sustainable borough	NO	YES	YES	Too often developers install various energy saving systems or sustainable projects but do not maintain them or do not use them. This is because staff are not properly trained and systems are not properly maintained as a way to reduce costs.	Provision should be included in planning approvals for an independent report two years and five years after the development is completed that verifies all environmental systems are being used and maintained to ensure design efficiencies are being met. The cost of this should be met by the developer.
8	39	Hammersmith and Fulham Air Quality Commission	2035 Vision - Delivering an environmentall y sustainable borough					2035 Vision : Delivering an environmentally sustainable borough, p.152 Insert '... carbon dioxide (CO ₂) and other harmful emissions.' Both the construction, and operation of, development produces air pollution other than carbon dioxide.
17	172	Hammersmith Society	2035 Vision - Delivering an environmentall y sustainable borough				Environmental Sustainability : We support the 2035 Vision.	
40	587	MR PRASHANT BRAHMBHATT	2035 Vision - Delivering an environmentall y sustainable borough				2035 Vision- Delivering an environmentally sustainable borough- LOCALISED WASTE RECYCLING deparation at source	

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8	40	Hammersmith and Fulham Air Quality Commission	Policy CC1 - Reducing Carbon Dioxide Emissions					<p>Policy CCI – Reducing Carbon Dioxide Emissions, p.153</p> <p>d) insert ‘... or communal heating systems, including heat networks , <i>if this can be done without degrading air quality</i> ; and’</p> <p>The GLA energy hierarchy puts CHP above sustainable energy sources, but LBHF should break from this to prioritise <u>sustainable</u> energy sources.</p>
	265	Home Builders Federation	Policy CC1 - Reducing Carbon Dioxide Emissions				<p>Policy CC1 – Reducing Carbon Dioxide Emissions</p> <p>We note that it has allowed a 6% increase in cost to account for the energy requirements of Policy DP39 - which we assume relates to a Core Strategy policy. Policy CC1 however, adopts the London Plan policy of seeking zero carbon homes from 2016 onwards – i.e. from now. This is a much more stretching target and it was partly for this reason that the Government removed the zero carbon target as announced in its <i>Productivity Plan</i> in July 2015 (<i>Fixing the Foundations</i>). It is unclear whether an allowance of £132 per square metre to £148 per square metre would adequately reflect the cost of complying with this policy.</p>	<p>We consider that the Council should reflect the national policy and not require building to zero carbon homes. What the Mayor and the Council is doing is lawful but it is not adhering to national policy</p>
8	41	Hammersmith and Fulham Air Quality Commission	Policy CC2 - Ensuring Sustainable Design and Construction					<p>Policy CC2 – Ensuring Sustainable Design and Construction, p.154</p> <p>b. insert ‘... equivalent assessments such as BREEAM or <i>WELL building standards</i>)...’</p>

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								<p>The WELL Building Standard™ is an evidence-based system for measuring, certifying and monitoring the performance of building features that affect health and well-being.</p> <p>p.154 , bottom para in box – delete ‘encouraged’ and substitute with ‘ <i>required</i> ’.</p> <p>In line with proposed deletion in CC10</p> <p>6.251 , p.155, insert ‘reducing CO ₂ <i>and other harmful</i> emissions’</p> <p>In line with 2035 Vision, p.152 (above).</p> <p>6.255 , p.155, insert ‘... using BREEAM , <i>WELL</i> (or similar)...’</p> <p>In line with CC2, p.154 (above).</p>
5	608	Hammersmith Community Gardens Association	Policy CC2 - Ensuring Sustainable Design and Construction	NO			<p>HCGA objects to the lack of policies to support the provision of local food growing spaces within new development and considers this makes the plan unsound in the light of the evidence on the mental and physical health needs of current and future residents to be housed at high densities, conformity with NPPF & the London Plan.</p> <p>We request policies which specifically call for major new development to include amenity space identified for their potential for residents to grow food.</p>	<p>Policy CC2 – Ensuring Sustainable Design and Construction</p> <p>a. <u>implementing the London Plan sustainable design and construction policies to ensure developments incorporate sustainability measures, including:</u></p> <p><u>Providing space for local food growing</u></p>

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							HCGA suggests amendments can be made to the Local Plan to make it sound and to meet the needs of current and future residents by either amending draft policies (see below) or by inserting a new policy on local food growing as you have for playspace and biodiversity.	<p><u>Planning conditions will be applied, or planning obligations sought to ensure the maintenance and enhancement of community food growing spaces provided.</u></p> <p>Justification 6.247 <u>Growing food locally will help meet London Plan SPG sustainable design and construction by promoting biodiversity, reducing CO2 emissions and avoiding natural hazards. The SPG states that growing food also has health and community benefits.</u></p> <p>6.248 <u>Developments have impacts on the environment, health and wellbeing of residents that need to be managed and minimised. Including food growing in policies will preserve the environment and improve health and wellbeing.</u></p> <p>6.249 <u>A development that provides space for growing food is responding to the impacts of climate change</u></p>
77	626	Environment Agency	Policy CC2 - Ensuring Sustainable Design and Construction	YES	YES	YES	<p>We support LBHF in requiring all major developments to implement the London Plan sustainable design and construction policies, including making effective use of water resources. The London Plan states that "The highest standards of sustainable design and construction should be achieved" requiring:</p> <ul style="list-style-type: none"> the "efficient use of natural resources (including water)" (Policy 5.3, Page 183 of The London Plan March 2016) and; a reduction in the environmental impact of existing urban areas through policies and programmes to bring them up to 	

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							<p>standards on sustainable design and construction (Policy 5.4 Page 185 of The London Plan 2016).</p> <p>The London Plan Policy 5.3 states that "The Mayor's supplementary planning guidance on Sustainable Design and Construction...reflect key sustainable design principals and outline the standards that are applicable to all developments" (Page 184). These, in conjunction with the London Plan, can be used as key guidance to implement Part (a.) of Policy CC2.</p> <p>In Part (b.), LBHF confirms to ensure Sustainability Statements (or BREEAM assessments) for all major developments. We support the use of Sustainability Statements, although LBHF is encouraged to implement the use of an industry recognised BREEAM assessment. The Local Plan does not specify the required efficiency and therefore the Agency recommends that when using the BREEAM assessments an 'excellent' rating for water efficiency is achieved for all developments (commercial and refurbished domestic). The BREEAM Refurbishment Domestic Buildings document can give appropriate guidance when retrofitting of existing buildings. Older properties are often the least water efficient and introducing such measures will reduce overall water consumption within the district.</p>	
31	336	Port of London Authority	Policy CC3 - Minimising Flood Risk and Reducing Water Use				<p>Climate Change</p> <p>Within this section of the Local Plan, consideration is given to flood risk. The National Planning Policy Framework states that " inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk". The PLA support the</p>	

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							conclusions discussed on this matter within the documentation, however, would encourage further consideration to be given to the impact of surface water flooding and run off into the River Thames (Controlled water). Any run off could result in adverse harm to the workings of the Thames, along with and including it's biodiversity and ecological habitat.	
49	402	Royal Borough of Kensington & Chelsea	Policy CC3 - Minimising Flood Risk and Reducing Water Use				<p>Reference to the Counters Creek Sewer Alleviation Scheme has been included in paragraph 6.274. The Local Plan refers to supporting "a solution to reduce the risk of sewer flooding", in paragraph 7.40 (under Utilities, in chapter 7). This is welcome. [Duty to Cooperate; Justification; Effectiveness].</p> <p>It is not clear if Policy CC4 has considered the potential significant environmental effects, including consequential effects for sewer and basement flooding in RBKC, particularly arising out of cumulative development in the Regeneration Areas. This is also a Duty to Cooperate issue as it relates to a strategic matter and infrastructure which affects both Boroughs. Paragraph 7.2.74 states that "developers will still be required to demonstrate that there is adequate capacity in the sewer system both on and off site to serve their development and that it would not lead to problems for existing users. In some circumstances, including all major developments impacting on surface or foul water drainage within the catchment of the Counters Creek sewer, this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development would lead to overloading of existing infrastructure." It is not clear if this will be enough to ensure</p>	<p>The Local Plan should also acknowledge the necessity for the Kensington Olympia site, which straddles the Boroughs' boundaries, to be used as a main drive site for the Counters Creek Sewer Alleviation Scheme for the reasons set out in Thames Water's Stage 3 Preferred Option and Sites Report. [Duty to Cooperate; Justification; Effectiveness].</p>

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							development does not have a negative impact in RBKC. [Duty to Cooperate; Justification; Effectiveness].	
48	442	London Borough of Richmond	Policy CC3 - Minimising Flood Risk and Reducing Water Use				Most of H&F is at risk from some form of fluvial/tidal flooding from the River Thames, therefore it would be unreasonable to restrict development only to Flood Zone 1 in the north of the borough, particularly as much of this area is also at risk from sewer and surface water flooding (covered by Policy CC4). Sewer flooding is also a potential problem for the borough, with Thames Water identifying over 2,000 locations in the borough affected by sewer flooding in the past 10 years. Also there is an increased potential for elevated groundwater in some parts of the borough, mainly to the south of Goldhawk Road. LBRuT supports Policies CC3 - Minimising Flood Risk and Reducing Water Use and CC4 - Minimising Surface Water Run-off with Sustainable Drainage Systems and other measures to reduce flood risk. Thames Tideway Tunnel, a multi-borough project including LBRuT, and is under construction along Carnwath Road, a major project in the South Fulham Riverside Regeneration Area (SSFRA).	
77	617	Environment Agency	Policy CC3 - Minimising Flood Risk and Reducing Water Use	YES	YES	YES	<p>We welcome the inclusion of the requirements set out in the Thames Estuary 2100 plan that sites must where necessary enhance, raise flood defences - or demonstrate raising is possible in the future.</p> <p>It is encouraging to see the awareness of Groundwater Source Protection Zones (SPR) in Policy CC3. However there is no supporting text to this policy and it is advised that 'measures' are specified to ensure that SPZ's are protected during development.</p>	<p>It is encouraging to see the awareness of Groundwater Source Protection Zones (SPR) in Policy CC3. However there is no supporting text to this policy and it is advised that 'measures' are specified to ensure that SPZ's are protected during development.</p> <p>We would suggest developers to submit a water efficiency calculator report to demonstrate compliance. It is also recommended that the term 'all developments' in the final</p>

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							<p>It is positive to note that the council has recognised population growth and climate change as having impacts on water resources within Paragraph 6.265 and 6.266. We advise the Borough to acknowledge it is within an area of 'Serious' Water Stress. 'Serious' water stress is defined as a region where the current or future demand for household water is, or is likely to be, a high proportion of the effective rainfall which is available to meet that demand. The Environment Agency's document 'Water Stressed Areas – final classification' 2013 can be viewed using the link or by visiting GOV.UK. In addition the London abstraction licensing strategy gives guidance on water resource availability and strategy measures.</p> <p>The final point in Policy CC3 addresses the requirement for all developments to 'include water efficiency fittings and appliances in line with London Plan consumption targets'. The London Plan has a target of 105 litres/person/day when designing residential development. Increased water efficiency would contribute towards the London Plan water consumption targets as mentioned in Policy CC3 and may benefit the householder by reducing water bill charges.</p>	point of Policy CC3 is expanded to specify pre-existing and new developments as mentioned in Paragraph 6.266.
	85	Imperial College London	Policy CC4 - Minimising Surface Water Run-off with Sustainable Drainage Systems	NO	NO	YES	<p>Whilst the need to reduce surface water run-off is recognised and supported by Imperial, the draft policy is too onerous in requiring all major developments to achieve greenfield run-off rates.</p> <p>The proposed wording goes substantially beyond the existing Core Strategy Policy CC2 which required development proposals to include appropriate sustainable drainage systems to reduce the amount of surface water discharged to the foul water drainage.</p>	<p>It is requested that the first bullet point be amended in line with the 2016 London Plan Policy 5.13 and therefore reworded to read:</p> <p>"all major developments must implement sustainable urban drainage systems (SUDS), unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates."</p>

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							It is requested that the first bullet point be amended in line with the 2016 London Plan Policy 5.13 and therefore reworded as set out below.	
19	222	Natural England	Policy CC4 - Minimising Surface Water Run-off with Sustainable Drainage Systems				<p>In line with the definition of GI provided in your Local Plan, there is an opportunity to specifically link SuDS (Policy CC4) and a safe environment for cyclists and pedestrians (Policy T1) with GI.</p> <p>Integrating these features with GI will improve both the quality of these features as well as the multifunctional character of GI.</p>	
41	353	Thames Water Utilities Ltd	Policy CC4 - Minimising Surface Water Run-off with Sustainable Drainage Systems	YES	YES	YES	<p>Thames Water support the policy requirement for a minimum of Greenfield run-off rates for all major planning applications as a minimum. This approach is supported by the London Sewer Capacity maps that are referenced within the submission Local Plan as well as the high level of growth forecast within the catchment.</p> <p>The policy is necessary to ensure that permanent developments which increase flows into the combined sewerage network mitigate this impact through the management of surface water to ensure that the development does not lead to overloading of existing infrastructure as set out in the supporting text at 6.274. As set out in Thames Waters response to the draft Local Plan consultation development outside Critical Drainage Areas (CDAs) could increase flows into the drainage network and exacerbate existing issues within the CDAs. Where it is considered that there are practical reasons for not incorporating SuDS the reasoning will need to be carefully assessed against the implications.</p>	

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77	627	Environment Agency	Policy CC4 - Minimising Surface Water Run-off with Sustainable Drainage Systems	YES	YES	YES	<p>We welcome the inclusion of a SuDS policy in the plan, however it is limited to flood mitigation. SuDS can be beneficial in slowing down impacts from urban diffuse pollution if designed, used and maintained in the correct manner.</p> <p>The Local Plan discusses the growing issue of sewage system capacity notably in Paragraph 6.265 & Policy CC3 (relating to water and wastewater infrastructure), Paragraphs 6.273, 6.274, 6.275 and 6.277 (surface water). We support this and advise the council to continue implementing SuDS to prevent direct run-off entering the sewage system.</p>	
77	628	Environment Agency	Policy CC5 - Water Quality	YES	YES	YES	<p>We find this policy sound and have the following minor amendments to recommend.</p>	<p>We welcome the commitment to implementation of water run-off harvesting however it is recommended that more clarity is given in relation to the actual use of the water supply i.e. drinking or grey water.</p> <p>It is advised to acknowledge the Water Framework Directive within the water quality policy. It is understood that no water bodies are within LBHF however LBHF can still play a role in maintaining, improving or preventing a deterioration in the status of surrounding water bodies. The Thames River Basin Management Plan (TRBMP) advises that the Environment Agency and local authorities will ensure that all relevant actions are identified, prioritised, resourced and implemented.</p> <p>Highway runoff can contain contaminants such as heavy metals and hydrocarbons. Highway runoff can be managed</p>

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								using gully pots and monitoring drainage systems. It is recommended that LBHF implement a maintenance plan for gully pots and use additional measures to ensure the system is working effectively. The use of SuDS can help improve the water quality of surface runoff through a filtering process, although not all SuDS will remove hydrocarbons.
6	10	Oxfordshire County Council	Policy CC6 - Strategic Waste Management				<p>Thank you for your letter dated 16 September 2016 consulting this Council on the Hammersmith & Fulham Proposed Submission Local Plan (September 2016), specifically with regard to waste planning.</p> <p>Oxfordshire County Council has no comments to make on the waste planning aspects of the Proposed Submission Local Plan (in particular policies CC6 and CC7); and has no comments to make on the Background paper on Waste, September 2016.</p>	
18	207	Old Oak and Park Royal Development Corporation	Policy CC6 - Strategic Waste Management				OPDC will continue to work with Hammersmith and Fulham Council, in order to help ensure that they can meet the borough's apportionment target, as defined by the London Plan.	
18	208	Old Oak and Park Royal Development Corporation	Policy CC6 - Strategic Waste Management				<p>Para 6.284</p> <p>There is a minor discrepancy in the figures cited in this paragraph:</p>	

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							<p>This represented approximately 42.8% of waste received at the site. Based on</p> <p>this proportion, it is estimated that the site has an ultimate licenced capacity</p> <p>to manage a maximum of 684, 800 tonnes of household and commercial</p> <p>and industrial waste (subject to market variation and realising the potential of</p> <p>rail and canal for waste transport).</p>	
18	209	Old Oak and Park Royal Development Corporation	Policy CC6 - Strategic Waste Management				<p>Para 6.285</p> <p>Please also note in this paragraph that OPDC does not have a waste apportionment target in the London Plan.</p>	
34	323	Thurrock Borough Council	Policy CC6 - Strategic Waste Management	NO		NO	<p>6.280 to 6.284</p> <p>The Hammersmith and Fulham Proposed Submission Local Plan is considered unsound as both the local plan and the evidence base as set out in the various iterations of the Waste Background Paper fail to take account of Inert Waste and in particular Construction Demolition and Excavation Waste (C, D,& E waste).</p>	<p>The Hammersmith and Fulham Proposed Submission Local Plan should be amended to make reference to the management of Construction, Demolition and Excavation waste (C, D & E waste).</p> <p>The Hammersmith and Fulham Local Plan should be supported by adequate evidence relating to C, D& E waste and this matter be subject to further Duty to Cooperate.</p>

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							<p>The Proposed Submission Local Plan Waste Policy (CC6 -Strategic Waste Management) and supporting paragraphs make no specific mention of C, D &E waste and how it is to be managed. There is very little reference to the C, D&E waste stream in the Waste Background Papers of January 2015 and September 2016.</p> <p>It is acknowledged that the Waste Policies in the adopted Further Alterations to the London Plan (FALP) do not make a specific apportionment of C, D & E Waste to be managed by the London Boroughs. Furthermore the FALP sets a target that London will recycle or reuse 95% of construction and demolition waste by 2020.</p> <p>It is recognised that high levels of recycling of C and D waste have been achieved across London. However evidence from the London Boroughs and Waste Planning authorities also indicates that significant levels of Inert Waste including C, D & E waste could continue to be exported from London to landfill facilities outside of London. This is in particularly the case with Excavation Waste (E Waste) which is identified as becoming a significant proportion of the Inert Waste exported from London.</p> <p>The Waste Background Paper of September 2016 and the earlier Paper of January 2015 do not quantify the level of C, D, & E arisings in Hammersmith and Fulham. The C, D & E waste streams are only referred to in these papers in the sections on waste exports and based on the EA Waste Interrogator data for recent years (2013 and 2014). There is also some limited further reference to C and D waste in relation to capacity at the Old Oak Common site.</p>	

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							<p>Whilst the overall exports of Inert Waste to landfill in Thurrock as stated from data derived from the EA Waste Interrogator (11243 tonnes in 2013 and 3082 tonnes in 2014) do not appear high it is considered using data based on waste flows for only several years does not provide a significant enough assessment of trends in waste flow. The flows of C,D &E waste can vary significantly over longer periods. The evidence takes no account of current or future trends of arisings of these waste streams. There is no identification of the potential impact of any major increases in such waste due to new major infrastructure and regeneration projects.</p> <p>The Proposed Submission Local Plan does not set out a policy position with regard to C, D&E waste and is not supported by appropriate and proportionate evidence. It is therefore unclear what the Council's position is on these waste streams. There has been no obvious Duty to Cooperate on this matter with no clear outcomes.</p> <p>For the above reasons Thurrock Council would welcome the opportunity to discuss the assumptions about C, D&E waste further and to be consulted and engaged in the Hammersmith and Fulham, Local Plan regarding this matter under the Duty to Cooperate.</p> <p>Thurrock Council is a unitary authority and the waste planning policies are included in the adopted Core Strategy of 2011. These policies are relevant for Thurrock until the Core Strategy is replaced. Thurrock Council is beginning to prepare a consolidated Local Plan that will include waste strategy and policies and have a period up to 2035 -37.</p> <p>C. D and E Waste streams</p>	

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							<p>The adopted Thurrock Core Strategy in common with other waste plans in the East of England has not planned for an apportionment of C,D&E waste from London. There is no such apportionment in the former RSS for the East of England or the adopted London Plan and its alterations.</p> <p>It is recognised that that C,D and E wastes have been a significant amount of waste exported from London boroughs and other authorities in recent years to Thurrock.</p> <p>It cannot be assumed that current or previous tonnage quantities of C,D&E waste can be received from London Boroughs or London waste authorities to Thurrock during the remainder of the current plan period or beyond (in any proposed local plans) for the following reasons:</p> <p>It cannot be assumed that current or previous tonnage quantities of C,D&E waste can be received from London Boroughs or London waste authorities to Thurrock during the remainder of the current plan period or beyond (in any proposed local plans) for the following reasons:</p> <ol style="list-style-type: none"> 1. Unless subject to contract the existing inert landfill capacity identified in the Thurrock plan is not specifically apportioned for London authorities. 2. The Thurrock adopted Core Strategy identifies specific Inert landfill capacity for meeting equivalent to local requirements and does not plan for additional capacity or London apportionment of C,D & E waste during the plan period to 2026 or beyond. 	

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							<p>3. Most landfill sites operating and receiving C,D&E waste in Thurrock are planned to close by 2020 with only one operational site at present planned to continue during the plan period to 2026.</p> <p>4. There remains uncertainty over two mothballed mineral site and the future availability of consented and potential void capacity at these sites.</p> <p>5. Uncertainty regarding the levels of capacity or confirmation regarding data.</p> <p>6. Unless contracted any Inert waste export from Hammersmith and Fulham will be potentially competing for sites to receive such waste within the wider south east; from major construction and excavation projects in London and wider south east areas; waste arisings for export in other waste plans in London as well as other waste requirements of the authorities in Thurrock and the East of England themselves.</p>	
49	403	Royal Borough of Kensington & Chelsea	Policy CC6 - Strategic Waste Management					RBKC is concerned that paragraph 8.102 of LBHF's adopted Core Strategy, which states "Spare waste management capacity of up to 220,000 tonnes has been identified within Hammersmith and Fulham. This spare capacity could accommodate the needs of the Royal Borough of Kensington and Chelsea and be utilised for that purpose", has been deleted. RBKC objects to the deletion of the paragraph and requests that it is reinstated to similar effect with an updated figure of the excess identified capacity. RBKC has a known shortfall of 194,000tpa based on the FALP apportionment figures to 2031.

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								<p>Due to the overlap of land between LBHF and OPDC, the Policy and justification should refer to the OPDC Waste Strategy which proposes to ensure that the apportionment targets for LBHF are adequately planned for. Subsequently the OPDC has confirmed that it considers there is sufficient capacity to meet LBHF's London Plan apportionment, therefore a reference to maximising the Powerday site should be referred to in Policy CC6.</p> <p>Waste background paper: The waste background paper will need to be updated with the findings of the WRWA Waste Technical Paper which is currently being prepared for the WRWA Waste Planning Authorities, including the OPDC.</p> <p>[Duty to Cooperate; Justification; Effectiveness; Consistency with National Policy].</p>
38	547	Greater London Authority and Transport for London Planning Team	Policy CC6 - Strategic Waste Management				Tfl support the council's wishes to increase the use of the River Thames for freight movement. This could be incorporated into Policy CC6- Strategic Waste Management.	

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74	568	Surrey County Council	Policy CC6 - Strategic Waste Management				<p>"Surrey County Council supports the approach under Policy CC6 to manage the apportioned tonnage of waste in accordance with the London Plan in cooperation with the adjoining Old Oak and Park Royal Development Corporation (OPDC). We suggest that more reassurance is provided that the Policy can be delivered by referring to the current progress of OPDC Draft Plan and specifically the safeguarding of the Powerday Plant.</p> <p>According to the latest available figures the Borough does not, at present, export non-inert waste to Surrey. But this is no guarantee for the future and hence our concern that provision is made to manage the appropriate apportioned tonnage of waste"</p>	
77	629	Environment Agency	Policy CC6 - Strategic Waste Management	YES	YES	YES	<p>We welcome the commitment to pursue a sustainable waste management strategy set out in policy CC6.</p>	<p>We suggest that the council considers the need for a policy to address the associated health and amenity impacts caused by the proposal to manage 247,000 tonnes of waste in borough by 2036.</p> <p>One possible method for this is the requirement to fully enclose new waste sites. This can reduce the spread of dust, odour and noise from waste management sites.</p>
6	650	Oxfordshire County Council	Policy CC7 - On-site Waste Management				<p>Thank you for your letter dated 16 September 2016 consulting this Council on the Hammersmith & Fulham Proposed Submission Local Plan (September 2016), specifically with regard to waste planning.</p> <p>Oxfordshire County Council has no comments to make on the waste planning aspects of the Proposed Submission Local Plan (in particular</p>	

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							policies CC6 and CC7); and has no comments to make on the Background paper on Waste, September 2016.	
46	436	Hadley Property Group Ltd (HPG)	Policy CC8 - Hazardous Substances				<p>HPG's Chelsea Island project on Harbour Avenue is currently under construction, and the company is keen to undertake future developments in the borough.</p> <p>HPG's comments on the draft local plan are made in a context of both Chelsea Island and its interest in developing in the borough</p> <p>Policy CC8 proposes the rejection of development proposals in the vicinity of existing establishments if there would be an unacceptable risk to future occupants. It also seeks to 'ensure that development takes account of major hazards identified by the Health & Safety Executive, namely; Fulham North Holder Station, Imperial Road; Fulham South Holder Station, Imperial Road; and Swedish Wharf, Townmead Road.'</p> <p>The policy refers to the two hazardous substances consents currently in place on the Fulham Gasworks site. The consents relate to the 5 gasholders which were used for the storage of gas until National Grid confirmed in January 2012 that the holders had been purged to air.</p>	<p>HPG's Chelsea Island development is one of a collection of sites which are currently constrained by their proximity to Fulham Gasworks.</p> <p>In accordance with an LBHF planning committee resolution on 8th June 2016, the Council will begin proceedings in January 2017 to revoke the hazardous substances consents. Therefore, upon the adoption of the Local Plan, following examination, the consents are very likely to have been revoked. On this basis, HPG requests that the specific references to the Fulham Holder Stations are removed from Policy CC8.</p>
42	648	National Grid Property Ltd	Policy CC8 - Hazardous Substances				<p>Policy CC8- Hazardous Substances</p> <p>Policy CC8 proposes the rejection of development proposals in the vicinity of existing establishments if there would be an unacceptable risk to future occupants. It also seeks to '<i>ensure that development takes account of major hazards identified by the Health and Safety Executive,</i></p>	<p>On this basis, NGP requests that the specific references to the Fulham Holder Stations are removed from Policy CC8.</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p><i>namely; Fulham North Holder Station, Imperial Road; Fulham South Holder Station, Imperial Road; and Swedish Wharf, Townmead Road.'</i></p> <p>The policy refers to the two hazardous substances consents currently in place on the Fulham Gasworks site. The consents relate to the 5 gasholders which were used for the storage of gas until National Grid confirmed in January 2012 that the holders had been purged to air.</p> <p>In accordance with an LBHF planning committee resolution on 8th June 2016, the council will begin proceedings in January 2017 to revoke the hazardous substances consents. Therefore, upon the adoption of the Local Plan, following examination, the consents are likely to have been revoked.</p>	
8	42	Hammersmith and Fulham Air Quality Commission	Policy CC10 - Air Quality					<p>Policy CC10 – Air Quality, p.167.</p> <p>Remove 'major' in 'all <i>major</i> developments', line 1.</p> <p>As a majority of development is small-scale, e.g., house extensions, the effect on air quality of these developments can overall be considerable. Such development should also be subject to the same air quality assessment as major development.</p> <p>Policy CC10 – Air Quality, p.167.</p> <p>A, b and c . Separate out in CC10 the assessment and mitigation of adverse air quality impacts generated by a) the construction of a development; and b) the operation of a</p>

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								<p>development. As this section now stands, construction and operation are conflated. It would be more helpful to distinguish them for assessment and mitigation purposes.</p> <p>Air Quality Policy CC10 should, like the Climate Change Policy, include the requirement for financial contributions to be made to implement the Council's Air Quality Action Plan when mitigation of air quality impacts cannot be fully implemented on site. This requirement should be extended to any development where new or additional receptors may be exposed to poor air quality.</p> <p>Substitute text at b. for the following:</p> <p><i>b. require developments to be 'air quality neutral' and resist development proposals which would materially increase exceedences of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Council's Local Air Quality Management Plan.</i></p> <p>Supports the principle of development not worsening the quality of air, and states appropriate mitigation.</p>
38	542	Greater London Authority and	Policy CC10 - Air Quality				TfL welcome LBH&F's efforts to reduce the negative air quality impacts of new development via the requirement of an air quality assessment for all major development. To deliver a beneficial impact, this policy should also	

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		Transport for London Planning Team					consider lowering parking levels for proposed major developments in areas indicated to have poor air quality.	
40	588	MR PRASHANT BRAHMBHAT T	Policy CC10 - Air Quality				6.297 - queen caroline street next to the Hammersmith flyover has residential school and a care home that are subjected to high level of air pollution and tis has to be a priority consideration.	
40	589	MR PRASHANT BRAHMBHAT T	Policy CC11 - Noise				NOISE, LIGHT AND AIR pollution in the TOWN CENTRE are a major concern and as such appropriate mitigation action has to be taken.	
7	118	Sport England	Policy CC12 - Light Pollution				<p><u>Light Pollution</u></p> <p>Floodlighting enables outdoor sport facilities, such as Artificial Grass Pitches and Multi-Use Games Areas, to be used during the weekday peak period (evenings) and therefore has a significant impact on communities' ability to participate in sport.</p> <p>Sport England would oppose any policy that would be interpreted to prevent outdoor sport facilities being floodlight. To assist the Local</p>	

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							<p>Authority, developers and site owners/operators, Sport England has developed artificial sport lighting guidance which can be found via the following link;</p> <p>https://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/artificial-sports-facilities/</p>	
40	590	MR PRASHANT BRAHMBHAT T	Policy CC12 - Light Pollution				<p>Street lighting has to be reconsidered and should not contaminate adjoining residential properties.</p>	

14. Transport & Accessibility

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	101	Fulham Society	Transport and Accessibility				<p>Transport . Despite the great success of the Imperial Wharf station (already overcrowded we understand), transport in the south east of the Borough is not good with poor access to the underground. Few buses cross the river to Wandsworth and currently few cater for the hinterland round the gasworks. With so few employment opportunities likely in the area, nearly all the residents will have to travel to work elsewhere.</p> <p>Although the rest of the Fulham area is quite well served by public transport, the roads are very busy with severe bottlenecks as they cross the West London railway and the river. Despite the laudable aims in the Local Plan it is difficult to see what can be done in this area without financial investment by the Council, or the agreement of and cooperation of Transport for London, or both.</p> <p>To take some of the individual targets in chapter 6.300:</p> <p>“developing and promoting safe environments for cyclist and pedestrians”. Yet there is nothing to say how pedestrians and small children will be protected from aggressive speeding cyclists.</p> <p>“securing access improvements for all”. This is vitally important on the underground. Fulham Broadway station is good but Parsons Green and Putney Bridge stations are appalling. Both urgently need some step-free access. Putney Bridge is a busy transport hub, with a nearby hotel, and caters for a large number of both elderly residents and young families.</p> <p>“ensuring that traffic generated by new development is minimised so that it does not add to parking pressures on local streets or congestion, or worsen air quality.” We all</p>	

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							<p>agree, but there will be a problem with developers and this could conflict with the Council's housing targets.</p> <p>"relat(e) the intensity of development to public transport accessibility and highway capacity." There is no sign that this is done and no policies in the Plan as to how it could be done.</p> <p>The FS supports the proposal for a footbridge across the river adjacent to Cremorne Bridge and loudly applauds the Council's support of a Fly-under at Hammersmith Broadway to replace the flyover. This would benefit both Fulham and Hammersmith residents and all those passing through the area.</p>	
7	119	Sport England	Transport and Accessibility		YES		Sport England welcome the objective to promote and facilitate safe environments for pedestrians and cyclists and increasing opportunities for such travel. This would contribute to active and healthy communities.	
17	175	Hammersmith Society	Transport and Accessibility				Policies T1 – T6 : We note that T1 has been expanded from the previous version in the 2011 Core Strategy to include Crossrail 2 ; HS2/Crossrail/Great Western interchange at Old Oak with interchanges with the West London Line and underground services ; a road tunnel replacing all or parts of the A4, including the Flyover through Hammersmith – all of which the Society supports : We question the omission of the proposal for a new on the Central Line at Du Cane Road.	
31	331	Port of London Authority	Transport and Accessibility				<p>Sustainable Transport</p> <p>The aims of the Local Plan, in terms of transport and connectivity, is to further improve transport, especially with the promotion of regular rail services, the use of cycle ways</p>	The need to reduce our carbon footprint and establish sustainable communities is paramount within National Policy. The use of the river as an alternative transport method

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							<p>and public rights of way. This has included the promotion of the Thames Path (subject to this not interfering with Safeguarded Wharf activity), which would ensure promotion of the River as a pleasant environment and one to enjoy.</p> <p>National policy focuses on the importance of sustainable transport choices and the wider role that this can play in achieving sustainability, as well as reducing congestion. It also states that new development should be located where it is accessible to public transport. It is the PLAs view that if development is located in close proximity to the river, the Borough should promote the use of the river as an alternative transport choice in this regard. This section of the Plan sets out a number of opportunities to improve transport and infrastructure in line with National Policy (and which has also been drawn out within other sections of the Plan) and it is pleasing that specific references to the use of the river (Policy T2), which assist in this regard, have been made.</p>	would therefore aid in promoting the objective of sustainable communities within the Borough.
73	415	St Quintin and Woodlands Neighbourhood Forum	Transport and Accessibility				North Kensington residents remain acutely aware that OPDC plans for 24,000 new homes at Old Oak involve no proposals for a new road network to relieve congestion of Wood Lane/Scrubs Lane as the sole north-south route in this part of London.	
14	55	Mr. Jon Burden	Policy T1 - Transport	NO	YES	YES	<p>Technology is moving much faster than Local Development Plans!!!! A potential "Borough Wide Target" could be:</p> <p>Investigate and work with new technologies (e.g. driverless cars) to improve traffic flow and reduce the need for private car ownership and use.</p>	<p>Use the following as a potential "Borough Wide Target":</p> <p>Investigate and work with new technologies (e.g. driverless cars) to improve traffic flow and reduce the need for private car ownership and use</p>

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18	211	Old Oak and Park Royal Development Corporation	Policy T1 - Transport				Policy T1 references support for the implementation of Old Oak Common Station. The emerging draft OPDC Local Plan sets out aspirations to deliver new and improve existing connections to surrounding areas.	To align with this approach and support integration of development and connectivity for local people in the borough, it is felt that the LBHF Local Plan should also reference the need for new development in the north of the borough, outside of the OPDC area, to be connected into Old Oak.
18	212	Old Oak and Park Royal Development Corporation	Policy T1 - Transport				Policy T1 references support for the implementation of the Old Oak Common Station, but does not mention support for the new Hythe Road or Old Oak Common Lane London Overground stations on the West London Line or North London Line. OPDC is actively pursuing the implementation of these stations and it is felt that the LBHF Local Plan should also reference support for the new London Overground stations which would benefit residents and business in H&F.	
18	213	Old Oak and Park Royal Development Corporation	Policy T1 - Transport				Policy T1 references support for the implementation of the Old Oak Common Station but doesn't mention support for an enhanced Willesden Junction station. As the London Overground platforms are situated in H&F, and LBH&F have assisted OPOC and TfL in the recent GRIP2 Willesden Junction station and interchange study, it is felt that the LBHF Local Plan should also reference support for a new and enhanced station at Willesden Junction which would benefit residents and business in H&F.	Should also reference support for a new and enhanced station at Willesden Junction which would benefit residents and business in H&F.
18	214	Old Oak and Park Royal Development Corporation	Policy T1 - Transport				Policy T1 references increased use of the River Thames. This should be extended to include the Grand Union Canal.	

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19	223	Natural England	Policy T1 - Transport				<p>In line with the definition of GI provided in your Local Plan, there is an opportunity to specifically link SuDS (Policy CC4) and a safe environment for cyclists and pedestrians (Policy T1) with GI.</p> <p>Integrating these features with GI will improve both the quality of these features as well as the multifunctional character of GI.</p>	
31	333	Port of London Authority	Policy T1 - Transport				<p>6.312. The Council also supports greater use of the Thames for freight movement, which is supported by the PLA. However, the PLA considers that the selective approach taken with the plan, both in timescale and cargo types, to freight transport is not in general conformity with the London Plan.</p>	
49	404	Royal Borough of Kensington & Chelsea	Policy T1 - Transport				<p>RBKC cannot support the proposal to seek a Crossrail 2 station at Imperial Wharf because it would be in conflict with our own proposals for a King's Road station. [Duty to Cooperate; Justification; Effectiveness].</p>	<p>Bullet 3 – Our previous consultation response requested the text be amended to "Seeking a road tunnel replacing all or parts of the A4..." because RBKC would not support the tunnel extending into this Borough and would prefer for the tunnel to replace only the Hammersmith Flyover. This change has not been made and we reiterate our request. [Duty to Cooperate; Effectiveness]</p> <p>Paragraph 6.307 – This paragraph sets out that possibilities for additional stations on the West London Line should be explored, including at North Pole Road "as advocated by RBKC". RBKC does not advocate a WLL station specifically at North Pole Road, though we do</p>

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								agree with residents who have said that a station between the existing Shepherd's Bush and Willesden Junction (and in the future between Shepherd's Bush and Old Oak Common) would have connectivity benefits for parts of North Kensington. In our previous consultation response we indicated that a station could be provided adjacent to the Imperial College West campus as an alternative to one at North Pole Road. This change has not been made and we reiterate our request. Please add "or adjacent to the Imperial College Campus" after "Road". [Duty to Cooperate; Effectiveness]
73	416	St Quintin and Woodlands Neighbourhood Forum	Policy T1 - Transport				While we support much of Draft Policy T1, we would welcome specific support for an additional Overground Station at 'Western Circus' (i.e. beneath the Westway elevated roundabout) as advocated by the West London Line Group and in the StQW Neighbourhood Plan. Current wording in Policy T1 refers only in general terms to <i>continuing to promote major improvements with new stations and enhanced local and sub-regional passenger services on the West London Line.</i>	
45	475	Berkeley Group (St James & St	Policy T1 - Transport				Our client supports the Council's approach to improve transportation provision in the borough. We acknowledge the Council's promotion of Crossrail 2 via South Fulham with an interchange at Imperial Wharf. We would welcome further engagement and	

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		George) & St William					detailed discussion around the potential location of such an interchange. However, a new station cannot impact on or delay deliverability of much needed new homes.	
38	520	Greater London Authority and Transport for London Planning Team	Policy T1 - Transport				Tfl look forward to working with LBH&F to minimise the level of motorised traffic generated by new development.	
38	543	Greater London Authority and Transport for London Planning Team	Policy T1 - Transport				<p>Policy T1- Transport " Seeking the increased capacity and reliability of the Picadilly and District lines"</p> <p>TfL support the borough-wide targets as they promote the Mayor's sustainable transport vision.</p> <p>This target is in line with TfL's vision and key priorities for London Underground. Capacity has been improved on the District Line with the introduction of new rolling stock. Tfl look forward to working with LBH&F to improve capacity on the Picadilly Line.</p>	
38	544	Greater London Authority and Transport for	Policy T1 - Transport				<p>Policy T1- Transport "Seeking and promoting the routing of Crossrail 2 via south Fulham, with an interchange to the Overground line at Imperial Wharf".- 1.5, spatial vision "Regenerating the Borough", Strategic Policy SFRRA, 5.110, 7.38.</p> <p>Although the London Plan does not state a final route for Crossrail 2, work on the potential for a station at Imperial Wharf has concluded that the route via Imperial</p>	Tfl would also request that the wording in the Local Plan be revised to reflect TfL's position.

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		London Planning Team					<p>Wharf takes Crossrail 2 too far to the west, it increases the length of the route and subsequent journey time for all users from Clapham Junction, and the increases overall cost of the project. With this in mind, it is not proposed that Crossrail 2 serve Imperial Wharf .</p> <p>TfL have undertaken work previously which has clearly shown that the optimal location for a station, if there is to be one between Victoria and Clapham Junction, is at Kings Road, as is currently proposed and has been since the original safeguarding for the scheme was established in 1991.</p> <p>Therefore, there is no case for a Crossrail 2 station at Imperial Wharf, and there are no active proposals to undertake any work in further considering one.</p>	
38	545	Greater London Authority and Transport for London Planning Team	Policy T1 - Transport				<p>6.305</p> <p>TfL look forward to working with LBH&F to improve public transport and accessibility. It is noted, however, that developers should, where appropriate, be approached to provide resources to do this.</p>	
38	546	Greater London Authority and Transport for London Planning Team	Policy T1 - Transport				<p>6.311-6.312- The River Thames</p> <p>TfL support the council's wishes to increase use of the River Thames for freight movements. This could be incorporated into Policy CC6- Strategic Waste Management.</p>	

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50	552	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy T1 - Transport				<p>Policy T1 – " <i>seeking and promoting the routing of Crossrail 2 via South Fulham, with an interchange to the Overground line at Imperial Wharf</i>"</p> <p>LBHF needs to study the implications of this connection on WLL passenger flows and services</p>	
23	251	H&F Disability Forum	Policy T2 - Transport Assessments and Travel Plans				<p>We do not support the following Borough Wide policies:-</p> <p>Policy T2: Transport assessments and travel plans</p> <p>The Disability Forum Planning Group has always had a problem with PTAL transport assessments because they do not assess how easily disabled people can get to various destinations. This is confirmed by <i>Accessible London</i> para 4.3. 10. Transport assessments normally assess how quickly and conveniently non- disabled people access various facilities.</p> <p>We have not seen a transport assessment using either PTAL or PERS methodology that properly evaluated and reported on "accessibility" from the perspective of disabled people or people with mobility impairments. <i>Accessible London</i> para 4.3.28 – 4.3.32 includes guidance on assessing the pedestrian environment from the perspective of disabled people.</p>	
57	152	Henrietta Bewley (H&F)	Policy T3 - Increasing and promoting Opportunities					I would like the council to make a commitment to building pedestrian and cycling bridges over the canal and roads into the development areas and the common

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		Liberal Democrats)	for Cycling and Walking					<p>lands of the Scrubs. The development plan as it is could be interpreted as new vehicular roads and new pedestrian bridges into the development areas, implying that the cyclists will be on the vehicular road bridges. Creating cycle routes that do not border vehicular roads, and are therefore low pollution and quiet, will make cycling more attractive. We already have significant number of cyclists and pedestrians sharing the canal towpath. An extension of this cycle - pedestrian routes would make cycling much more attractive.</p> <p>I would also like to see the same approach to creating pedestrian and cycling routes over the other rail routes in the borough that are currently a barrier to cyclists, forcing cyclists to travel in on the same congested road routes that the vehicles are using. For example, creating a cycling bridge over the railway at Olympia, enabling H&F cyclists to go along the cycle routes of Sinclair Road / Blyth Road, over Olympia, then across Kensington via Napier Road, Melbury Road and Holland Park, to the main East West cycle route through Kensington Gardens and Hyde Park, would give cyclists a traffic free route to</p>

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								travel East West across Hammersmith, without having to use the Hammersmith Gyration, or to cycle along the heavily polluted Hammersmith Road.
17	177	Hammersmith Society	Policy T3 - Increasing and promoting Opportunities for Cycling and Walking					T3 : Increasing and promoting Opportunities for Cycling and Walking : Add support for the Mayor's Cycle Super Highway through the borough and around Hammersmith Broadway.
27	291	Louise Rowntree	Policy T3 - Increasing and promoting Opportunities for Cycling and Walking				<p>Increasing and promoting Opportunities for Cycling and Walking</p> <p>Another initiative I highly commend, as a family of 5 with no car (husband cycles to work, we all use public transport and walk a lot).</p> <p>I didn't spot (apologies if it was in your plan) reference to road crossing safety: I have had several people complain to me that we need pedestrian crossings outside all major supermarkets in H&F. Two particularly dangerous places (a person was killed a few weeks ago a few meters up from one) is outside Sainsburys , Fulham road (opposite Durrell road), and the other Waitrose at parsons green: can the council urgently explore putting crossing there.</p> <p>On a related note, I would light to congratulate H&F council on introducing 20mph speed limits in residential streets: whilst there are the occasional scary speeders (any way of catching them on film and fining them?) it has made our streets much safer.</p>	Finally, I'd welcome the opportunity to attend one of the council meetings debating this plan, and perhaps answer any questions the council might have about my ideas, or explain in more detail how a Local Gardening Day could work. Warning, I am a Liberal Democrat (although, again, these views are my personal views).

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28	303	Hammersmith Mall Residents Association	Policy T3 - Increasing and promoting Opportunities for Cycling and Walking				Policy T3: Increasing and Promoting Opportunities for Cycling and Walking: Please refer to our comments on cycling on the Thames Path under Policy RTC2: Access to Thames Riverside and Foreshore, above.	
73	418	St Quintin and Woodlands Neighbourhood Forum	Policy T3 - Increasing and promoting Opportunities for Cycling and Walking				On cycling , policy T3 contains little specifics. There is reference in the text to supporting the Mayor of London's Cycling Vision, but no details on how Local Plan policies will respond to the planned East West Cycle Superhighway or the need to establish a dedicated cycleway between the Westway roundabout and the Old Oak Common HS2/Crossrail interchange to the north, and an enlarged Westfield shopping centre to the south.	
38	550	Greater London Authority and Transport for London Planning Team	Policy T3 - Increasing and promoting Opportunities for Cycling and Walking				This policy should make reference to the latest WestTrans guidance in ensuring that good quality cycle parking is an integral part of development. TfL would be interested in the weight that LBH&F would give this guidance and whether it may resolve to adopt it as an SPD	TfL suggest rewording of the policy to read: "Developer contributions for improvements to cycling infrastructure, including contributions to TfL Cycle Hire scheme to mitigate their impact on the existing network". The planned segregated East-West Cycle Superhighway should also be referred to within the document. TfL also request further information is added to this policy which emphasises the important

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								tole that cycle parking design has in creating attractive cycle parking infrastructure that people will use. For guidance, please see the WestTrans Bicycle Parking Report 2016.
38	561	Greater London Authority and Transport for London Planning Team	Policy T3 - Increasing and promoting Opportunities for Cycling and Walking				6.321 TfL requests that the word 'minimum' is italicised to place emphasis on the fact that the cycle parking standards in the London Plan represent the mimum provision required. Ideally, developers should be exceeding the levels in appendix 8 of this document, given the sustained rise in uesers of this mode as stated in Policy T3.	
25	289	Tri-Borough Public Health	Transport and Accessibility				Policy is T3 is particularly welcome.	
18	215	Old Oak and Park Royal Development Corporation	Policy T4 - Vehicle Parking Standards				The parking standards are not in line with the London Plan and they are fairly lenient in their restriction. Given pressure on the highways in the borough, LBHF should consider stricter car parking or include a line in the policy to require stricter car parking where PTAL is high.	
50	553	Capital and Counties on Behalf of Earls Court and Olympia Group	Policy T4 - Vehicle Parking Standards				Paragraph 6.322 now says <i>"Sufficient car parking will need to be provided to meet the essential needs of developments in accordance with London Plan (2016) parking standards set out at appendix 7"</i>	

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							This is acceptable, given the reference to London Plan (2016) parking standards rather than proposing more restrictive local standards. Appendix 7 is also acceptable.	
38	562	Greater London Authority and Transport for London Planning Team	Policy T4 - Vehicle Parking Standards				<p>6.323 TfL welcome the robust approach to permit free development.</p> <p>6.324 TfL welcome the council requirement for 25% active and 25% passive EVCP provision</p>	TfL request that the wording of this policy is revised to make clear that car parking permit free measures will be implemented on all new development except for where on-street blue-badge parking may be required as set out in Policy T5.
38	563	Greater London Authority and Transport for London Planning Team	Policy T6 - Borough Road Network - Hierarchy of Roads				<p>6.328- TLRN Routes</p> <p>In the interests of consistency, please note that separate approval is needed from TfL for any development on the TLRN.</p>	
50	555	Capital and Counties on Behalf of Earls Court and Olympia Group	Table 6 Hierarchy of Borough Roads				Policy T6 – appears to be unchanged from the previous Policy T7	
31	334	Port of London Authority	Policy T7 - Construction and				The PLA would wish to draw your attention to the content of Policy T7, which relates to Construction and Demolition Logistics, where further emphasis on the use of the	

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			Demolition Logistics				<p>river of the transportation of materials and waste associated with development could be given.</p> <p>However, the opportunity to utilise the Borough's three Safeguarded Wharves in this regard is a opportunity missed, which is disappointing (matters relating to Safeguarded Wharves is further drawn out below).</p>	
48	450	London Borough of Richmond	Policy T7 - Construction and Demolition Logistics				<p>With all the proposed growth and development in H&F, LBRuT is pleased that it is stated that: <i>All construction, demolition, utilities and major logistic activities within the borough will be required to work with the council in developing the scope and impact of their operations. In order to mitigate the impact of any additional traffic or potential disruption to the network, careful planning and co-ordination with the council is required to ensure the smooth operation of the highway network, Policy T7 - Construction and Demolition Logistics.</i></p>	
38	564	Greater London Authority and Transport for London Planning Team	Policy T7 - Construction and Demolition Logistics				<p>Policy T7- Construction and Demolition Logistics</p> <p>TfL welcome this inclusion of policy where construction and demolition logistics were not mentioned in LBH&F's Core Strategy (2011). An addition to this policy could insist that vehicles entering construction and demolition sites must be FORS accredited.</p>	

16. Planning Contributions & Infrastructure

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
23	252	H&F Disability Forum	(7) Planning Contributions and Infrastructure				We need to work with the Planning Department on appropriate wording to ensure accessible and inclusive outcomes from planning conditions and S106 agreements. See also <i>London Plan SPG Accessible London</i> 3.6 Planning Conditions and S106 agreements.	
49	405	Royal Borough of Kensington & Chelsea	(7) Planning Contributions and Infrastructure				Paragraph 7.38 – The Council objects to the "bring forward a new Crossrail 2 station at Imperial Wharf". The Council strongly supports the provision of a Crossrail 2 station at King's Road, Chelsea. [Duty to Cooperate; Justification; Effectiveness] .	
48	451	London Borough of Richmond	(7) Planning Contributions and Infrastructure				Cross boundary, infrastructure provision such as schools and health care facilities may come under increased pressure with growing numbers in population, however this can be kept under review through ongoing liaison through the Duty to Cooperate.	
12	614	Imperial College Healthcare NHS Trust	(7) Planning Contributions and Infrastructure				<p>2.4 Section 7: Planning Contributions and Infrastructure: Health</p> <p>The Trust welcomes the Council's approach as set out in Section 7 headed "Planning Contributions and Infrastructure" where it is stated in paragraph 7.26 on "Health":</p> <p>"The council is seeking to respond to the changing and evolving health care provision by supporting and enhancing the provision of existing secondary and primary health services in the borough. The increase in population as a result of the Local Plan proposals will have an impact upon the existing health provision and the council will work with its partners to develop</p>	<p>The Trust suggests that the wording of this paragraph is amended to read:</p> <p><i>"The council will support:</i></p> <ul style="list-style-type: none"> <i>The existing secondary health care services in the borough(Hammersmith/Queen Charlotte's Hospital and Charing Cross Hospital) by working in partnership with the Imperial College Healthcare NHS Trust".</i>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>integrated health and social care and to improve access to community healthcare and out-of-hospital services for existing and new residents."</p> <p>It should be noted that the Trust and Hammersmith & Fulham GP Federation established a formal relationship in 2015/16 to explore a new model of integrated care for the population of the borough.</p> <p>This evolving model of care is in line with national policy development and includes consideration of an 'accountable care partnership' when healthcare providers come together to offer joined-up care to a whole population across primary and secondary care.</p> <p>The Trust estimates that around a third of patients currently in one of our inpatient beds could be better cared for in the community or at home. Many are frail, elderly people and others with complex, long-term physical and/or mental health conditions. They remain in hospital simply because the support and services they need to go home or to a residential care facility are not easily available at the right time. We also know that there will continue to be big increases in the number of people with one or more long-term conditions, such as diabetes or arthritis by around a third and advanced dementia and Alzheimer's increasing by 40 per cent by 2030. Proactive care to help people stay as healthy and independent as possible and manage their own conditions will need to be very different to the reactive treatment we tend to provide now.</p> <p>The Trust welcomes the Council's commitment to work together with our Trust as set out in paragraph 7.27 which states:</p> <p>"The council will support:</p>	<p>However, the Trust wishes to question and see evidence for the statement made in paragraph 7.28 where it is claimed:</p> <p>"The Local Plan proposals have been developed with the health providers and therefore relevant health facilities have been identified in the regeneration area proposals. Further details of the specific requirements and anticipated phasing are included in the schedule of the IDP."</p>

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							<ul style="list-style-type: none"> • <i>The existing secondary health care services in the borough (Queen Charlotte's Hospital and Charing Cross Hospital) by working in partnership with the Imperial College Healthcare NHS Trust".</i> 	
	27	CLS Holdings	Policy INFRA1 - Planning Contributions and Infrastructure Planning				As noted elsewhere in these submissions we have significant concerns over the viability and, therefore, deliverability of the Local Plan given the competing demands of CIL payments, affordable housing and other infrastructure requirements.	
	43	Hammersmith and Fulham Air Quality Commission	Policy INFRA1 - Planning Contributions and Infrastructure Planning					<p>Policy INFRA1 – Planning Contributions and Infrastructure Planning, p.183.</p> <p>Include in S.106 reference to LBHF installing air monitors (plus funding, managing and reporting) at Hammersmith Broadway, Fulham Broadway and Brook Green to measure not only nitrous oxide and PM10 but also ozone and PM2.5, the particulates most dangerous for health. At the moment the only air monitor in the borough is at Shepherds Bush Green.</p> <p>The Council to increase the number of air quality monitors that feed into the London air quality network to better represent the actual levels of air pollution in the borough. One monitor is not</p>

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								adequate to measure air quality in Hammersmith and Fulham to a robust standard, sufficient to satisfy EU, Government and GLA.
	120	Sport England	Policy INFRA1 - Planning Contributions and Infrastructure Planning				Policy INFRA1 indicates that the Local Authority would seek contributions via CIL and S106 with sport being included in the Regulation 123 List. Although the acknowledgment of sport is welcomed, the Council do not have a clear action plan and strategy that sets out which facilities or projects to direct the contributions.	The Local Authority should have a clear set of priorities based on a thorough and robust assessment of current and future demand as highlighted above. Sport England therefore question how effective CIL and s106 will be in securing money into sport and therefore object.
	179	Hammersmith Society	Policy INFRA1 - Planning Contributions and Infrastructure Planning				Policy INFRA1 : The society supports the proposals to provide financially for infrastructure planning.	However, we request greater transparency as to how these funds are charged and to what use the funds are put. We have requested several times for sight of the S106 monies collected against projects and what is currently not spent.
	216	Old Oak and Park Royal Development Corporation	Policy INFRA1 - Planning Contributions and Infrastructure Planning				Para 7.16 “The Council will work with partners and stakeholders separately to deliver strategic sites and detailed delivery programmes.” This sentence could be misconstrued	perhaps the word separately should be removed so the sentence reads “The Council will work with partners and stakeholders to deliver strategic sites and detailed delivery programmes.”

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
	217	Old Oak and Park Royal Development Corporation	Policy INFRA1 - Planning Contributions and Infrastructure Planning				<p>Para 7.19</p> <p>OPDC would like LBHF to acknowledge the issue of affordable rental accommodation in the last sentence of the paragraph.</p>	The council will work with the Government, Greater London Authority (GLA), Homes and Communities Agency (HCA), Registered Providers and private Homes and Communities Agency (HCA), Registered Providers and private house builders to tackle affordability issues with low cost home ownership housing and rented accommodation.
	218	Old Oak and Park Royal Development Corporation	Policy INFRA1 - Planning Contributions and Infrastructure Planning				<p>Para 7.38 second bullet point</p> <p>The proposed new TfL Overground line stations at Hythe Rd and Old Oak Common are not mentioned please add them to the second bullet point</p>	support the regeneration proposals of the OPDC and the provision of HS2, Crossrail and a Great Western Main Line station at Old Oak Common and two new potential London Overground Stations at Hythe Road and Old Oak Common Lane .
	407	St Quintin and Woodlands Neighbourhood Forum	Policy INFRA1 - Planning Contributions and Infrastructure Planning				<p>Neighbourhood CIL</p> <p>Paragraph 7.5 of the Regulation 19 Draft reads <i>The council has produced the R123 list which identifies the borough's strategic priorities in terms of infrastructure spending. The CIL Regulations 2010 also identify that where there is a neighbourhood forum in place, through the production of a neighbourhood plan policies may be developed to identify the 'neighbourhood' infrastructure priorities.</i></p> <p>This does not seem an adequate explanation of either the 15% element of Neighbourhood CIL applying in all areas, nor the 25% element in areas with a 'made' neighbourhood plan. The 25% element is transferred directly to parish councils with a NP in place. In non-parished areas a neighbourhood</p>	We suggest this position should be reflected in the Regulation 19 Draft, in place of the current insufficient wording at paragraph 7.5.

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
							<p>forum with a 'made' neighbourhood plan is expected to have a significant role in deciding how this 25% element is allocated.</p> <p>As we understand, the 15% and 25% Neighbourhood CIL element can be applied to a wider range of expenditure than 'infrastructure' and could be used e.g. to fund the preparation of a neighbourhood plan.</p> <p>Paragraph 073 Reference ID: 25-073-20140612 of Planning Practice Guidance explains that: <i>Communities without a Parish, Town or Community Council will still benefit from the 15% neighbourhood portion (or 25% portion, if a neighbourhood plan or neighbourhood development order has been made). If there is no Parish, Town or Community Council, the charging authority will retain the levy receipts</i>but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding. Charging authorities should set out clearly and transparently their approach to engaging with neighbourhoods using their regular communication tools e.g. website, newsletters, etc. The use of neighbourhood funds should therefore match priorities expressed by local communities, including priorities set out formally in neighbourhood plans (our emphasis).</p>	
	429	Hammersmith and Fulham Clinical Commissioning Group (CCG)	Policy INFRA1 - Planning Contributions and Infrastructure Planning				<p>7.27 The council will support: The existing secondary health care services in the borough (Queen Charlotte's Hospital and Charing Cross Hospital) by working in partnership with the Imperial College Healthcare NHS Trust; The rise in demand of secondary healthcare provision by identifying provision in the regeneration areas; and, Continued partnership working with Hammersmith & Fulham Clinical Commissioning Group (CCG), the NHS</p>	<p>Secondary care services should also include Hammersmith Hospital (as well as Charing Cross and Queen Charlotte's). The overall health care needs of new residents within the regeneration areas should be taken into account (primary, secondary and tertiary care). This is reflected in our planning assumptions underpinning our Sustainability and</p>

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							Property Services and other successor groups to respond to future health and social care requirements.	Transformation Plan and in the specific schemes as set out in the Infrastructure and Delivery Plan (IDP).
	430	Hammersmith and Fulham Clinical Commissioning Group (CCG)	Policy INFRA1 - Planning Contributions and Infrastructure Planning				<p>7.29 The council also recognises the impact of the health and wellbeing of its communities with the physical environment. Improving air quality, increasing the provision of and access to open spaces, ‘greening’ of the borough, promoting accessible and inclusive facilities are examples of how the Local Plan takes a holistic approach to tackling these issues. The Local Plan policies have been developed to ensure these principles are implemented into the development process.</p> <p>The CCG shares the ambition of the Local Authority and would be keen to work with Local Authority partners to increase the provision of and access to green and open spaces, improve air quality and promote accessible and inclusive facilities.</p>	
	476	Berkeley Group (St James & St George) & St William	Policy INFRA1 - Planning Contributions and Infrastructure Planning				We have significant concerns over the viability and therefore deliverability of the Local Plan given the competing demands of CIL payments, affordable housing and other infrastructure requirements.	We recommend that the Council undertakes a review of its CIL Charging Schedule alongside the progression of its new Local Plan.

16. Glossary

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
8	44	Hammersmith and Fulham Air Quality Commission	Glossary					<p>Glossary , p.192.</p> <p>The state of the air around us rated as good or poor based on the level of pollution within it.</p>
44	374	Hammersmith & Fulham Historic Buildings Group	Glossary				<p>Glossary page 191</p> <p>Conservation Area: We welcome the new definition.</p>	<p>Glossary page 191</p> <p>Local Building of Merit</p> <p>Add for clarity: ... or Locally Listed Building ... to title. This would repeat the phrase in NPPF Glossary definition of ‘heritage asset’ and relate the Borough’s title to the wording of the NPPF</p> <p>Listed Building</p> <p>This is insufficiently informative. Amend definition as follows:</p> <p><i>A building or structure of special architectural or historic interest that is statutory protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. Listed buildings are graded I, II* or II with grade I being the highest. Listing can include the interior as well as the exterior of the building, and any buildings or permanent structures within its curtilage.</i></p> <p>Metropolitan Open Land:</p>

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
								<p>This is insufficiently informative . Amend definition as follows:</p> <p>Strategic open land within the urban area <i>which is protected by statute (similar to Green Belt protection)</i>. Clarification of the statute referred to would be welcome.</p>
65	456	Travis Perkins	Glossary				<p>Indeed we do note that the glossary included within the Proposed Local Plan does included <i>sui generis</i> employment uses within its employment uses definition. However, we also feel that this could make more specific reference to builders' merchants.</p>	<p>We would therefore encourage the Council to include the following red text within their definition:</p> <p>" Employment uses are defined as all Class B Uses and similar uses that are classified as sui generis including builders' merchants (Town and Country (Use Classes) Order 1987 (as amended))."</p> <p>This results in there being no doubt that any current or future <i>sui generis'</i> builders merchants are protected by the aforementioned employment policies for the duration of the Local Plan.</p>
50	530	Capital and Counties on Behalf of Earls Court and Olympia Group	Glossary				<p>Affordable Housing -</p> <p>As of the 1st April 2016 eligible Intermediate households can earn up to £90,000 within London.</p>	<p>Amend '£60,000' to '£90,000'.</p>

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38	566	Greater London Authority and Transport for London Planning Team	Glossary				Please note that TfL now uses the term 'Public Transport <i>Access</i> Level' instead of Public Transport <i>Accessibility</i> Level'.	

17. Appendices

Person ID	Rep No.	Name/ Organisation	Section	Sound	Legally Compliant	Duty to Co- operate	Comments	Suggested amendments by representor
17	181	Hammersmith Society	Appendices				Appendix 1 and 9 : Viability and Viability Protocol : We suggest that it essential that these important policies are checked and the wording approved by a leading Queen’s Counsel.	
70	438	Friends of Margravine Cemetery	Appendix 3 - Open Space Hierarchy					<p>1. Appendix 3</p> <p>Under ‘Cemeteries’ it should refer to ‘Margravine’ not ‘Hammersmith – as Margravine is what it says on the Council notices inside and outside the cemetery and how people refer to it. This also distinguishes it from the New Hammersmith cemetery. We are the Friends of <i>Margravine</i> Cemetery.</p>
70	441	Friends of Margravine Cemetery	Appendix 3 - Open Space Hierarchy				<p>Appendix 3 and 4</p> <p>In appendix 3 the area of Margravine Cemetery (referred to as Hammersmith!) is 6.53 hectares, and in Appendix 4 as 6.2 hectares. The Proposals map shows it appears to all be Nature Conservation. However, the former London Ecology Unit referred to 6.2 hectares.</p>	
70	439	Friends of Margravine Cemetery	Appendix 4 - Nature Conservation Areas and					<p>1. Appendix 4</p> <p>Under ‘Cemeteries’ it should refer to ‘Margravine’ not ‘Hammersmith – as Margravine is what it says on the Council notices inside and</p>

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			Green Corridors					outside the cemetery and how people refer to it. This also distinguishes it from the New Hammersmith cemetery. We are the Friends of <i>Margravine</i> Cemetery.
70	443	Friends of Margravine Cemetery	Appendix 4 - Nature Conservation Areas and Green Corridors				Appendix 3 and 4 In appendix 3 the area of Margravine Cemetery (referred to as Hammersmith!) is 6.53 hectares, and in Appendix 4 as 6.2 hectares. The Proposals map shows it appears to all be Nature Conservation. However, the former London Ecology Unit referred to 6.2 hectares.	
58	183	Historic England	Appendix 5 - Archaeologic al Priority Areas					Archaeological Priority Areas. This should clearly state that these are the current APAs and that they may be subject to change following a review in 2020 by Historic England. In the meantime Historic England's Greater London Archaeological Advisory Service should be consulted during the pre-application stage to ensure that archaeology is appropriately scoped.
23	253	H&F Disability Forum	Appendix 6 - Local Plan Monitoring Indicators				Chapter 10: Monitoring From the Disability Forum perspective it will be helpful if monitoring included how the planning process improved outcomes for disabled residents or residents with long term health conditions.	

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	254	H&F Disability Forum	Appendix 6 - Local Plan Monitoring Indicators				<p>Appendix 6: Local Plan Monitoring Indicators</p> <p>Housing Policy HO6: affordable housing : this needs to be updated to include M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.</p> <p>We also recommend this is not just monitoring housing granted permission but also includes number and % of housing completions (market and affordable housing to include intermediate, affordable rent and social rent) in any one year. This will enable the council to see how well their policies are working to meet the needs of all local residents.</p>	
38	657	Greater London Authority and Transport for London Planning Team	Appendix 7 - Car Parking Standards				TfL support the inclusion of London Plan standards in this appendix.	
14	57	Mr. Jon Burden	Table 7	NO	YES	YES	Many people, including retired and young professionals, are living in homes with a large number of bedrooms but have little or no need for a vehicle. The retired and elderly live in homes from which their children have left. Young professionals often convert a bedroom (or even two if both partners are self employed) into offices. A better measure needs to be developed for gauging car parking requirements.	Investigate a more accurate method of determining car parking requirements than bedrooms.
14	58	Mr. Jon	Table 7	NO	YES	YES	Reference should be made to exceeding cycle provision requirements listed in the next appendix. If a development provides additional, well design, secure cycle	If a development provides additional, well design, secure cycle parking the obligation for providing

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		Burden					parking the obligation for providing car parking should be reduced to allow more housing, retail or office space.	car parking should be reduced to allow more housing, retail or office space.
50	554	Capital and Counties on Behalf of Earls Court and Olympia Group	Appendix 8 - Cycle Parking Standards				Appendix 8 – the cycle parking standards are now consistent with the London Plan	
47	86	Stanhope PLC	Appendix 9 - Viability Protocol	NO	YES	YES	<p>Point 1 requires the FVA to be submitted at the time the application is submitted and will form part of the documentation suite available to the public. This transparency is understood to be in line with the GLA's revised protocol. It is therefore expected that this approach is likely to become the adopted approach however it is considered that careful management of the consultation process will be required as third parties could unduly delay the application process in unreasonably trying to argue each and every point in the FVA.</p> <p>Point 3 Benchmarking – the reference to ‘publicly available data source’ is potentially confusing and limiting (to both sides). Is, say, data gleaned from discussing sales values with other developers or residential agents ‘publicly available’ given it will not be set out on a website for all to see?</p> <p>Point 4 - Profit It is considered that this needs further clarity. We agree with the sentiment that a “market” profit rather than Applicant specific one should be considered. However it is not clear how one then provides evidence of what the “market” would require. Furthermore the draft only talks about profit on GDV or Cost but should include IRR</p>	<p>Point 1 - careful management of the consultation process will be required as third parties could unduly delay the application process in unreasonably trying to argue each and every point in the FVA. Importantly, it is considered that the option to redact specifics on commercially sensitive information should be possible.</p> <p>Point 3 Benchmarking – further clarity is required</p> <p>Point 4 - Profit - It is considered that this needs further clarity. We agree with the sentiment that a “market” profit rather than Applicant specific one should be considered. However it is not clear how one then provides evidence of what the “market” would require. Furthermore the draft</p>

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							<p>Point 5 - Benchmark Land Value – the protocol requires applicants to use EUV + or AUV, and effectively removes the Market Value approach that was recently used on sites in LBHF to justify the BLV. Whilst AUV provides an option on some sites, the need for any proposed AUV to be deemed “clearly fully compliant with the development plan” means that the Borough would need to sign off any AUV scheme before any of the Council’s advisors will value it. It is considered that it could be challenging aligning the proposals for a theoretical scheme with the likely detailed questions the Council are likely to need to ask to be comfortable it would comply with policy without fully designing a detailed alternative scheme which would be costly and time consuming.</p> <p>Growth Model – The protocol states that growth modelling should be provided on any scheme that has longer than a two year build programme. This is considered excessive. Two years is not a long construction period, and most schemes coming forward will take longer to construct. This is not in accordance with RICS guidance</p> <p>Review mechanisms – The protocol effectively seeks a review on any scheme that is not policy compliant. It does not set out however how the review mechanism will work, when it will be triggered, how betterment is split, does it go down as well as up, if there is a cap etc. Further clarity should be included in this protocol.</p>	<p>only talks about profit on GDV or Cost but should include IRR</p> <p>Point 5 - Benchmark Land Value – Consideration to how this would work in practice and the implications for applicants in terms of delays and cost needs further consideration and clarity. Applicants should not have to present a fully detailed alternative scheme.</p> <p>Growth Model – The RICS Viability Guidance suggests 5 years (or phased schemes). This should really be left to viability advisors to agree an appropriate methodology at the time of the application on a site specific basis.</p> <p>Review mechanisms – Further clarity should be included in this protocol.</p> <p>The GLA Revised Housing SPG will be published in circa 1 month, LBHF should review that guidance and ensure the principles are aligned.</p>