London Borough of Hammersmith & Fulham

Cabinet

Agenda

MONDAY
7 MARCH 2022
7.00 pm

MAIN HALL
FIRST FLOOR
3 SHORTLANDS
LONDON W6 8DA

Watch the meeting live on YouTube: https://youtu.be/KhjxTud9l2A

Membership

Councillor Stephen Cowan, Leader of the Council
Councillor Sue Fennimore, Deputy Leader
Councillor Larry Culhane, Cabinet Member for Children and Education
Councillor Andrew Jones, Cabinet Member for the Economy
Councillor Wesley Harcourt, Cabinet Member for the Environment
Councillor Max Schmid, Cabinet Member for Finance and Commercial Services
Councillor Ben Coleman, Cabinet Member for Health and Adult Social Care
Councillor Lisa Homan, Cabinet Member for Housing
Councillor Adam Connell, Cabinet Member for Public Services Reform
Councillor Sharon Holder, Cabinet Member for Strategy

Date Issued
25 February 2022

If you require further information relating to this agenda please contact: Katia Neale, Committee Coordinator, tel: 07776 672 956 or email: katia.neale@lbhf.gov.uk

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Shortlands

3 Shortlands,
Hammersmith,
London W6 8DA

Closest Underground Station
Hammersmith

Closest Bus Stop
Latymer Court (Stop G)

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and say which item you would like to attend for. Priority will be given to those who are participating in the meeting. Observers will be allocated seats on a first come first serve basis.

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DEPUTATIONS

Members of the public may submit a request for a deputation to the Cabinet on item numbers **4-11** on this agenda using the Council's Deputation Request Form. The completed Form, to be sent to Kayode Adewumi at the above address, must be signed by at least ten registered electors of the Borough and will be subject to the Council's procedures on the receipt of deputations. **Deadline for receipt of deputation requests: Wednesday 2 March 2022.**

COUNCILLORS' CALL-IN TO SCRUTINY COMMITTEES

A decision list regarding items on this agenda will be published by **Tuesday 8 March 2022.** Items on the agenda may be called in to the relevant Accountability Committee.

The deadline for receipt of call-in requests is: **Friday 11 March 2022 at 3.00pm.** Decisions not called in by this date will then be deemed approved and may be implemented.
A confirmed decision list will be published after 3:00pm on **Friday 11 March 2022.**

London Borough of Hammersmith & Fulham

Cabinet
Agenda

7 March 2022

Item		Pages
1.	**MINUTES OF THE CABINET MEETING HELD ON 7 FEBRUARY 2022**	5 - 14
2.	**APOLOGIES FOR ABSENCE**	
3.	**DECLARATION OF INTERESTS**	
4.	**CCTV CAPITAL INVESTMENT STRATEGY**	15 - 24
5.	**ENDING VIOLENCE AGAINST WOMEN & GIRLS STRATEGY 2022 - 2027**	25 - 64
6.	**HAMMERSMITH BRIDGE - ESSENTIAL WORK LEADING TO STRENGTHENING AND RESTORATION PROJECT**	65 - 71
7.	**ADOPTING THE WLA LOW-CARBON PROCUREMENT POLICY**	72 - 99

If a Councillor has a disclosable pecuniary interest in a particular item, whether or not it is entered in the Authority's register of interests, or any other significant interest which they consider should be declared in the public interest, they should declare the existence and, unless it is a sensitive interest as defined in the Member Code of Conduct, the nature of the interest at the commencement of the consideration of that item or as soon as it becomes apparent.

At meetings where members of the public are allowed to be in attendance and speak, any Councillor with a disclosable pecuniary interest or other significant interest may also make representations, give evidence or answer questions about the matter. The Councillor must then withdraw immediately from the meeting before the matter is discussed and any vote taken.

Where Members of the public are not allowed to be in attendance and speak, then the Councillor with a disclosable pecuniary interest should withdraw from the meeting whilst the matter is under consideration. Councillors who have declared other significant interests should also withdraw from the meeting if they consider their continued participation in the matter would not be reasonable in the circumstances and may give rise to a perception of a conflict of interest.

Councillors are not obliged to withdraw from the meeting where a dispensation to that effect has been obtained from the Standards Committee.

8.	**FLOOD RISK MITIGATION PROGRAMME**	100 - 131
9.	**SCHOOL BUDGET (DEDICATED SCHOOLS GRANT) 2022/23**	132 - 143
10.	**AFFORDABLE WORKSPACE SUPPLEMENTARY PLANNING DOCUMENT**	144 - 347
11.	**RAILWAY ARCHES SUPPLEMENTARY PLANNING DOCUMENT**	348 - 444
12.	**FORWARD PLAN OF KEY DECISIONS**	445 - 478

13. DISCUSSION OF EXEMPT ELEMENTS (IF REQUIRED)

LOCAL GOVERNMENT ACT 1972 - ACCESS TO INFORMATION

Proposed resolution:

Under Section 100A (4) of the Local Government Act 1972, that the public and press be excluded from the meeting during the consideration of the following items of business, on the grounds that they contain the likely disclosure of exempt information, as defined in paragraph 3 of Schedule 12A of the said Act, and that the public interest in maintaining the exemption currently outweighs the public interest in disclosing the information.

London Borough of Hammersmith & Fulham

Cabinet

Minutes

Monday 7 February 2022

NOTE: This meeting was held remotely. A recording of the meeting can be watched at on YouTube at: https://www.youtube.com/watch?v=2xlS1go-gpI

PRESENT

Councillor Stephen Cowan, Leader of the Council
Councillor Andrew Jones, Cabinet Member for the Economy
Councillor Lisa Homan, Cabinet Member for Housing
Councillor Max Schmid, Cabinet Member for Finance and Commercial Services

IN ATTENDANCE VIRTUALLY

Councillor Sue Fennimore, Deputy Leader
Councillor Adam Connell, Cabinet Member for Public Services Reform
Councillor Wesley Harcourt, Cabinet Member for the Environment
Councillor Sharon Holder, Cabinet Member for Strategy

1. MINUTES OF THE CABINET MEETING HELD ON 10 JANUARY 2022

RESOLVED:

That the minutes of the meeting of the Cabinet held on 10 January 2022 be confirmed and signed as an accurate record of the proceedings, and that the outstanding actions be noted.

2. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor Larry Culhane and Councillor Ben Coleman.

3. DECLARATION OF INTERESTS

There were no declarations of interest.

4. REVENUE BUDGET AND COUNCIL TAX LEVELS 2022/23

Councillor Max Schmid stated that this report would be debated and formally approved in over two weeks' time at the Budget Council. He highlighted that while living costs and inflation were going up this Council was freezing Council Tax and had chosen not to apply the Government modelled 1% 'adult social care precept', resulting in a reduced burden on local taxpayers. These and the other measures proposed would not impair the delivery of services owing to £7.434m of new investment on new and better services for residents.

Councillor Schmid added that the budget proposals included prudent measures to strengthen the Council's future financial resilience by contributing one-off resources of £2.1m to reserves and general balances.

The Leader commended Cllr Schmid, the Chief Executive, Kim Smith, and the Senior Management Team for the excellent report proposing greater investment fund into frontline services. He added that this was one of the very few councils in Britain to have frozen Council Tax without any extra funding for the Government. This was funded by the Council's ruthlessly financially efficient programme, which eliminated bureaucracy and wastage, resulting in a modern effective business.

AGREED UNANIMOUSLY BY THE CABINET MEMBERS PRESENT:

That Cabinet recommend that Budget Council, for the reasons set out in this report and appendices, agree:

1. To freeze the Hammersmith & Fulham element of the council tax charge for 2022/23 and not apply the 2% increase modelled by the government for the coming year.

2. To not apply the government modelled "adult social care precept" levy of 1% for 2022/23, and to instead use council savings and income to fund growth in adult social care spending.

3. To set the Council's own total net expenditure budget for 2022/23 at £125.657m.

4. To approve £7.434m of new investment on key services for residents.

5. To approve fees and charges, as set out in paragraph 10, including freezing charges in adult social care, children's services and general fund housing.

6. To note the budget projections to 2025/26 made by the Director of Finance in consultation with the Strategic Leadership Team.

7. To note the statement of the Director of Finance, under Section 25 of the Local Government Act 2003, regarding the adequacy of reserves and robustness of estimates (paragraph 37).

8. To approve the reserves strategy and realignment of reserves as set out in Appendix J and Appendix K.

9. To require all Directors to report on their projected financial position compared to their revenue estimates in accordance with the Corporate Revenue Monitoring Report timetable.

10. To authorise Directors to implement their service spending plans for 2022/23 in accordance with the recommendations within this report, the Council's Standing Orders, Financial Regulations, relevant Schemes of Delegation and undertake any further consultation required regarding the Equalities Impact Assessment.

11. Set the Council's element of council tax for 2022/23 for each category of dwelling, as outlined in the table below and in full in Appendix A and calculated in accordance with Sections 31A to 49B of the Localism Act 2011.

Category of Dwelling	**A**	**B**	**C**	**D**	**E**	**F**	**G**	**H**
Ratio	6/9 £	7/9 £	8/9 £	1 £	11/9 £	13/9 £	15/9 £	18/9 £
a) H&F	554.64	647.08	739.52	831.96	1,016.84	1,201.72	1,386.60	1,663.92

12. To note, based on the Mayor of London's draft consolidated budget, the element of council tax to be charged by the Greater London Authority in accordance with Section 40 of the Local Government Finance Act 1992 for each of the categories of dwellings as shown in the table below

Category of Dwelling	**A**	**B**	**C**	**D**	**E**	**F**	**G**	**H**
Ratio	*6/9* *£*	*7/9* *£*	*8/9* *£*	*1* *£*	*11/9* *£*	13/9 £	15/9 £	18/9 £
b) GLA	263.73	307.68	351.63	395.59	483.50	571.41	659.32	791.18

13. That the overall Council Tax to be set at £1,227.55 per Band D property as follows:

Category of Dwelling	A	B	C	D	E	F	G	H
Ratio	6/9 £	7/9 £	8/9 £	1 £	11/9 £	13/9 £	15/9 £	18/9 £
a) H&F	554.64	647.08	739.52	831.96	1,016.84	1,201.72	1,386.60	1,663.92
b) GLA	263.73	307.68	351.63	395.59	483.50	571.41	659.32	791.18
c) Total	**818.37**	**954.76**	**1,091.15**	**1,227.55**	**1,500.34**	**1,773.13**	**2,045.92**	**2,455.10**

14. To authorise the Director of Finance to collect and recover National Non-Domestic Rate and Council Tax in accordance with the Local Government Finance Act 1988 (as amended), the Local Government Finance Act 1992 and the Council's Scheme of Delegation.

15. That the Council opts-in to the sector led 'appointing person' regime operated by Public Sector Audit Appointments (PSAA) for the appointment of the external auditor (including Pension Fund) for the years 2023-28.

Reason for decision:
As set out in the report.

Alternative options considered and rejected:
As outlined in the report.

Record of any conflict of interest:
None.

Note of dispensation in respect of any declared conflict of interest:
None.

5. FOUR YEAR CAPITAL PROGRAMME 2022-26 AND CAPITAL STRATEGY 2022/23

Councillor Max Schmid stated that this report had a compilation of the financial capital implications of the decisions made by the Council over recent years. In particular, the decisions prioritised the need for more genuinely affordable social housing to be delivered to the Civic Campus scheme alongside other benefits, and the provision of development financing to the EdCity scheme, which would bring a brand-new school and affordable housing. He stated that this report would be debated and formally approved in over two weeks' time at the Budget Council.

The Leader stressed the importance of the youth facilities being built at the EdCity scheme in White City which would create engagement opportunities for young. This was part of the Council's industrial strategy.

AGREED UNANIMOUSLY BY THE CABINET MEMBERS PRESENT:

1. To approve the four-year General Fund Capital Programme budget at £187.6m for the period 2022/23-2025/26 (presented in Table 2 and Appendix 1).

2. To approve the continuation of rolling programmes for 2022/23 funded from the Council's mainstream resources. For financial modelling purposes, these programmes are assumed to continue at the same level until 2025/26:

	£m
Corporate Planned Maintenance	2.400
Footways and Carriageways	2.030
Column Replacement	0.346
Controlled Parking Zones	0.275
Total	**5.051**

3. To delegate approval of the detailed programmes for use of the rolling programmes, in recommendation 2, to the relevant SLT Director in consultation with the Director of Finance and relevant Lead Cabinet Member.

4. To approve the four-year Housing (HRA) Capital Programme at £389.6m for the period 2022/23-2025/26 as set out in Table 5 and Appendix 1.

5. To delegate authority to the Director of Finance in consultation with the Cabinet Member for Finance and Commercial Services to approve the potential use of up to £4.3m of capital receipts under the Government's Flexible Use of Capital Receipts provisions for funding of Invest to Save schemes in 2022/23 and 2023/24 (as identified in Appendix 5) and potential match-funding opportunities.

6. To approve the Capital Strategy 2022/23, as set out in Appendix 4.

7. To approve the annual Minimum Revenue Provision policy statement for 2022/23, as set out in Appendix 6.

8. To note the existing mainstream funded schemes previously approved, but now reprofiled to 2022/23 and future years as detailed in Table 3.

Reason for decision:
As set out in the report.

Alternative options considered and rejected:
As outlined in the report.

Record of any conflict of interest:
None.

Note of dispensation in respect of any declared conflict of interest:
None.

6. CAPITAL PROGRAMME MONITOR & BUDGET VARIATIONS, 2021/22 (THIRD QUARTER)

Councillor Max Schmid stated that this report reflected the capital activity over the year. The construction and capital projects had been affected by the negative impact of Brexit and the pandemic, consequently reducing the activity in some schemes. However, the EdCity and the Civic Campus schemes were still on track and progressing.

AGREED UNANIMOUSLY BY THE CABINET MEMBERS PRESENT:

1. To note the net forecast decrease in 2021/22 capital expenditure of £12m (9.4% of the approved budget). The variations are detailed in Appendix 2.

2. To approve the updated four-year capital programme 2021-2025 of £473.2m as detailed in Appendix 1.

3. To note the potential risks regarding the Housing Capital Programme, as summarised in paragraphs 20-22.

Reason for decision:
As set out in the report.

Alternative options considered and rejected:
As outlined in the report.

Record of any conflict of interest:
None.

Note of dispensation in respect of any declared conflict of interest:
None.

7. TREASURY MANAGEMENT STRATEGY STATEMENT 2022/23

Councillor Max Schmid stated that this report would be debated and formally approved in over two weeks' time at the Budget Council.

AGREED UNANIMOUSLY BY THE CABINET MEMBERS PRESENT:

1. That approval be given to the future borrowing and investment strategies as outlined in this report.

2. That the Director of Finance, in consultation with the Cabinet Member for Finance and Commercial Services, be delegated authority to manage the Council's cash flow, borrowing and investments in 2022/23 in line with this report.

3. In relation to the Council's overall borrowing for the financial year, to approve the Prudential Indicators as set out in this report and the revised Annual Investment Strategy set out in Appendix E.

Reason for decision:
As set out in the report.

Alternative options considered and rejected:
As outlined in the report.

Record of any conflict of interest:
None.

Note of dispensation in respect of any declared conflict of interest:
None.

8. TREASURY MANAGEMENT STRATEGY: MID-YEAR REVIEW 2021/22

Councillor Max Schmid stated that this report would be debated and formally approved in over two weeks' time at the Budget Council.

AGREED UNANIMOUSLY BY THE CABINET MEMBERS PRESENT:

Cabinet is asked to note the Treasury Management Strategy 2021/22 mid-year review.

Reason for decision:
As set out in the report.

Alternative options considered and rejected:
As outlined in the report.

Record of any conflict of interest:
None.

Note of dispensation in respect of any declared conflict of interest:
None.

9. FINANCIAL PLAN FOR COUNCIL HOMES: THE HOUSING REVENUE ACCOUNT (HRA) 2022/23 HRA BUDGET, 2022/23 RENT SETTING AND HRA 40-YEAR FINANCIAL BUSINESS PLAN

Councillor Lisa Homan stated that the proposed increase of 1.5% to rent and other charges was well below inflation and the Government's suggested rent policy, and much lower than the rates proposed by other councils. She added that tenants and residents had been consulted on the plans at the Housing Representatives Forum and at the Economy, Housing and the Arts Policy & Accountability Committee and they fully endorsed this report.

Councillor Schmid and the Leader both added that the Council recognised the higher cost of living pressures faced by tenants due to rising inflation and new Government taxes. Therefore, the Council was proposing a real-terms rent reduction to help residents. Rent and other charges would only increase by 1.5%, which was well below the Government's suggested rent policy of CPI inflation plus 1%, which would have resulted in a 4.1% rent increase.

AGREED UNANIMOUSLY BY THE CABINET MEMBERS PRESENT:

1. To approve the Housing Revenue Account 2022/23 budget for Council homes as set out in Table 1.

2. To approve the 40-year financial plan for Council homes for 2021-2061, which requires an increase in the ongoing annual revenue savings (when compared to the 2021/22 base budget) of £3.8 million per annum from 2022/23, rising to £7.1m from 2023/24 and to £7.9m from 2024/25.

3. To approve a rent increase of 1.5% from 4 April 2022, which equates to an average weekly increase for tenants of £1.75 in 2022/23.

4. To approve an increase to shared ownership rents of 1.5% from 4 April 2022.

5. To approve an increase to tenant service charges of 1.5% from 4 April 2022, which equates to an average weekly increase for tenants of £0.13 in 2022/23.

6. To approve an increase to the management fee for temporary on licence properties of 1.5% from 4 April 2022.

7. To increase garage charges for council tenants, resident leaseholders, and for other customers from April 2022 by 1.5%.

8. To note that any change to parking charges on housing estates will be considered separately with the Council's parking plans.

9. To increase car space rental charges for all customers by 1.5% from April 2022.

10. To approve an increase in the Leasehold After Sale – Home Buy Fees by 1.5% from April 2022 from £200 to £203.

11. To note that an external review of the service will be undertaken in early 2022 to identify further savings in the Housing Service.

Reason for decision:
As set out in the report.

Alternative options considered and rejected:
As outlined in the report.

Record of any conflict of interest:
None.

Note of dispensation in respect of any declared conflict of interest:
None.

10. SHORT BREAKS STATEMENT AND PATHWAYS TO ASSESSMENT GUIDANCE

The Leader stressed that this was one of the cutting-edge schemes done by the Council to support the needs of young people, along with the recreational time that they needed in very challenging circumstances.

AGREED UNANIMOUSLY BY THE CABINET MEMBERS PRESENT:

To approve the updated Short Breaks Statement and Pathways to Assessment document, attached at Appendix 1 and 2.

Reason for decision:
As set out in the report.

Alternative options considered and rejected:
As outlined in the report.

Record of any conflict of interest:
None.

Note of dispensation in respect of any declared conflict of interest:
None.

11. FORWARD PLAN OF KEY DECISIONS

The Key Decision List was noted.

12. DISCUSSION OF EXEMPT ELEMENTS (IF REQUIRED)

There was no discussion of exempt elements

Meeting started: 7.02 pm
Meeting ended: 7.20 pm

Chair .....

London Borough of Hammersmith & Fulham

Report to: Cabinet

Date: 07/03/2022

Subject: CCTV Capital Investment Strategy

Report of: Councillor Sue Fennimore, Deputy Leader

Report author: Matthew Hooper, Chief Officer, Safer Neighbourhoods & Regulatory Services

Responsible Director: Sharon Lea, Strategic Director of Environment

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Summary

Keeping our residents safe, ensuring our streets are crime-free, and tackling gangs and anti-social behaviour is a Number 1 priority for Hammersmith & Fulham (H&F). That is why we already have the most extensive CCTV network of any local authority in the country with 1,869 cameras monitored 24/7. To take our crime-fighting commitment to the next level, this report seeks approval for a capital investment strategy in the borough's CCTV network and infrastructure. This will give us not only the most extensive CCTV system in the country, but also the most technologically advanced. The cameras are monitored 24/7 from the Beavor Lane CCTV control room by a team of 11 Operators and one Manager. They consist of 581 cameras in public areas, 1,209 on housing estates and 79 mobile, deployable cameras which can be quickly located anywhere across the borough. H&F's CCTV system is used on a daily basis to investigate anti-social behaviour, identify criminals and allow us to take action. It is also regularly used by the police during live operations to identify criminals and bring them to justice. The murders across London of Sarah Everard, Nicole Smallman, Bibaa Henry and Sabina Nessa have brought into sharp focus our urgent duty to do all we can to protect women and girls in public places. Our extensive CCTV network plays a key role in keeping women and girls safe in H&F.

Maintaining and developing a state-of-the-art CCTV system is core to our efforts to tackle crime and anti-social behaviour. It is therefore essential that the CCTV system is maintained and that we take advantage of the benefits of new technology to improve and expand the ways the system can improve safety further. Modernising the cameras and transmission network will provide the ideal digital platform on which to build London's most efficient, effective and forward thinking CCTV system. The new digital platform will enable H&F to make use of the full range of benefits afforded by video analytics and automation. This includes using Artificial Intelligence to deliver a network of cameras able to 'think' and communicate independently. Cameras will analyse footage and be able to generate alerts through to the control room for operators to review. This will dramatically improve the rate at which the service detects crime and works with the Police to bring perpetrators to justice. It will also improve our response to anti-social behaviour. We will be using state of the art technology to keep our residents safe.

Police funding is the responsibility of national and regional government. However, cuts in police numbers combined with rising crime rates, gang crime and the number of shocking high-profile attacks against women prompted H&F to take the unprecedented step of using council funds to pay for crime fighting across the borough. Last year, the council launched its new Law Enforcement Team (LET) with 72 new Law Enforcement Officers to provide extra eyes and ears on our streets to help keep residents safe. We believe H&F's LET is one of the largest such teams anywhere in Britain. We have invested £4.6m a year to fund the LET operation and a further £1m for a new specialised Gangs Unit dedicated to safeguarding children and young people. The new enhanced digital CCTV capability will play a key role in supporting the ground operation provided by the police and the council's LET team and dedicated Gangs Unit. It will give H&F the most comprehensive and effective community safety offer in London.

Recommendations

That Cabinet:

1. Approves one-off capital funding of £5.365m (across 5 years) for investment in the Council's CCTV infrastructure, to be funded from an expected West London Alliance (WLA) grant (£0.9m) and general fund borrowing (£4.465m).

2. Approves one-off revenue funding of up to £0.1m to fund a detailed condition survey of the Council's CCTV network, required to secure estimated inward investment of £0.9m from the West London Alliance, to be funded from the annual corporate contingency budget for 2021/22.

Wards Affected: All

Our Values	**Summary of how this report aligns to the H&F Values**
• Taking Pride in Hammersmith & Fulham	Investing in CCTV to help tackle crime and make our residents safer.
• Building shared prosperity	Providing a fully maintained CCTV service covering town centres and neighbourhoods provides confidence and security benefits for residents and businesses in the borough.
• Creating a compassionate council	Supporting families and young people by making streets safer

FINANCIAL IMPLICATIONS

One-off capital funding of £5.365m is sought to fund the costs of upgrading aspects of the CCTV infrastructure in order to take advantage of new technology opportunities and improve reliability (£4.4m), a Programme Manager to oversee the upgrade (£0.24m over the four year programme) and an annual budget to fund major repairs and unavoidable replacement of the existing network (from 2021/22 and ongoing through the duration of the upgrade programme, £0.525m in total). As the upgrade work progresses the annual fault repair costs will reduce, which has been factored into the funding request. The capital funding request also includes integrating the body cameras and radios of the new Law Enforcement Team with the CCTV control room (£0.15m), as well as some other smaller works (£0.05m).

Officers have secured grant funding of £0.9m from the West London Alliance that can be used to part fund the requested capital investment programme. This is contingent on the Council providing a full and detailed condition survey of the current CCTV network to demonstrate need. One off revenue funding of £0.1m is requested to fund this survey, to be funded from the 2021/22 corporate unallocated contingency budget.

The remaining balance of £4.465m will be funded by the Council and increase the need for the council to borrow for a capital purpose (capital financing requirement). The current estimated annual revenue cost of borrowing is c£0.05m per annum for every £1m, or £0.285m per annum to fund the total investment (should the external grant not be confirmed). Risks around potential increases in long-term interest rates may increase that cost further. The additional revenue costs of borrowing to fund the capital investment will be incorporated into the Council's annual budget for the net cost of borrowing with appropriate funding from the available parking surplus contributions and balances. Where parking surplus contributions and balances are insufficient, any balance will need to be incorporated into the medium-term financial planning process. Should the council secure further external funding this would reduce the borrowing need.

The requested capital funding is summarised in the following table:

	Value (£000)
Network upgrade programme	4,400
Programme Manager (£60,000 p.a.)	240
Major annual repairs	525
One-off Law Enforcement Team integration	150
Other smaller works	50
Total Capital Funding Required	**5,365**

Finance implications completed by Kellie Gooch – Head of Finance (Environment), 31st January 2022
Verified by Emily Hill – Director of Finance, 31st January 2022

LEGAL IMPLICATIONS

On the basis that this is an upgrade of CCTV in existing locations, there are limited legal implications. The Council will need to ensure that it continues to comply with the 12 guiding principles of the Surveillance Camera Commissioner Code of Practice and should consider undertaking an updated self-assessment.

Any new contracts, if required, to implement the CCTV network upgrade must be procured in accordance with the Council's Standing Orders and the Public Contracts Regulations 2015

Legal implications completed by: Angela Hogan, Chief Solicitor (Contracts & Employment), 20th January 2021

Background Papers Used in Preparing This Report - None

DETAILED ANALYSIS

Background

1. The Council's CCTV assets consist of fixed CCTV cameras, the associated transmission network and a smaller number of rapidly deployable cameras. The cameras are monitored 24/7 from the control room at Beavor Lane by a team of 11 Operators and one Manager (this excludes parking CCTV). All the IT servers necessary to control the existing cameras and record/store footage are also based at 43 Beavor Lane.

2. The Council's CCTV network of cameras is one of the most expansive in the country. The system currently supports 1,869 CCTV cameras (audit as at 31 March 2020) servicing both public areas (581 cameras - 31%) and H&F housing estates (1,209 cameras - 65%). It also supports 79 (4%) deployable cameras located across the borough.

3. As part of a system audit and validation exercise a range of issues have been identified which need to be addressed to ensure the CCTV infrastructure is secure and resilient. In addition, the majority of cameras require replacement due to their age. We will aim to recycle as many cameras as we can to reduce waste and minimise disposal costs (the cameras have minimal scrap value).

4. Modernising the cameras and transmission network will provide the ideal digital platform on which to build London's most efficient, effective and forward thinking CCTV system. The system improvements required for better resilience and security and the associated investment plan for years 1 to 4 are set out in section 5.

Key Findings – Audit & Validation Exercise

5. The audit and validation exercise undertaken in 2021 identified some major issues which require rectification for the CCTV network to operate as it should. These issues relate to the transmission network (underground cabling), the network switches (which join the cameras onto the infrastructure), and the wireless transmission network (our backup wireless CCTV transmission capability).

    - The transmission network is made up of ageing materials that are now prone to failure. Our fault repair costs are substantial partly as a consequence of this.

    - A large number of the network switches which connect cameras on to the network now require replacement to prevent faults developing and improve security.

    - It is necessary to upgrade our wireless transmission infrastructure in order to maximise the security of the network. Wireless transmission is used for any camera that cannot be connected directly on to the physical fibre network.

6. The mobile deployable CCTV cameras rely on cellular data transmission rather than the Council's fixed network. They are costly to operate and have very limited data capacity which results in them stopping and requiring manual intervention. These units are heavily relied on and there are more capable and reliable units available on the market.

7. An annual planned capital expenditure programme is required to replace the entire CCTV system and transmission network over a four-year period (see section 5).

Maintenance & Repair Costs

8. The Council's new CCTV maintenance contract is split in to two key components - a fixed protective preventative maintenance element including an annual service of the control room, transmission network and cameras (£85,000 per year and provided for in the existing CCTV revenue budget); and a variable agreed schedule of rates element covering ad hoc work and fault rectification. Network fault repairs are currently costing circa £12,000 per month and are currently unbudgeted (£150,000 per year). A fault repair budget (i.e. maintenance which is required to keep the system online and operational) is required to cover costs of unavoidable maintenance on the current network until it is replaced as part of the programme set out in this report. The annual cost of this is expected to reduce as the upgrade work progresses. As such, a one-off budget of £525,000 is required to fund fault repairs and unavoidable maintenance for 2021/22 (£150,000) and the four year CCTV investment programme (£375,000 across the four years).

9. Additional one-off capital funding is required in 2021/22 to fund the integration of the new Law Enforcement Team body cameras and radios with the CCTV control room (£150,000) and other smaller works within the year (£50,000).

West London Alliance Funding – "Fibre West'

12 An opportunity for additional funding to support the upgrading of the CCTV ducting network has been pursued by H&F officers through the West London Alliance "Fibre West" digital programme.

13 This Fibre West programme will see the deployment of £7.9m of grant funding across seven west London boroughs to install new gigabit fibre and ducting connections to public buildings in areas with poor connectivity. The new fibre connections will have a transformative effect for digital inclusion, addressing 'not spots' (where fibre connections are slow) across growth and regeneration areas and providing businesses, public buildings and residents with cutting edge fibre connectivity to their premises.

14 This will require the installation of ducting and fibre to priority sites and areas across west London. Over 50 potential sites which could bring the greatest benefits in terms of connections and enabling infrastructure in the borough have already been identified for further analysis. In terms of delivery, H&F is in a unique position compared to other boroughs. This is because the existing CCTV ducting network across the borough already provides much of the infrastructure needed to support the extension of the fibre network, albeit the condition of the ducting needs improvement or renewal. Many of the potential 'Fibre West' H&F sites identified sit close to the existing ducting network.

15 Officers have therefore proposed to the WLA that rather than invest in a new separate private sector owned fibre network to connect new sites, more significant value could be derived from the investment being directed towards upgrading and replacing the existing council owned CCTV fibre network. Using the existing network has the potential to deliver the digital inclusion objectives whilst also part funding the ducting upgrade. Upgrading the existing network rather than create a separate one would also accelerate the delivery of the programme to enable the extension of the ducting and fibre network into identified public sector sites adjacent to the existing network infrastructure.

16 WLA has agreed in principle to this approach which would provide funding in the region of £900,000 for the borough. Further details including relevant milestones are currently awaited from the WLA team.

17 In order to take forward this opportunity, a full and detailed condition survey of the CCTV network will be needed to demonstrate need and inform the selection of priority sites for digital connections. Undertaking a survey of the full system is a significant undertaking. Prices obtained have indicated the cost would be in the region of £80,000 to undertake the survey (£40,000 per

month for 2 months). A further £20,000 is required to formally record the survey findings on the Council's GIS system and asset maps.

CCTV Service Strategy

18 The strategy set out below identifies the key objectives being pursued through the CCTV upgrade programme:

Strategic Aim

- To develop our existing CCTV network into a state of the art, fully digital system capable of using artificial intelligence to reduce crime and increase safety and security in H&F.

Objective 1 - Artificial Intelligence

- **Auto fault detection** – the system will be able to identify and locate faults immediately, removing the need to diagnose faults manually which can take several days.
- **Analytics** – cameras that can analyse a scene and identify what is likely to be happening.
- **Incident Management** – once an incident is identified the system will alert the control room to review the relevant camera(s)

Objective 3 - Resilience

- **Fewer faults** – the upgrade will provide a newer, more robust system with less downtime meaning better camera coverage.
- **Improved Security** – with upgraded cabling and transmission infrastructure the CCTV data will be more secure.
- **Rapid Deployment** – as part of the upgrade we will invest in a new suite of 79 mobile, rapidly deployable CCTV cameras to monitor emerging crime and anti-social behaviour issues.

Objective 3 - Efficiency

- **Repair costs** – The upgraded system will be more resilient to faults and therefore cost less to maintain
- **Pro-active alerts** – as the cameras will detect certain incidents themselves this reduces pressure on the CCTV staff who will be alerted to incidents via an interface.
- **IOT Sensors** – the new infrastructure will be able to transmit data from other , non crime or ASB related, 'Internet Of Things' assets installed across the borough.

19 As a result of upgrading the system to a new digital platform, the service can make use of the full range of benefits afforded by video analytics solutions and automation. This includes the intelligent automation options provided by having a network of cameras able to think and communicate independently. Cameras will analyse footage and be able to generate alerts through to the control room for operators to review. This will dramatically improve the rate at which the service detects crime and disorder as well as allowing auto-detection of faults meaning less system downtime.

Capital Investment Plan

20 A four-year planned capital investment programme is required to replace the entire CCTV system and transmission network, at a total estimated cost of £4.4m (as summarised below). A Programme Manager is required to oversee the upgrade programme (£60,000 capital funding requested for each year 2022/23 to 2024/25).

2022/23 Year 1 – £1.2m investment

- Survey full fibre infrastructure – replacement of already damaged fibre to SWA (armoured);
- Survey entire estate to replace with Single Mode SWA;
- Purchase ongoing support for Hik Platform;
- Upgrade to latest version 2.01 Hik-Central roll out;
- Upgrade all wireless links to 60GHZ;
- Consolidate main node recording hardware to enterprise solution;
- Replace main switching hardware with fully managed and future proof 10Gig;

2023/24 Year 2 – £1.2m investment

- Implement network monitoring tool of all devices;
- Replace all redeployable assets;
- Commence migration away from existing analogue platform;
- Commence replacing all estate head end installation with correct enclosures etc and power; &
- Review camera location and need.
- Replace fibre cabling with single mode, links to main nodes first;
- Commence replacement of all remaining analogue cameras for IP including media converters;
- Replace all remaining switching hardware for managed;
- PSIM overlay (bring in other services into one platform); &

2024/25 Year 3 – £1m investment

- Become full digital platform (this would then enable Parking/Traffic Enforcement to go automated if required);
- Replace fibre cabling with single mode; &
- IOT sensor data.

2025/26 Year 4 – £1m investment

- Control room – full integrated videowall solution;
- Implement analytics solution; &
- Control room reconfiguration (providing more space for more cameras to be monitored).

Reasons for Decision

21 Resident safety is one of H&F's top priorities and maintaining an effective CCTV system is core to our efforts to tackle crime and anti-social behaviour. H&F's CCTV system is used on a daily basis to investigate anti-social behaviour, identify perpetrators and allow us to take action. It is also regularly used by the police during live operations to ensure criminals are caught and

brought to justice. It is therefore essential that the system is maintained and that we take advantage of the benefits of new technology to improve and expand the ways the system can improve safety further.

22 The current CCTV infrastructure is ageing and, in many areas, no longer of an appropriate specification. These two issues combined have led to regular faults occurring. Due to the fragility and partially analogue nature of the system it takes longer to diagnose these faults and the repairs are more costly. On a number of occasions CCTV has been inoperative across large parts of the borough due to major faults.

23 We are aware of a number of weak spots across the network which are more prone to being damaged due to various factors. If these faults do materialise we know we will not be able to get the system back online unless whole sections of fibre are replaced which will be costly and time consuming. It would be far preferable to replace and upgrade these areas pro-actively prior to any major faults.

24 H&F is known for having an extensive and technologically advanced CCTV system. In order to safeguard our reputation in this area we need to invest in the system and modernise. Doing so will mean we can continue to keep residents safe by tackling crime and anti-social behaviour.

Equality Implications

25 As the proposal is to upgrade the CCTV network rather than change its scope or use the equality implications for this proposal are considered to be neutral. Crime affects all residents in H&F and the aim of the CCTV system is to protect our residents and help them feel safer as they go about their lives.

Risk Management Implications

26 The report recommends funding a detailed infrastructure survey which would support an application for funding to the West London Alliance for an estimated £900,000. This is in line with the Council objective of being ruthlessly financially efficient. The proposal is consistent with the CCTV Service Strategy which seeks to help tackle crime and make residents safer. Ensuring that a fully functioning, comprehensive, secure and future-proofed solution is in place is a key component providing confidence and security benefits for residents and businesses in the borough's town centres and neighbourhoods.

Implications completed by: David Hughes, Director of Audit, Fraud, Risk and Insurance, 21st January 2022

Climate and Ecological Emergency Implications

27 The main climate and ecological impacts of the change are relatively low with the main impacts coming from the disposal of hardware and replacement with newly manufactured equipment. We have investigated whether the new system can be entirely cloud based to avoid having to purchase a substantial

level of hardware but due to the need for maximum resilience the system will need to be both server and cloud based. However, one of the main benefits of the upgrade will be increased system resilience and therefore greater sustainability.

Implications verified by Hinesh Mehta, Strategic Lead – Climate Emergency, 25th January 2022

LIST OF APPENDICES:

None

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Cabinet

Date: 07/03/2022

Subject: Ending Violence Against Women & Girls Strategy 2022 - 2027

Report of*:* Councillor Sue Fennimore, Deputy Leader

Report author: Annabel Moores, Ending Violence Against Women and Girls Lead

Responsible Director: Sharon Lea, Strategic Director of Environment

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SUMMARY

The Ending Violence Against Women & Girls Strategy has been co-produced by partners across the borough, including survivors, residents, businesses, and multi-agency professionals.

It outlines our Coordinated Community Response (CCR) to ending Violence Against Women & Girls (VAWG) which states that it is everyone's business to work together to end these crimes. It sets out our four objectives to ending VAWG, which are: VAWG is prevented, survivors are supported, abusers are held to account and collaboration to create change.

It outlines how we can all play our part in ending VAWG, as individuals, communities, professionals and as a society. H&F will also co-produce a five-year action plan setting out how the council will achieve its objectives; this will be developed alongside partners and survivors in early 2022 for publication later in the year.

RECOMMENDATION

1. That Cabinet approves the contents and publication of Hammersmith & Fulham's Ending Violence Against Women & Girls Strategy 2022 - 2027.

Wards Affected: All

Our Values	**Summary of how this report aligns to the H&F Values**
Creating a compassionate council	The strategy seeks to deliver an approach which is collaborative, coordinated, trauma-informed, intersectional, gender-informed, and

Our Values	Summary of how this report aligns to the H&F Values
	above all puts survivor voices and specialist services at its heart. It promotes gender equality and the human rights of all individuals irrelevant of gender, race, religion, sexuality, or disability.
Doing things with residents, not to them	The strategy is co-produced, which includes collaborative work with, residents, representatives from the community, as well as from local businesses and professionals across the borough.

Financial Impact

The strategy was compiled and developed by the Community Safety Unit within the existing approved budget for the service. It is expected that the implementation of the strategy and action plan will also be managed within existing approved budgets. The funding of activities that support delivery of the strategy will be the subject of separate decision reports in line with the Council's normal decision-making process and/or considered as part of the annual budget setting process. This includes changes to any existing grant funding that is currently used to fund VAWG related activity (as this could change over time).

The 2022/23 budget proposals include an increased investment in VAWG of £100,000 annually and an increased investment in ending modern slavery and exploitation of £85,000 annually.

Implications provided by: Kellie Gooch, Head of Finance (Environment), 04/01/2022
Verified by Andrew Lord, Head of Strategic Planning and Monitoring, 04/01/2022
Verified by Emily Hill, Director of Finance on 26/01/22

Legal Implications

The Council has duties under Part 4 of the Domestic Abuse Act 2021 to provide support for victims of domestic abuse. It is subject to a duty under s17 of the Crime and Disorder Act 1998 to exercise its functions with due regard to the likely effect on and the need to do all that it reasonably can to prevent crime and disorder in its area. The strategy set out in this report for ending violence against women and girls contributes to the Council complying with its duties under these provisions.

Implications provided by: John Sharland, Senior solicitor (Contracts and procurement), 04/01/2022

Background Papers Used in Preparing This Report – *None*

DETAILED ANALYSIS

Ending VAWG in Hammersmith & Fulham

1. Violence Against Women and Girls (VAWG) is the umbrella term used to describe a range of violent and abusive acts and behaviours, which are predominantly, but not exclusively, directed against women and girls. This term is used to describe abuse against all genders but highlights the disproportionate impact on women and girls. There are multiple forms of VAWG, whether physical, sexual, psychological, or economic. Abuse can include violence in public places, such as sexual harassment, or within the private sphere such as intimate partner violence.

   Whilst victim is the legal definition necessary within the criminal justice system survivors is a nationally recognised term to describe someone who has been a victim of abuse but who has continued to live, it is a positive term of empowerment and therefore used throughout the strategy.

   The prevalence of VAWG is reflected in national statistics that indicate that 1 in 3 women and 1 in 5 men will experience Domestic Abuse at some point in their lives and 1 in 5 women and 1 in 10 men will experience stalking and harassment at some point in their lives. This also reflects how these crimes disproportionately affect women and girls.

   The difficultly of capturing an accurate statistical picture of VAWG is nationally recognised. This is for a range of reasons including the hidden nature and consistent underreporting of VAWG issues, alongside inconsistent approaches to data collection across organisations. Our data picture is therefore only the tip of the iceberg. We have used data from our strategic assessment, national VAWG data and date from the Mayor's Office for Policing and Crime (MOPAC). We have also used data from the Angelou VAWG service commissioned by Hammersmith & Fulham (H&F) and the results of a resident survey to inform our strategy.

   There were 1,095 referrals to the H&F commissioned Angelou VAWG service in 2020-21, 52% of referrals were for Black and Asian women or people from another global majority background. Global Majority is a collective term that first and foremost speaks to and encourages those so-called to think of themselves as belonging to the global majority. It refers to people who are Black, Asian**,** Brown, dual-heritage, indigenous to the global south, and or have been racialised as 'ethnic minorities'. 10% of referrals were for women with a disability and 58% of survivors referred stated that they had poor mental health. In 2017 MOPAC estimated that 2,983 women who live in H&F had undergone FGM. Our resident survey conducted in 2021 received 68 responses. 57% of respondents said they had personally experienced street harassment and 53% said they had witnessed a woman being harassed by a man or group of men 1-2 times in the last year.

Coordinated Community Response

2. The strategy outlines our Coordinated Community Response (CCR) to ending VAWG, which states that it is everyone's business to work together to end these crimes. It sets out our four objectives to ending VAWG, which are:

1. VAWG is prevented,
2. Survivors are supported,
3. Abusers are held to account, and
4. Collaboration to create change

Co-production

3. The H&F strategy has been co-produced by partners across the borough, including survivors, residents, businesses, community groups and multi-agency professionals. This consultation highlighted the need for the strategy to be accessible to everyone. We have adopted an ecological model in responding to VAWG and there is guidance throughout the strategy highlighting how individuals, community groups, multi-agency professionals and wider society can play their part in ending VAWG.

Design

4. Once the content of the strategy has been approved, design colleagues will produce a final version and we will produce an accessible to be published at the same time. We plan to use videos throughout the strategy which will include partners and service providers to demonstrate that this strategy is for everyone and has been developed in partnership.

Reason for the decision

5. The Council has statutory duties to protect victims of VAWG. Ending VAWG is also a strategic priority for H&F. Supporting victims of abuse (including victims of all forms of VAWG such as FGM) is a manifesto commitment incorporated into H&F's business plan. Ending VAWG is similarly a strategic priority for the Community Safety Partnership and is a mandatory high harm priority for all London boroughs. Both the Children's Safeguarding Board and the Safeguarding Adult's Board have ending VAWG within their action plans and priorities.

6. The Domestic Abuse Act 2021 also aims to strengthen the support for victims of abuse by statutory agencies and sets out provisions to do so including recognising children as victims of abuse.

7. Adopting the strategy contributes to the fulfilment by the Council of these obligations, as well as promoting and protecting adults and children's human rights. The strategy also aligns with the key objectives outlined in the government's VAWG Strategy 2021, prioritising prevention, supporting victims, pursuing perpetrators, and strengthening the system.

Equality Implications

8. There are no direct negative equality implications, under the Equality Act 2010, for those service users from groups with certain protected characteristics by the approval of recommended option outlined in this paper. A positive impact on certain groups with protected characteristics is anticipated. The strategy

recognises experiences of racism, classism, ageism, homophobia, transphobia, and discrimination against disabled people. It has a positive impact in terms of age, disability, gender reassignment, marriage, and civil partnership, pregnancy and maternity, race, religion and belief and sex. The H&F Equality Impact Analysis Tool has been completed (Appendix 2).

Risk Management Implications

9. The Council has statutory duties to protect victims of VAWG. Ending VAWG is a strategic priority for H&F. The report recommends approval of the Ending Violence Against Women & Girls Strategy 2022–2027 which outlines the Council's Coordinated Community Response to ending violence against women & girls through four key objectives. This is in line with the priority of creating a compassionate council and is a key priority for the Community Safety Partnership, the Children's Safeguarding Board, and the Safeguarding Adults Board.

Implications provided by: David Hughes, Director of Audit, Fraud, Risk and Insurance, telephone: 07817 507 695, 31/01/2022.

Climate and Ecological Emergency Implications

10. There are no implications for climate and ecology as a result of the strategy. A robust action plan will be developed to support the strategy and any services commissioned as a result will be assessed on an individual basis.

Implications provided by: Hinesh Mehta, Strategic Lead, Climate Emergency, *telephone 07960 470125*, *31/01/2022.*

Consultation

11. The strategy has been co-produced and as such, focus groups were held with a variety of agencies and drafts of the strategy shared at various stages

12. We held four workshops with survivors. Feedback from survivors have informed the strategy throughout development and there is a section in the strategy "What survivors with lived experience told us". Discussions with both survivors and stakeholders have informed the four objectives within the strategy.

13. We held three stakeholder workshops with a range of multi-agency professionals from the borough including the Metropolitan Police, local NHS trusts and Non-Governmental Organisations. A range of VAWG experts and service providers were also consulted to ensure that the strategy has an intersectional and inclusive approach. Standing Together's 'In Search of Excellence' report also provided insight into how to strengthen our Coordinated Community Response. H&F Children's Services adult safeguarding, and housing colleagues were also involved in the stakeholder workshops and we consulted the VAWG Board on three occasions.

14. We held an all-staff event to present the proposed strategy that was attended by 180 team members.

15. The council also received 68 responses to an online survey aimed at residents.

16. Participant details were kept anonymous to protect individual's safety and to allow them to speak openly during the above consultations.

LIST OF APPENDICES

Appendix 1 – Ending Violence Against Women and Girls Strategy 2022-2027
Appendix 2 – Equality Impact Assessment

Appendix 1: Violence against Women and Girls Strategy 2022 – 2027

Contents:

1. Introduction
2. What is violence against women and girls?
3. What causes violence against women and girls?
4. What are the common myths about VAWG?
5. The local picture: what we already know
6. What survivors with lived experience told us?
7. Our Approach
8. Our Objectives
9. Objective One: Violence against women and girls is prevented
10. Objective Two: Survivors are supported
11. Objective Three: Abusers are held to account
12. Objective Four: Collaboration to create change
13. How we will deliver this strategy
14. The way forward: A call to action
15. Conclusion

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hammersmith & fulham

1. Introduction

Violence against Women and Girls (VAWG) is a fundamental human rights violation, which harms the lives of millions of adults and children. It is recognised as a worldwide issue of epidemic proportions and it is something that is happening here in Hammersmith & Fulham (H&F), affecting around one in three women and girls. In many instances VAWG remains hidden, but it is not inevitable and collectively we can end it. No one agency can end VAWG alone and this strategy sets out the role we can all play in ending VAWG as part of a coordinated community response (CCR). H&F were the first borough to adopt the coordinated community response model in the UK. This strategy builds on the nationally recognised best practice that has been happening in H&F since the launch of our first VAWG strategy in 2015 and affirms our continued commitment to ending violence and abuse.

Video: Welcome to our strategy and why it's important (30 sec)

This strategy has been co-produced by partners, including survivors, residents, and local businesses, and sets out our collective vision to make our borough safe for anyone who is living, studying, working, and travelling in H&F.

This strategy will be accompanied by a robust action plan which will outline the actions we will take as a partnership to achieve our objectives. The strategy and action plan will be the foundation for our approach to ending VAWG, a key priority for H&F.

2. What is violence against women and girls?

Violence Against Women and Girls (VAWG) is the umbrella term used to describe a range of violent and abusive acts and behaviours, which are predominantly, but not exclusively, directed against women and girls. This term is used to describe abuse against all genders but highlights the disproportionate impact on women and girls.

Locally and nationally, we have adopted the United Nations definition of VAWG, which defines VAWG as:

"Any act of gender-based violence that results in, or is likely to result in, physical, sexual, or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life."[1]

Violence against men and boys

(30 seconds)

There are multiple forms of VAWG, whether physical, sexual, psychological, or economic. This can include violence in public places, such as sexual harassment, or within the private sphere such as intimate partner violence, which can often lead to homicide. 2 women are killed every week by a partner or ex-partner in the UK. Some forms of violence are technology based, such as internet stalking, or driven by economic factors such as international trafficking of women and girls. Others are the result of harmful practices, such as Female Genital Mutilation, Forced Marriage, and virginity testing. These abuses can differ in how they are experienced, but all are the result of the misuse of power and control.

[1] United Nations. Declaration on the elimination of violence against women. New York: UN, 1993.

Type of Abuse	What does this mean?
Domestic abuse (including coercive control)	This is when a partner or family member has power and control over their victims and uses abuse to maintain it. Abuse can be physical, emotional, economic, psychological and/or sexual.
Rape and sexual violence	Rape is sex without consent. This means that rape isn't just people being physically forced into a sexual act, it also includes pressure that makes someone feel like they have no choice but to have sex or perform/receive a sexual act.
Female genital mutilation	This is the partial or total removal of external female genitalia for non-medical reasons.
Early and Forced marriage	This is where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used, to force them to do so.
So called "honour" based violence	This is abuse and violence which is carried out in order to protect or defend perceived "honour" of the family and/or community. We are clear that there is no honour in honour-based violence.
Faith-based abuse	This is when someone uses religion or faith to justify the abuse of another person, usually a child or vulnerable adult. It could be caused by the perpetrator's belief in witchcraft, spirit or demonic possession, ritual, or satanic abuse. It is not caused by religion or faith.
Sexual harassment	This is unwanted behaviour of a sexual nature which violates someone's dignity, makes someone feel intimidated, degraded, or humiliated and/or creates a hostile or offensive environment.
Stalking	This is a pattern of persistent and unwanted attention that makes someone feel pestered, scared, anxious, or harassed.
Modern Slavery	This is an umbrella term for human trafficking and servitude. It is used when somebody is forced or controlled to do something, and another person gains from this.
Prostitution and Sexual exploitation	This is where someone is being coerced or forced into selling sex or performing sexual acts. Victim/survivors may also be trafficked into prostitution. Children, young people, and vulnerable adults may also be sexually exploited and coerced into receiving or performing sexual acts. Abuse of children and adults can include sharing pornographic images and the use of technology.

3. What causes VAWG?

Many different reasons are given as to why VAWG happens. This includes blaming substances, mental ill health, anger issues, growing up in an abusive household, cultural practices, and stress. These issues might have an effect, but none of these issues CAUSE violence or abuse. Instead, evidence has shown that gender inequality is a key driver of VAWG.[2] The Council of Europe give three factors which lie at the root of the problem:[3]

[2] General Recommendation 19, Committee on the Elimination of Discrimination Against Women: UN, 1992
[3] https://www.coe.int/en/web/gender-matters/what-causes-gender-based-violence

Cultural Factors	Legal Factors	Political Factors
Sexist views and the idea that men can have more power over women and children, results in abuse being used to maintain this power. Gender stereotypes reinforce this inequality and creates an acceptance of violence and abuse. For example: Sexist attitudes like believing men must be tough, strong, and always in control can result in them exerting control over a partner or family member. These attitudes are harmful to all genders.	Although abuse is illegal, sadly we see many victims blamed for the abuse and low sentences for abusers. This results in low reporting and abuse being allowed to continue. For example: Rape convictions remain low and have got worse in recent years, with only 1.6% nationally leading to conviction in 2020. Survivors have told us that this sends a terrible message that rapists can 'get away with it' and allows abuse to continue.	The under-representation of women and minority groups in power and politics means they have fewer opportunities to shape the discussion and to affect changes in policy, or to adopt measures to end VAWG. For example: Rape in marriage only became a criminal offence in 1991 and coercive control only became an offence in 2015. Both happened because of lobbying by women's groups.

We also know that experiences of racism, classism, ageism, homophobia, transphobia, and ableism can make people more vulnerable to abuse and they may face additional barriers in accessing support. We know that disabled people including those with mental ill health are twice as likely to experience abuse and 80% of trans people have experienced emotional, sexual, or physical abuse from a partner or ex-partner. The Oxford dictionary defines Intersectionality as "the interconnected nature of social categorisations such as race, class, and gender, regarded as creating overlapping and interdependent systems of discrimination or disadvantage". It can also give some people advantage and opportunities that others don't have access to. Our strategy recognises the need for an intersectional approach which understands the barriers people face and how these connect with each other and with their experiences of abuse.

What support do survivors need? (60 seconds)

4. What are some of the common myths about VAWG?

Myth: To stay safe, women should not go out late at night	Myth: Leaving an abusive relationship means the abuse will end
Women should not have to restrict their lives to be safe. We need to tell abusers to stop the abuse, not tell women to restrict their freedoms. Telling women this is victim blaming. It is important to note that staying at home doesn't necessarily mean women will be safe either. Statistically, women are more likely to be harmed in the home than on the street. Telling women to change behaviour does not	There can be many barriers to leaving an abusive relationship, and access to support and resources plays a role. Survivors should not be blamed if they do not leave, this is victim blaming. We also know that risk escalates when survivors leave so survivors must be supported to leave safely if they choose to.

address the root cause of abuse and will not result in change.	Even after leaving, survivors can still be at risk. Survivors recall abusers continuing to stalk them and even using institutions, such as the family courts, to continue abuse. Support for survivors must therefore always be long-term.
Myth: Violence against women and girls only affects certain groups of women	**Myth: Abuse is the result of an anger problem, use of substances or mental ill-health**
Research has repeatedly shown violence can affect women from all social, economic, cultural, and family backgrounds. There is no evidence to suggest that violence is more prevalent in some communities than others. Instead, barriers to accessing support can increase vulnerability. Experiencing racism, ableism, or homophobia can influence someone reaching for support. This is why an intersectional approach is important.	There is no research to support this. Abuse and violence are about power and control. Abusers often choose when they abuse, often where there are no witnesses. We know that substances or mental ill health do not cause abuse. Many people who use substances or have a mental health condition do not abuse. However, substance use or mental ill health can make existing abuse worse. It's important to offer abusers wider support, but there should be no excuse for abuse.
Myth: VAWG is mainly about physical violence	**Myth: Abusers can still be good parents**
VAWG extends beyond just physical violence. Instead, VAWG is about the different ways that victims are controlled, intimidated, humiliated, or threatened. VAWG is about being denied human rights, to achieve this, abusers may use physical violence, but they also use methods such as psychological, emotional, and economic abuse. They may also use reproductive abuse whereby abusers prevent the survivor from making their own choices about pregnancy and having children. These types of abuse can be just as harmful as physical abuse. Abusers may use children to abuse the non-abusive parent making a partner or ex-partner feel guilty about their children, using the children to relay messages, using children to monitor and report on the survivor's movements, using contact arrangements to harass their partner, or threatening to take children away.	Children are recognised as victim/survivors in the Domestic Abuse Act 2021 because where children are exposed to domestic abuse this is a form of psychological abuse. They do not have to witness the abuse to be affected by VAWG. However, many children do see and hear abuse taking place within the home and children may also be physically harmed by the abuser particularly if they are trying to defend the non-abusive parent. "An estimated 90% of children whose mothers are abused witness the abuse. The effects are traumatic and long-lasting. When a child witnesses domestic abuse this is child abuse. Between 40% and 70% of these children are also direct victims of abuse". (Women's Aid) Where there are children the onus should not be put on the mother to protect her children, abusers must be held to account for their behaviour and challenged on their parenting responsibilities.
Myth: There is nothing we can do to stop violence against women and girls	**Myth: Women involved in prostitution can not be raped or sexually assaulted**
VAWG is the product of learned attitudes and behaviour and harmful gender norms. By eliminating gender stereotypes and promoting a culture of respect and equality at home, at work, in communities, and across society we can work together to end VAWG.	Sexual violence is any sexual act that a person did not consent to or is forced into against their will. Women involved in prostitution do experience rape and sexual assault. Women involved in prostitution face discrimination and are often blamed for the

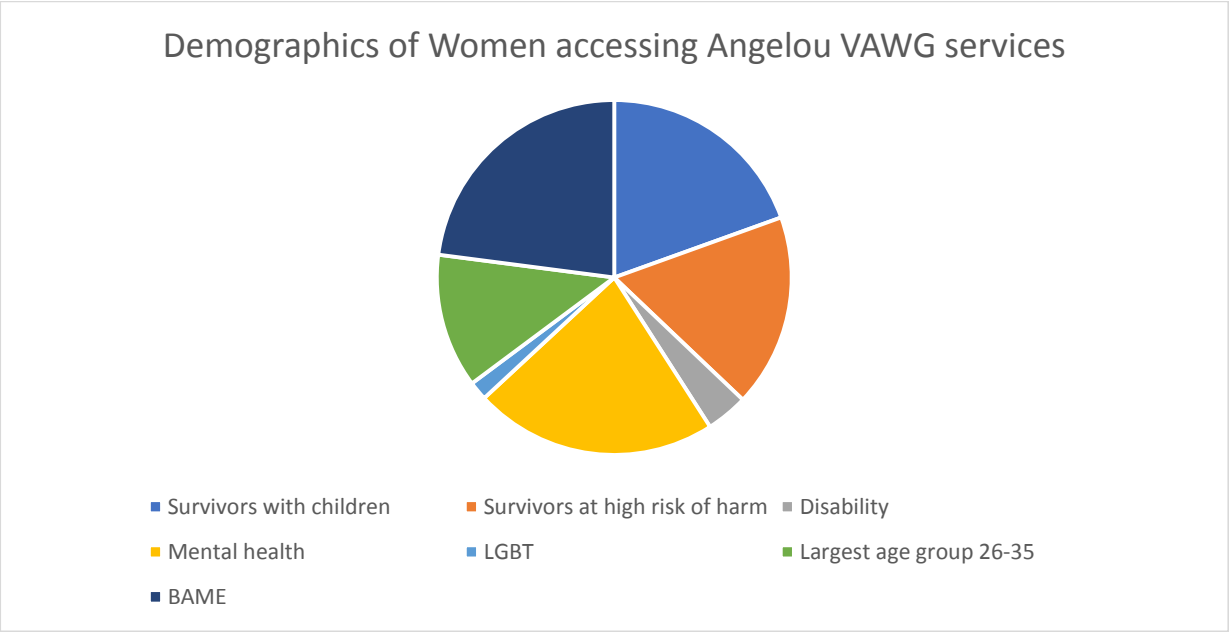
	abuse. This is not acceptable, and we believe everyone should be supported to access support.
Myth: Forced marriage only happens in South Asian communities	**Myth: Violence against women and girls is an issue that only concerns women and girls**
Forced marriage affects a wide range of communities from different cultural backgrounds. It affects men and women all over the world, regardless of race, ethnicity, or religion. Labelling it as a problem for 'certain' communities creates harmful stereotypes and can creates barriers for people accessing support.	It is important to note that men, boys, and non-binary people also experience the types of abuse set out in this strategy. Although we recognise that VAWG disproportionately affects women and girls, abuse can affect anyone, and our approach will be inclusive of everyone who needs support. Men and boys also play an important role in ending VAWG.
Myth: Sexual violence is more likely to be committed by a stranger	**If a young person accepts drink, drugs, or money for sex its their choice to do so**
At least two thirds of sexual assaults are committed by someone known to the survivor. According to some studies only 2% of abusers are complete strangers. 97% of women who contacted Rape Crisis said they knew the person who raped them.	This is a form of exploitation and usually the people supplying alcohol, money and gifts have the power in this relationship and will use this to their advantage. Often the victims may not recognise what they are experiencing as abuse and may have misplaced loyalty to the person abusing them

5. The local picture: what we already know?

The difficultly of capturing an accurate statistical picture of VAWG is nationally recognised. This is for a range of reasons including the hidden nature and consistent underreporting of VAWG issues, alongside inconsistent approaches to data collection across organisations. Our data picture is therefore only the tip of the iceberg. However, we do know that:

- 1 in 3 women will experience domestic abuse at some point in their lives. **23,285** women in H&F have experienced domestic abuse.
- **2,983** women living in H&F are estimated to have undergone FGM (it is not known where the FGM took place).
- 1 in 5 women will experience stalking or harassment at some point in their lives. **15,523** women in H&F have experienced stalking or harassment.
- **34%** of the cases referred to children family service's "front door" were referred because of domestic abuse.
- **373** people approached H&F housing because of domestic between 2019 and 2020. **23%** had a disability or physical health issues and **33%** had mental health issues.
- In 2020 – 21 there were over **1000** referrals to the Angelou VAWG services who support victims/survivors, over **50%** of survivors had children.
- **58%** of the women referred to the Angelou service reported poor mental health.

Figure 1.



We also invited residents to share their thoughts so we could better understand concerns and needs in our communities.

- **52%** of those who responded told us that they had witnessed a woman being harassed by a man/group of males in public between one and two times in the last year
- **11%** of those who responded told us that they had witnessed a woman being harassed by a man/group of males in public between six and ten times in the last year
- **57%** of those who responded told us that they personally experienced street harassment
- **26%** of those who responded told us they felt either fairly unsafe or very unsafe in the borough at night
- **78%** of those who responded said it should be a priority to provide support to women when they need it for as long as they need it.

6. What did survivors with lived experience tell us?

Hearing directly from survivors from a range of backgrounds, with different experiences, is important in shaping this strategy and our direction. In developing this strategy, we spoke to survivors with lived experience about what they felt was important in developing our approach for the next five years. Their thoughts covered four main areas:

Asking the Question:

- Survivors told us that professionals need to be curious about abuse.
- Survivors should not be stereotyped as there is no 'type' of survivor.
- The right response is also important. They want to be believed and supported. They don't want to have to prove themselves.
- Support should be made available sooner, not when survivors reach crisis.
- It can take a while for abuse to be identified.

We need to make sure professionals, friends and family can identify abuse and understand how to ask and respond.

Sustainability of support:

- There needs to be long-term support, not just a response to crisis.
- There should be awareness of the increased risk after separating.
- Services need to work together better so that survivors don't have to keep telling their story.
- Services need to see the whole person and meet wider equality needs.
- There needs to be understanding of the links between experiencing abuse, using substances to cope and impact on mental health.

Support needs to be long-term, intersectional and needs led. Professionals need to work together so that the right support is in place.

Training for Professionals:

- Survivors emphasised the need for widespread training so that awareness could be raised on a range of VAWG issues.
- Training must include key messages on not blaming victims for the abuse and on holding perpetrators to account.
- Understanding coercive control, and abuse beyond physical violence, is key. Survivors felt there should not be a hierarchy of types of abuse.

Training and awareness need to be raised amongst professionals but also more widely, so everyone understands the issue.

Responding to children:

- Survivors felt it was a priority to educate children about abusive behaviours and recognise where they are victims of abuse. They need a voice for themselves.
- They wanted boys to learn about empathy and opportunities for them to see what a healthy relationship looks like.
- Schools and education settings need to be part of the coordinated community response to VAWG.

The needs of children and young people must be recognised within the strategic response. Their voices must be heard and shape provision

Survivor is a nationally recognised term to describe someone who has been a victim of abuse but who has continued to live, it is a positive term of empowerment and therefore used throughout the strategy.

7. *Our approach*

The Coordinated Community Response:

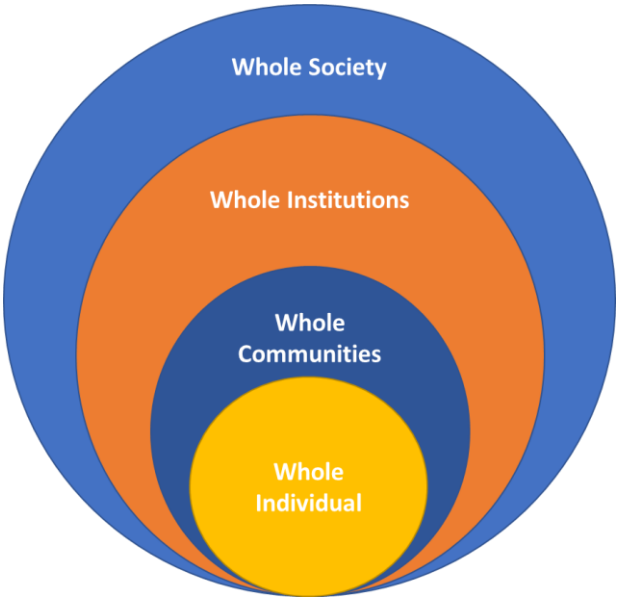
We recognise that real change in responding to and ending VAWG can only be achieved when all agencies, residents, and communities work effectively together. On a survivor's journey, they are likely to encounter a number of services, organisations, and individuals. Each will hold vital information and can help build a picture of what support is needed so survivors do not have to navigate services to get the help they need.



Ensuring everyone knows the role they play in responding to VAWG and how they work with each other is a process known as the Coordinated Community Response (CCR). Our CCR approach ensures a whole system response to a whole person. The following diagram shows some of the different agencies and groups who need to be involved in the response:

The Ecological Model:

Our approach to VAWG is also based on the ecological model on violence prevention. The ecological model looks at developing interventions across multiple levels – the individual, the community, the institutional and societal. When working closely across these levels, we are able to address the wider context in which VAWG happens and make wider cultural change.



The ecological model explains how improving responses across communities, institutions, and wider society, can better support individuals. By understanding the challenges that an individual faces at these levels, we are also better able to respond to survivor's needs. Change requires an enabling environment where VAWG is increasingly unacceptable. Understanding what this looks like on different levels ensures that everyone plays their part in changing the culture in which VAWG happens.

Across this strategy, we will look at how we can meet our objectives by better understanding the actions individuals, communities, institutions, and society can take to meet our aim to end VAWG.

8. Our Objectives:

Our vision is to end VAWG through our coordinated community response approach. Our theory of change shows how we will meet this goal through the following four objectives. Our theory of change also shows the problems and barriers we want to address in achieving our goal:



9. Objective One: Violence against women and girls is prevented

Prevention of VAWG must always be our first priority. In order to prevent VAWG we must address the root causes of the problem. As VAWG is the result of gender inequality and discrimination, we will work collaboratively with agencies and communities in tackling the harmful behaviours and attitudes that underpin abuse. This approach must include challenging sexist and misogynistic attitudes. We want to build confidence across H&F by creating a culture change and a zero-tolerance approach to abuse in all its forms. We must also promote the rights of women and girls, including their fundamental human right to live free from abuse in their homes and in public places.

We must also recognise the intersecting experiences of abuse and discrimination that survivors may experience based on but not limited to their age, ethnicity, sexuality, gender identity, religious beliefs, and disabilities. We must therefore challenge discrimination in all its forms.

The behaviours and beliefs that can lead to VAWG are often manifested in early years. We will work preventatively with children and young people in schools and other settings to promote healthy relationships, gender equality and respect. This work is important, but our response must be wider – working with adults, both professionals and residents is key. We want to support people to be allies in ending abuse, to provide early intervention and to be active in improving our response to VAWG.

We recognise that children living within a family where there is abuse are also victims and by providing support to survivors and their families, we can prevent further harm to children and educate families around abuse.

Our theory of change shows how we will do this:

End VAWG through our CCR Approach	**Objective One**	**How will we achieve our outcome?**	**What difference will this make?**
	VAWG is Prevented	Increased knowledge and understanding across communities through training and events Awareness raised through campaigns and activities Preventative work with young	Residents and professionals are supported to better identify and respond to VAWG. Communities can come together to challenge harmful attitudes. Everyone understands their role in responding and ending VAWG

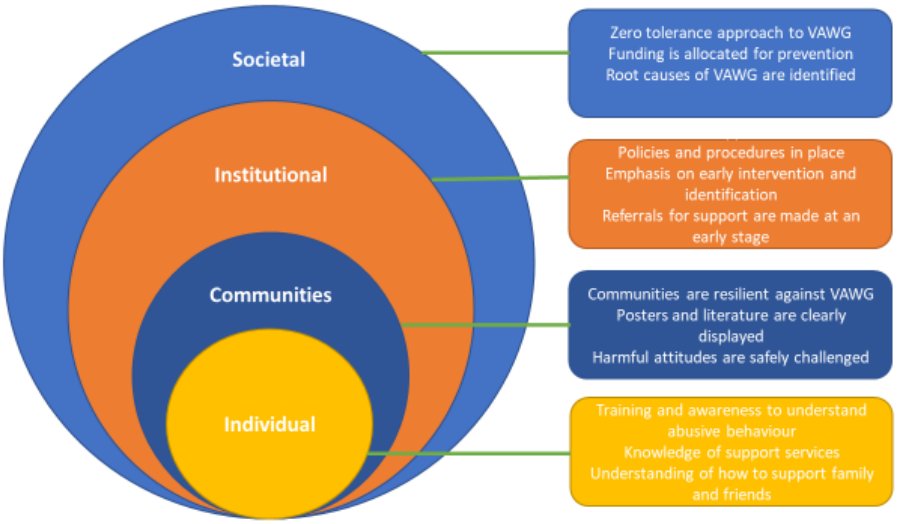
What survivors have told us about why this objective is needed:

> ***"A big campaign is needed to educate about reality of abuse."***

> ***"We need to stop victim blaming. Professionals need to be more clued up."***

> ***"I asked my doctor for support. I was given a leaflet but there needs to be more knowledge and awareness."***

What does this outcome look like across the coordinated community response?



Spotlight on best practice:

Women and Girl's Safety

H&F recently invested over £4million to increase public safety through its Law Enforcement Team (LET), doubling the numbers patrolling the street and increasing the service to 24 hours a day. Police and the Safer Business Network provide training for Local bars and restaurants so that they can support women who may feel unsafe or be at risk of abuse. H&F's Night Time Economy working group has also developed women's safety as part of its action plan. H&F are doing a review of lighting and public space across the borough and will be trialling a passive lighting system that increases light when it detects human movement, this will improve the environment for residents when out at night. In addition, we are delivering sessions on women's safety for officers across Transport and Highways. We also made a successful bid for the Safety of Women at Night funding and have been awarded over £100,000 towards initiatives aimed at improving the safety of women including:

- A VAWG/Women's Safety campaign
- Delivery of a programme for young women to become leaders of change in their community
- Business/community women's safety champions to improve identification and access to safety
- An independent women's safety audit to enable us to deliver evidence-based solutions
- Specialist by-stander training to create women's safety champions within the LET
- Increased homelessness outreach provision to increase identification and pathways to support for women as part of our street population

10. Objective Two: Survivors are supported

We recognise that survivors need a range of support at different stages of their journey. We understand that survivors not only need specialist support for the abuse they have experienced, but may also need support with housing, mental health, substance use, child care, immigration, and other support. We are determined to create a joined-up approach with services working together, so that survivors are provided the right support at the right time. This support must be led by the needs of survivors, be provided immediately and be long-term, holistic, and intersectional. We must also consider the needs of children and young people as survivors of VAWG whether they experience abuse within their home, from family members, at school, in public or in their young intimate relationships.

What support do survivors need? (60 seconds)

Survivors have told us that they want to be asked about their experiences in a non-judgmental way, they want to know what support is available, and they want therapeutic support, not just a focus on crisis response. Long-term support is vital to support the journey towards recovery. This includes access to training and employment, support groups, and opportunities for wider development. We recognise that survivors with lived experience are key stakeholders, and they have told us that they need more spaces where they can talk to other survivors and to "give back."

Our theory of change shows how we will do this:

	Objective Two	How will we achieve our outcome?	What difference will this make?
End VAWG through our CCR Approach	Survivors are Supported	Agencies follow duties and best practice Referrals are made to the right support, when needed Trauma-informed and intersectional support is in place Creation of Survivor Forums	Abuse is identified and support is offered A joined-up approach is created with agencies working together Survivors' holistic needs are met Survivors' voices are heard and shape responses

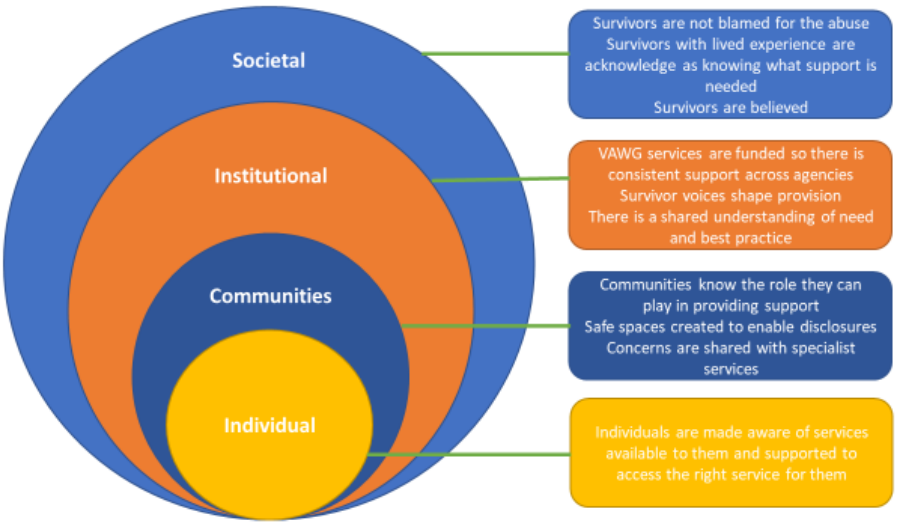
What survivors have told us about why this objective is needed:

"You should not have to tell your story repeatedly."

"The stereotype of a 'victim' needs to be challenged – especially if a survivor 'looks

"They should be asking about and making the connections between trauma, substance use and mental ill-health."

What does this outcome look like across the coordinated community response?



Spotlight on best practice

Al-Hasaniya

Maria (not her real name) was referred to Al-Hasaniya's domestic abuse project as she needed practical and emotional support around her experiences of domestic abuse. An Advocate who spoke Maria's language contacted her and arranged an assessment. Maria disclosed that she was being subjected to harassment and stalking from her estranged husband and that this had been ongoing for many years. Previous incidents of abuse included threats of acid attacks, threatening her with a knife and an attempt to strangle her. She also expressed her concern, fear, and anxiety at the impact it was having on their children, particularly where one of them was now living with her estranged husband. He would regularly attend the family home, loiter, and bring his friends to intimidate her. He asked their children to inform him of what was happening in the household and what she was doing. Maria was referred to Children's Social Services and a referral to the Multi Agency Risk Assessment Conference (MARAC) was made. Safety plans were made with Maria and the children. Maria was supported to report incidents to the Police and to apply for a non-Molestation Order. The Non-Molestation Order allowed Maria to feel protected and safe enough to apply for a divorce. The Advisor liaised closely with the Social Worker and the children's schools to ensure safety plans were in place for the children there. With the help of a therapist, the children were able to confide their feelings, their relationships were strengthened, and all the children were reunited in Maria's care as the safe parent. By services working together, the family started to come together, feel safe and stable. **"I've been suffering for so many years and never thought this nightmare would end. Without your support, advice, and help, I would still be stuck, and my child would be away from me. Thank you so much for all your help. No matter what I say, I cannot express how grateful I am for you!"**

11. Objective Three: Abusers are held to account:

Ending VAWG can only happen if perpetrators stop their abuse. Our strategy recognises that we must address the root causes of VAWG. This involves holding abusers to account and providing intervention and support for them to change their behaviour. This should include support for young people who are displaying signs of abusive behaviour providing intervention at the earliest opportunity.

Holding abusers to account must happen across the board. Abusers may have contact with multiple services and professionals must be trained in identifying abusers, accurately assessing the risk they pose to others, safely challenging their behaviour, and using their power and influence to hold them to account. Employers also have a responsibility to challenge any sexist or abusive behaviour amongst employees. They should have firm policies and procedures in place if an employee is identified as an abuser, using the appropriate disciplinary action where required and proportionately sharing information to ensure the safety of others.

Our response also means having a fit-for purpose criminal justice system which holds abusers to account. Victims of abuse deserve justice and it is important that this is reflected by an increase in prosecutions and convictions. However, justice is wider than just the criminal justice system. Abusers must be held to account by all sections of society, by the services working with them and within the systems that govern us.

Our theory of change shows how we will do this:

End VAWG through our CCR Approach	**Objective Four**	**How will we achieve our outcome?**	**What difference will this make?**
	Abusers are held to account	Professionals are confident in holding abusers to account Abusers will be provided support to reform Root causes of abuse tackled	Justice for survivors. Abusers know that their behaviour will not be tolerated Abusers will change their behaviour, reducing harm to others Everyone's equal human rights are upheld

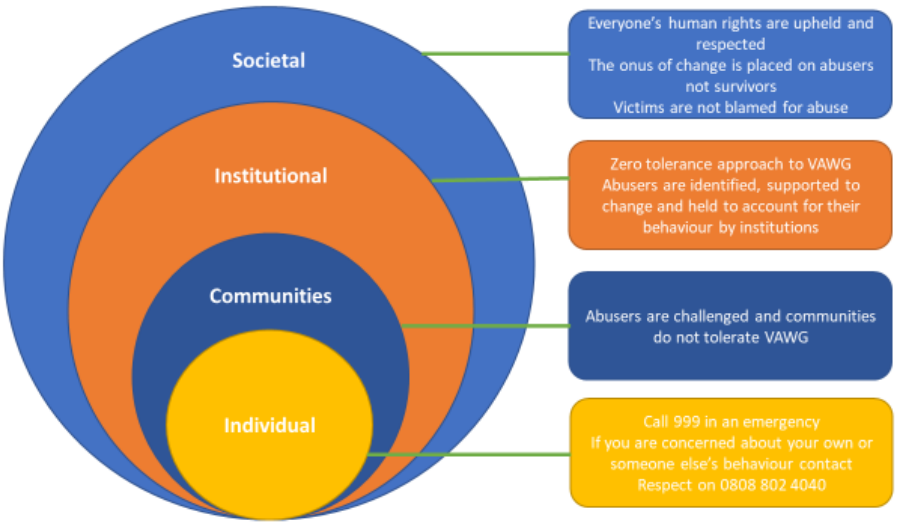
What survivors have told us about why this objective is needed:

"They (professionals) need to be more clued up – something like Safe & Together."

"Justice needs to be served, so that those [that] are being abused are actually getting justice. A lot of people get away with it – what kind of messages does this send victims and survivors?"

"Stop blaming those who experience abuse."

What does this outcome look like across the coordinated community response?



Spotlight on best practice

The criminal justice response for survivors in H&F

– Advance & Standing Together

There is a specialist domestic abuse court (SDAC) in H&F which is now a national mentor court of best practice for managing domestic abuse cases. The H&F Impact project enhances the support provided by the SDAC. There is a Coordinator who ensures that all relevant information is available to the court to improve victim safety and swiftly progress cases through the courts, avoiding delays. There are also domestic abuse (DA) advocates who are co-located alongside the police to ensure that victims are offered support. The SDAC and the Impact Project work closely with the Police, CPS, the courts, Magistrates, and probation to ensure that at every stage of the criminal justice journey the survivor is supported and interventions reduce the risk posed by abusers, ensure that abusers are held to account and increase victim's confidence in the criminal justice response. Survivors consistently report that after the support they have received they are at reduced risk and have improved safety. Many also report having a positive experience of the criminal justice process and the police. The interventions provided by the Impact project, the SDAC and criminal justice partners have also had a positive impact on conviction rates. The conviction rate for Hammersmith & Fulham is consistently above the London average. We also see that a variety of sentencing options are used by DA informed magistrates at the SDAC as demonstrated by use of rehabilitative sentences as opposed to fines or unconditional discharge. "**I think I felt empowered when I left court at the end of the trial (when he was convicted). I felt validated, that I am not mad…the support I received from Advance, the police, the prosecutor, and my family practitioner: that made me feel safe"**

12. Objective Four: Collaboration to create change

We will build on the success of the Coordinated Community Response (CCR) model to bring survivors, services, and the community together. We will create a culture change to address the issues that cause VAWG and develop services that meet the intersecting needs of survivors and their families. In H&F we are committed to working collaboratively with our partners and recognise that survivors are a key partner in developing the response to end VAWG. Our CCR approach addresses prevention, early intervention, crisis response, and long-term recovery and safety. We work with a wide range of services, pathways, and systems so survivors can access support where and when they need it. The CCR works across systems including health, housing, social care, education, criminal justice, and communities.

An effective partnership will have robust ways of working to ensure it is meeting its objectives, has a shared understanding of what best practice looks like, has respect between agencies and is informed by the voice of survivors. We recognise that there are challenges to working effectively in a partnership. This includes limited resources and capacity, competing priorities and different ways of working. However, the model of a coordinated local partnership to tackle and ultimately prevent VAWG is proven to be effective. A key indicator of a successful partnership is the effect it has on improving and delivering services to survivors and their families. We will continue to develop and improve services for survivors, with survivors. In H&F, survivors are at the heart of what we do and through collaboration and co-production they will also be at the forefront driving our response.

End VAWG through our CCR Approach	**Objective Three**	**How will we achieve our outcome?**	**What difference will this make?**
	Collaboration to create Change	All agencies see ending VAWG as core 'business' A shared understanding of need and response Informed by the experience of survivors Increased knowledge, skills, and capacity in responding	Survivors can access support through multiple routes Processes are in place to ensure a positive initial response and referral to appropriate specialist if needed Professionals are well trained and feel competent and confident to respond

Our theory of change shows how we will do this:

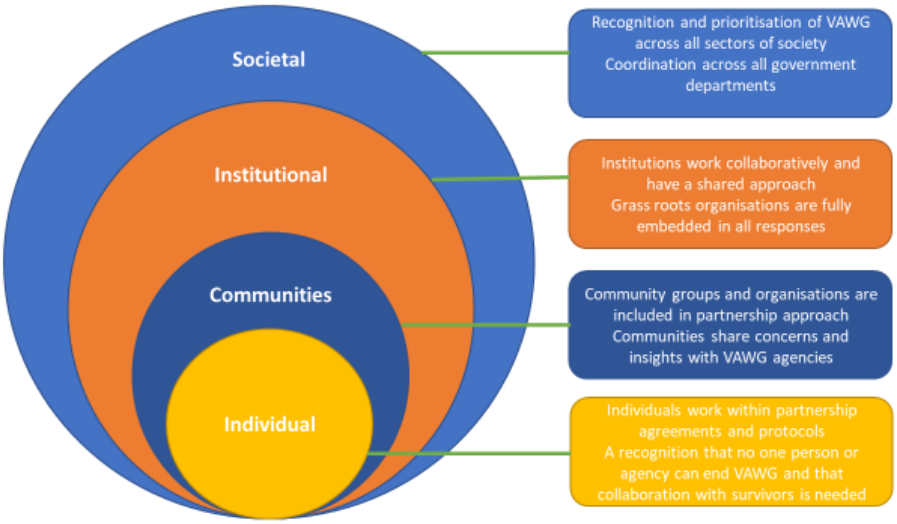
What survivors have told us about why this objective is needed

"Information should be easily accessible. Information in one place."

"Services follow safeguarding when they see bruises not when seeing coercion."

"Sometimes people don't look like us and don't speak our language and don't understand our needs. We don't want to feel judged; we want to be helped."

What does this outcome look like across the coordinated community response?



A spotlight on best practice:

A Whole Health Approach to Domestic Abuse:

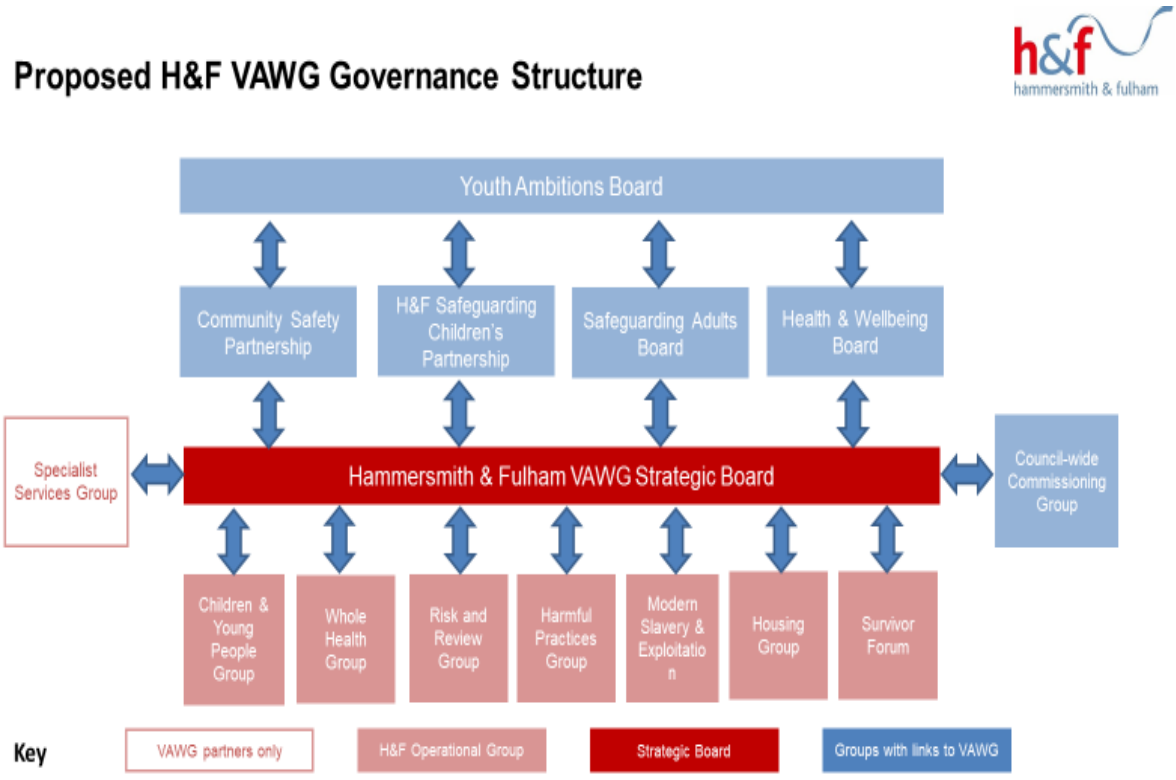
Survivors have often told us about the negative impact experiencing VAWG has had on their physical and mental health. Indeed, evidence tells us that 80% of women experiencing domestic abuse seek help from health services and these are often their first, or only, point of contact.

In order to meet the needs of survivors, a partnership approach was established to improve responses to domestic abuse across the health economy. H&F were a key partner in the 'Pathfinder Project' – a project which looked to improve the responses in mental health services, GP surgeries, and Acute Services across multiple sites. A steering group was set up which included domestic abuse charities, local authority representatives and health partners. Over 18 months, the partnership trained a range of health professionals, our health partners held conferences and events to raise awareness and health partners developed policies to make sure their whole organisation understood the role they play. The project trained 180 NHS staff on domestic abuse which resulted in the recruitment of 60 domestic abuse ambassadors and a new domestic abuse coordinator in mental health. The success of the project led to us setting up a health focused operational group to continue this work going forward and through the IRISi (Identification and Referral to Improve Safety) programme domestic abuse experts are now co-located in GP surgeries in the borough to provide on-the-spot support for survivors. This includes specialist domestic abuse experts who work with Black and Asian women and women from Ethnic Minority backgrounds (Global Majority). There are also co-located Independent Domestic Abuse Advisors (IDVAs) in Housing, Children and Family Services and Criminal justice settings in H&F to meet the intersecting needs of survivors and provide survivors with independent support to navigate these systems.

13. How we will deliver this strategy

We will deliver this strategy through our coordinated community response where everyone plays their part in responding to and ending VAWG. The strategy will be reviewed and held by the H&F VAWG Board which is attended by senior representation from voluntary, statutory and community organisations working to tackle VAWG across the borough. The Board will be influenced by 6 Operational Groups that each have a coordinator and a chair who oversee a specific area of work in accordance with a detailed action plan based on our strategic objectives. Our governance structure will be underpinned by dedicated spaces for specialist services and survivors with lived experience. This will ensure that our work is meeting best practice and identified need.

Below is our VAWG partnership structure which will oversee and support the delivery of our strategy:



To ensure that we can deliver this strategy it is important that we have funding in place to achieve our four strategic objectives. We commit to commissioning specialist VAWG service to support survivors. However, we know that more always needs to be done. Our partnership will continue to identify and apply for funding to meet need. We will also pool resources and work together collaboratively to ensure the right support is available to prevent abuse, support survivors and their children, and to hold abusers to account.

14. The Way Forward: A Call to Action

This strategy sets out our vision for ending violence against women and girls. This is an ambitious vision which will be realised through a robust action plan. We are working closely with residents, survivors, and multi-agency partners to develop this in order to address our four strategic objectives:

➔ Objective One: Violence against women and girls is prevented

➔ Objective Two: Survivors are supported

➔ Objective Three: Abusers are held to account

➔ Objective Four: Collaboration to create change

An action plan will be published later in the year setting out the steps to be taken. Initial conversations suggest that these actions will include:

- work with schools in a preventative capacity,
- projects helping to make our streets safe,
- focused work with survivors from minoritised backgrounds and those who experience multiple disadvantage,
- focused work on how to meaningfully engage with a diverse range of survivors including children and young people,
- work in changing abuser behaviour,
- and a focus on improving systems and referral pathways.

The emphasis of the action plan will be on our coordinated community response and the role we can all play in ending VAWG. The action plan will also build on best practice work that we have been delivering across the borough. This includes commissioning commended services such as the Angelou Partnership, a partnership of ten agencies who provide a single front door of support for survivors of abuse; co-located Independent Domestic Violence Advisors working across a range of services and Housing First which looks to meet the needs of rough sleeping women affected by domestic abuse and multiple disadvantage. This strategy and the action plan will link with and support other strategic priorities to increase safety, including ending serious youth violence, promoting safeguarding, addressing Modern Slavery, and embedding equality, diversity, and intersectionality.

15. Conclusion

Together we can end violence against women and girls

We are determined to end violence against women and girls and believe that this can be done best if we work in partnership and as part of our coordinated community response. This strategy sets out the role we can all play in responding to and ending VAWG. We welcome professionals, residents, and survivors to join us in achieving our four objectives. Together, we can work to make our borough safer for everyone who is living, studying, working, and travelling in H&F.

Appendix 2

H&F Equality Impact Analysis Tool

Conducting an Equality Impact Analysis

An EIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool is informed by the **public sector equality duty** which came into force in April 2011. The duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

1. **Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Equality Act 2010**

2. **Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it**

3. **Foster good relations between persons who share a relevant protected characteristic and persons who do not share it**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against these three tenets.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.

2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.

3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.

4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.

5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

https://www.gov.uk/government/publications/public-sector-equality-duty

https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx

H&F Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2021/ Q4
Name and details of policy, strategy, function, project, activity, or programme	Title of EIA: Ending Violence Against Women and Girls Strategy 2022 – 27. This is a new strategy replacing the 2015 strategy and accompanying addendums We are publishing our Ending Violence Against Women and Girls Strategy 2022 – 27 for Hammersmith & Fulham. This strategy has been co-produced by partners across the borough, including survivors, residents, and multi-agency professionals. It outlines our Coordinated Community Response (CCR) to ending violence against women and girls (VAWG), which states that it is everyone's business to work together to end these crimes. It sets out our four objectives to ending VAWG, which are: VAWG is prevented, survivors are supported, Partnership working, and abusers are held to account. It outlines how we can all play our part in ending VAWG as an individual, a community, as professionals and as a society. We will develop a robust action plan to support the objectives as set out in the strategy and will update the EIA with any actions completed that impact those with protected characteristics.
Lead Officer	Name: Annabel Moores Position: Ending Violence Against Women & Girls Lead Email: annabel.moores@lbhf.gov.uk Telephone No: 07747476034
Date of completion of final EIA	16/12/21

Section 02	Scoping of Full EIA
Plan for completion	The EIA will be finalised alongside the strategy, with the aim to publish the final strategy and accompanying EIA in Mar 2022. This will be completed by the Ending Violence Against Women and Girls lead

Analyse the impact of the policy, strategy, function, project, activity, or programme	Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.

Protected characteristic	**Analysis**	**Impact:** Positive, Negative, Neutral
Age	The strategy is aimed at all residents, irrespective of age.	Positive
	The strategy states that VAWG can affect anybody of any age.	Positive
	The strategy states that vulnerability factors such as age may mean that some individuals have limited ability to access support or make consensual choices. The strategy advocates for long-term trauma-informed support.	Positive
	Under a section titled 'what causes VAWG', our strategy recognises the additional barriers such as ageism that survivors might face in accessing support. It puts this in the context of Intersectionality and requests responses are tailored to an individual's needs.	Positive
	The strategy recognises the impact of VAWG on children as victims of abuse. Children growing up in homes where they may witness abuse are recognised as experiencing psychological abuse. The strategy promotes positive outcomes for children, including safeguarding for children affected by VAWG.	Positive
	We consulted with survivors from a diverse range of age groups and analysed the data from service providers including a broad range of age groups.	Positive
	The strategy recognises the need to prevent these crimes and raise awareness of VAWG to prevent further harm to survivors experiencing abuse which will have a positive outcome irrespective of age.	Positive

	Disability	The strategy is aimed at all residents, irrespective of Disability. The strategy will be made accessible by the designers for people who have visual impairment. The strategy advocates for immediate and long-term physical and mental health support for all survivors of VAWG. Under a section titled ‘what causes VAWG’, our strategy recognises the additional barriers survivors who are disabled might face in accessing support. It puts this in the context of Intersectionality and requests responses are tailored to an individual’s needs. Under a section titled ‘Objective one: VAWG is prevented’ the strategy recognises the intersecting experiences of abuse and discrimination that survivors with a disability may experience and states that we must challenge discrimination in all its forms. An intersectional approach is promoted throughout the strategy. We analysed the data from service providers in relation to disability including ill-health; 10% of referrals were for women with a disability and 58% of survivors referred stated that they had poor mental health. We also consulted directly with service providers on the needs of survivors with disabilities and poor mental health.	Positive Positive Positive Positive Positive Positive

	Gender reassignment	The strategy is aimed at all residents, irrespective of Gender reassignment. Under a section titled 'what causes VAWG', our strategy recognises the additional barriers survivors who are trans might face in accessing support. It puts this in the context of Intersectionality and requests responses are tailored to an individual's needs. Under a section titled 'Objective one: VAWG is prevented' the strategy recognises the intersecting experiences of abuse and discrimination that survivors may experience based on gender identity and states that we must challenge discrimination in all its forms. An intersectional approach is promoted throughout the strategy. We analysed the data from service providers in relation to gender reassignment and consulted with a LGBTQ+ organisation to ensure that the strategy is inclusive	Positive Positive Positive Positive
	Marriage and Civil Partnership	The strategy is aimed at all residents, irrespective of marriage and civil partnership. Any change in response due to the strategy will be irrespective of marriage and civil partnership. We analysed the data from service providers in regards relationships status to ensure we were meeting the needs of both single people and those in a relationship.	Positive Neutral
	Pregnancy and maternity	The strategy is aimed at all residents, irrespective of Pregnancy and maternity Any change in response due to the strategy will be irrespective of Pregnancy and maternity. Pregnant women experiencing VAWG face additional risk this strategy will ensure that they receive appropriate support	Positive Neutral Positive

	Race	The strategy is aimed at all residents, irrespective of Race.	Positive
		The strategy states that VAWG can affect anybody of any ethnicity.	Neutral
		Under a section titled ‘what causes VAWG’, our strategy recognises the additional barriers some Black and Asian survivors and those from ethnic minority groups or global majority might face in accessing support. These can include services not being visible within their community and the strategy recognises the need for a range of services and the need to engage with our communities. Other barriers to support can also include language barriers, immigration status, experiences of discrimination and a mistrust of institutions. It puts this in the context of Intersectionality and requests responses are tailored to an individual’s needs.	Positive
		Under a section titled ‘Objective one: VAWG is prevented’ the strategy recognises the intersecting experiences of abuse and discrimination that survivors may experience based on race and states that we must challenge discrimination in all its forms. An intersectional approach is promoted throughout the strategy.	Positive
		We consulted with survivors from a diverse range of ethnic backgrounds and analysed the data from service providers in relation to ethnicity with over 50% of service users were from a global majority background including Black, Asian and people from a minority ethnic group in the UK.	Positive
		The strategy recognises that we need to engage with the different communities from diverse ethnic backgrounds living in Hammersmith & Fulham and each of our 4 objectives specifically outline what we can do with our communities to support our goal of ending violence against women and girls. We will be developing our action plan alongside our communities to outline specific actions to achieve our objectives.	Positive

	Religion/belief (including non-belief)	The strategy is aimed at all residents, irrespective of religion/belief. The strategy states that VAWG can affect anybody of religion/belief. Under the section “What is VAWG” the strategy explains what faith-based abuse is and clearly states that This is when someone justifies abuse based on their belief it is not caused by religion/belief. Under a section titled ‘what causes VAWG’, our strategy recognises the additional barriers some survivors might face in accessing support including their religion/beliefs. It puts this in the context of Intersectionality and requests responses are tailored to an individual’s needs. Under a section titled ‘Objective one: VAWG is prevented’ the strategy recognises the intersecting experiences of abuse and discrimination that survivors may experience based on religion/belief and states that we must challenge discrimination in all its forms. An intersectional approach is promoted throughout the strategy. We consulted with survivors with a range of religious beliefs and faiths and analysed the data from service providers in relation to religion to ensure that the strategy was inclusive for people with a wide range of religions and beliefs.	Positive Neutral Neutral Positive Positive
	Sex	The strategy is aimed at all residents, irrespective of their sex. Any change in response due to the strategy will be irrespective of sex Under the section “What is VAWG” the strategy explains that VAWG can happen to anyone irrespective of their gender. Under the section “What is VAWG” the strategy highlights that VAWG	Positive Neutral Neutral

		disproportionally affects women and girls	Positive
		Under the section what causes VAWG the strategy highlights cultural factors such as Sexist views and the idea that men can have more power over women and children, results in abuse being used to maintain this power. Gender stereotypes reinforce this inequality and creates an acceptance of violence and abuse.	Positive
		Under the section what causes VAWG the strategy highlights political factors such as the under-representation of women and minority groups in power and politics means they have fewer opportunities to shape the discussion and to affect changes in policy, or to adopt measures to end VAWG.	Positive
		Under the section Common Myths about VAWG the strategy explains that men, boys, and non-binary people also experience the types of abuse set out in the strategy.	Positive
		Under the section Objective one VAWG is prevented the strategy explains that as VAWG is the result of gender inequality and discrimination, we will work collaboratively with agencies and communities in tackling the harmful behaviours and attitudes that underpin abuse.	Positive
	Sexual Orientation	The strategy is aimed at all residents, irrespective of their sexual orientation.	Positive
		Any change in response due to the strategy will be irrespective of sexual orientation	Neutral
		Under the section what cause VAWG the strategy recognises that experiences of homophobia can make people more vulnerable to abuse because they face additional barriers in accessing support. Our strategy recognises the need for an intersectional approach	Positive

Human Rights or Children's Rights
If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice

Will it affect Human Rights, as defined by the Human Rights Act 1998?
No

Will it affect Children's Rights, as defined by the UNCRC (1992)?
No

Section 03	**Analysis of relevant data** Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	We have used data from our strategic assessment, national VAWG data and date from the Mayor's Office for Policing and Crime (MOPAC). We have also used data from the Angelou VAWG service commissioned by Hammersmith & Fulham (H&F) and the results of a resident survey to inform our strategy. This includes the demographics of people living in the borough and those accessing services**.**
New research	N/A

Section 04	**Consultation**
Consultation	The strategy has been co-produced and as such, focus groups were held with a variety of agencies and drafts of the strategy shared at various stages. We held four workshops with survivors. Feedback from survivors have informed the strategy throughout development and there is a section in the strategy "What survivors with lived

	experience told us". Discussions with both survivors and stakeholders have informed the four objectives within the strategy. We held three stakeholder workshops with a range of multi-agency professionals from the borough including the Metropolitan Police, local NHS trusts and Non-Governmental Organisations. A range of VAWG experts and service providers were also consulted to ensure that the strategy has an intersectional and inclusive approach. Standing Togethers 'In Search of Excellence' report also provided insight into how to strengthen our Coordinated Community Response. H&F Children's Services adult safeguarding, and housing colleagues were also involved in the stakeholder workshops and we consulted the VAWG Board on three occasions. We held an all-staff event to present the proposed strategy that was attended by 180 team members. The council also received 68 responses to an online survey aimed at residents to inform the strategy.
Analysis of consultation outcomes	We held a Stakeholder workshop with professionals in Feb 2020 Workshop with VAWG Board March and November 2021 Survivor consultation: 3 workshops held in April/May and 1 workshop in November 2021 Theory of Change stakeholder workshop: April 2021 Strategy Stakeholder workshop in November 2021. Workshop with H&F Transformation board in November 2021 Wellbeing Wednesday session on the VAWG strategy in Dec 2021 Resident survey April to June 2021, 68 responses, we have a breakdown of residents protected characteristics and participants in the survey had a range of ethnic backgrounds and age groups and included those with disabilities Feedback from survivors and stakeholders have informed the strategy throughout development and there is a section in the strategy "What survivors with lived experience told us" this has informed the 4 objectives within the strategy.

	Feedback from a range of service providers has ensured that the strategy has intersectional and inclusive approach and Standing Togethers 'In Search of Excellence' also provided insight into how to strengthen our Coordinated Community Response. Consultation with service providers highlighted the need to have an intersectional approach recognising that survivors will have multiple and overlapping needs and may experiences multiple disadvantage and/or additional barriers to accessing support.

Section 05	**Analysis of impact and outcomes**
Analysis	The strategy is inclusive. It states that Violence Against Women and Girls (VAWG) is the umbrella term used to describe a range of violent and abusive acts and behaviours, which are predominantly, but not exclusively, directed against women and girls. This term is used to describe abuse against all genders but highlights the disproportionate impact on women and girls. It highlights that gender inequality is a key driver of VAWG. The council of Europe give three factors which lie at the root of the problem: Cultural, legal, and political and sexism, victim blaming and the under-representation of women and minority groups in power and politics means they have fewer opportunities to shape the discussion and to affect changes in policy, or to adopt measures to end VAWG. The strategy also recognises that experiences of racism, classism, ageism, homophobia, transphobia, and discrimination against disabled people can make people more vulnerable to abuse because they face additional barriers in accessing support. Our strategy recognises the need for an intersectional approach which understands the barriers people face and how these connect with each other and with their experiences of abuse. The strategy was developed with Survivors and a wide range of stakeholders, in consultation with residents and professionals. The strategy adopts the coordinated community and an ecological model to shape our response to ending VAWG. Across this strategy, we look at how we can meet our objectives by better understanding the actions individuals, communities, institutions, and society can take to meet our aim to end VAWG. The strategy is designed for anyone loving working or visiting the borough. It promotes everyone's human rights and seeks to end violence against women and girls, recognising men as survivors and promoting positive behaviour change that will have a positive impact on individuals with protected characteristics. There are no direct negative equality implications, under the Equality Act 2010, for those service users from groups with certain protected characteristics by the approval of recommended options outlined in this paper. A positive

	impact on certain groups with protected characteristics is anticipated.

Section 06	**Reducing any adverse impacts and recommendations**
Outcome of Analysis	Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for LBHF, and the overall outcome. **N/A**

Section 07	**Action Plan**
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis **N/A**

Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan

Section 08	**Agreement, publication and monitoring**
Senior Managers' sign-off	Name: Sharon Lea Position: Strategic Director of Environment Email: Sharon.Lea@lbhf.gov.uk Telephone No: Considered at relevant DMT: 10 / 01
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: 07 / 02 / 22 Key equalities issues have been included: Yes/No
Equalities Advice	Name: Yvonne Okiyo

(where involved)	Position: Strategic Lead Equity, Diversity and Inclusion Date advice / guidance given: 25.01.02 Email: Yvonne.Okiyo@lbhf.gov.uk Telephone No: 07824 836 012

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Cabinet

Date: 07/03/2022

Subject: Hammersmith Bridge – Essential Work Leading to Strengthening and Restoration Project

Report of: Councillor Wesley Harcourt, Cabinet Member for the Environment

Report Author: Bram Kainth, Chief Officer for Public Realm

Responsible Director: Sharon Lea, Strategic Director of Environment

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SUMMARY

Hammersmith Bridge (the Bridge) was re-opened to pedestrians, cyclists and river traffic on 17 July 2021 following a significant period of closure. This decision was taken (with the advice of the Case for Continued Safe Operation (CCSO)) after the completion of extensive investigations by London Borough of Hammersmith & Fulham (LBHF) engineers that included the introduction of a pioneering temperature control scheme.

In order to maintain expeditious progress, the Council commissioned independent external advice on the design solutions for the stabilisation of Hammersmith Bridge and the preferred option was approved by the Leader of the Council on 16 August 2021. Cabinet on 6 December 2021 approved the stabilisation project, which should be completed in 2022.

Progress must be maintained for the full re-opening of the Bridge to all motorised traffic - in line with the Strategic Transport aspirations of the Department for Transport, Transport for London and the Council. In this regard, there are essential works on the concept design and technical ground investigations that need to be completed during the year whilst the stabilisation works are progressing. This will ensure that the future project to strengthen the Bridge can be undertaken with greater expediency, effectiveness and minimisation of technical risks.

This report sets out the details of this work and proposals for the commencement of the work through preferred external technical experts and suppliers. This expenditure will be incorporated as part of the overall expenditure for the full restoration of the Bridge.

RECOMMENDATIONS

1. To approve a new capital budget of up to £3.5m in 2022/23 to progress concept design and associated works leading to the strengthening and restoration works to be initially funded by Council borrowing (increase to the Capital Financing Requirement).

2. To approve the procurement approach set out in paragraph 4 given the specialist nature of the works.

3. To approve the appointment of the preferred technical experts to complete the work for the amounts set out in paragraph 4, subject to a client held contingency being used where required.

Wards Affected: All

Our Values	**Summary of how this report aligns to the H&F Values**
Building shared prosperity	The commencement of this preparatory work will continue to promote the confidence of residents and businesses that are based in the Borough and will support continued future economic growth
Doing things with local residents, not to them	The projects to stabilise and strengthen the Bridge are being undertaken with extensive public engagement through public meetings and media
Being ruthlessly financially efficient	The completion of this preparatory work will minimise future financial risks by providing greater certainty of the technical matters to restore the Bridge. In line with government announcements, this is expected to be two thirds funded by DfT and TfL
Taking pride in H&F	The work will eventually lead to the full restoration of a historic asset that is much valued and appreciated by residents
Rising to the challenge of the climate and ecological emergency	The current diversion of traffic (with greater consequential carbon emissions will be reduced) as will long term levels of traffic through a potential future road charge for users of the Bridge

Financial Impact

In line with government announcements, central government and TfL are expected to fund two-thirds of the total stabilisation and strengthening project costs and this is expected to be formalised in a proposed Memorandum of Understanding (MoU).

In advance of the confirmation of this funding, the Council is planning to fund this capital expenditure of £3.5m through borrowing (by an increase in the Council's Capital Financing Requirement). The annual revenue costs of this spend is estimated at £140,000 based on expected Public Works Loan Board (PWLB) rates and includes a Minimum Revenue Provision of 2%. This would reduce by two thirds once expected grant funding is confirmed.

There is a risk that should the strengthening works not progress following the proposed concept design and technical ground investigations, then any expenditure will need to be written off to revenue. Should strengthening progress but a different design solution is selected then the expenditure on the concept design and other costs associated with the preferred option of £1.6m will need to be written off to revenue.

The Council is developing the Outline Business Case for submission to the DfT and TfL for the full stabilisation, strengthening and restoration of the Bridge. This seeks to justify the expenditure of public funds and the development of a toll or road charging scheme to finance the Council's contribution to the project. In the event such a scheme is implemented, the Council's additional revenue costs set out above may be funded by a future toll or road charging arrangement. In the absence of a toll or charge, these costs will need to be met through general fund and incorporated into the Council's Medium-Term Financial Planning process.

Sukvinder Kalsi, Finance Officer, dated 24 January 2022

Verified by: Emily Hill, Director of Finance, dated 31 January 2022

Legal Implications

The proposed appointments of FM Conway (to be subcontracted to Fosters/COWI), FM Conway and WSP (to be subcontracted to Peter Davidson) are for values above the current thresholds of £213,477 for public services contracts for the purposes of the Public Contracts Regulations 2015 (PCR). The Council is therefore subject to the advertisement and competition requirements set out in the PCR.

The Council has five call-off contracts with FM Conway. These were called-off under framework agreements set up by the Royal Borough of Kensington & Chelsea in which LBHF was named as a participating body. The contract for Highway Bridge and Structural Maintenance Works includes provision for consultancy work. There are significant advantages in appointing Fosters/COWI to undertake this work because of their previous involvement. It is proposed therefore to commission this work from FM Conway under the current call-off arrangements on the understanding that the work will be sub-contracted to Fosters/COWI.

The work in connection with crowd loading assessments which is proposed to be awarded to Mott Macdonald, is below the threshold for a public services contract. The Council is not therefore obliged to follow the advertising and competition requirements set out in the PCR in relation to this award.

The proposed award to FM Conway in relation to geotechnical investigations is proposed to be awarded under the existing call-off arrangements referred to above.

The localised traffic modelling work to be undertaken by Peter Davidson is proposed to be awarded to WSP under the Transport for London framework for traffic and transport modelling on the basis that it will be subcontracted to Peter Davidson. Since this framework has been let in accordance with the provisions of the PCR and LBHF is entitled to call-off under it this proposed method of procurement is in compliance with the PCR.

The proposed awards to Fosters/COWI, FM Conway and Peter Davidson are all high value contracts for the purposes of the Council's Contract Standing Orders. The proposed award of works to FM Conway are under an existing call-off contract under a framework agreement. The proposed award to Peter Davidson is under a third-party framework which is a permitted means of procuring contracts of this value under CSO 19.

Verified by: John Sharland, Senior Solicitor (Contracts and Procurement)
Dated: 31 January 2022

Background Papers Used in Preparing This Report - None

DETAILED ANALYSIS

1. A range of technical projects need to be completed in preparation for the strengthening work. These are detailed in the table below:

Project	£ '000
Concept Design • fully evaluate the engineering/technical/logistical aspects of the preferred project design • to develop and test any prototype models • to assess the longevity and life cycle maintenance costs • develop and secure all necessary planning consents	1,500
Crowd Loading Assessments • to evaluate the technical load limits of the preferred project	100

Project	£ '000
Geo Technical Investigations • ground investigations of the riverbed • investigation of the existing pier and pedestal foundations	700
Localised Traffic Modelling (part of strengthening and restoration works) • to assess the potential local usage of the Bridge (with a potential road charge) • to determine the wider regional traffic flow impacts	300
Procurement Plans (as necessary) • to develop and agree the procurement options and strategy for the full strengthening and restoration works • undertake any necessary market engagement to evaluate the options to progress the works	500
Provisional Contingency (for unforeseen additional works and investigations that may be necessary)	400
Total	**3,500**

2. The details of the work that will be undertaken (including the number of engineering days, materials and other costs) will be evaluated extensively by Council officers to ensure that these are consistent with other projects and work undertaken previously by the preferred contractors.

3. The Council is already working with the proposed technical experts on a range of work relating to Hammersmith Bridge and the additional proposed works are either an extension of existing work or are complementary tasks. These technical experts were previously selected based on the following key requirements:

    - nationally recognised experts with substantial experience of providing strategic advice for complex transport projects (including technical engineering expertise)

    - significant recent experience in the delivery of similar highways and transport related projects within the country and internationally

    - provision of competitive rates for services that would ensure value for money (and based on previous comparable work undertaken for the Council)

    - to secure the services in an expeditious manner given the links of this work to the existing stabilisation project that is in progress (and due to be completed in 2022)

- to reduce any additional costs (both financial and from time delays) that could be incurred so that the continuing impact on residents, businesses and visitors to the Borough is minimised

4. The officers of the Council considered a range of options to secure these services including the use of national government procurement frameworks and a specific competitive procurement process. After consideration (with due regard to the factors set out in paragraph 3 above), it is proposed that the contracts with the following consultants/contractors.

    - Concept Design – FM Conway subcontracted to Fosters/COWI (March 2022 to October 2022)
    - Crowd Loading – Mott McDonald (March 2002 to June 2022)
    - Geo-Technical Investigations – FM Conway (March 2022 to December 2022)
    - Localised Traffic Modelling – WSP subcontracted to P Davidson (March 2022 to December 2022)

Reasons for Decision

5. The decisions are based on the following considerations:

    - the proposed work will ensure that the development of the strengthening project is based on a strong evaluation of the technical and infrastructure issues
    - it will minimise the technical and financial risks for the procurement of future contractors (in due course) for the completion of the strengthening works
    - it will reduce the time interval between the completion of the stabilisation works and commencement of the strengthening works (as this work will be completed whilst the stabilisation project is being completed)
    - it will benefit from the insight and complement the work that is underway on the stabilisation (especially the geo-technical investigations)

Equality Implications

6. The Bridge has only been initially opened to pedestrians and cyclists and the stabilisation works have now commenced. The completion of this essential work will support the completion of the full restoration works in due course so that the Bridge can be utilised by all residents/businesses/visitors of the Borough as well as wider usage from across London and nationally. Additional details on the positive/negative and neutral impacts will be set out in future reports on the full restoration of the Bridge for motorised traffic.

Risk Management Implications

7. The completion of this work will improve the long-term prospects for the safe and expeditious completion of the strengthening work. It will assist in de-risking aspects of the construction and delivery of the project. As the work is progressed, a Risk Register will be maintained, and risks evaluated including any necessary mitigation/recovery plans that may be required. Appropriate project oversight and governance will need to be exercised to ensure that risks

and mitigations are reviewed on a regular basis, along with the delivery of the works.

8. Consultation on insurance requirements for this essential work are in progress and financial provision will need to be made by the Council when this is established.

Verified by: David Hughes, Director of Audit, Fraud, Risk & Insurance
Dated: 12 January 2022

Climate and Ecological Emergency Implications

9. It is likely that the full re-opening the Bridge (including to motorised traffic) will potentially reduce the overall impact on the environment as it should reduce the mileage and emissions from previous users that are having to use longer and alternative diversion routes to cross the Thames River.

Verified by: Hinesh Mehta, Strategic Lead – Climate Emergency
Dated: 31 January 2022

Local Economy and Social Value

10. The stabilisation and strengthening of the Bridge will have major strategic and economic benefits for residents and businesses. These details will be set out more clearly in the Outline Business Case that is being compiled for the DfT.

Consultation

11. The proposals relating to the Bridge continue to be subject of Planning Consultations and Consents. There is ongoing consultation on the proposals with DfT, TfL and engagement with local residents.

LIST OF APPENDICES
None

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Cabinet

Date: 07/03/2022

Subject: Adopting the WLA low-carbon procurement policy

Report of: Councillor Wesley Harcourt, Cabinet Member for Environment

Report author: Jim Cunningham, Climate Policy and Strategy Lead

Responsible Director: Sharon Lea, Strategic Director for Environment

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SUMMARY

This paper seeks approval to adopt the West London Alliance (WLA) low carbon procurement policy ('the policy'). This has been developed collaboratively by H&F and eight west London boroughs, and presents a unified expectation of suppliers for council contracts on tackling the climate emergency across the subregion.

A charter with suppliers accompanies this, for inclusion in all new tenders, and for circulation to existing suppliers to encourage them to sign up to the same principles. A toolkit has also been developed to support commissioning and procurement officers to adopt climate considerations into all procurement.

RECOMMENDATIONS

That Cabinet:

1. Adopts the West London Alliance low-carbon procurement policy.

2. Approves the inclusion of the accompanying low-carbon charter in all future tenders as a precondition for successful tenderers.

3. Approves that the charter be sent to all current suppliers to encourage them to voluntarily agree to its principles.

4. Approves the inclusion of climate impact considerations in the development and evaluation of all future procurements, supported by the low-carbon toolkit and other support and advice available from the climate unit and elsewhere.

Wards Affected: All

Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	This supports a local green economy by reducing the climate impact of local services and providing a unified message to businesses from west London boroughs. Training sessions will be held with local suppliers.
Doing things with local residents, not to them	This is part of a wider green economy agenda including the H&F Climate Alliance, which will support SMEs to transition to net zero carbon.
Being ruthlessly financially efficient	This supports H&F's aim to maximise environmental and social benefits of its' contracts by prioritising local supply chains and delivering greater value for money.
Rising to the challenge of the climate and ecological emergency	This delivers on the procurement objectives within H&F's Climate and Ecology Strategy. It supports boroughwide emissions reduction by encouraging low-carbon approaches from local suppliers.

Financial Impact

The one-off cost of implementing the WLA low carbon procurement policy is £4,800 in respect of consultancy and training. This can be fully funded from one-off underspends in the existing Climate Change Team revenue budget for 2021/22.

The procurement risks of adopting the policy are set out from section 20. In general, adoption of the policy is not expected to have an adverse impact on competition and the cost of contracts, as the toolkit is designed as a guideline to be used flexibly and with reference to the Council's own priorities and ambitions. The financial implications of any changes to existing contracts, or the award of new contracts, will be considered as part of the normal decision making process.

Kellie Gooch, Head of Finance (Environment), 9th December 2021
Verified by Andy Lord, Head of Strategic Planning and Monitoring, 10th December 2021

Legal Implications

There is no statutory requirement for Local Authorities to produce a Climate Strategy or an Action Plan under the Climate Change Act 2008. The Council's 2030 target and planned actions are intended to be consistent with, and exceed, the ambitions set out in the Mayor of London's 1.5 degree compatible action plan, and the Climate Change Act 2008, which presently sets a target for the UK to be net-zero by 2050.

All the recommendations set out in this report are consistent with the Council's policy and the Public Contracts Regulations 2015.

Verified by Joginder Bola, Senior Solicitor (Contracts and Procurement), 2nd December 2021

Background Papers Used in Preparing This Report

None.

DETAILED ANALYSIS

Current low-carbon procurement policy in Hammersmith & Fulham and west London

1. Hammersmith & Fulham Council's (H&F) baseline 2019/20 carbon audit estimated over 63,000 tonnes CO2e from H&F's procurement, equal to all the council's emissions from its corporate buildings, housing, and fleet.

2. The council's Climate and Ecology Strategy states the following ambition on procurement: *"The development of our low carbon procurement framework will offer a huge opportunity to progressively reduce the impact of our £420m yearly spend. We will develop our internal mechanisms to ensure our procurement meets the objectives of this strategy. Where possible, we will maximise the environmental and social performance of the council's contracts by prioritising local supply chains, supporting our local economy, and delivering greater value for money for our residents."*

3. The accompanying action plan includes the following actions to pursue this:

Ref	Action	When
F3.2	Evolve our procurement policy and management framework (including standard terms and conditions; and minimum standards) so that it is consistent with our ambition zero emissions and associated policy around value for money, social value.	2022
F3.3	Communications, engagement and market management with existing providers – including identifying quicker win actions that can be undertaken through current contracts and programme of recommissions/procurement that are upcoming.	Immediate and ongoing
F3.5	Align the forward plan for contract review and re-procurement and wider commissioning strategies with the climate strategy programme.	2022
F3.6	Organisational development and training for key lead officers in commissioning and procurement on low carbon procurement policy.	Ongoing

4. The West London Build & Recover plan, launched in September 2020, states that councils will "use [their] status as 'anchor institutions' to lead by example

by making our procurement policies more favourable to low carbon suppliers."

5. H&F does not yet have a sustainable procurement policy, which is commonly used to set out principles and objectives to procuring officers, prospective tenderers, and residents.

6. Climate implications are now required for key decisions and procurement strategies in H&F. Drafting tends to take place at the report-writing stage, so a further framework is needed to embed the consideration of climate impacts from the outset of designing proposals.

Proposals and Analysis of Options

WLA Low-carbon procurement policy, charter, and toolkit

7. H&F and other west London sustainability and procurement officers collaborate in the West London Low-Carbon Procurement Group. This group, with the support of environmental consultants, has developed a common low-carbon procurement policy, a supplier charter to be signed by council contractors, and a supporting toolkit for officers involved in procurement.

8. The policy is intended to:
    - facilitate continuous improvement in climate impacts from participating boroughs' procurement;
    - provide a common approach to achieving, monitoring, and reporting this;
    - present a unified and more navigable low-carbon policy landscape to businesses.

9. The charter is a document for suppliers to commit to. It sets expectations for suppliers to support the contracting borough in its objectives to achieve net zero greenhouse gas emissions.

10. WLA authorities are expected to include the charter in tender packs for all new procurement as a condition of award. The authorities will also send the charter to all existing suppliers, to encourage them to sign up and to notify them of this precondition for any future contracts. Existing suppliers cannot be compelled to agree to the charter, but many are expected to voluntarily agree.

11. The toolkit helps authorities deliver on the aims of the policy and charter by guiding officers undertaking procurement to include climate-specific considerations, tender questions and KPIs.

12. The approach was discussed at the West London Environment Directors' group in November 2021, where the principle of acting as a subregion was supported. It was agreed to progress the policy and accompanying documents through individual boroughs' governance.

Options appraisal

13. The following options have been considered:

14. **Option 1: do nothing**- not recommended. H&F would continue without a low-carbon procurement policy, supplier charter, and toolkit. The council would not meet its adopted Climate and Ecology Strategy actions stated above in point 4. In the absence of a policy, charter and toolkit, services would develop proposals independently of corporate guidance, and suppliers would not have a single clear point of reference for the council's expectations, hampering progress on the council's objectives to reduce its climate impact through procurement.

15. **Option 2: develop a sovereign low-carbon procurement policy, charter, and toolkit in-house**- not recommended. A sovereign approach would have a lesser impact than a unified subregional approach, as it will not indicate that these standards will be expected for any local authority work across west London. It will also create a more arduous policy landscape for suppliers, including local suppliers, to navigate. The main benefit would be the scope to tailor a policy to aspects unique to H&F. However, the approach and principles set out in the WLA policy are at a high level and are flexible to the particular requirements of each borough, and make reference to adhering to the climate action plans of the relevant borough. The WLA approach was developed with H&F officers, so an in-house approach would likely be similar.

16. **Option 3**: **use the toolkit, but do not adopt the policy or charter**- not recommended. In the absence of a policy the toolkit would be harder to embed and its use by services would be piecemeal.

17. **Option 4: adopt the WLA policy, charter, and toolkit-** recommended. The adoption of these is expected to bring the following benefits:
    - Delivering on the actions in our adopted Climate and Ecology Strategy, referenced above in point 4.
    - Delivering on the West London Build & Recover Plan.
    - Ensuring all of the council's spend of over £400m per year considers opportunities for carbon reduction.
    - Sending a strong signal to suppliers as a subregion and avoiding the perception that businesses can pivot towards boroughs with lower expectations on the climate emergency.
    - Growing a competitive advantage for the local green economy by incentivising suppliers in the subregion to align their business to net zero sooner rather than later.
    - Providing a more navigable low-carbon policy environment for local businesses, and those operating locally, by offering a common policy framework rather than eight separate policies.
    - Supporting H&F's borough-wide net zero objective by incentivising local suppliers to decarbonise.
    - Providing a common framework for monitoring supply chain commitment to decarbonisation across west London.
    - Offering opportunities for learning alongside other boroughs, through an initial training offer to commissioners and suppliers on the approach and toolkit, and through feedback and continuous improvement on a common framework and toolkit.

Risks of adoption and mitigations

18. The following risks of adoption of the WLA policy and accompanying documents have been considered:

19. **Risk 1: limiting the scope of H&F's procurement-** low risk. The policy is a high-level statement that sets out principles and objectives consistent with H&F's existing ambitions in our adopted Climate and Ecology Strategy. There are no requirements to use particular products, services, or procurement approaches. The toolkit is a guideline to be used flexibly and with reference to authorities' own priorities and ambitions.

20. **Risk 2: increasing the cost of procurement-** medium risk. As set out in Risk 1, the documents do not hold authorities to any specific products, services, or procurement approaches, so adoption poses no direct implications for cost. Costs associated with low-carbon solutions are dependent on each product and service model, and range from immediate savings (such as on reducing meat in food procurement or consolidating deliveries) to higher costs (such as on replacing gas boilers with heat pumps), and higher upfront costs but with lifetime savings from reduced operational expenditure (such as electric cars and building insulation). This risk can be managed through market engagement prior to procurement, and the inclusion of ambitious but proportionate targets for low-carbon transition within contracts.

21. **Risk 3: reducing supplier interest in bidding for council contracts-** low risk. The supplier charter expects suppliers to support the council's net zero ambitions by seeking opportunities to reduce the climate impacts of their services. This is aligned with national legislation mandating the UK to achieve net zero carbon emissions by 2050, and does not commit suppliers to specific targets, which would be the subject of the specification and KPIs of any procurement. Risks of discouraging bids are further mitigated by adopting a common policy across the subregion, and by working with suppliers to support their transition, including through the H&F Climate Alliance.

22. **Risk 4: restricting the opportunity for small and local suppliers to bid for council contracts**- medium risk. As discussed above the policy is high-level and flexible, and its adoption does not directly pose a risk to small local suppliers. The policy stipulates that for procurements below a given threshold value 'due regard should be given to the resources available to smaller providers which may bid for lower value procurement.' This will be applied according to the thresholds within H&F's constitution and contract standing orders. Some upfront costs of low-carbon solutions may be more easily borne by larger suppliers, so this should be considered in procurement strategies. However, smaller local suppliers may also offer low-carbon opportunities such as more flexible business models, and reduced transport needs. Additional support for local suppliers will include the H&F Climate Alliance.

23. **Risk 5: low adoption of the approach in council procurements**- medium risk. As H&F's procurement is decentralised efforts will be needed to ensure consistent adoption. A formalised policy is expected to assist with visibility of this agenda. Its application will be mainstreamed into the wider category

management approach under development to ensure it is consistent, targeted, and simplified for the services undertaking procurement. This risk will also be managed through existing procurement checkpoints.

Next steps

24. To embed the approach and further progress H&F's carbon reduction through procurement, the intention is to:

- Ask all current suppliers to sign up to the charter voluntarily, and include the charter in tender packs for all future procurements.
- Hold training sessions for H&F officers.
- Hold training sessions for local suppliers.
- Mainstream carbon reduction into the category management approach currently under development.
- Ensure the approach is applied consistently through existing procurement checkpoints such as Contracts Assurance Board.
- Establish a framework of key performance indicators across the Climate and Ecology Strategy, including on procurement outcomes, to track progress against the strategy. These will be aligned with the monitoring approach across west London.

Reasons for Decision

25. The recommendations deliver on the council's adopted Climate and Ecology Strategy, support the transition to net zero emissions in the borough, and offer the additional benefits over alternative approaches outlined above at point 17 ('Option 4: adopt the WLA policy, charter and toolkit').

Equality Implications

26. No equality implications are foreseen as a result of these recommendations. As described above, the policy is flexible and makes provision for smaller suppliers, so no structural impacts on certain types or sizes of business that could result in inequalities should result from adoption of this policy.

Risk Management Implications

27. The report recommends the adoption of the West London Alliance low carbon procurement policy which has been developed collaboratively with seven other boroughs, which is intended to present a unified, high-level expectation of suppliers for council contracts on tackling the climate emergency across the subregion. The reports sets out a number of risks in adopting this policy with a range of mitigations which can be put in place.

28. The H&F Climate Unit will have a key role to play in assessing the benefits and impacts of the policy, both environmental and financial, as it is applied to

procurement exercises and to use this assessment to review and develop the policy. This assessment should include keeping the risks identified above and any emerging risks under review and proposing appropriate mitigations where required.

Implications verified/completed by: David Hughes, Director of Audit, Fraud, Risk and Insurance, 9th December 2021

Climate and Ecological Emergency Implications

29. These recommendations aim to embed a low-carbon approach to the council's procurement, associated with emissions of over 63,000 tonnes CO2e. This represents a significant opportunity for the council to reduce the 'scope 3' emissions indirectly caused via its supply chain. It also supports the development of a local green economy by influencing local suppliers within the council's supply chain, and thereby supports the reduction of boroughwide emissions.

Implications verified by: Hinesh Mehta, Strategic Lead – Climate Emergency, 9th December 2021

Procurement implications

30. The climate change team are working with the council's procurement function to identify how the standard procurement documentation and process is to be updated.

31. This important aspect is part of our commitment to sustainable, responsible, ethical sourcing, and will be shared with all officers leading on procurement and contract management across directorates.

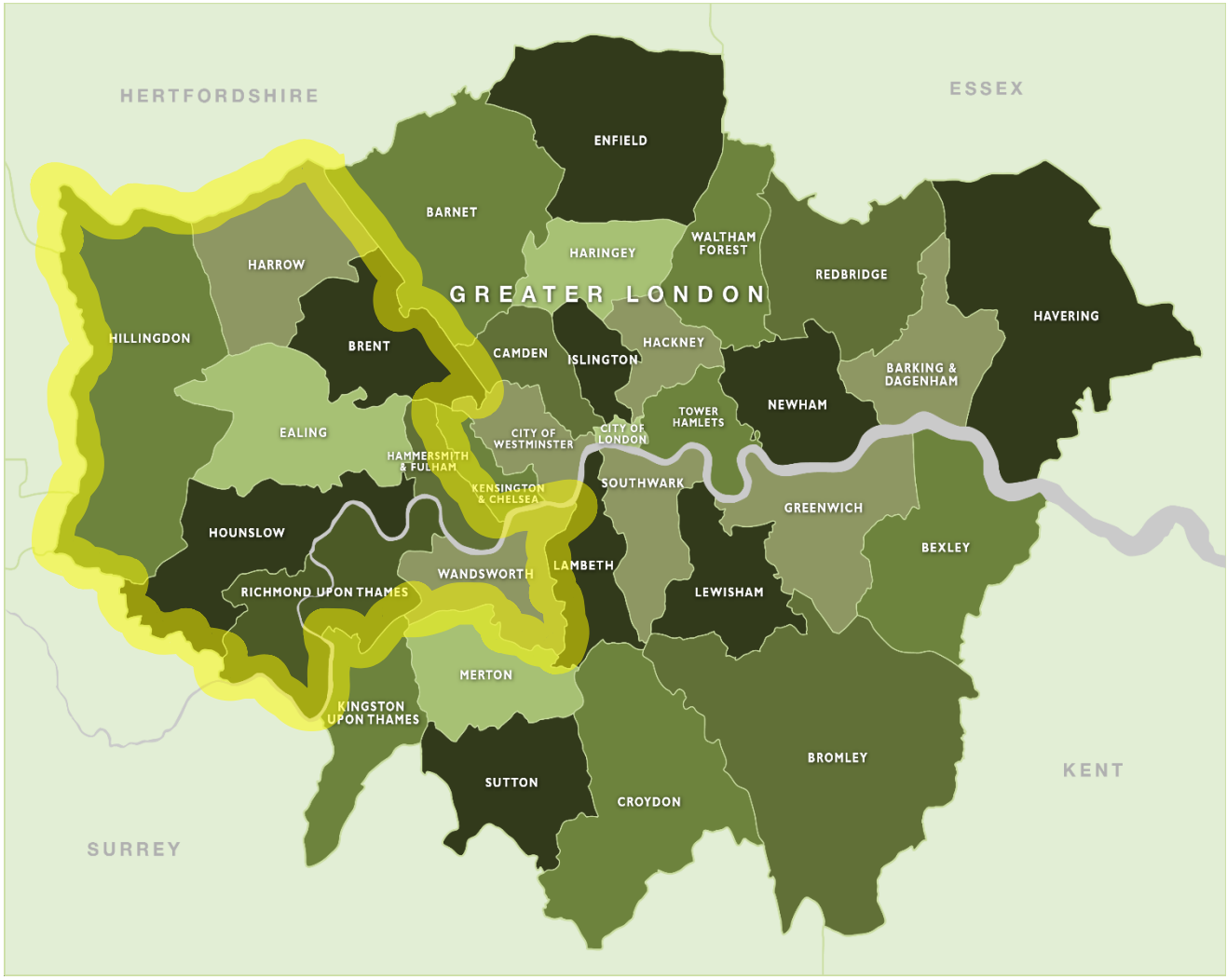
32. Implementation will be supported by the training programme outlined in this report.

Verified by Waheeda Soomro: Corporate Procurement Officer, 26th January 2022

LIST OF APPENDICES

1. WLA low carbon procurement policy
2. WLA low carbon procurement charter
3. WLA low carbon procurement toolkit part 1 (Word)
4. WLA low carbon procurement toolkit part 2 (Excel)

APPENDIX 1



WEST LONDON

LOW CARBON PROCUREMENT POLICY - OCTOBER 2021

West London Low Carbon Procurement Policy

1. Introduction and Vision

i. It is widely agreed that there is a climate crisis, and that every organisation should work towards reducing its carbon impact to net zero by 2050. The eight local authorities in West London – Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hounslow, Richmond upon Thames, and Wandsworth – and West London Waste (together the 'Participating Authorities') - are no different and each has made a commitment to reduce our emissions and address related social and environmental impacts.

ii. We spend millions of pounds annually on the procurement of goods, services and works. The approach we take in spending our budgets has a direct and significant impact on the community we work for and hence we have a great responsibility and opportunity to create positive carbon outcomes from that spend.

iii. We have agreed that, in pursuing low carbon outcomes from the commissioning, planning & design of services, procurement, contract management, and delivery of all our services, we will collaborate in our efforts in a coordinated and consistent fashion in order to further alleviate negative impacts on the environment, society, and the community in which we operate.

iv. This Low Carbon Procurement Policy sets out the commitment of the eight local authorities and West London Waste and the general principles we will follow across all our procurement and commissioning activities to ensure that it is undertaken to deliver sustainable procurement at value for money across the life of the contract / or whole life costs.

v. Doing so, we will play our part in addressing the issue of climate change and reduction of carbon emissions within supply chains to work towards UK's Net Zero target.

vi. The Policy also recognises the associated benefits from simultaneously addressing the impacts of poor air quality, enhancing biodiversity, improving the health and wellbeing of residents, moving to a more circular economy, driving increased investment in the eight boroughs, encouraging innovation, and developing local skills. In aiming to reduce our carbon emissions, we strive to address these related impacts and opportunities as well.

vii. Furthermore, the Policy aims to drive consistency and action on carbon reduction across the eight local authorities and, while each local authority will carry out procurement independently, the policy advocates a commitment to a common and collaborative approach where possible.

2. Background

i. Formed in 1997, the West London Alliance[1] is a partnership that includes the local authorities of Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, and Hounslow. In September 2020, following approval by the West London Economic Prosperity Board, the West London Alliance published their Build & Recover Plan[2]. The Plan places a strong emphasis on a green recovery and includes a commitment to *"Use our status as 'anchor institutions' to lead by example by making our procurement policies more favourable to low carbon suppliers"*. In addition, each of the Participating Local Authorities have formally declared a Climate Emergency with a commitment to work towards carbon neutrality / net-zero by 2030.'

[1] https://wla.london/
[2] 2020-September-Build-and-Recover-Plan.pdf (wla.london)

ii. This Policy recognises the importance of the Participating Authorities' supply chains to reducing our organisational emissions and working towards our targets. We recognise that achieving those reductions needs the collaboration, continued support, and involvement of our supply chain through the procurement process.

3. This document is intended for:

i. Councillors – to lead, challenge and monitor the way we carry out procurement.
ii. Senior Management Teams – to manage the Participating Authorities' adherence to the objectives we have set for ourselves and ensure that proposed improvements happen.
iii. Procurement – so they can be clear about the Participating Authorities' objectives and shape their procurement activities accordingly.
iv. Commissioners (Internal Client) – to ensure the commitment of the Participating Authorities towards net zero 2030 is reflected in the specification for procurement.
v. Delivery Contract Managers – to ensure the supply chain commitments made during the tender stage are realised by effective supplier performance and relationship management.
vi. Suppliers and potential suppliers – to understand the Participating Authorities' expectations and to provide SMART solutions to deliver our goals.
vii. Strategic Suppliers – so we can better work together to align our policies and strategic direction.
viii. And most importantly for our residents and local stakeholders – to be aware of the direction the Participating Authorities are taking.

4. Scope

i. The policy covers all areas of commissioning and procurement cycle, irrespective of contract value and duration, within the Participating Authorities and will influence the way we procure goods, works and services.
ii. For procurement below a given value threshold (refer to local authority procurement strategy for individual thresholds), due regard should be given to the resources available to smaller providers which may bid for lower value procurement. Requirements will also apply to major sub-contractors.
iii. It includes local and global impacts, and applies to the procurement of goods, works and services including use, refurbishment and decommissioning of goods and materials as applicable.
iv. Notwithstanding the above, each authority will maintain their own, local discretion on how to deliver the carbon outcomes desired by the Participating Authorities.

5. Purpose

The purpose of this Policy and the associated climate action plans is to:

i. Enable procurement and commissioning to contribute to the Participating Authorities' overall vision to deliver improved outcomes for West London and to provide efficiencies to help deliver its key priorities and provide services for its residents. These include net zero carbon and related impacts of biodiversity net gain, local air quality, circular economy, and social value.
ii. Provide a framework for the Participating Authorities' to develop a plan to achieve continuous climate change improvement in its commissioning and procurement activities.
iii. Ensure compliance with relevant legislation, policies, and procedures.

iv. Go beyond compliance to maximise benefits achieved by going on step further.
v. Ensure consistency in approach across the Participating Authorities to Net Zero objectives.

6. Objectives

The key objectives of our Policy are to make procurement:

i. Consistent – to ensure a unified approach of agreed excellence in relation to carbon reduction across the Participating Authorities, bringing the benefit of a joined-up approach to the supply chain.
ii. Responsible – to use commissioning and procurement to strengthen the Alliance environmentally and socially.
iii. Accountable – accountability for impacts generated by in-house services and those by our supply chains, with a life cycle perspective on works, goods or services.
iv. Respect our stakeholders – and their interests for a greener, safer, healthier environment for now and future generations.
v. Transparent – in our procurement decisions and activities and encouraging the same of our supply chains as a basis for collaborative working relationships, using our Low Carbon Procurement Toolkit.
vi. Measurable – using the Low Carbon Procurement Toolkit to measure how we are performing in reducing the carbon associated with procurement and supply chain.
vii. Continually Improve – in support of achieving this target we have set.
viii. Analyse all costs – consider the cost incurred over the life cycle, value for money achieved, and the costs and benefits for society, the environment and the economy resulting from its procurement activities.

7. Our Supply Chain

To bring our supply chain along with us on this journey, we will:

i. Incorporate action on climate change into our procurement and tendering, asking questions of all categories of supplier markets, proportionate to the supplier business size and relevant to the sustainability topic and impact, to ensure contracted suppliers over time are making a positive and progressive contribution to reducing carbon emissions.
ii. Expect existing suppliers to embed climate change initiatives into their current service contracts and tendering processes.
iii. Expect new suppliers to incorporate this vision and support this outcome as part of their tender bid, contract award and delivery process.
iv. Engage with our supply chains to go beyond compliance and contractual requirements.
v. Implement supplier development plans to support suppliers individually to develop their capabilities over time, including sustainability.
vi. Be coordinated in our approach and support in development of innovation and capability within the supply chain.
vii. Initiate capacity building programmes to improve alignment between the Participating Authorities and their suppliers.

8. West London Boroughs' Priorities

To deliver on our vision, we need to work alongside our supply chain partners. To set the direction, we have identified our priorities as: implementing Climate Action Plans; Measuring and Monitoring Progress; Providing Training and Support; Encouraging Innovation; Working collaboratively; and communicating to our stakeholders.

To evidence success against our set priorities, we have outlined objectives that sit under each of them. These objectives will be incorporated into our decision-making process with the supply chain and form a central part of our procurement procedures.

- ✓ We will communicate our drivers and goals in the procurement process. The climate action plans set the route for our area to make the transition to net zero have been developed by the Participating Authorities. Including these in our tender documents and other market engagement channels ensures we communicate our plans to the supply chain.
- ✓ We will ensure there is support for those responsible for the commissioning and procurement of works, goods and services, to build their sustainable procurement capability and capacity to deliver net zero within procurement teams. We will also support and encourage upskilling of our key suppliers and contractors in this area. The ability to address and reduce the impacts from carbon and other related sustainability impacts needs to be embedded in the whole authority, across staff and systems.
- ✓ We will encourage innovative, sustainable solutions from our supply chain, through the procurement process, market engagement, prequalification, tender stage, and post award of contract to support us in delivering our carbon targets.
- ✓ We will collaborate with our wider stakeholders, such as affiliated local authorities, the Ministry of Housing, Communities and Local Government (MHCLG[3]), the Local Government Association (LGA[4]), London Councils[5] and other key delivery bodies, on developing and delivering strategies which ensure a systematic transformation in line with achieving net zero carbon.
- ✓ We will collect performance data from our internal functions and supply chains and use this data to manage performance, monitor and report on progress in reducing emissions.

9. Delivery of this Policy

i. The delivery of our vision and key commitments which form part of this Policy for the West London Boroughs are reflected within the climate actions plans of the Participating Authorities. Our approach for delivery will be holistic and will encompass provision of relevant training, working with various stakeholders, including elected Members and officers of the Council, as well as our customers and suppliers to enhance our existing processes and documents for procurement and contract management. In addition, relevant tools for capturing results and monitoring progress of achievement of our objective will be put in place and our achievements, will be widely communicated within the Participating Authorities and externally.

ii. It is important that we define clear environmental benefits in our procurement in a way that is practicable and proportionate to the value and complexity of each individual contract. The

[3] https://www.gov.uk/government/organisations/ministry-of-housing-communities-and-local-government
[4] https://www.local.gov.uk/
[5] About Climate Change | London Councils

outputs and outcomes that we set and agree with our suppliers will be realistic and we will be proactive with regards to how we track our progress, making sure that the outcomes are realised and captured.

iii. We will deploy a Low Carbon Procurement Toolkit (including an agreed form of Charter to be sent to existing and prospective suppliers) that will describe and define our approach to procuring low carbon solutions in the works, products, and services we source from the supply chain.

10. Governance

i. Reporting against the vision and target set out in this policy will be done at local authority level, based on the individual climate action plans.

ii. This Policy is a live document and will be reviewed and updated annually on the recommendation of the Participating Authorities' Low Carbon Procurement Working Group to reflect current legislation, advances in UK governments targets, and other factors directly relevant to the vision and its outcomes.

Appendix A – Link to Documents (climate action plans or strategies of the WLA local authorities)

- Brent
  a) Declaring a Climate and Ecological Emergency
  b) Brent Council Anti-Idling guidance for Vehicles
  c) Brent Climate & Ecological Emergency Strategy
  d) Procurement Sustainability Policy
  e) Brent Long Term Transport Strategy

- Hounslow
  a) Hounslow Climate Emergency Action Plan (CEAP)
  b) The Green Recovery Strategy (Titled: Stimulating A Green Recovery)
  c) Contract Procedure Rules

- Hillingdon
  a) Hillingdon Council declares a climate change emergency - Hillingdon Council
  b) Climate change consultation - Hillingdon Council
  c) Strategic Climate Action Plan

- Ealing
  a) Climate Declaration / Carbon strategy
  b) Sustainable Procurement Policy Statement

- Richmond
  a) Climate Emergency Strategy
  b) Richmond Climate Emergency Strategy & Emergency Plan 2021

- Wandsworth
  a) Wandsworth Environment and Sustainability Strategy
  b) Wandsworth Environment and Sustainability Strategy 2021

- Hammersmith and Fulham
  a) Carbon Audit: results and Recommendations
  b) London Borough of Hammersmith & Fulham's Social Value Strategy
  c) H&F 2030: Climate and Ecology Strategy

- Harrow
  a. London Borough of Harrow Climate Change Strategy Incorporating the Air Quality and Climate Change Action Plans, 2019 – 2024
  b. The Climate and Ecological Emergency –Harrow's Interim Strategy and actions

- West London Waste
  a) WLWA Carbon Plan
  b) WLWA Procurement Rules

APPENDIX 2 - Climate Commitment Charter: Partnering with our Suppliers to reduce our carbon impacts

Statement

The eight local authorities in West London – Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hounslow, Richmond upon Thames, and Wandsworth – and West London Waste (the West London Authorities) have set out our ambitions to become net zero authorities in all that we do.

We cannot deliver this alone and look to our stakeholders, especially our supply chain to help meet these targets and join us on this journey. Therefore, to support us in that aim, we need you as our suppliers and contractors to play your part in reducing both your carbon emissions in total and more specifically in the products and services you provide to us.

By committing to this Charter, we invite your organisation to join us in collectively tackling the climate emergency and to set out the actions you will take to reduce your organisation's carbon emissions.

Commitment by You, the supplier

By signing this Charter, You, the supplier, commit to supporting any of West London Authorities with whom you work on initiatives to tackle climate change. This is to reduce the greenhouse emissions related to the manufacture, delivery and operation of your products and services. It includes initiatives and technology, such as, the following that will depend on the nature of the goods and services procured: -

- Seeking alternative, lower carbon sources of power
- Improving energy efficiency of equipment
- Improving the air quality emissions from plant and vehicles
- Providing alternative transport methods
- Reducing the impact on the environment, improving it where possible, through enhanced biodiversity and the use of sustainably sourced materials
- Designing for circularity to reduce the use of virgin materials and encourage reuse and recycling to minimise waste.
- Delivering other co-benefits that arise from a transition to low carbon and sustainable lifestyles and working practices, including improved health and wellbeing outcomes
- Communicating the same sustainability intentions through *your* procurement process with *your* suppliers

All suppliers are expected to work towards the following actions and outcomes for mitigating and adapting to climate change:

- In providing, goods, works and services to ensure climate resilience, the lowest possible whole life carbon impacts, and deliver year-on-year improvements in carbon and energy intensity
- A strategy to measure, monitor and reduce your organisation's carbon footprint in line with climate science and working towards net zero
- Provide accurate data to help us disclose our greenhouse gas emissions in a clear and transparent way

- Devise and offer innovative solutions that support our journey to achieve net zero carbon
- Develop and implement a carbon reduction plan that is aligned to climate science.

As part of this we would like to gather information on your plans and implementation for carbon reduction:

1. *Do you, as our supplier, currently have a strategy to reduce your organisation's carbon footprint in line with climate science and working towards net zero? Response: Yes/No/In development.*
2. *If Yes, what is the date for achieving it? Response:*

Our commitment

We will work closely with our supply chain to deliver lasting sustainable benefits. In practice this means we will:

- Be accountable for our own impacts on society, the economy and the environment
- Be transparent in those decisions and activities that impact the environment, society and the economy
- Behave ethically and promote ethical behaviour throughout our supply chains
- Respect, consider and respond to the interests of stakeholders impacted by its procurement activities
- Buy only what is needed and seek more sustainable alternatives
- Ensure that sustainability is integrated into all existing procurement practices to maximise sustainable outcomes
- Work towards continually improving our sustainability practices and outcomes, and encouraging organisations in our supply chains to do the same

We very much hope you will want to work with us to be ambitious for our environment for generations to come. Please pledge your support for this important collaboration to prevent the worst effect of climate change.

I/We will use reasonable endeavours when tendering for contracts and throughout the contract term to become more efficient in our ways of delivering the contract to support the above aims and initiatives, working closely with the West London Authorities and reporting back the achievements.

Signed on behalf of the Supplier [senior Manager or Director]

Name:

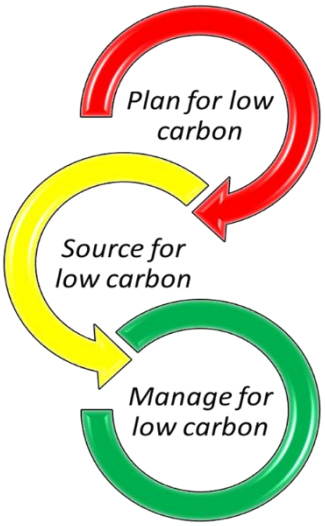
Position:

Date:

[Signed once by Senior Representatives of each Borough Authority]

APPENDIX 3

WEST LONDON LOW CARBON PROCUREMENT TOOLKIT



Version: 1.0

Date: October 2021

Authors: Mel D'silva and James Cadman, Action Sustainability

Contents

1. **Introduction……2**
2. **Purpose……2**
3. **Planning……3**
4. **Sourcing……5**
5. **Managing……6**
6. **Appendix A – Pre-Market Engagement Questions……8**

1. Introduction

This Low Carbon Procurement Toolkit should be read in conjunction with the Low Carbon Procurement Policy, which details the vision and objectives for the eight West London Boroughs and West London Waste in meeting the net zero carbon targets. It has been created to help embed carbon considerations across the procurement and commissioning cycle and is supported by a bank of questions (SQ and ITT) and model answers to accelerate the inclusion of carbon. This toolkit applies to new procurement as well as existing, awarded contracts where low carbon considerations can be embedded within the performance management stage.

2. Purpose

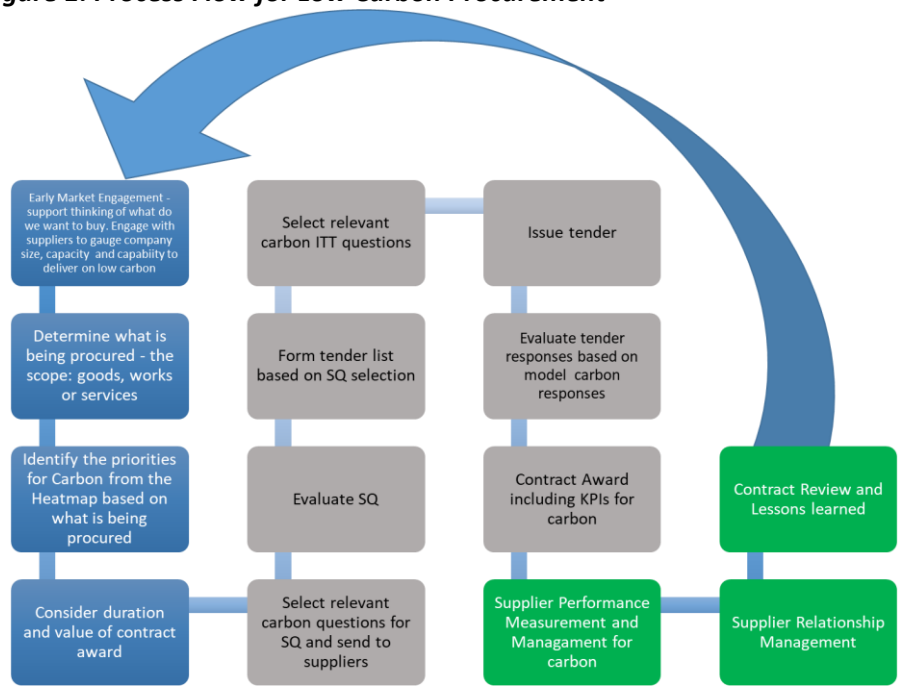
The purpose of this Procurement Toolkit is to explain when and where considerations for addressing and reducing carbon emissions is to be considered in the three stages of procurement - planning, sourcing, and managing - to achieve the targets, set out in the climate action plans for each individual Borough.

The toolkit is a live document to be used in the commissioning cycle acting as a guide for the commissioning and procurement teams within each Borough on how and where to embed low carbon procurement considerations within a spend category. The toolkit is not a set of definitive, inflexible instructions; rather the user is encouraged to approach the toolkit as the basis to develop what they need for their situation and their procurement.

This document will be updated based on legislation, government policies, the market situation, each Borough's circumstances, innovative low-carbon sustainable solutions to keep it relevant.

The diagram below shows the steps through the procurement cycle.

Figure 1: Process Flow for Low Carbon Procurement



The guidance in this toolkit describes where and how carbon should be considered, embedded, and managed in planning, sourcing, managing, and contract review stages of the commissioning cycle.

3. Planning

To embed low carbon considerations into specifications and scope for the procurement of works, goods and services, each local authority must ensure carbon considerations are included in their relevant gateway processes to drive the delivery of carbon reduction in the supply chain.

Gateway 1

The gateway at planning stage will be the procurement strategy and category strategy. In carrying out steps 1 and 2, the strategy must identify risks, opportunities, and market intelligence on possible low-carbon procurement solutions.

Step 1. Pre-market engagement considerations.

The commissioning planning phase prior to a procurement is significantly important to embed low carbon aspirations into the specification of works. Low carbon considerations can start right at early market engagement when determining what you need to buy. If opportunities are initially advertised to the open market (via London Tenders Portal and prior information notices, for example), this stage can be used to include 'feeler' questions and topics on carbon reduction, such as broad themes of the supplier's overall capacity, capability, and experience of delivering low carbon outcomes in the products and services they supply. This will help to test how well suppliers can support the Borough with net zero targets for carbon. It will also identify any suppliers that the Borough is unaware of.

There are certain 'minimum' performance levels or standards you should be considering for carbon and energy consumption that can be included in pre-market engagement, research, and routes such as meet the buyer events. These indicate your expectations for carbon to the market, as well as questions on whether the supplier has a carbon strategy and targets, an environmental management system that references carbon specifically. These are included in Appendix A.

When engaging with the supply chain in any pre-market discussions, ask questions around their latest innovations and solutions to increase environmental sustainability, to determine what can be included in the scope and specification document for the tender later in the sourcing stage.

Step 2. Identifying risks and opportunities for carbon

The Procurement Manager, in consultation with all relevant internal stakeholders who have an influence on the procurement process, should use the heatmapping risk identification process to discuss and agree what the potential risks and opportunities for carbon reduction are for the spend category(ies) in question for the Project. This should be done as early as possible in the planning stage. Importantly, it should take a direct steer from the Borough's policy, objectives, and targets for carbon reduction in terms of ambition, focus and timelines – this is the 'golden thread' – so that procurement and supply chain contribute to the Borough's overall net zero goal.

Through discussion, the heatmapping process highlights where carbon is a hotspot in the life cycle of the goods, services or works being procured. It therefore informs the prioritisation of relevant questions asked of the supply chain at SQ and Invitation to Tender (ITT) stages. The heatmapping process has crossover with other concepts such as Kraljic Matrix and the Supplier Preferencing Model.

Part 2 of this Toolkit provides a template heatmap for high level key categories of spend. This can be used as it stands, and the subsequent SQ and ITT questions that it links to. But it is strongly recommended that each Borough takes this template and develops it for their own needs. For example, adding in other categories of spend; customising and developing more detailed heatmaps for high value / high reputational procurements; as well as keeping it relevant and up to date.

The process for undertaking heatmapping requires asking three questions, as follows:

1. **Relative magnitude of impact/risk.**
   How large is the impact, risk, or opportunity from a particular category of spend? Importantly, you should be considering the inherent risk to a particular category, despite what mitigating measures are in place already. The severity of a risk should be considered red if the incident could result in a material business impact. E.g., damage to reputation with customers potentially leading to loss of sales; adverse media coverage; loss of stakeholder confidence; loss of life, environmental damage or significant health impacts leading to prosecution, statutory intervention, or loss of production; damage to employee or supplier perception of the business leading to failure to attract and retain quality resources; failure to achieve continuity of supply leading to loss of production.

3. **Scope for improvement**
   What scope is there to improve the sustainability characteristics of a given product or market? What can the manufacturers and other actors do themselves to transform the market to a situation of lower impact products? If the industry is already doing as much as it can, either due to legislation or hi-tech innovation, there may not be much more you can do with it. Or is there room for greater efficiencies with existing technology or even a jump to new technologies or business models? If such scope exists you may be able to tap into improvement activities, or support and promote them where possible.

2. **Leverage to improve**
   What leverage or influence do you have with your suppliers? Are you one of their main customers; do they supply you frequently; do you have regular engagement with them? In which case you have more opportunity to work with them to improve the sustainability of the products they supply you. Or do you purchase from a large international business that services many customers? If this is the case, you will clearly have less ability to steer them on a more sustainable course. From the opposite direction, how attractive are you to the supply base; do they want to engage with you to do business; do they see you as a market-place leader and someone they would like to be associated with for their own reputation?

4. Sourcing

Gateway 2

The gateway at sourcing stage is the tender pack. Steps 3 and 4 should contain the outcomes from the risk and opportunity analysis in the planning stage and ask the relevant questions as set out in the WLA Low Carbon Procurement Toolkit Part 2.

Step 3. Supplier Selection

In a Restricted Route tender, for the process of SQ, it is essential that suppliers can demonstrate that they possess or have access to and apply the principles of good governance. These include qualifications, competence, quality, reliability, corporate social responsibility, environmental and security compliance capabilities, to the extent necessary for them to be accepted as appropriate to supply products, deliver services or undertake works for a potential buying organization.

In this stage, having reviewed the heatmap for hotspots in the Planning Stage for the products / categories being procured, the procurement manager then selects the relevant carbon questions from this Toolkit, Part 2 to be included in the SQ and send that to the 'potential' tender list. These questions will ascertain the supplier's competence and experience for the kind of products or services being procured. By its nature it will go into more detail than Step 3, as it will focus on the products required. The buyer / procurement manager along with the environmental management team / carbon management specialist, will evaluate the SQ responses, scoring them to select the supplier list for the Invitation to Tender. For open tendering, the procurement team skips the SQ process and goes to Step 5 – ITT.

As mentioned above in this Toolkit, both the heatmap and associated SQ and ITT questions are provided as a template and guidance. The procuring authority is encouraged to adjust and develop them as necessary for the procurement action you have at hand – they are not 'written in stone'.

As part of this Toolkit, two 'pre-amble' paragraphs have also been created, below, that you can use to set the context of climate change within your tendering exercise, whether with new or existing suppliers.

Option 1: for new suppliers

[Borough Name] has committed to reducing greenhouse gas emissions from everything we commission. So that we can achieve this as effectively as possible, we have gone through a process of identifying where our biggest risks and opportunities exist for carbon reduction and have developed suitable questions on that basis. Taking this approach of prioritisation on climate change across the range of products and services we buy enables you, as our potential supply chain partner, to provide your best and most appropriate solutions to support us in our climate goal. Should you be successful, we would expect you to sign our Climate Commitment Charter as part of supporting us.

Option 2: for existing suppliers

[Borough Name] has made a public commitment to reducing our greenhouse gas emissions from everything we commission. As one of our valued supply chain Partners we would like to get your continued support in helping achieve our goals, through the products, goods and services we commission from you. As such we

would like you to make a similar commitment by signing our Climate Commitment Charter, drawn up by the eight Boroughs in West London.

Step 4. Tendering - ITT

After the SQ stage the procurement manager should then select the appropriate and relevant ITT questions to be asked of the tenderers, likewise, provided in Part 2 of this Toolkit, again flowing from the prioritised impacts in the heatmap. This is where questions are more focused on the actual contract at hand for supply or services.

The tender documents should contain relevant weightings given to the carbon-related questions versus the weighting for cost, quality, programme, and other qualitative questions. These will be determined at Borough level, depending on the goods, services or works being procured, as well as the size of the procurement.

Importantly, this toolkit also provides guidance on what a good supplier response looks like. The procurement manager along with the environmental management team / carbon management specialist, evaluates the suppliers' bid based on the questions and model answers, scoring them on a scale of 1 to 5. Responses that are rated as good, for example 4 or 5 out of 5, should be captured as a guidance for future procurements in gauging supply chain experience and capacity to deliver on low carbon.

5. Managing

Gateway 3

There are two gateways in the managing stage. The first is the contract. The targets, KPIs around low carbon that were asked of the supply chain and the commitments made in the tender responses must be written into the contract.

Step 5. Contract set-up

The scope and any conditions for delivery of carbon management and reduction, measurement against targets, and reporting, as determined by the nature of the goods, works or services being provided, should be written into the contract. There should a seamless flow, or 'golden thread' from the questions being asked about carbon and the information required from the supplier in the SQ and ITT stages through to how they demonstrate they are delivering on their proposal in the contract implementation phase. As such any reporting KPIs should be linked to the questions being set and the information required from the supplier. Example KPIs are provided in this toolkit, but others can be developed appropriate to your situation.

For example, if you are asking about vehicle emissions and how the supplier will reduce them during the contract, suitable reporting KPIs could include i) absolute total greenhouse (GHG) emissions from supplier's vehicle movements, based on VED gCO_2 per km (the "tax disc"), and ii) % reduction in GHG emissions during this contract compared to a suitable 'business as usual' benchmark.

Gateway 4

The second gateway in the managing stage is managing the supply chain performance in line with the

balance score card. Contract management should allow for and capture supply chain performance, data, progress towards carbon reduction in the goods, services, works being carried out.

Step 6. Manage performance to meet the programme.

The carbon management performance of the suppliers should be measured and monitored at regular intervals, as with any performance metrics, appropriate to the nature of the contract and the KPIs set within the contract. But it should be frequent enough to allow for performance data to be used in managing the contract's delivery, not just as a post-contract assessment. Importantly, as carbon has been identified as a priority from the heatmapping, it should be a standing agenda item in supplier performance review meetings. For contracts that have been previously awarded with little or no carbon reduction considerations, the performance management stage is a good starting point to ask of the supply chain, gauge any innovative developments they are doing in terms of GHG emissions that can lend itself to the existing contract and if they can start to incorporate the goals as set out in the Low Carbon Procurement Policy going forward.

Step 7. Reporting on Carbon and environmental KPIs performance data

Data and information from performance reviews should be captured in an appropriate database or tool. Ideally suppliers will be able to report into the tool directly to reduce data handling. The collected data should be reviewed and approved within the Borough's contract delivery team. This is used to award suppliers who are performing exceptionally well or put in place a supplier improvement plan for the ones who are not performing well. Likewise, the information can be used to evaluate trends in carbon reduction over time and to understand what 'best practice' looks like, for a given contract type to support benchmarking.

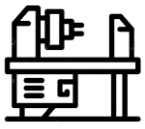


Step 8. Produce case studies and lessons learned.

Capturing and reporting the benefit implemented by the supply chain through reduction of GHG emissions, and other concomitant benefits such as reduced air quality emissions, should be undertaken to record the actual value that the supply chain contributes to a project. This and wider learning from the delivery of the project or scheme should be shared internally to inform the next procurement cycle and to understand what the current best practice is. The information also contributes more widely to the Borough's overall understanding of its supply chain scope 3 emissions and objective to work towards net zero.

Appendix A – Pre-Market Engagement Questions

In the planning stage, pre-market engagement is carried out to gauge supply chain/market capacity and capability to deliver the requirements of the local authorities. The information below provides example questions on the minimum technical standards to be met by the suppliers. Asking them also gives the supply chain some insight into the local authorities' ambitions for low carbon solutions. Whilst this list provides a guidance, it is not exhaustive and will be updated based on latest market solutions, trends, policies, relevant legislations:

Plant, fleet and vehicles: 	• Road-going vehicles should at least Euro 6 engines, if not looking to alternative power sources such as electric. This will support access and compliance with the ULEZ. • Off-road plant and equipment should be least Stage V and, as above, consider alternative power sources such as hybrid and electric. This also supports the GLA's NRMM criteria.
Materials: 	• Cold and warm application materials provided to replace the need to heat asphalts, road markings and anti-skid treatments, etc • Materials such as concrete, steel, asphalt, plasterboard, and packaging, should include recycled content and other constituents that give a lower embodied carbon, as well as consideration to end-of-life recyclability. • Encouraging suppliers to bring new products to market will help accelerate the demand for lower carbon materials.
Equipment: 	• Energy-using equipment should be as efficient as possible. For example, IT should be compliant with standards such as the Energy Star; lighting should all be LED as far as possible; white goods should have as high an energy rating as possible; and HVAC should use refrigerant gases with as low a global warming potential (GWP) as possible.
Low carbon Packaging: 	• Follow the waste hierarchy to reduce packaging: avoid > reduce > reuse > recycle • Use refillable and reusable packaging, or even remove the packaging altogether • Think about lightweighting to reduce the amount of material in the packaging • Working in collaboration with product and with packaging suppliers to source materials from low carbon processes (e.g. powered by renewable energy) • Increase proportion of recycled content used (note that from 2022

	taxes will apply for plastic packaging that does not contain at least 30% recycled content) • Increase end of life recyclability
Circular Economy, Waste & Resource Efficiency: 	• Other related aspects should be considered for reducing consumption of water, use of consumables and disposable products. This directly tackles waste, circular economy and resource efficiency, but also the embedded carbon within those products and services. • The suppliers' ambitions to be an environmentally sustainable supplier and include for sustainable solutions such as hydrogen powered vehicles or electric fleet, using low-carbon material substitutes, recycling plastic waste to reduce emissions. • Applying principles of the waste hierarchy and circular economy to within their own supply chain to help minimise carbon emissions whilst also cutting cost. This would include interrogating all procurement decisions to establish whether they are necessary. (If you do not need to buy, you will save money and carbon.)
Data measurement, monitoring and managing: 	• Does the supplier measure its carbon footprint annually? What does the organisation's carbon footprint cover? • Use of initiatives to measure, monitor carbon data such as Greenhouse Gas Protocol, Science-Based Targets Initiative, Carbon Disclosure Project
Training: 	• Providing climate literacy training to all staff working in the organisation to help embed carbon reduction priorities and enable staff to identify and capitalise on carbon reduction opportunities further down the supply chain. • Offering this training to key partners within their own supply chains will support SME and Local suppliers to respond to requirements for them to become more carbon efficient
Collaborative Partnerships: 	• Suppliers' consideration for collaborative partnership opportunities to meet the carbon reduction goals

APPENDIX 4 - West London Alliance - Low Carbon Procurement Toolkit, Part 2

Instructions

This Document complements the Low Carbon Procurement Charter, Policy and Toolkit part 1, and provides several key elements of the Low Carbon Procurement Toolkit:

1. The Heatmap.

* The heatmap shows the prioritisation of carbon impacts, across the life cycle of products and services, for the main categories of supply agreed with the WLA group.
* It works left to right, from manufacture (embodied carbon), through logistics and packaging to use phase and end-of-life disposal.
* As well as carbon impacts, it accounts for associated air quality emissions, where relevant.
* It is informed by where authorities have a risk or opportunity with respect to carbon, but also where there is leverage and scope to do something about it.
* Red indicates a high risk or opportunity, yellow is medium, and green is low risk or leverage.
* This heatmap should be used to identify the relevant carbon priorities for the products or services you are procuring, and then take that forward to the relevant model questions and answers, below.

NOTE: this heatmap is a template for general use across a wide variety of categories. It is strongly recommended that it is adjusted and developed where a procurement is being undertaken that is financially and or reputationally significant, in order to get a greater level of granularity.

2. The Model Questions and Answers.

* This section of the Toolkit provides a set of model questions to ask suppliers, related to the priority impacts for carbon in the heatmap across the life cycle of the products and services at hand.
* It likewise provides a description of the information expected in supplier responses - model answer content.
* Once you have identified the key risks in the heatmap, then choose the relevant questions that match the heatmap rating, therefore focusing on the most relevant climate impacts for that product or service.

For example, Transport and Vehicles have a red risk for Use Phase GHG emissions, due to the use of the vehicles, and hence go to the Use Phase section of the Model Questions to find the relevant input for Transport.

NOTE: as stated above, the questions are adaptable and can be adjusted to different circumstances; they are not set in stone. Moreover, we strongly recommend that the model answers are added to as procurements and supplier responses are gathered

3. KPIs.

* Based on the questions and responses, there is a set of KPIs that can be used in the procurement cycle to track supplier performance progress against their stated aims. It is a selection of KPIs that can be chosen, both output and outcome KPIs - there is no compulsion to use them all

4. Services.

* Services have their own category line, for areas such as adult and child care. It also applies to other services where there is a clear and distinct use of products, for example catering services using food and cooking appliances.
* As such when considering services, also consider other relevant category lines, such as IT or vehicles that maybe procured and used in the delivery of the service.

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Cabinet

Date: 07/03/2022

Subject: Flood Risk Mitigation Programme

Report of: Councillor Wesley Harcourt, Cabinet Member Environment

Report author: Ian Hawthorn, Assistant Director Environment Special Projects and Highways

Responsible Director: Sharon Lea, Strategic Director for Environment

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SUMMARY

In the summer of 2021, the borough was hit by a storm that caused over 300 properties to flood causing incredible hardship for many of our residents. Flooding can be very stressful to residents as it is an invasion of their homes and can cause very significant damage to properties. Keeping residents safe and secure in their homes is a No 1 priority of this Council.

Flood mitigation is a difficult task as assets that contribute to flooding often sit outside of the Council's control. This report sets out what we can do to help deal with flooding. This will involve both big and small projects including: major retro-fit schemes that completely reconstruct roads, installing water storage units underneath the surface that allow a slow release of water into the ground in the main flooding areas; de-paving and removal of hard surfaces in public spaces as well as supporting the same on private land; smaller intervention like stopping up rain gullies and diverting rain water from the road into newly created green spaces. The Council has also appointed a Flood Mitigation Czar as a lead councillor.

The focus of the report is two-fold: to inform and develop a flood mitigation programme that the Council can deliver on our roads; and to support Thames Water to develop an action plan that deals with their sewers alongside further protection measures to support residents against future flooding. We will also seek to encourage and support residents and business to reduce the hard surfaces in their private spaces. Work also needs to be undertaken with stakeholders on the serious insurance issues that this flooding causes our residents and businesses.

RECOMMENDATIONS

1. That detailed proposals for the flood mitigation measures described in the report be developed.

2. That subject to funding being secured, the progression and implementation of the flood mitigation measures are delegated to the Strategic Director of Environment in consultation with the Cabinet Member for Environment.

Wards Affected: All

Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	Flooding has a negative impact on both residents and businesses alike disrupting lives and businesses. The proposed mitigations seek to reduce any disruption.
Creating a compassionate council	Flooding affects the most disadvantaged groups and therefore any measures to reduce the impact are important for protecting the most disadvantaged from the impact that flooding causes to lives and homes.
Doing things with local residents, not to them	All schemes will be developed, designed and delivered with residents in mind. Residents are key to any successful flood risk scheme being implemented.
Being ruthlessly financially efficient	Whilst reducing the impact of flooding will require significant financial investment, flooding has a major impact on the highway asset which requires expenditure on repairing the asset due to flood damage. Emergency reactive measures will prove costly over time to both the Council and residents as repairs are often costly and need significant amounts of time to be successful.
Taking pride in H&F	The proposed mitigations will act to transform streets and neighbourhoods and build on the current green infrastructure, allowing residents to take an active part in where they live and work with the Council to manage their space.
Rising to the challenge of the climate and ecological emergency	The proposed measures will directly combat the negative effects of climate change and mitigate against the risks presented by extreme weather events and flooding.

Financial Impact

This report is seeking agreement to develop the outline proposals into detailed options only and as such, there are no direct financial implications at this stage. Detailed options and their funding requirements will be considered as separate reports, in line with the Council's normal decision-making process.

The high-level estimated funding requirement is summarised in the table below, for illustration purposes only at this stage. Potential funding sources will need to be explored as part of the detailed option appraisals, but could include external grants (e.g. climate change related grants from central government or private sector organisations), developer contributions (subject to the availability of funding), existing flood mitigation Council reserves and existing highways revenue and capital planned maintenance budgets.

Flood Mitigation	Revenue/ Capital	One-Off/ Ongoing	Est. Funding Requirement
Sustainable drainage projects	Capital	One-off	£6,000,000
Reducing hard surfaces (Pilot)	Revenue	One-off	£300,000 p.a
Greening the grey	Capital	Ongoing	£50,000 p.a
Creating flood spaces	Capital	One-off	£500,000
Collaborative Highways/Housing Estate Schemes	Capital	One-off	£1,000,000

Implications completed by: Kellie Gooch Head of Finance Environment and verified by Emily Hill, Director of Finance, 25 January 2022

Legal Implications

The Council has statutory responsibilities in relation to flood risk and therefore has a duty to put in place measures to mitigate this risk. It is a lead local flood authority under the Flood and Water Management Act 2010. This means the Council needs to have a strategy in relation to flood risk in its area and carry out works with a view to managing these risks. In carrying out these functions it is required to co-operate with other bodies which a role in risk management relating to flooding including Thames Water and Transport for London.

The Council is also a category one responder under the Civil Contingencies Act 2004. A flood may constitute an emergency under this legislation as it is an event or situation which threatens serious damage to human welfare and the environment. The Council needs to assess the risk of an emergency occurring and to have plans with a view to preventing emergencies if possible and to control and mitigate their effects.

The Council will need to be in a position to undertake a range of measures to prevent and mitigate the risk of flooding, the dangers of which are increasing as a

result of climate change. As these measures are developed and put in place further legal input can be provided to assist in ensuring the most efficient compliant procurement strategies for commissioning the necessary works and services.

Implications completed by: John Sharland, Senior solicitor (Contracts and procurement) email: john.sharland@lbhf.gov.uk, 21 January 2022

Background Papers Used in Preparing This Report – none

DETAILED ANALYSIS

Proposals and Analysis of Options

1. On 12th July 2021 the Council saw the impact that extreme weather can have on the borough and what the absence of assets to cope with significant levels of rain fall means for residents. Over 150 properties were reported flooded in the borough with several of the most vulnerable residents severely affected. This is illustrated in the borough plan showing the streets impacted by the flooding on the 12th July 2021 in Appendix 1.

2. In the last several years the Council has been the leading authority in developing innovative flood risk schemes such as the two Counters Creek projects, Bridget Joyce Square, Australia Road and many others. Working with Thames Water and other specialists on the Counters Creek projects has allowed the Council to test and develop flood mitigation measures that have proved to be effective in the street environment. These measures have been replicated in several schemes across the borough in the last few years and these areas saw limited flooding impact on 12th July.

3. The Intergovernmental Panel on Climate Change's (IPPC) 2021 report made two central conclusions: that it is now certain that climate change is responsible for an observed increase in natural disasters; and that further major climate change is unavoidable. It is probable that this will result in more frequent and severe flooding events, along with other unpredictable weather events.

4. Reducing the likelihood of flooding and mitigating the impact requires new thinking and a step-change in surface water flood risk measures. The Council has installed successful sustainable drainage schemes (SuDS) on highways and housing estates in recent years, and these have demonstrated their effectiveness. Nevertheless, to achieve systemic impact a greater scale of flood mitigation measures is needed.

5. It is important to acknowledge that flood risk cannot just be eliminated even with innovation and significant investment; but widespread implementation of surface water management will reduce the likelihood and severity of flooding. As well as the measures proposed in this report, we need to continue to lobby Thames Water to upgrade their sewer capacity.

6. Thames Water, after events in the summer, are currently undergoing an independent review of flooding measures and their response to three major flooding incidents in London. They will report back later in the year. Any works they undertake will be done liaising with the Council and will align with our own works. At a public meeting in early February 2022, Thames Water committed to delivering an action plan to assist residents and businesses in the short term by March 2022. Thames Water are due to announce an investment fund for surface water which boroughs can bid for, and the independent review will highlight any further investments needed from Thames Water to enhance their current sewage capacity. The challenge to Thames Water is that they need to do more to mitigate flooding.

7. The river Thames although a potential flood source is managed by river walls maintained by the Council and several third parties and monitored by the Environment Agency. This is considered minimal risk compared to over flood sources such as sewer surcharge and surface water.

8. The set of options outlined in this report build upon what the Council has already done across the borough to build resilience against extreme weather events.

9. The table below shows the streets that were reported to the Council as severely affected during the extreme weather events on 12th July. These streets will be prioritised for enhanced flood mitigation action.

Aldensley Road	Mall Road	Dalling Road
Barons Court Road	Shepherd Bush Road	Devonport Road
Batoum Gardens	Westville Road	Dorville Cresecent
Blythe road	Margravine Road	Niton Street
Bollingham Road	Masbro Road	Overstone Road
Kenyon Street	Boscombe Road	Raynham Road
Lakeside Road	Crabtree Lane	Ellerby Street
Maclise Road	Crisp Road	Fielding Road
Goldhawk Road	Hammersmith Grove	Southerton Road
Grove Mews	Haydon Park Road	Sulgrave Road
Weltje Road		

Background - Sewer capacity and flooding on 12th July

10. London's extensive Victorian sewer system, designed by Joseph Bazalgette, diverts waste to the Thames Estuary, downstream of the main population. Six interceptor sewers, almost 100 miles in total length, are fed by 450 miles of main sewers that, in turn, convey the contents of some 13,000 miles of smaller local sewers. This is a Thames Water asset that they manage and maintain.

11. This system was designed to cope with 6.5 mm per hour of rainfall and a much smaller population. London's dramatic growth has put enormous pressure on capacity. High levels of rainfall (in excess of 6 mm per hour) in a short period of time can overwhelm the system.

12. On 12th July close to 48mm of rain fell within five hours (compared to a monthly average of 43mm), causing surcharge. This happens when rainwater, mixed with sewage in combined sewers, cannot be discharged into the Thames quickly enough. This sanitary sewer overflow floods properties through toilets and baths, and streets, causing a health risk.

13. Forecasting of the arriving storm front was accurate, but the intensity and continuation of the storm over West London for five hours was unexpected.

Flood Mitigation Options and Actions from the Public Meeting

14. Several potential flood mitigation measures that Council can undertake, and their estimated costs are outlined below. It is important to note that this must be a joint exercise and Thames Waters action plan will need to align to the measures the Council can introduce. It is proposed that these Council options are further developed into detailed business cases. Listed below are also the actions from the public meeting held with Thames Water held on the 2nd February 2022.

15. **Actions from the Meeting.** The key actions from the meeting were that Thames Water would develop and present an action plan for March 2022 which would be presented at a second public meeting. A review and explanation of the Council's gully service, an outline of what Sustainable Drainage Scheme the Council had installed already and how residents could request these schemes in their area and finally, super drainage scheme and what other greening schemes were available. In addition a multiple agency working group was to be set up supported by Thames Water to look at insurance assisted for affected residents.

16. **Thames Water Action Plan.** Officers from the Council have set up a series of meetings to monitor the progress of Thames Water's development of their action plan for March 2022.

17. **Gully Service.** The Council's rainwater gully assets on the borough's strategic road network are cleaned twice a year, our residential roads are cleaned annually, and there is a special tree route where streets with lots of London Plane trees are given an extra clean in December when the leaves have fallen. We also run a reactive service were blocked gullies that are reported to us are action within 24 hours. Some gullies that are defective will take longer because of a need of a complete repair. The Council currently has 10,010 gullies in the roads and have commenced a new review of these assets. The Council will roll out the use of smart gullies that allows live data on performance to be monitored 24/7. The Council had piloted 20 of these covers recently and these will be deployed in the areas flooded in the summer.

18. **Current SuDs in the borough**. A list of current sustainable drainage schemes is attached. The major retrofit schemes are as follows:

- Bridget Joyce Square (Australia Road),
- Mendora Road,
- Milena Road,
- Rostrevor Road,
- Greenside Road,
- Eddiscombe Road,
- Munster Road (section between St Dionis Road to Fulham Road),
- Godolphin Road (Thornfield Road to Goldhawk Road),
- Wendell Road (Bassein Park Road to Rylett Road),
- and Talgarth Road.

Work is ongoing to create a link on the web page to request an engineer to survey areas that report flooding so options for mitigation can be assessed.

19. **Super drain.** Officers are investigating if this would be viable in any of the current layout of the borough's road.

20. **Other Flooding options.** Are listed in the proposals set out below.

21. **Flood Mitigation Czar.** The Council has appointed Cllr Helen Rowbottom to be the lead member of flood mitigation.

22. **Retro-fit Sustainable Drainage Projects**. The proposal is to deliver another six retrofit schemes in the key flood locations impacted by the extreme weather event on 12th July (as noted in the table above). Using the measures delivered previously we would look to adapt these roads to the highest possible level of flood mitigation including adding containment water storage units, tree root management systems, more trees and using public realm features to enhance the street itself. Based on the scheme previously undertaken at Counters Creek, which was fully funded by Thames Water, it is expected that each retrofit scheme would cost in the region of £1m (£6m total capital investment for all 6 key flood locations). Funding for the scheme will be explored as part of the detailed business case, with a focus on again securing external funding in the first instance (e.g. external grants, developer contributions etc).

23. **Reducing Hard Surfaces**. One of the causes of flooding has been the reduction of permeable surfaces across the borough, meaning less water can drain directly into the soil. Instead, surface water is redirected to the Council's gullies and Thames Water's sewers. An annual public de-paving programme is proposed, where skips and labour are provided to individual streets to assist residents and businesses in replacing their hard surfaces with permeable surfaces; this would take place in private space. This would be a continuous programme to start the process of education and action showing the public what they could do to help manage water. A similar scheme is already being rolled out in Lambeth. A pilot scheme could be rolled covering 6 streets in the worst affected areas which would costs around £300,000. An average length street would cost an estimated £50,000 each which would include a temporary surface option. Once the first set of streets are completed, we can develop what any future programme would look like and how it would be funded based

on the outcomes of the pilot. De-paving is already a key part of the climate change strategy. Again, funding for the scheme will be explored as part of the detailed business case, with a focus on securing from external funding in the first instance.

24. **Greening the Grey**. Highways have introduced a greening fund within the existing annual planned maintenance programme, ringfencing £200,000 for investment in de-paving areas that have verges and returning them to green alternatives. The proposal is to increase that fund to £250,000 per annum, by ringfencing an additional £50,000 from the planned maintenance budget (therefore no additional funding requirement). The borough has approximately 1,000 streets – it is expected that there will be opportunities to green the grey in 40% of these streets. In all Highway projects greening the grey principle will be applied where viable and we are currently seeing this in North End Road Market enhancement scheme.

25. **Creating Flood Spaces**. The Council has many open spaces that have been mapped by Highways. It is proposed to develop some of these areas to hold water in extreme rain events. This involves excavating large areas and installing flood risk measures by creating an artificial pond effect below the current highway level. The estimated cost to develop and deliver the first flood space is estimated at £500,000 (capital). The cost of subsequent schemes and we would estimate around four will vary, depending on the area available. Funding for the scheme will be explored as part of the detailed business case, with a focus on securing external funding in the first instance. We have submitted a bid in for funding for a green verge/swale that would run along New Kings Road from Eel Brook Common to Parsons Green with an aim of linking the two green spaces, also some signage for walking from Fulham Broadway station to Eel Brook.

26. Collaborative Highways/Housing Estate Schemes. The Council currently has several housing developments projects underway across the borough (16 in total). There is therefore an important opportunity to review flood mitigation potential across both the public highway and housing estate roads, including their surrounding spaces, in a way that will benefit both housing tenants and the wider public realm. For example, using excess highway water to feed green infrastructure in housing landscapes. It is proposed to establish a one-off £1m capital development budget covering 2/3 years that will enable Highways the opportunity to match highway flood risk work to any of the 16 current housing estate developments. This would allow Highways to incorporate highway sustainable drainage schemes into housing estate regeneration schemes, sharing the benefits of using both assets whilst working with the Housing Regeneration team. Any funding requirement from the Housing Revenue Account will be considered as part of the detailed business case.

27. Increase flooding data information. Working with Thames Water and local community groups to build a robust and concise flooding map of the borough and using this to drive flood mitigation options.

28. Community Flood Groups. Use Resident Associations and Community forums to form a Flooding Risk Management Group and actively engage with

community action groups on a regular basis to increase knowledge but focused flood risk mitigation measures.

Reasons for Decision

29. Climate change will create a major challenge for London in how it manages water. The Council has seen the impact of flooding for several years and the proposals outlined would be the first steps in reducing that impact to the residents and businesses of the borough.

30. Equality Implications

31. Flooding impacts all types of communities, especially the most vulnerable and this was highlighted on 12th July when assistance had to be provided to several vulnerable residents. Any mitigation is important to reduce this impact to all in the community, especially the most vulnerable.

Risk Management Implications

32. It is recognised that climate change poses a major challenge for London in how it manages water and that the frequency and severity of flooding incidents due to intense rainfall is likely to increase over time. The report recommends the exploration of a range of actions which the Council could consider mitigating the risk of future flooding incidents which have a significant impact on affected residents. The work will involve a detailed appraisal of the feasibility and impact of a range of options, as well as considering potential sources of funding for the options considered. This is in line with the Council's priorities including rising to the challenge of the climate and ecological emergency (by examining measures which would reduce/mitigate the impact of flooding events on residents/businesses) and being ruthlessly financially efficient (by seeking to prevent/limit damage from flooding in key risk areas).

33. In carrying out the detailed analysis and evaluation of options, officers will consider a range of factors including legal, environmental impacts associated with a proposed scheme. Officers should ensure that appropriate insurance advice is sought as part of this detailed options appraisal.

Implications completed by: David Hughes, Director of Audit, Fraud, Risk and Insurance, 13 January 2022

Climate and Ecological Emergency Implications

34. Flooding is a destructive and highly visible event for the borough's residents and organisations, and a tangible consequence of climate change. It should be viewed in the round with other climate risks, which are currently less visible but pose significant threats to health and infrastructure. The two other key threats to London that can be managed by boroughs are excess heat and drought.

35. These tend to pose the greatest risk to the most vulnerable, including older people, disabled people, homeless people, and those living in dense and higher-storey flats. Overheating within the Council's homes is likely to be an emergent risk over the next few decades.

36. Heatwaves pose particular threats in areas with limited green space (see heatmap below). The greening initiatives described above will help to reduce dangerous surface temperatures. Measures to mitigate heat risk and reduce water consumption, through green infrastructure and alterations to buildings, should also be considered alongside flood risk as part of any capital works, particularly to homes.

37. The proposed workstreams included in this report serve to both reduce the overall footprint of hard surfacing in the borough and mitigate flood risk now and under expected climate change. Moreover, the proposal will increase green space in the borough and create more habitats for nature.

38. Implications verified by: Hinesh Mehta Lead Climate Change/Sebastian Dunnett – Climate Change – Ecology Officer, 25 January 2022

Procurement implications

39. This report is a strategic update and procurement strategy report/s will follow for sign off of procurement for schemes. This report does not cover procurement routes and states a need to work through detail on approaches.

40. Implications verified by: Joanna Mccormick Assistant Director Procurement and Commercial, 25 January 2022

Consultation

41. Consultation and coproduction will be undertaken with the affected residents and as part of the detailed development of the mitigation measures. The stakeholders include local residents, businesses, Thames Water, Environment Agency, GLA, TfL and London Councils plus a number of the water Industry Bodies.

LIST OF APPENDICES

Appendix 1 – Borough Plan illustrating the streets flooded on the 12 July 2021
Appendix 2 – 1st Counters Creek Project case study (includes an RBKC Scheme that was delivered by the h&f officers)
Appendix 3 – 2nd Counters Creek Project case study

APPENDIX 1

London Borough of Hammersmith & Fulham



FLOODED STREETS 2021

LEGEND

Roads with Flooded Properties

- Hospital
- Fire Station
- Town Hall
- Library
- Police Station
- School
- Underground Station
- National Rail Station
- Road Closure (c = cycle exception)
- Borough Boundary

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hammersmith & fulham

NOT TO SCALE
Drawing No. 75110/14/2
January 2022

Counters Creek SuDS Retrofit Pilot Study, London



SuDS used

- *Rain gardens*
- *Permeable block pavement / porous asphalt*
- *Attenuation basins (geocellular boxes)*

Benefits

- *Reduces runoff peaks*
- *Community involvement and endorsement*
- *Increased the level of green space and biodiversity*
- *Improved amenity value of the area*
- *Cost effective compared to traditional solutions*
- *Water quality improvements*

1. Location

- Melina Road, Shepherd's Bush, London W12 9HZ
- Mendora Road, Fulham, London SW6 7NB
- Arundel Gardens, Kensington, London W11 2LA

2. Description

In recent years, over 2,000 properties across the Counters Creek catchment area, in West London (within Thames Water's area) have reported basement sewer flooding, with widespread flooding occurring in 2005 and 2007, following severe heavy rainfall. Since then, the local councils and Thames Water have been working together to address this problem and to help ensure that residents and businesses are protected against flooding. Ofwat approved the funds needed to undertake the Counters Creek Sewer Alleviation Scheme in December 2014.

The scheme includes a number of elements including introducing sustainable drainage systems into the local area to reduce surface water run-off entering the sewers.

The scheme is Thames Water's largest sewer flooding alleviation project and the aim is to deliver a long-term solution to basement sewer flooding specifically across west London. In addition to other sewer attenuation measures, this SuDS retrofit pilot project has been implemented to measure the effectiveness of sustainable drainage systems in controlling surface water flows to combined sewers in the Counters Creek area.

This submission focuses on three roads where SuDS have been implemented:

- Melina Road, Shepherd's Bush, London
- Mendora Road, Fulham, London
- Arundel Gardens, Kensington, London

3. Main SuDS components used

The Melina Road SuDS scheme has involved the installation of four new rain gardens in the existing pedestrian area at the southern end of the road. The rain gardens were constructed as typical bio-retention areas, with a topsoil surface that has allowed appropriate planting, and geocellular units beneath to provide the required attenuation.



Fig 1: Example of rain garden at Melina Road, Shepard's Bush:

The **Mendora Road** SuDS scheme comprises of linear permeable block paving within the existing parking bays on each side of the road, replacing the need for existing gullies. The south side of the road takes the runoff from the road and footpath and provides attenuation within the sub-base in a linear gravel trench installed beneath the block paving. On the north side of the road, a greater volume of attenuation is required because half of the roof area from the houses on the road drains to the highway. Attenuation is provided within a linear trench made of geocellular units.



Fig 2: Mendora Road, Fulham – block paving on each side of the road

At **Arundel Gardens, Kensington**, porous asphalt has been laid across the whole width of the road with enhanced attenuation within a shallow layer of geocellular boxes. This attenuation is separated in cascades with flow controls between them to maximise use of the attenuation and to minimise pass forward flows.

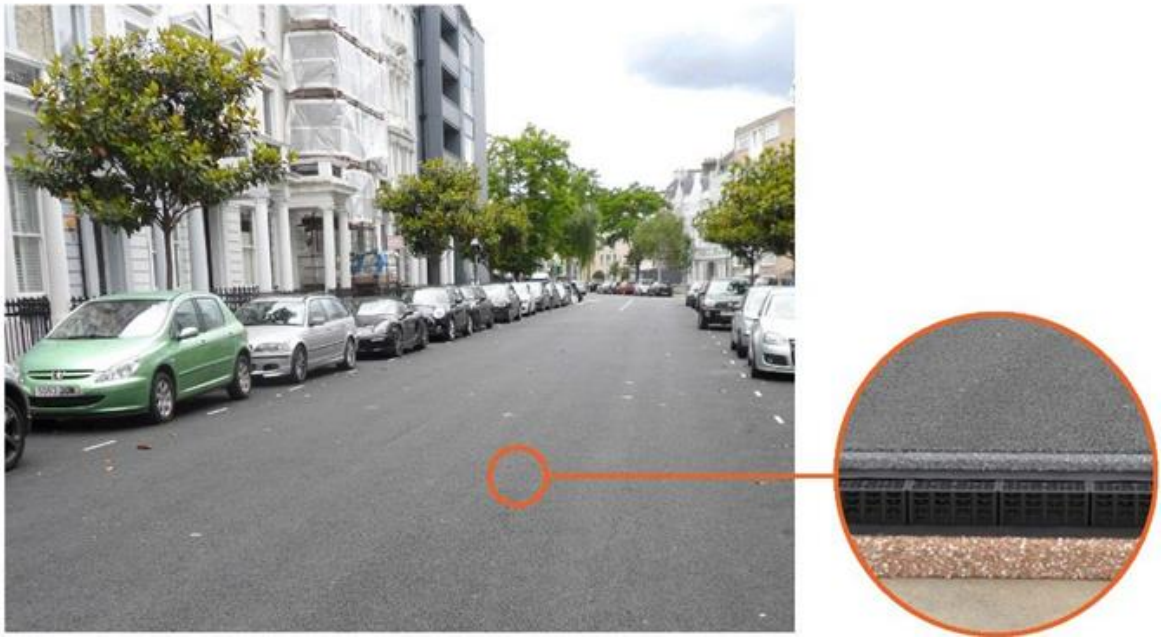


Fig 3; Arundel Gardens, Kensington showing the porous asphalt across the road

4. How it works

Melina Road – Surface water runoff is conveyed by gullies from the road and resin bound material with a flow channel made of geocellular units located under the pedestrian areas, directly into the attenuation layer of the rain gardens.

Mendora Road – Surface water runoff from downpipes, footpath and the road is conveyed through the permeable block pavement directly into the attenuation beneath. The permeable pavement

strip on each side is divided into four sections separated by a flow control orifice, which maximises the attenuation capacity of the system.

Arundel Gardens – Gullies within the road have been removed and surface water runoff from the footpaths and the road is conveyed directly via porous asphalt into the attenuation beneath.

Attenuation in all three streets has been provided by lining the drainage system with an impermeable membrane that will prevent runoff infiltrating the ground.

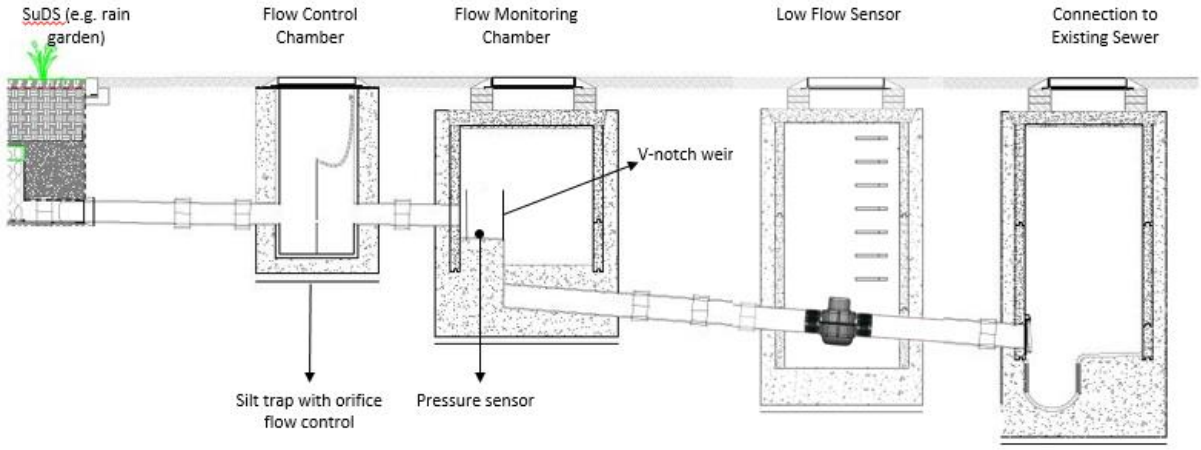
SuDS elements in all three streets have been designed to hold a one hundred-year storm event, with allowance for climate change within the underground system. It was noted that for systems that are collected via gullies, temporary ponding on the road would appear during high intensity storms. Interception losses were not calculated as part of the initial design.

Flow Controls

Flows from all three streets are controlled by the same type of controls. Removable plates with orifices and weirs are located within the flow control chambers. Orifice plates in control chambers are holding water within the attenuation tanks and pass forward a maximum 5 litres/second for events of up to a thirty-year return period frequency. For less frequent events, the flows will overtop the plate over the weir to allow passage of events of up to a hundred-year return period frequency.

Monitoring Chambers

Flow control chambers are followed by a monitoring chamber (where monitoring equipment is installed) before final discharge to the combined sewer system.



Drawing: Typical set up for monitoring chambers for all three streets

Water Quality

Although water quality improvements were not the primary driver for these schemes as they discharge to a large combined sewer, water quality improvement of road runoff would be achieved using permeable block pavements, resin bound material and porous asphalt.

Runoff inflow from the carriageway in Melina Road, through the top of rain gardens that would have contributed to water quality improvement, was not possible due to the layout of the site. Additional catchpits are installed before attenuation, when the runoff is collected via gullies to reduce the amount of silt reaching the attenuation tanks.

Multifunctionality

Use of block paving and porous asphalt has meant that parking at Mendora Road and Arundel Gardens was unaffected. Rain gardens at Melina Road enrich the biodiversity and enhance the local

environment near the school. The community also has an interest in the maintenance of the rain gardens with 'ownership' of one specific garden, while a local senior school's gardening club is directly involved in the care of two of the gardens. The fourth rain garden has been allocated to a local Nursery School so that the children can be involved with the planting.

5. Specific project details

Compared with traditional drainage, the implemented scheme reduces runoff peaks and elongates the time of entrance to the combined sewer system. Impermeable lining prevents substantial reduction of runoff volume. However, flow controls attenuate the water in the storage layers before draining into the main sewer after storm events cease.

Street	Catchment area (ha)	Proportion of SUDS footprint
Melina Road	1.68	2.31%
Mendora Road	1.11	8.50%
Arundel Gardens	1.02	17.66%
Total	**3.81**	**8.22%**

Table: Percentage of catchment area covered by SuDS footprint

In relation to entire Counters Creek catchment, 0.0125% has been transformed into SuDS.

6. Maintenance & operation

Thames Water has funded the construction of the project and will monitor and maintain the scheme for a period of 24 months following completion. Once this 24-month period has expired, the monitoring and maintenance responsibilities will lie with the local Councils thereafter.

7. Monitoring and evaluation

Thames Water and Imperial College London are undertaking monitoring and are ensuring that these pilot projects remain robust in terms of measurable outcomes so to influence the nature of future schemes.

An Independent Advisory Group of leading experts is also in place to scrutinise the process of modelling and monitoring. Each of the discharge structures from the SuDS is equipped with a level monitoring device either side of a calibrated V-notch weir. For Melina and Mendora Roads, level monitors are also fitted to the orifice plates so that levels with the geocellular storage/gravel can be measured.

A fine scale conceptual model will be developed to simulate hydrological processes within SuDS, including precipitation, evapotranspiration, interception losses, surface runoff, and infiltration. A network of rain gauges covering the entire catchment provides measurements of rainfall. Those measurements combined with the flow survey from main sewers helped understanding the rainfall-runoff processes in each street to identify the sub-catchments draining through SuDS. This enables computation of inflow to SuDS, while outflow from SuDS is obtained from monitoring of discharge at the outlet of each device by a calibrated v-notch weir.

The performance indicators considered in this study are mainly quantitative. These are the peak flow reduction and lag times between existing sewer peaks and SuDS outflow peaks.

8. Benefits and achievements

This project's greatest achievement has been the success of collaboration. Thames Water, the Royal Borough of Kensington and Chelsea together with the London Borough of Hammersmith and Fulham worked together, as one, with their contractors and suppliers to bring the project to fruition.

Communication was key to ensuring that the residents were supportive of the pilot project. To install sustainable drainage systems in residential roads, this required road closures and associated disruption to residents. The project team needed to ensure that the residents were fully aware, in advance of forthcoming project requirements. Regular project updates were hand delivered to all residents and a simple questionnaire to all residents at completion of installation provided evidence of the approval of residents that they had been kept sufficiently well informed. Over a period of eighteen months of work, only one complaint was received. The method of communication used for the SuDS project was adopted by the London Borough of Hammersmith and Fulham for their own projects, such was the evident success of a simple and pictorial flyer.

9. Lessons learnt

The essential key challenge was 'the unknown'. The project had been planned but the installation of these types of sustainable drainage systems under residential roads in urban London was untried. The installation of such extensive installations, including monitoring chambers was a challenge with potential objections from residents and technical difficulties for the project team but it was realised that good communication was key to overcoming potential problems.

Residents were kept well informed at all times and the project team communicated regularly and jointly overcame technical difficulties in the early stages.

Project design was revised numerous times to adapt to unexpected requirements – such as a high voltage cable under a pavement; excessive concrete surrounding a water main that required a design change for the SuDS; passive watering systems that could not be installed and required a change of design; rain garden designs that needed to be adapted to allow high pedestrian footfall from the Academy; disabled spaces that needed to be extended; and resurfacing required at Mendora Road due to unexpected third party paint spillage. The project was very much a pilot project that had to adapt to the circumstances in which it was being rolled out. The fact that the project was such a success is specifically due to communications and a flexible team of designers and contractors.

10. Interaction with local authority

Good working relationships with the local authorities was essential for a successful project outcome. An open and honest dialogue was necessary at all times to ensure that potential hazards and problems were considered. As the project progressed, the relationship between Thames Water and the local authorities became stronger and more collaborative. Presentations to external organisations were given jointly; decisions were made jointly and communication was regular and detailed, and communications to residents were co-branded at all times.

11. Project details

Construction completed and Costs:

Melina Road
Start Date – 11/02/2016, Finish Date – 20/03/2017 (Completion Certificate Date)
Final Actual Construction Cost - £522,881.15

Mendora Road
Start Date – 11/02/2016, Finish Date – 20/03/2017 (Completion Certificate Date)

Final Actual Construction Cost - £1,368,684.81 (this includes the requirement to undertake a water main diversion)

Arundel Gardens
Start Date – 21/11/2016, Finish Date – 17/03/2017 (Completion Certificate Date)
Final Actual Construction Cost - £737,167.43

Extent:

The following table shows the percentage of catchment area covered by SuDS footprint:

Street	Catchment area (ha)	Proportion of SUDS footprint
Melina Road	1.68	2.31%
Mendora Road	1.11	8.50%
Arundel Gardens	1.02	17.66%

In relation to entire Counters Creek catchment, 0.0125% has been transformed into SuDS.

12. Project team

Funders	• This project was unique in that a Funding Agreement was drawn up between Thames Water and the two Borough Councils and their Term Maintenance Contractor.
Designers	• Under CDM 2015 the following responsibilities were assigned: • Project Sponsor – Thames Water / SMB JV • Clients – London Borough of Hammersmith & Fulham and Royal Borough of Kensington & Chelsea • Principal Designers – AECOM, Mott McDonalds and Atkins
Contractors	• Principal Contractor – FM Conway • Subcontractor and Supplier – SEL Environmental
Monitoring	• Thames Water, Imperial College and Atkins

13. Project pictures / images



Fig 4: Permeable block paving being installed at Mendora Road, Fulham



Fig 5; Local school engaged in planting at Melina Road, Shepard's Bush



Fig 6: Resurfacing Arundel Gardens, Kensington with porous asphalt

Counters Creek Flood Alleviation Scheme - SuDS



SuDS used

- *Permeable pavement (concrete block pavement with geocellular sub-base replacement)*
- *Rain gardens*
- *Tree pits*

Benefits

- *Reducing basement sewer flooding to properties*
- *Reducing the impact of the urban heat island effect*

- *Increasing green infrastructure on the public highway*
- *Creating capacity within the wider sewer network, increasing future resilience*
- *Wider improvements to the road network, such as traffic calming and footway renewals*
- *Community engagement events helped create a sense of ownership of the SuDS schemes by residents*

1. Location

Munster Road – SW6 - St Dionis Road to Fulham Road

Greenside Road – W12 – Whole Road

Godolphin Road – W12 – Thornfield Road to Goldhawk Road

Eddiscombe Road – SW6 – Whole Road

Wendell Road – W12 – Bassein Park Road to Rylett Road

Rostrevor Road – SW6 – Whole Road

2. Description

The wider Counters Creek Flood Alleviation Scheme was undertaken to protect over 1000 properties in West London by reducing the risk of basement sewer flooding to properties during a storm event in the catchment. The Counters Creek scheme involved the construction of new local sewer improvements, the installation of FLIP devices, and the installation of SuDS.

The SuDS element of the scheme involved retrofitting the existing Public Highway with SuDS on six roads in the highly urbanised London Borough of Hammersmith and Fulham. The SuDS element of the Counters Creek Flood Alleviation Scheme is the basis of this case study.

The SuDS schemes use permeable paving, rain gardens and tree pits to help slow the flow of surface water into the sewer. Due to the residential nature of the roads, it was a key requirement that once complete, the retrofit SuDS schemes fit aesthetically and functionally into the local environment.

3. Main SuDS components used

- Permeable paving (involving concrete block paving and a geocellular sub-base replacement)
- Rain gardens
- Tree pits

4. How it works

Before the main SuDS components were selected, consideration was given to other solutions. These consisted of SuDS solutions which aimed to address the four pillars: water quantity, water quality, biodiversity and amenity. The success of each depended largely on the engineering and local

constraints of the streets, along with the potential storage capacity of each of the solutions considered.

Out of the four pillars of SuDS, water quantity was the key driver in the design of these SuDS. The first consideration was maximising the catchment areas feeding into the SuDS system. This was challenging due to the nature of the existing streets. The proximity of the SuDS to property basements and surrounding ground conditions reduced the ability to limit runoff volume through infiltration. There was the added challenge of the space available within the parking bay area, this limited the ability to provide green SuDS (e.g. bio-retention areas) within the parking bays due to the added pressure this would cause to on-street parking provision.

The system utilises the topography of the existing highway, by draining the carriageway and footway surface water into permeable parking bays. The parking bays on both sides of the road were excavated to an approximate depth of 700mm. Within the excavated parking bays, 300mm (in depth) geocellular units were installed on a capping layer of Type 1 material. The pervious concrete base was laid on top of the geocellular units, with a minimum thickness of 220mm. A permeable block layer was laid above the permeable concrete along with a 50mm layer of bedding. This construction provided a structurally solid carriageway, whilst giving the highway the permeability to allow water through. Where the sites were constrained by utilities at shallow depth, 4/20 coarse aggregate was used instead of geocellular units. This gave flexibility in the design but reduced the storage capacity available, so was used only where necessary. Where lateral utilities were encountered, the geocellular units were omitted and both ends were connected by piping through the laterals.

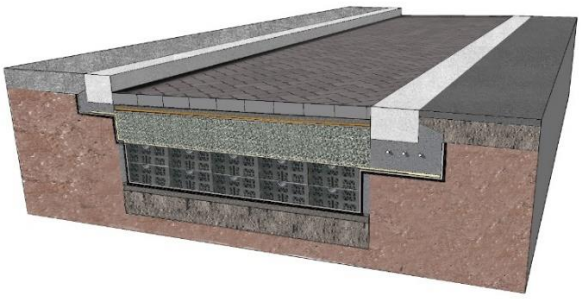


Figure 1: Cross section of permeable parking bay



Figure 2: Installation of geocellular units on site – Munster Road

Whilst guidance is available for the structural design of geocellular systems, testing material in systems with low cover is limited. As the parking bays were within the highway, it was considered that they should be designed for commercial vehicle overrun. Published guidance for geocellular storage structural design warns that they may be vulnerable to traffic damage when installed below paving at less than 1m cover. A proprietary permeable concrete base was provided below the permeable block paving to provide protection to the geocellular units. This was chosen because it has improved flexural strength, crack resistance and load-spreading ability under repetitive loading compared with permeable hydraulic bound material and traditional no-fines concrete. Moreover, its placement avoids the need for compaction plant to traffic over the geocellular units. To obtain a low cover pavement design, analysing the base thickness required customisation of the approach set out in CIRIA C737 which covers structural design using geocellular units.



Figure 3: Just laid pervious concrete – Eddiscombe Road

The permeable parking bays collect water at the surface, where it moves through the joints of the blocks, bedding and pervious concrete before entering the geocellular units. A filter geotextile is provided to capture silt and oils. Once the surface water is in the geocellular units, it flows through a series of flow control chambers which were provided with orifice and weir plates to minimise discharge rates and maximise the storage capacity. Orifice sizes were set to a minimum of 50mm diameter to minimise discharge rates while reducing the risk of blockage. These lead to terminal manholes connecting to the combined sewer system which were provided with flap valves and foul air traps to prevent back flows, odours or gases entering the SuDS system. The discharge rates for return periods up to the 1 in 20 year storm were dictated by the overall sewer hydraulic modelling to meet the target TWL at the sewer. The system was also designed to have controlled flooding for return periods up to the 1 in 100 year with a climate change allowance of 40%.

In addition to the permeable paving, rain gardens and tree pits were integrated into the design. These biodiversity pockets, generally 2m x 2m, could be located at dead spots or discreet locations in the

longer streets without having significant impact on parking provision. These rain gardens are part of the hydraulic system of the permeable paving: geocellular units below the substrate are connected upstream and downstream to the sub-base storage of the permeable paving. These units include a gravel sump and rockwool material to provide passive irrigation to the substrata by capillary action, thus removing some runoff volume from the sewer. The system also intercepts runoff directly from the highways via kerb openings; a measure that, together with a filter geotextile installed in the permeable paving, provides pollution control should the system be connected to a surface water sewer in the future.

The approach of using permeable block paving parking bays provided an adaptable solution for the site-specific constraints of each road, specifically in terms of the depth of excavation and the existing highway use. This was a proven solution based off successful previous trials with SuDS working collaboratively with Thames Water. As the SuDS schemes are in highly urbanised areas, it was clear from initial consultation with residents that parking was at a premium. Although residents were open to green infrastructure, in general they were opposed to the idea if there was a risk of loss of parking. In three of the SuDS schemes, rain garden and tree pits could be installed.



Figure 4: Finished scheme – Eddiscombe Road



Figure 5: Finished scheme – Munster Road

5. Specific project details

This SuDS project is part of a wider drainage project called the Counters Creek Flood Alleviation Scheme, aiming to reduce the risk of basement sewer flooding within the catchment area.

The solution involved localised construction options; FLIP devices (pumped non-return valves), local sewer upgrades and SuDS. In March 2019 a final decision was made on which SuDS schemes were to go ahead, this left 3 months to complete detailed design and 9 months to deliver on site before the wider Counters Creek project ended in March 2020.

During design and delivery, there were multiple disciplines involved, from Hydraulic Modellers, Drainage, Civil and Highway Engineers to Landscape Designers. In addition there was a Thames Water communication team who worked closely with the engineers to ensure the right messages were delivered to the residents.

As all the SuDS schemes had to be delivered on-site in 9 months and the lead time for the design team was short, it was key that all partners worked together in the design and delivery to ensure the tight time scales were met. Both F M Conway and Cappagh Contractors were involved in the design of the SuDS schemes, helping to create designs that were deliverable. During the design phase, meetings were held with all parties (Thames Water, LBHF, Mott MacDonald, F M Conway and Cappagh Contractors) every 2-3 weeks to go through the designs and programme. At these meetings other areas of the project team would also be in attendance including; the commercial team, H&S leads and the communications team, this again ensured we remained on programme and prepared for construction. This project involved significant collaboration between Hammersmith & Fulham Council, Thames Water, Mott Macdonald and the different contractors involved.

The consultation with residents and Councillors was of great importance in these SuDS schemes, due to the amount of disruption caused whilst the roads were closed, and the short time frame for the consultation process. As such it was decided to do on-street consultation events for each road, along with letter drops to residents and businesses which had enclosed a leaflet of information about the project and the planned works.

The consultation events were held mid-week and in the early evening as most people were more likely to be at home. The on-street engagement involved having the plans for the street on view within a gazebo in the parking bay area for each road, this approach led to an increased engagement rate at the drop-in events. At each event there were at least 4 people from the project team present including a minimum of; a member of the Thames Water communication team, a designer from the Mott MacDonald, a representative from Thames Water integration team and LBHF. The events were

well attended and feedback from residents at the events influenced the final design of some roads with the removal or repositioning of rain gardens, and changes in traffic management. The events also provided an opportunity to deal with concerns over access to off street parking, repositioning of disabled bays and electric charging from home.

6. Maintenance & operation

The SuDS are maintained by LBHF. Inspections of the block paving is part of the routine Highway inspection programme, and cleansing of the chambers part of the gully cleansing programme.

Maintenance of the green spaces is being undertaken by the Hammersmith Community Gardens Association, who were also involved with planting of the rain gardens and helped to organise community events for the planting of these spaces.



Figure 6: Community plantintg day – Godolphin Road

7. Monitoring and evaluation

The SuDS schemes have worked in current rainfall to date. Monitoring of flow will be taking place but is not in place at this time. This is due to be implemented later in 2020.

8. Benefits and achievements

- Benefits
    - Reducing surface water runoff entering the combined sewers resulting in reduced risk of basement sewer flooding.
    - Reducing risk of surface water flooding in the highways.
    - Reusing highways runoff in rain gardens and tree pits.
    - Reducing pollutant concentration from highways runoff at discharge points.

- Increasing green infrastructure on the public highway and reduce impact of the urban heat island effect through the removal of asphalt for permeable blocks.
- Creating capacity within the wider sewer network, increasing future resilience.
- Project delivered wider improvements to the road network, such as traffic calming and footway renewals.
- Community engagement events helped create a sense of ownership and involvement of the SuDS schemes by residents and residents' groups.
- Works were undertaken by the borough's contractors, meaning the maintenance of the spaces will be undertaken by contractors who have experience of SuDS. The work also built up knowledge of SuDS for the contractors.

- Achievements
  - The SuDS schemes were all delivered within 9 months, and when given the constraints of the road network in London and size of the project this was an achievement.
  - Consultation with residents was key, their input at consultation shaped the design at street level and built ownership in the community.
  - The project helped to build awareness of flood risk within the community and showed how we can alleviate flood risk sustainably.
  - Showing that SuDS can be installed in highly urbanised areas, and on roads that have high traffic flow.
  - The SuDS schemes designs are easily repeatable in other streets.
  - Collaborative working and trust between all partners involved was key to the susceess of the project. The relationship between the private utility company and a local authority showed how the two can work well together. This is supported by how the contractors on-site worked well together under tight site conditions.

9. Lessons learnt

All 6 SuDS schemes had to be designed and delivered on site within the 12 month period. If more time had been available further ground investigation would have been undertaken to gain further knowledge of ground conditions, which would have prevented making changes to the design on-site.

Communciation was key to the project's success, both internally between all the partners involved and externally with residents and Councillors. Early engagment with residents and Councillors allowed their ideas to be incorperated into the designs and any concerns to de addressed.

The Contractors were involved in the design of the project, enabling early feedback they had on the site management, programme and incorporating their suggestions of materials and working practices. This early engagement with F M Conway and Cappagh Contractors prepared them for the

works, and made them an integral part of the project, helping to build that spirit and trust between all the partners involved.

During construction independent H&S inspections were undertaken every two weeks, assessing all the contractors on-site and wider traffic management. As the construction was all undertaken in a short time frame, and at points multiple SuDS schemes were in construction concurrently, it was key that Health and Safety standards did not drop, and if they did immediate action was taken to address this.

During construction, on-site weekly meetings were held with LBHF, the Contractors and the design team from Mott MacDonald. These meetings went through any issues with constrution and design, and enabled Mott MacDonald to make changes to the design quickly if needed.

When changes to the design occurred on-site, Hammersmith & Fulham Council were able to use their in-house survey team to undertake surveys when needed. This ensured that the design team had accurate information to undertake any change in design. An example from Godolphin Road being a utility service being shallower than anticipated, in this case it was not straight in the road, but moved from side to side. The in-house survey team were able to map the utility within a few hours and send it to the design team that day to work on a solution. This ability to adapt and make changes fast was cruitial to keep the construction to programme.

The project trialed new applications for some products, including a proprietary permeable concrete mix. Using these products in high traffic roads was a concern due to the risk of road failure, additionally there was little available on how to best install the product. With additional time, trials could have been undertaken before using the product more widely. However, in this case, after a few pours the best instalation method was identified with the supplier and through beam tests of the material that came to site, it provided confidence that the product will meet the design specifications.

Other lessons learnt include:

- Rethinking the traditional ‘level of protection’ has allowed for opportunities to be realised within the catchment, offering smaller-scale solutions bringing quantifiable benefits for the residents.
- Early coordination with Statutory Undertakers and surveys are essential to understand above and below ground constraints.
- Design needs flexibility and modular solutions that can adapt to specific constraints.
- Engagement with the community and the supply chain is important to identify opportunities and innovative products.

10. Interaction with local authority

Hammersmith & Fulham Council were involved throughout the process and tasked with the delivery side of the project. This ensured an innovative and collaborative approach with all partners throughout. All the SuDS schemes were within the public highway and after installation are maintained by the Local Authority. It was therefore decided that the Local Authority would use their highway contractors to undertake the work.

Thames Water Utilities Ltd were the project sponsors, Mott MacDonald were the designers, Hammersmith & Fulham Council were the client, and F M Conway and Cappagh Contractors were the contractors for the work, with support from SEL an installation company for Polypipe.



Figure 7: Project team and contractors on site at Munster Road

11. Project details

Construction completed: *9th March 2020*

Cost: TBC

Extent: 12851m^2

Project team

Funders	• Thames Water Utilities Ltd	
Clients	• Hammersmith & Fulham Council	
Designers	• Mott Macdonald • Hammersmith & Fulham Council	
Contractors	• F. M. Conway Ltd • Cappagh Contractors	
Other	• SEL Environmental Ltd • Hammersmith Community Gardens Association	

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Cabinet

Date: 07/03/2022

Subject: School Budget (Dedicated Schools Grant) 2022/23

Report of: Councillor Larry Culhane, Cabinet Member for Children and Education

Report author: Tony Burton, Had of Finance Children's Services and Education
Jan Parnell, Director of Education

Responsible Director: Emily Hill,-Director of Finance
Jacqui McShannon, Director of Children's Services

SUMMARY

This report seeks approval of the final proposed 2022/23 schools block allocation and funding to schools through the schools funding formula for the financial year ending 31 March 2023. Hammersmith & Fulham Schools Forum agreed the model for 2022/23 budget shares on 18 January 2022. The Education and Skills Funding Agency (ESFA) require political endorsement of the schools' forum decision to agree the 2022/23 budget.

This report covers the budget decisions for the following Hammersmith & Fulham education provision funded from the four blocks of the Dedicated Schools Grant:

- The Schools Block – funding for mainstream primary and secondary schools. Schools block funding of £111.107m has been confirmed for Hammersmith & Fulham for 2022/23 by The Department of Education (DfE).
- The Central Services Schools Block Budget – £2.187m funding in 2022/23 to meet the statutory education functions of the local authority and historic central funding commitments.
- Early Years Block – budget with respect to the government's universal and extended childcare and early years education offer for 3- and 4-year-olds.
- High Needs Block – provisional core funding allocation for special educational needs provision of £33.157m in 2022/23 financial year. An additional £4m funding through the High Needs Safety Valve is also expected in 2022/23.

RECOMMENDATIONS

1. Schools Block Budget 2022/23 Financial Year:

    a. To approve the Local Authority formula for allocating resources to Hammersmith & Fulham schools for 2022/23 as set out in Appendix 1, the Authority Proforma Tool (APT) for setting school budgets.

b. To approve the National Funding Formula (NFF) transitional funding formula factor rates (as set out in Appendix 1) as the basis for calculating the 2022/23 schools funding formula, together with a 1.5% per pupil Minimum Funding Guarantee (MFG) protection for individual schools versus 2021/22 levels with respect to pupil led funding.

c. To approve the transfer of £0.556m (0.5% of the total schools' block allocation) from the schools' block to the high needs block in the 2022/23 financial year. This is to support high needs education expenditure for special educational needs in Hammersmith and Fulham.

d. To approve the proposal to top-slice the 2022/23 Schools Block to the value of £0.200m or 0.18% of the total for the Falling Rolls protection fund in 2022/23. Allocations to mainstream schools from the agreed fund would be agreed by a sub-group of the Schools Forum.

e. To approve de-delegation budgets of £0.666m for maintained mainstream schools only.

f. To approve the education functions budgets of £0.258m for maintained mainstream schools only, as confirmed by Schools Forum on 18th January 2022.

2. Central Services Schools Block Budget 2022/23
   a. To approve the proposed budget allocation for Central Services Schools Block DSG totalling £2.817m.

3. Early Years Block Budget 2022/23
   a. To approve the 2022/23 draft budget of £15.173m for 3- and 4-year-olds in line with grant conditions, including the proposed distribution of an increase in the hourly Base Rate paid to providers from £6.26 to £6.39 and the high level central Early Years budget of £0.759m.

4. High Needs Block Expenditure 2022/23
   a. To note the significantly increased funding allocation for High Needs and special educational needs education in 2022/23, planned expenditure by category and commissioned places with special education providers in 2022/23.

Wards Affected: All

Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	The allocation of funding to local schools who are employers within the borough.
Creating a compassionate council	Enables pupils within the borough to receive a good quality education.
Doing things with local residents, not to them	Providing educational opportunities for all pupils within the borough.
Being ruthlessly financially efficient	Contributes to a level of financial stability for schools. The high needs block transfer enables this support to schools to continue and helps to reduce the high needs budget pressure.
Taking pride in H&F	Ensures continuing good quality provision in the borough's schools enabling pupils to take pride in their school and the borough.
Rising to the challenge of the climate and ecological emergency	Assists with the delivery of climate Education to young people within the borough.

Financial Impact

Schools Block Budget

This report covers the allocation of the funding for all mainstream schools in Hammersmith & Fulham for education between reception and year 11 for the period April 2022 to March 2023. The basis for the distribution of funds within the Schools Block of the Dedicated Schools Grant across all schools is in line with the regulated range of allowable variables in the grant conditions.

Other than the proposed transfer between blocks, the remaining funds are distributed to individual schools in line with their individual characteristics and with regard to the local formula.

The budget for the falling rolls protection fund for 2022/23 is made available by a budget top slice from the mainstream schools' budget and agreed at Schools Forum following wide consolation with schools.

De-delegated budgets are budgets managed for schools centrally by the local authority on their behalf.

Funding for education functions is to meet the cost of providing statutory education functions on behalf of maintained schools and in line with the education funding regulations.

Central Services Schools Block (CSSB)

The historic element of CSSB funding has reduced by £0.496m in the year to 2022/23. The decrease has been met by savings on historic CSSB.

A balanced budget has been proposed for 2022/23. The Education and Skills Funding Agency will confirm further block funding reductions from 2023/24 in the new financial year. The Education Department is exploring budget options for 2023/24 in order to mitigate expected further block reductions.

Early Years Block

The Early Years proposed budget for 2022/23 will ensure the 95% pass through rate of grant as required by the funding regulations and grant conditions.

The increases in funding to early years providers proposed is afforded by the increase in the hourly funded rate confirmed by the ESFA for 2022/23. The rate has increased by 2.1% by £0.17 to £8.23 per funded hour.

This budget is based on estimated likely activity levels in 2022 and 2023 with respect to the government's 3- and 4-year-old universal and targeted childcare offer. The current indicative funding allocation for 2022/23 from the ESFA is £13.389m which is based on the January 2021 census when early years activity was significantly suppressed due to the covid-19 pandemic lockdown. Activity has since recovered to a large extent to pre pandemic levels and so both funding and expenditure are expected to be significantly higher than the provisional funding allocation.

Final 3- and 4-year-old funding for the 2022/23 year will be determined by the January 2022 and January 2023 census points. This will be monitored and reported closely through the financial year ahead.

High Needs Block (HNB)

The total 2022/23 allocation for High Needs Block Spend includes a 0.5% transfer from the schools block of c.£0.556m

Funding Source	**2022/23 allocation for High Needs Block expenditure £m**
DSG High Needs Block	33.157
Schools block transfer to the HNB	0.556
Total 2022/23 funding available for HNB expenditure	**33.713**

Tony Burton, Head of Finance Children's Services and Education, 18/01/2022
Verified by, Emily Hill, Director of Finance, 19/01/2022

Legal Implications

The Dedicated Schools Grant is payable to local authorities under section 14 of the Education Act 2002. It is a 'ring fenced grant' that is to say it must be solely spent on the grant conditions and guidance has been prepared by the Education and Skills

Funding Agency (ESFA) to assist local authorities in the operation of the dedicated schools grant (DSG).

Each year new regulations are issued as they only cover one year the current being School and Early Years Finance (England) Regulations 2021. These Regulations provide that Local Authorities must consult their Schools Forum and schools maintained by them when determining the school funding formula. Cabinet is the decision-making body for the schools funding formula and must consider the outcome of the consultation and take that into consideration when making a decision on whether to adopt the NFF, as per Schools Forum's recommendation. Although not duty bound to follow the recommendation of Schools Forum following the consultation, if Cabinet departs from the recommendation clear reasons must be given.

In 2022-23, The Council will continue to determine schools' budget allocations at a local level, through a local funding formula, though in future years to come this will change to a national set funding formula

Verified by, Jade Monroe, Chief Solicitor Social Care, 20/01/2022

Background Papers Used in Preparing This Report – *ALL PUBLISHED*

Schools Forum 18/01/22 Papers and minutes
Agenda for Schools Forum on Tuesday, 18th January, 2022, 2.00 pm | LBHF

Schools revenue funding 2022 to 2023 Operational Guide
Schools_revenue_funding_2022_to_2023_December_2021_update.pdf (publishing.service.gov.uk)

Early Years Funding 2022 to 2023 Operational Guide
Early years entitlements: local authority funding of providers operational guide 2022 to 2023 - GOV.UK (www.gov.uk)

DETAILED ANALYSIS

Proposals and Analysis of Options

Schools Block

1. The recommended model of distribution of the Schools Block of the Dedicated Schools Grant through the Authority Proforma Tool was agreed by Schools Forum on 18th January 2022 as below and per the detailed funding factor rates and values in Appendix 1.
2. The agreed model provides stability to schools in 2022/23 by ensuring that schools benefit from a 1.5% minimum funding guarantee on a per pupil basis for pupil led funding. The agreed factors are National Funding Formula (NFF) factors (plus area cost adjustment for inner London) which have been uprated by 7.33% to ensure the full schools block allocation is distributed to schools.

3. A transfer to support the High Needs Block of £0.556m or 0.5% of the block has been agreed with Schools Forum and will be used to mitigate funding pressures in the high needs budget in 2022/23.

4. De-delegation budgets of £0.666m for maintained mainstream schools have been agreed at Schools Forum. These are budgets that maintained primary schools agree to delegate to the local authority to manage and spend.

Area of expenditure	**2022/23 £m**
Maintained Schools in Financial Difficulty/Contingency	0.175
Maintained Schools Trade Union Facilities Cover	0.025
Maintained Schools Maternity Cover	0.130
Maintained Schools Licence Fees	0.032
Behavioural Support (SEND)	0.052
Free School Meals Eligibility	0.031
The Learning Partnership	0.046
School Improvement Service	0.175
Total	**0.666**

5. Education functions budgets of £0.258m were also agreed at Forum. These budgets are set with reference to DfE schools funding guidance to meet the cost of meeting the local authorities retained education functions with respect to maintained mainstream schools.

Area of expenditure	**2022/23 £m**
Finance	0.088
Asset management	0.074
Asbestos management and risk	0.073
Business Intelligence	0.023
Total	**0.258**

6. Falling rolls budget support of £0.2m is proposed within the budget to provide limited assistance to mainstream schools to manage the impact of reduced rolls in the short term. Schools Forum have agreed the fund which is available to mainstream schools with a good or outstanding Ofsted assessment per the grant conditions. Available funding will be allocated to eligible schools in due course through Schools Forum decision.

Central Services Schools Block

7. In 2022/23 there is no change to the arrangements for Central Schools Services Block (CSSB) of the DSG. The CSSB allocation for 2022/23 provides funding for:
   - The retained duties element of the Education Services Grant (ESG) for all schools
   - Ongoing central statutory functions – for example Admissions – for maintained schools
   - Ongoing historic commitments.

8. For historic commitments there will be a further reduction to this element of funding for all local authorities receiving it. For Hammersmith & Fulham this equates to a further reduction in grant of £0.496m in 2022/23 versus 2021/22 (a circa £1.6m reduction since 2019/20).

9. The CSSB budget for 2022/23 is presented below and will be recommended to Schools Forum on 15 March 2022.

Central Services Planned Expenditure 2022/23

Area of Expenditure	**2022/23 Proposed**
	£m
Copyright Licensing	0.110
Asset Management, Place Planning and Strategic Operations	0.165
Management, Support, Finance/Business Intelligence and SACRE	0.529
Virtual School	0.106
Professional Development Centre/Learning Partnership	0.060
Admissions and ACE	0.528
Contingency to support High Needs Transformation	1.319
Total Spend/Funding	**2.817**

Early Years Block

10. The 2022/23 Early Years Block initial allocation was received in Autumn 2021 2020 and is based on the January 2021 Early Years census.

11. The draft 2022/23 early years budget is based on the January 2020 headcount as this is considered to better reflect the activity likely in 2022/23. The table below gives a high-level summary of the proposed budget.

Proposed 2022/23 Early Years budget based on January 2020 headcount

Element	**Amount £m**
3- and 4-YO universal offer	12.364
3- and 4-YO extended offer	2.809
Sub-total 3- and 4-Year Old Offer	**15.173**
2-YO Disadvantaged offer	1.198
EY Pupil Premium	0.100
Disability Access Fund	0.051
MNS supplementary funding	0.880
TOTAL	**17.402**

12. The decisions required in this report relate to the allocation of the 3- and 4-year-old funding which is made up of a number of parts. The table below shows the proposed breakdown of the 2022/23 budget which is compliant with the DfE regulations for 95% pass through to Early Years providers. This budget includes a 2.1% increase of £0.13 in the hourly base rate paid to providers from £6.26 to £6.39 per hour.

2022/23 Early Years Budget – 3- & 4-YO Universal and Extended Offer

	21/22 Budget	22/23 Budget	Change
	£000	£000	£000
A. Participation based on estimated hours - base rate	11,542	11,784	242
B. Participation based on estimated hours – deprivation.	1,302	1,329	27
C. SEN Inclusion Fund	500	629	129
D. Provision for Vulnerable & Additional Needs Children	550	562	12
E. Contingency	73	50	-23
F. Central services expenditure - 5% maximum allowed	743	759	16
G. G. Best Practice, Training and Network Building	150	60	-90
TOTAL SPEND	**14,860**	**15,173**	**313**

13. Funding for Early Years is adjusted annually to take account of the changes in the January census numbers. The final allocation for 2022/23 financial year will not be confirmed until July 2023.

14. Years providers have been consulted based on the recommendations in paragraph 12 above in line with DfE requirements. The results will be presented to Schools Forum on 15th March 2022 along with the final proposed budget for 2022/23.

High Needs Block Budget 2022/23 and Place Commissioning

15. 2022/23 HNB planned expenditure and 2021/22 forecast outturn is detailed below:

2022/23 High Needs Block Budget

Category	2021/22 Forecast £m	2022/23 Budget £m
Alternative Provision	1.004	0.967
Commissioned Services	2.107	2.423
Discretionary payments	0.040	0.040
EHCP top-up	18.258	19.473
LAC Belongings	0.683	0.538

Place Funding	8.609	8.264
SEND Service	0.919	0.874
Other	0.592	1.134
Total	**32.212**	**33.713**

16. Place funding should broadly reflect the local authority's recent commissioning activity and strategic plans to secure suitable Special Educational Needs and Disabilities (SEND) and Alternative Provision (AP). The LA has consulted with local providers to determine the agreed number of funded places.

Planned Commissioned Place Numbers for Academic Year (2022/23)

Provision Type	Commissioned Place Numbers AY 2021/22	Commissioned Place Numbers AY 2022/23	Place Number increase/(decrease)	Commissioned Place Cost FY 2022/23 £m	2022/23 Financial year impact £m
Maintained					
Special Schools	287	287	0	2.870	0
SEN Resource Unit	20	20	0	0.144	0
Sixth Form College	50	50	0	0.300	0
Maintained – sub-total	**357**	**357**	**0**	**3.314**	**0**
Academies					
Special Schools	246	246	0	2.460	0
Alternative Provision	88	64	(24)	0.740	(0.140)
SEN Resource Unit	20	20	0	0.168	0
Further Education College	266	300	34	1.582	0.136
Academies – sub-total	**620**	**630**	**10**	**4.950**	**(0.004)**
Total	**977**	**987**	**10**	**8.264**	**(0.004)**

17. The planned commissioned place numbers have been costed within the safety valve forecast agreement in the Q3 monitoring report submitted in December 2021.

18. The increase in commissioned places was agreed in the cabinet report approved on the 11th November 2021. A further increase of 15 places at the Further Education College was agreed in January 2022 by a Director's decision report.

Reasons for Decision

19. Schools' budget shares from the schools' block of the Dedicated Schools Grant (DSG) are agreed annually according to the process and regulations set out by the Education and Schools Funding Agency (ESFA).

20. Schools Forum and the Local Authority must approve the basis for the allocation to schools. Hammersmith & Fulham Schools Forum agreed the budget model proposed at a meeting on 18 January 2022.

21. Both the Early Years and High Needs Block budgets in Hammersmith & Fulham are significant in value at £17.4m and £33.7m respectively. Whilst the application of Dedicated Schools Grant is heavily regulated by grant conditions and the requirements of the national funding formula funding guidance, local authorities must work with Schools Forum and education leaders to agree effective, efficient and value for money budgets.

22. Work continues with the Department for Education in order to address the retained deficit on the Dedicated Schools Grant in line with the Safety Valve agreement.

Equality Implications

23. There are no direct negative equality implications for groups with protected characteristics, under the Equality Act 2010, by the approval of these funding proposals set out in the Recommendations.

24. Officers anticipate a neutral impact as the funding model outlined in this report is intended to provide financial stability to schools in the final year of the transitional period before changes in funding and allocations arrangements.

25. Place funding decisions are negotiated with schools, accounting for the needs of the school population and to ensure a budget for the efficient and effective running of schools. In addition to place funding, individual learners also attract top-up funding to deliver to the specification in their Education, Health and Care Plans. Place and top-up funding is determined within the national funding formula for schools funding.

Risk Management Implications

26. The council has experienced growing pressures on the High Needs budget as a result of demographic growth, government policy changes and the continuing impact of the government's austerity. Ensuring that resources available to schools are appropriately allocated supports the delivery of the council's corporate priorities to ensure that children and young people will receive a great start in life and that schools will be amongst the best in the country, with enough places for all and with all children achieving the best that they can.

27. In line with the Council's objective of being Ruthlessly Financially Efficient and given the significant financial pressures faced by schools, it is important that strong oversight and financial monitoring continues to be maintained and appropriate ongoing assurances provided on the management of these risks.

Verified by, David Hughes, Director of Audit, Fraud, Risk and Insurance, 18/01/2022

Climate and Ecological Emergency Implications

28. This report covers are the revenue budgets for schools and education in Hammersmith and Fulham rather than the maintenance or capital programme on the school's estate. There is no expectation from the DfE that these budgets are used by education providers for anything other than minor revenue maintenance. The local authority holds the budget for the school's capital investment as this is not delegated to schools and subject to separate decisions as part of the medium-term capital strategy.

Verified by, Hinesh Mehta, Strategic Lead – Climate Emergency, 31/01/2022

Consultation

29. The local authority consulted with Schools Forum in October 2021 with respect to the distribution of the provisional schools block allocation advised by the ESFA.

30. The local authority consulted with the wider schools' community in October and November 2021 with respect to the proposed options for the schools block budget allocation. Budget workshops were held for schools to review the key elements of the proposed model over the course of the consultation. A further budget briefing was held on 12th January 2022 to include details of the final recommended proposals and the updated final funding notified by the ESFA in December 2021, prior to Schools Forum on the 18th January 2022.

31. Hammersmith & Fulham Schools Forum agreed the proposed 2022/23 schools block budget shares on 18 January 2022.

32. Following Schools Forum on 18 January 2022, Early Years providers will be consulted with respect to budget proposals to support the sector in the Spring 2022 term and beyond.

33. The local authority will continue to consult and liaise with special education providers with respect to high needs place numbers and top-up funding.

LIST OF APPENDICES

Appendix 1, the 2022/23 Authority Proforma Tool (APT) for setting school budgets

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Appendix 1 The 2022/23 Budget Authority Proforma Tool submitted to ESFA pending LBHF decision

Local Authority Funding Reform Proforma

LA Name:	Hammersmith and Fulham
LA Number:	205

Primary minimum per pupil funding level	Secondary (KS3 only) minimum per pupil funding level	Secondary (KS4 only) minimum per pupil funding level	Secondary minimum per pupil funding level	Disapplication number where alternative MPPF values are used
£4,265	£5,321.00	£5,831.00	£5,525.00	

Pupil Led Factors

	Reception uplift	No	Pupil Units		0.00				
	Description	Amount per pupil		Pupil Units		Sub Total	Total	Proportion of total pre MFG funding (%)	Notional SEN (%)
1) Basic Entitlement Age Weighted Pupil Unit (AWPU)	Primary (Years R-6)	£4,095.86		9,099.00		£37,268,275	£81,846,862	34.04%	2.95%
	Key Stage 3 (Years 7-9)	£5,775.21		4,480.00		£25,872,947		23.63%	2.53%
	Key Stage 4 (Years 10-11)	£6,508.57		2,874.00		£18,705,639		17.08%	2.53%
	Description	Primary amount per pupil	Secondary amount per pupil	Eligible proportion of primary NOR	Eligible proportion of secondary NOR	Sub Total	Total	Proportion of total pre MFG funding (%)	Primary Notional SEN (%) / Secondary Notional SEN (%)
2) Deprivation	FSM			2,702.00	1,797.00	£0	£10,369,458	9.47%	0.00% / 0.00%
	FSM6	£751.19	£1,101.31	2,983.00	2,506.00	£5,000,692			18.41% / 26.40%
	IDACI Band F	£280.10	£407.42	990.75	787.42	£598,321			7.00% / 8.90%
	IDACI Band E	£343.76	£541.11	1,784.63	1,279.95	£1,306,075			11.10% / 15.40%
	IDACI Band D	£534.75	£757.55	945.42	677.61	£1,018,887			27.00% / 33.00%
	IDACI Band C	£585.67	£827.58	1,048.34	890.75	£1,351,151			31.40% / 35.40%
	IDACI Band B	£623.86	£891.24	642.28	567.51	£906,478			1.00% / 1.00%
	IDACI Band A	£814.85	£1,133.14	90.02	101.05	£187,854			1.00% / 1.00%
	Description	Primary amount per pupil	Secondary amount per pupil	Eligible proportion of primary NOR	Eligible proportion of secondary NOR	Sub Total	Total	Proportion of total pre MFG funding (%)	Primary Notional SEN (%) / Secondary Notional SEN (%)
3) Looked After Children (LAC)	LAC March 19	£551.23		49.29		£27,170	£2,773,836	0.02%	100.00%
4) English as an Additional Language (EAL)	EAL 3 Primary	£719.36		2,298.11		£1,653,158		2.30%	100.00% /
	EAL 3 Secondary		£1,947.99		444.30	£865,495			/ 100.00%
5) Mobility	Pupils starting school outside of normal entry dates	£1,177.70	£1,693.35	140.77	36.75	£228,014		0.21%	100.00% / 100.00%
	Description	Weighting	Amount per pupil (primary or secondary respectively)	Percentage of eligible pupils	Eligible proportion of primary and secondary NOR respectively	Sub Total	Total	Proportion of total pre MFG funding (%)	Primary Notional SEN (%) / Secondary Notional SEN (%)
6) Low prior attainment	Primary low prior attainment		£1,438.71	26.45%	2,406.87	£3,462,788	£5,762,208	5.26%	100.00% /
	Secondary low prior attainment (year 7)	64.53%	£2,177.16	14.57%	1,056.16	£2,299,420			/ 100.00%
	Secondary low prior attainment (year 8)	64.53%		14.63%					
	Secondary low prior attainment (year 9)	64.53%		14.46%					
	Secondary low prior attainment (year 10)	63.59%		14.72%					
	Secondary low prior attainment (year 11)	58.05%		13.38%					

Other Factors

Factor			Lump Sum per Primary School (£)	Lump Sum per Secondary School (£)	Lump Sum per Middle School (£)	Lump Sum per All-through School (£)	Total (£)	Proportion of total pre MFG funding (%)	Notional SEN (%)
7) Lump Sum			£154,438.50	£154,438.50			£7,258,610	6.63%	0.00% / 0.00%
8) Sparsity factor							£0	0.00%	0.00% / 0.00%
Rows 46 to 49 are populated with the NFF methodology, please leave this as is if you wish to follow the NFF. As per the Operational Guidance, the distance thresholds can be increased or the year group size thresholds decreased and the distance threshold taper is optional. An alternative method of allocation to the NFF's average year group size taper can be chosen: the continuous taper (Tapered) or fixed sum (Fixed). Examples of each are provided in the Operational Guidance.									
Primary distance threshold (miles)	2.00	Primary pupil number average year group threshold	21.40	Apply primary distance taper			Yes	NFF, tapered or fixed sparsity primary lump sum?	NFF
Secondary distance threshold (miles)	3.00	Secondary pupil number average year group threshold	120.00	Apply secondary distance taper			Yes	NFF, tapered or fixed sparsity secondary lump sum?	NFF
Middle schools distance threshold (miles)	2.00	Middle school pupil number average year group threshold	69.20	Apply middle school distance taper			Yes	NFF, tapered or fixed sparsity middle school lump sum?	NFF
All-through schools distance threshold (miles)	2.00	All-through pupil number average year group threshold	62.50	Apply all-through distance taper			Yes	NFF, tapered or fixed sparsity all-through lump sum?	NFF
9) Fringe Payments							£0	0.00%	
10) Split Sites							£217,312	0.20%	0.00%
11) Rates							£1,267,725	1.16%	0.00%
12) PFI funding							£0	0.00%	0.00%
13) Exceptional circumstances (can only be used with prior agreement of ESFA)									
Circumstance							Total (£)	Proportion of total pre MFG funding (%)	Notional SEN (%)
Additional lump sum for schools amalgamated during FY21-22							£0	0.00%	0.00% / 0.00%
Additional sparsity lump sum for small schools							£0	0.00%	0.00%
Exceptional Circumstance3							£0	0.00%	0.00%
Exceptional Circumstance4							£0	0.00%	0.00%
Exceptional Circumstance5							£0	0.00%	0.00%
Exceptional Circumstance6							£0	0.00%	0.00%
Exceptional Circumstance7							£0	0.00%	0.00%

Total Funding for Schools Block Formula (excluding minimum per pupil funding level and MFG Funding Total)	**£109,496,011**	**100.00%**	
14) Additional funding to meet minimum per pupil funding level	**£0**	0.00%	0.00%
Total Funding for Schools Block Formula (excluding MFG Funding Total)	**£109,496,011**	**100.00%**	

15) Minimum Funding Guarantee	1.50%	**£855,785**	
Where a value less than 0.5% or greater than 2% has been entered please provide the disapplication reference number authorising the value			
Apply capping and scaling factors? (gains may be capped above a specific ceiling and/or scaled)		No	
Capping Factor (%)	Scaling Factor (%)		
Total deduction if capping and scaling factors are applied		£0	
		Total (£) / **Proportion of Total funding(%)**	**Notional SEN (%)**
MFG Net Total Funding (MFG + deduction from capping and scaling)		£855,785 / 0.77%	0.00%
Total Funding for Schools Block Formula		**£110,351,795**	**£12,897,763**

High Needs threshold (only fill in if, exceptionally, a high needs threshold different from £6,000 has been approved)	
Additional funding from the high needs budget	£0.00
Growth fund (if applicable)	£0.00
Falling rolls fund (if applicable)	£200,001.00
Other Adjustment to 21-22 Budget Shares	**£0**
Total Funding For Schools Block Formula (including growth and falling rolls funding)	**£110,551,796**
% Distributed through Basic Entitlement	**74.75%**
% Pupil Led Funding	**92.01%**
Primary: Secondary Ratio	**1 : 1.28**

22-23 NFF NNDR allocation	**£1,113,104**
Total Funding For Schools Block Formula (including growth and falling rolls funding) after deduction of 22-23 NFF NNDR allocation	**£109,438,692**

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Cabinet

Date: 07/03/2022

Subject: Affordable Workspace Supplementary Planning Document

Report of: Councillor Andrew Jones, Cabinet Member for the Economy

Report author: David Gawthorpe, Team Leader, Policy and Spatial Planning

Responsible Director: Jonathan Pickstone, Strategic Director for the Economy

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SUMMARY

This report seeks approval from Cabinet to adopt the Affordable Workspace Supplementary Planning Document (SPD). The SPD includes further information, evidence and guidance on local plan policies which seek affordable workspace particularly for small local businesses, start-ups and not-for-profit sector. The SPD takes forward the evidence reports' recommendations of focussing new provision on the 4 priority sectors identified in the Industrial Strategy and Local Plan: Creative and Digital; Financial and Professional; Life Sciences; and Manufacturing sectors. The guidance and evidence base will steer pre-application discussion, negotiations and support detailed planning obligations.

The SPD and accompanying evidence should improve implementation and delivery of policy objectives which reflect the Council's vision to see a stronger local economy that provides training and job opportunities for local people; and securing and promoting employment. The SPD also supports delivery of objectives of the Industrial Strategy and meets several of the Council's Business Plan commitments. The SPD and up to date evidence base will provide a stronger basis to negotiate developments and planning agreements with developers, to provide affordable space to support entrepreneurs and small businesses.

Loss of business premises through permitted development have increased land values which are unaffordable to small SMEs and start-ups, many of which serve our local residents. The SPD establishes more detailed guidance on the application of, and implementation of policies that seek affordable space in larger schemes, and more flexible space in a range of sizes and typologies to meet a clear borough need. This SPD can address social value as local charities and voluntary organisations can benefit from discounted rates. The SPD is accompanied by an evidence base report on viability of seeking discounted market rents and alternative affordable options. The SPD does not conflict with the adopted Local Plan and is also in conformity with London Plan policy objectives.

RECOMMENDATIONS

1. That Cabinet carefully considers the public consultation responses in Appendix 4.

2. That Cabinet approves the SPD for adoption incorporating amendments following the public consultation.

Wards Affected: All

Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	The SPD seeks to address the mismatch between high rents and large floorplate office premises by requiring a proportion of small and flexible space at discounted rents and/or preferential terms. This ensures the significant SME, start up and not-for-profit sector can remain and thrive in the borough.
Creating a compassionate council	The council will be providing guiding principles for development which may be accessible to local charity and voluntary organisation. Local employment and apprenticeships are also required by Local Plan employment policies.
Doing things with local residents, not to them	Planning together for growth and well-being. Lists of local businesses, charities and residents looking for premises and/or apprenticeships will be maintained.
Being ruthlessly financially efficient	See financial impacts below.
Taking pride in H&F	Giving local businesses, start-ups and residents an opportunity to contribute towards the growth of the borough. Many local SMEs and the not for-profit-sector serve local residents too.
Rising to the challenge of the climate and ecological emergency	The council helping support local businesses and residents to remain locally, avoiding the need to travel out of the borough.

Financial Impact

The costs of adopting the Affordable Workspace SPD will be charged against existing revenue budgets, mainly those relating to staffing and minor printing costs within the Policy and Spatial Planning budget.

Comments and verification by Andrew Lord, Head of Strategic Planning and Monitoring – Corporate, January 2022

Legal Implications

The preparation and adoption of the SPD is governed primarily by the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). They require that the SPD be in conformity with the London Plan and not conflict with the adopted development plan. This report confirms that the proposed SPD is not in conflict with the adopted development plan and conforms with the London Plan.

Once adopted, the SPD will supplement other planning documents such as the Local Plan and the London Plan. It does not provide new policy but provides more detailed guidance to the Local Plan policies. It will be a material consideration to which regard will have to be had when considering any planning application.

Poonam Rajput, Senior Planning Licensing Solicitor, 31st January 2022

Background Papers Used in Preparing This Report

None

DETAILED ANALYSIS

Proposals and Analysis of Options

1. The SPD provides guidance for development associated with Affordable Workspace. It contains a brief identification of the overarching policy context, including national and London wide policy relevant to the meeting local economic and business needs.

2. The SPD is informed by a comprehensive study into local demand, supply and viability of providing affordable workspace on major applications for new business floorspace. The evidence reports provide recommended approaches, and justify discounted rent levels. A flexible approach, taking into account site specific circumstances is recommended and reflected in the SPD. Support through other measures may be preferential in achieving the optimum outcome for the Council, such as discounted desks, flexible leases and managed workspace hubs including on smaller schemes below 1000 sqms. The SPD will set out a suggested workspace management plan to include management, reporting and monitoring measures through an approved provider, which will also be secured through planning obligations. As the document focusses on evidenced requirements and implementation, it provides an important resource for identifying and maximising the opportunity to meet the needs of a range of small SMEs, local start-ups, and non-profit organisations which otherwise could not afford to locate in the borough. This should help retain a more diverse local

economy, provide local residents opportunities to work close to home, retaining expenditure in the borough, and to go some way in offsetting losses of business space through permitted development.

3. The SPD provides guidance for applicants, planners and other stakeholders on the provision of affordable workspace in the borough. The SPD covers topics that frequently need to be addressed at pre-application stage, as well as post-decision such as drafting the planning obligations, when considering proposals and applications for development of affordable workspace. It is intended that this will better achieve delivery of policy objectives going forward.

4. The SPD sets out a range of requirements to be delivered through the planning application process, as well as more detail on implementation to ensure policy objectives are delivered:
   - Areas-based discounted market rents on a proportion of floorspace on large commercial schemes above 1000 sq. m gross;
   - Alternatives to discounted market rents which may be applicable to smaller schemes too – such as flexible leases; discounted desks; flexible workspace/cafe hubs;
   - Ensuring that existing affordable workspace/ SME occupiers are re-provided for in regeneration/redevelopment schemes;
   - Improving implementation and promoting early negotiations by setting out model Workspace Management Plans and links to Affordable Workspace Providers and local small businesses looking for premises;
   - Information on Payments in Lieu and End of Scheme reviews;
   - A flexible approach is promoted, focussing on key policy objectives, social value and optimal outcomes for the council.

   The above requirements are justified as viable and recommended by the evidence base reports.

5. The Options available to the Council are as follows:

   5.1 To adopt the Affordable Workspace SPD incorporating amendments, as appropriate, following public consultation
   5.2 To withdraw the proposed SPD.

6. The recommendation is option one above, that the Council adopt the Affordable Workspace SPD incorporating the amendments following the public consultation. Option two would leave a gap in planning guidance for the borough which may preclude deliverability of local plan policy objectives and the key aims of the Industrial Strategy.

Post adoption requirements

7. After adoption, it will be necessary under the Town and Country Planning (Local Planning) (England) Regulations 2012 to make the SPD available for inspection and to publish on the Council's website. The Council must also make an adoption statement available and notify any person who requested to be notified of the publication of the SPD. The Equalities Impact Assessment report (EqIA),

and summary of any comments made as are result of public consultation, will also be published on the website (see appendix 3. The adoption statement must be sent to the Secretary of State.

8. The Council are not required to carry out a sustainability appraisal for the SPD (this now only applying to development plan documents) pursuant to the Planning and Compulsory Purchase Act 2004. However, the SPD must be considered against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and a draft screening statement made available.

9. There were no objections to the council's view that the SPD was not likely to have significant environmental effects. As a consequence, the decision was taken that a Strategic Environmental Assessment (SEA) was not required because, amongst other things, the SPD is a lower tier planning policy document among the suite of council planning policy documents; it supplements existing adopted policy and does not introduce new policy; and it supplements adopted planning policies that have been subjected to Sustainability Appraisals.

Reasons for Decision

10. To progress the Affordable Workspace SPD to adoption to ensure that up-to-date guidance is in place to support the adopted Local Plan and to comply with regulatory requirements

11. The adoption of the Affordable Workspace SPD will provide more detail on the application of the strategic and boroughwide policies in the Local Plan. The SPD will be a material consideration in planning decisions although it will not be part of the development plan.

Equality Implications

12. An Equalities Impact Assessment (EQIA) has been carried out, in relation to the SPD (see appendix 3), and it shows only neutral or positive impacts of the planning guidance on protected groups.

13. The EQIA assists the Council in demonstrating compliance with its public sector equality duty under Section 149 of the Equality Act 2010.

Risk Management Implications

14. The report sets out a clear rationale for adopting the Affordable Workspace Supplementary Planning Document (SPD). The SPD is intended to support, through information, evidence and guidance on local plan policies, the identification and introduction of affordable workspace, particularly for small local businesses, start-ups and not-for-profit sector. This is in line with the council priority of building shared prosperity to address the mismatch between high rents and large floorplate office premises by requiring a proportion of small and flexible space at discounted rents and/or preferential terms which will be available/accessible to SMEs and third sector organisations. The report also

demonstrates how the council priority of doing things with and not to residents through the consultation process has been addressed.

Implications completed by: David Hughes, Director of Audit, Fraud, Risk and Insurance, tel: 07817 507 695 – 28th January 2022

Climate and Ecological Emergency Implications

15. The public consultation and adoption of an SPD for Affordable Workspace enables the council to generate more affordable commercial floorspace in the borough. This is a topic-based SPD which does not contain any measures for mitigating climate change.

16. As the primary method of providing affordable office space is by securing discounts on commercial development, this is not expected to have a direct effect on emissions. However, as requirements for discounts will impact the profit margins of schemes, care should be taken to ensure at the application stage that costs are not recovered by reducing standards for energy efficiency, low-carbon or biodiversity. However, by providing affordable workspace in the borough there may be indirect benefits, such as reducing the need to travel outside of the borough to access affordable premises. Whilst the positive impacts of this SPD on climate change may be minimal, it will contribute towards strengthening the local economy and this in turn may be a driver for change and investment in green infrastructure.

Implications verified by: Hinesh Mehta (Strategic Lead Highways, Parks and Waste tel: 0208 753 6703) – 31st January 2022

Local Economy and Social Value

17. Loss of office space through permitted development has driven up commercial rents to prohibitively high levels, meaning there is need to increase the amount of affordable workspace developed within the borough to reduce the burden on local SMEs. By adopting the SPD, the Council will offer clear guidance on the requirements to fulfil this need by providing details on best practice on the implementation of affordable and flexible workspace. This added clarity will help to meet local demand and support local enterprise.

Implications verified/completed by: Sam Ridley, Economic Development Officer, 07766 720080 – 31st January 2022

Section 106

17. The Council has previously secured obligations for affordable workspace but on an ad hoc and case-by-case basis. The SPD relies on up-to-date evidence on the viability of new development to provide affordable workspace and will improve the overall quantum of affordable workspace to be secured on-site or through a payment in lieu. Further, it provides clarity, previously absent, on how the affordable workspace will be managed, ensuring the floorspace secured is used effectively.

Implications verified/completed by: Matthew Paterson, Head of Spatial Planning tel: 07776672447 – 31st January 2022

Consultation

18. Public consultation on the draft SPD began on 19th November for 4 weeks until 17th December 2021 (see appendix 4). The SPD was made available at the borough reference libraries and on the Council's website, as set out in the Council's Statement of Community Involvement. Additional targeted consultation was carried out, including hosting a seminar on Teams and publicity via the Council's Twitter account. The Council wrote to specific consultation bodies outlined in the Regulations and to general consultation bodies, such as amenity groups, resident associations, businesses and others.

19. The Council received representations from 13 organisations and individuals. A brief summary of the consultation responses is set out below. Full details of the representations and how these have been addressed will be appended to the Cabinet Report (see appendix 4).

20. Detailed representations to the consultation were received from landowners and developers on key sites: Westfield Europe Limited (White City, specifically the Westfield London Shopping Centre); Patrizia, Romulus construction (major investors /developers in Hammersmith Town Centre), Yoo Capital (Kensington Olympia; Shepherd's Bush Market Site); and Stanhope plc. These were in the main, duplicate responses provided one agent. Deloitte; Earls Court Development Company (ECDC) and TfL Commercial also submitted comments representing major sites or landholdings.

21. Responses to the consultation were also received from the key stakeholders Natural England, and the H&F Disability Forum.

22. Overall, the majority of representations supported the principle of seeking affordable workspace in the borough.

23. Responses from landowners and developers criticised the evidence base reports, primarily on methodology and datasets used. This is not accepted, as the approach reflects locally commissioned evidence based on latest data and the methodology used in assessing viability is an 'industry standard'. It is therefore considered robust and reflects strategic and local context. A common thread between alternative methodologies is the application of site-specific considerations to viability on any particular scheme.

24. Objections that the SPD has not been legally prepared/consulted on were made by Westfield Europe Limited; Patrizia, Romulus Construction; Yoo Capital; and Stanhope plc. The objections are based on the belief that the proposed SPD is a Development Plan Document. This is not the case: the SPD production has been followed in line with legislation, including the consultation requirements. This Affordable Workspace SPD is a guidance document and not a statement to support the adopted development plan policies, and while being a material

planning consideration, it does not include new policy requirements. It is considered that the SPD clearly states that the Council will take into account viability on a case-by-case basis and that the Council will take a flexible approach taking into account site specific considerations in achieving the best outcome.

25. These representors, along with Deloitte, ECDC and TfL Commercial all objected to the lack of flexibility in the SPD, that it sets policy, and that the H&F requirements were more onerous in comparison with other boroughs. Officers consider that the former are a matter of misinterpretation. The responses in Appendix 4 consistently refer to the various points in the SPD where it is made clear the approach in the SPD will be applied flexibly and on a site by site basis. Planning regulations are clear that SPDs are guidance documents only, are a material consideration in planning decisions, but do not set policy.

26. All the major landowners/developers above made representations on viability of providing affordable workspaces on major sites, for example sites having competing priorities, the need to deliver major infrastructure, affordable housing, and costs in meeting new environmental policy requirements. It is noted that recent local plan work in London boroughs, backed up by viability evidence are justifying policies and SPDs requiring affordable workspace much lower thresholds, discounted rents higher above 25% in some locations; and with provision in perpetuity.

27. As recommended in the evidence reports, the SPD clarifies that a flexible, site-specific by site approach will be taken, with the overall aim to achieve the optimal outcome rather than stifle development and as such a range of measure in included to promote affordable workspace delivery, such as discounted deskspace, flexibility and site-by site considerations are explicitly referred to.

28. A number of changes were suggested: ECDC sought to exclude Earls Court from the discounted market rents and floorspace requirements in Table 5.10, and the majority of the above developers sought similar changes and more wording on flexibility, to limit the requirement to uplift/net internal area. A number of more detailed changes, such as delivery timescales and phasing were made, however these are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD.

29. A small number of comments were received on matters not covered by the SPD. Natural England suggested the SPD seeks a range of urban greening measures alongside affordable workspace; the H&F Disability Forum sought more detail on promoting access for people with disabilities. It is important that a single-topic planning guidance document does not duplicate requirements set out elsewhere; however it is considered helpful and good practice to add an additional criterion within the template Workspace Management Plan (WMP) on meeting the needs of disabled people. Comments on implementation matters, such as working with affordable workspace providers, management, types of workspace, and skills

training and are noted as will be taken forward with the Council's Economic Development team.

30. Local residents raised some useful comments on local areas of availability, demand, supply and affordable workspace typologies, which have been noted, support for affordable workspace being made available to third sector organisations, and a suggestion that the Council provide working from home hubs with desks and Wi-Fi.

Summary of Post Consultation Changes

31. As a result of the consultation, only minor changes are considered necessary to the SPD prior to adoption.

32. The proposed minor changes to the SPD resulting from the consultation responses are summarised below:

Section of SPD/Topic	**How the SPD will be amended**	**Reason**
Minor changes: formatting Chapter 4, p10 Image 1	• *Insert a Key to Image 1 to explain the colour of each sub-area*	*In response to comments from TfL Commercial it is agreed that including a Key to Image 1, can improve clarification.*
Minor formatting change Paragraph 5.8	Reformat bulleted list to make a sentence: • *Testing included a range of locations and floorspace/benchmark turnover rates, the current and 'normal' economic climate; and testing different levels of discounts.*	*There were many related comments on the evidence base and about the need to take a flexible, site by site approach to viability. Officers consider these matters are covered in both the Local Plan policy and in the SPD, nevertheless minor wording and formatting changes have been made to provide further clarity by separating out the description of evidence from the SPD requirements.*
Clarification: Formatting Paragraph 5.11	Change last sentence in paragraph 5.11 to start new paragraph: *Within the areas listed above...*	*Comments from Westfield Europe Limited sought clarification that the affordable workspace measures on Table 5.19 are not an exhaustive list and may also be applicable to schemes over 1,000 sqms. Officers agree that formatting changes to separate out the evidence base matters for SPD requirements can improve clarification.*
Clarification Paragraph 5.12	Add text to 3rd bullet point: *A mix of discounted rents and other*	*Comments from Westfield Europe Limited sought clarification that the affordable workspace measures on Table 5.19 are not an exhaustive list*

	affordable /supportive measures as suggested in Table 5.19 to meet needs of the start-ups/SMEs and priority sectors may be appropriate depending on site circumstances.	*and may also be applicable to schemes over 1,000 sqms. Officers agree that minor wording and formatting changes can improve clarification.*
Clarification Table heading 5.19	Change to read *' Examples of Alternative Measures to Support Affordable and Flexible Accommodation'*	*Comments from Westfield Europe Limited sought clarification that the affordable workspace measures on Table 5.19 are not an exhaustive list and may also be applicable to schemes over 1,000 sqms. Officers agree that minor wording and formatting changes can improve clarification.*
Accessibility Appendix A, paragraph 8.1.4	A new bullet point on accessible and inclusive design will be inserted into 'Points to Consider' *Ensure that Inclusive Design is integral to the build, fit out and management to ensure inclusive workspaces.*	*In response to the Disability Forum's comments to the SPD it is agreed that the SPD could be amended to clarify that new development of affordable workspace should be accessible and inclusive in terms of design and access, including access to new employment opportunities.*
Urban greening/climate change Appendix A, paragraph 8.1.4	A new bullet point promoting urban greening measures will be inserted into 'Points to Consider' •*That opportunities for urban greening measures and sustainable design are maximised.*	*Natural England sought additional wording to promote urban greening, biodiversity and tree planting. It is agreed that the SPD should be amended to clarify that these considerations are relevant to the development of affordable workplaces*
Minor changes: correction Appendix B Table 8.2.3B	Payments in Lieu calculator: correction • *Step 5 from J=(1xl) to J= (1/l)*	*Officers are grateful that representations from Stanhope plc highlighted a minor typographical error which has been corrected.*
Minor changes: formatting Chapter 4, p10 Image 1	• *Insert a Key to Image 1 to explain the colour of each sub-area*	*In response to comments from TfL Commercial it is agreed that including a Key to Image 1, can improve clarification.*

33. Full details of the representations and how these have been addressed are appended to the Cabinet Report (see appendix 4). The minor text changes have been inserted into the SPD (Appendix 1).

LIST OF APPENDICES

Appendix 1 - Affordable Workspace SPD
Appendix 2 - Affordable Workspace Viability Reports; Hatch/Turley 2020-2021
Appendix 3 – Equalities Impact Assessment
Appendix 4 – Affordable Workspace SPD Representations Schedule

Hammersmith & Fulham

Appendix 1

AFFORDABLE WORKSPACE

SUPPLEMENTARY PLANNING DOCUMENT

MARCH 2022





www.lbhf.gov.uk



Table of Contents

1. Introduction 4

2. Policy Context 6

3. What Is Affordable Workspace in Hammersmith and Fulham? 8

4. Who Needs Affordable Worspace in Hammersmith and Fulham? 9

5. Approaches to Meeting Needs 11

6. Implementation 17

7. Conclusions 18

8. Appendices 19

8.1. Appendix A - Model Workspace Management Plan 19

8.2. Appendix B - Payments in Lieu Calculator, and End of Scheme Rewiews 21

1. INTRODUCTION

1.1. Hammersmith & Fulham is already home to a thriving business community, including global companies such as GE, Disney, and L'Oreal, and at the other end of the scale has one of the highest concentration of start-up firms. The borough is changing rapidly and the Council is working to ensure that growth and opportunities are shared with local people. The Council has published an Industrial Strategy- " Economic Growth for Everyone (2017)" setting out four key priorities: (1) West Tech Innovation District; (2) Encouraging Enterprise; (3) A Great Place in London; and, (4) Economic Growth for All. A key pillar that cuts across all of these priorities is creating Affordable Workspace. Limited supply and strong demand have pushed rents up and space has become unaffordable for many businesses. A range of mechanisms are set out to do this, but one of the most prominent is to produce an Affordable Workspace SPD which focusses on the delivery of affordable workspace to meet local needs, through the planning system.

1.2. Finding workspace that is affordable is a major challenge for many businesses in London, particularly Small and Medium Sized Enterprises (SMEs), start-ups and those in less productive sectors (charities and voluntary sectors). Affordability is often a key determinant in choosing where to locate. Loss of offices and business workspace through permitted development has been significant, and particularly impacted smaller buildings under 100 sqms. The result has been rising rents, high land values, and loss of employment space. SMEs and start-ups are particularly vulnerable to small increases in costs. SMEs are facing prohibitively high rents, which may therefore be discouraging business expansion and start-up incubation, while there is also evidence of displacement of existing businesses in this sector.

1.3. Evidence shows that the Hammersmith & Fulham economy is diverse and is home to around 140,000 jobs and at least 14,000 businesses. Recent performance between 2013-2018 has been positive with 7% employment growth, and 13% growth in the number of businesses. More recent evidence undertaken for the council by Turleys 2021[1] show that Hammersmith and Olympia and West Brompton have seen an uplift in office/mixed-use commercial values, with Hammersmith increasing by 8% and Olympia and West Brompton by 5%. Whilst this growth has not been constant across the whole borough, Turley consider the rental value changes achieved across LBHF are generally positive, and demonstrate the borough has market resiliency in light of COVID-19 and associated market changes. The evidence also shows that investor appetite has remained consistent, perhaps due to being positively influenced the London Plan and LBHF policies allowing for intensification and opportunities to value-add . This means that it can be reasonably expected that large commercial developments can support a proportion of affordable workspace.

1.4. The purpose of this Affordable Workspace Supplementary Planning Document (SPD) is to support the council's Local Plan policies by setting out requirements for, and to provide details and best practice on the implementation of affordable and flexible workspace to meet local demand and to support local enterprise.

1.5. The diverse range of types of businesses in the borough needs is reflected in the type

1 Affordable Workspace Study - Viability Review, London Borough of Hammersmith and Fulham, October 2021

of premises available for local people. The Council is also keen to see the replacement of well-used local business spaces. This SPD will focus on meeting local needs encompassing a range of sizes and types of affordable accommodation. This is expected to include, but not be limited to rental discounts, flexible leases, provision of co hubs/pay as you use desks and start up spaces, usually managed by an affordable workspace provider.

1.6. Many of the borough's businesses are small or medium-sized, and the council is keen to support existing and new businesses, as well as to maximise opportunities for, and respond to changing behaviours and methods of doing business. This may include permanent structural changes following the Covid pandemic: hybrid working arrangements with home/office, and new work patterns perhaps extending over a 7 days/ 24 hours to be more responsive to local business, customer and employee needs. This can promote innovation and fit in around family and existing employment commitments. Interventions through the planning process are therefore necessary to support the local economy and avoid negative impacts of high rents and lack of suitable floorspace on the borough's general economic prosperity.

1.7. This SPD will support Local Plan Policy to secure a range of affordable workspaces in terms of size, costs and leasing arrangements, and to "future proof" through flexible design of the accommodation to respond to new working practices, such as a 24 hour business economy.

What is a Supplementary Planning Document?

1.8. A Supplementary Planning Document supplements other planning documents such as the Local Plan and the London Plan. It does not provide new policy but provides more detailed guidance to the Local Plan policies. The SPD supports pre-application discussions, assess planning applications and assists with the drawing up of planning obligations.

1.9. This Affordable Workspace SPD sets out requirements and approaches to delivering affordable and flexible workspace. It is supported by, and should be read alongside a bespoke evidence report[2]. This research report defines what 'affordable' workspace means in the context of Hammersmith and Fulham, demonstrates the viability of, has informed the requirements for, and recommended approaches to delivery and implementation of affordableand flexible workspace within this SPD.

1.10. The SPD provides the policy context, defines affordable workspace in Hammersmith and Fulham; identifies who needs affordable workspace; and sets out requirements and approaches to delivery of affordable and flexible workspace. Guidance on implementation and to assist early engagement with the council has been provided as appendices. Following adoption, it is envisaged that this SPD will be referred to alongside the council's Employment and Skills Code, and Supply Chain Procurement.

2 Affordable Workspace Viability Study, Hatch /Turleys 2020

2. POLICY CONTEXT

2.1. The Hammersmith and Fulham Local Plan was adopted in February 2018 and includes policies which seek flexible and affordable workspace suitable for SMEs. The Local Plan also includes a policy on planning contributions and Section 106 requirements for new developments.

2.2. The council has also published an ambitious Industrial Strategy 'Economic Growth for Everyone" in 2017, which seeks to ensure that economic growth in the borough is supported and inclusive. A key feature of the strategy is 'Creating Affordable Workspace' while recognising the importance of STEM, digital and creative industries for the local economy. This SPD is expected to aid the implementation of the Industrial Strategy.

Table 2.3: Policy Framework

The National Planning Policy Framework 2021

Section 6. Building a strong, competitive economy
Specifically paragraphs 81 to 85 are pertinent to this SPD. This National Policy Statement states:"Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development…" The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."

London Plan 2021

This forms part of the Hammersmith and Fulham's Development Plan. Its policies and supporting evidence base are up to date and take account of the strategic importance of providing affordable and flexible workspace; supporting growth in priority industries such as creative and media sectors; and supporting the SME, start-up, and voluntary sector; and emphasising social value.

Policy E1 - Providing for a range of employment uses
Asks for improvements "to the quality, flexibility and adaptability of office space of different sizes…" Paragraph G of this policy also considers that development of "new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace".

Policy E2 - Providing suitable business space
Boroughs should include policies in local Development Plan Documents that support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro-, small- and medium-sized enterprises and to support firms wishing to start-up or expand.

Policy E3 D - Affordable Workspace
Sets out the strategy policy approach to meeting needs and delivery, and encourages applicants to "engage with workspace providers at an early stage in the planning process…"

Hammersmith and Fulham Local Plan 2018

The Local Plan states that applications for large new commercial schemes will be expected to provide affordable workspace. This could be via cross-subsidised rent through S106 Agreements, reduced rent arrangements, the provision of co-hubs, start-up space and/or flexible leasing arrangements.

Policy E1 - Providing for a Range of Employment Uses: Sets out the borough's aspirations for mixeduse and new employment schemes, and the retention, enhancement and intensification of existing employment uses. The council recognises the existing strengths in the borough in creative industries, health services, life science and other research-based industries. Policy E1 states that these industries will require flexible and affordable space suitable for small- and medium-sized enterprises in large new business developments, unless justified by the type and nature of the proposal, and subject to viability.

Paragraph 7.5 of the Local Plan recognises that: "successful working of affordable workspace will require an understanding of the occupant and the type of space required. Therefore the council will expect developers to engage with workspace providers in order to manage the space, and/or to identify the future occupants of the space."

Policy E2 - Land and premises for employment uses: Retain employment land and resist loss of employment uses subject to criteria. The policy also addresses the need to retain a sufficient stock of premises and sites to meet local needs for a range of types of employment uses including SMEs.
Where intensification of existing sites may be appropriate, the retention of floorspace and adequate replacement of small businesses is required.

3. WHAT IS AFFORDABLE WORKSPACE IN HAMMERSMITH AND FULHAM?

3.1. There is no single definition of affordable workspace. The London Plan includes a general definition of affordability, however at borough-level, local authorities are left to interpret and determine what 'affordable' workspace means in the context of their particular borough. The London Plan defines affordable workspace as:

"Workspace that is provided at rents maintained below the market rate for a specific social, cultural or economic development purpose. It can be provided directly by a public, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently by planning or other agreements".

3.2. The term 'workspace' covers a broad range of different typologies, from conventional office and industrial space to more niche shared spaces, including artist studios, maker spaces, labs and co-working spaces.

3.3. The evidence study supporting this SPD carried out a benchmarking review of flexible typologies to meet local needs: different London borough policies, approaches and definitions of affordable workspace, and identified several differences in how boroughs approach affordable workspace. The following sections of the SPD reflect this in determining of what 'affordable' means in Hammersmith and Fulham, taking account of local viability analysis on discounted rent. The SPD takes forward recommendations for alternative approaches to secure a range of affordable/flexible typologies to meet local needs.

4. WHO NEEDS AFFORDABLE WORKSPACE IN HAMMERSMITH AND FULHAM?

4.1. Two of the priorities of the council's Industrial Strategy, Economic Growth for Everyone (2017) are:

- Encouraging enterprise
- Ensuring all residents and local businesses benefit from economic growth.

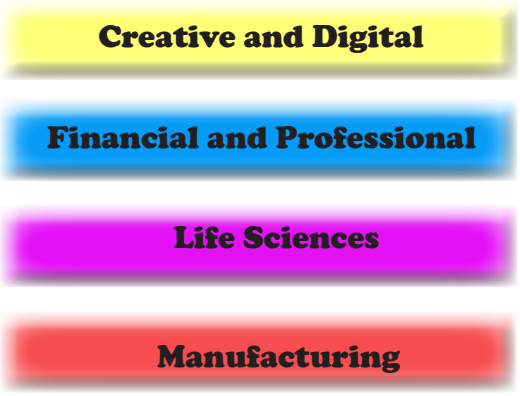
4.2. A diverse economy in the borough across a range of sectors is sought, particularly those promoting jobs in creative industries, health services, bio-medical and other research-based industries. Employment space and support specifically for SMEs and start-ups are also promoted.

Local Plan Objectives

4.3. The aims and objectives of this document are based on the challenges facing the borough. The SPD can only guide planning applications and development proposals in a way to ensure that a wide range of benefits are created without impacting upon development viability. As a result, the aims and objectives are:

- To provide workspace that is local, affordable and accessible for small and medium businesses, start-ups, and not-for-profit (3rd sector) organisations
- To increase supply and choice in workspace
- To encourage, retain and grow business activity in the borough
- To provide jobs, local enterprise and opportunity for all in the borough
- To encourage working and activity between existing industries, education and new businesses.
- To deliver social value

4.4. The evidence commissioned to support this SPD identified four priority sectors for affordable workspace, on the basis that identifying priority sectors can allow limited resources and opportunities to be directed to where they can have the most significant impact and contribute to wider strategic objectives. These are:



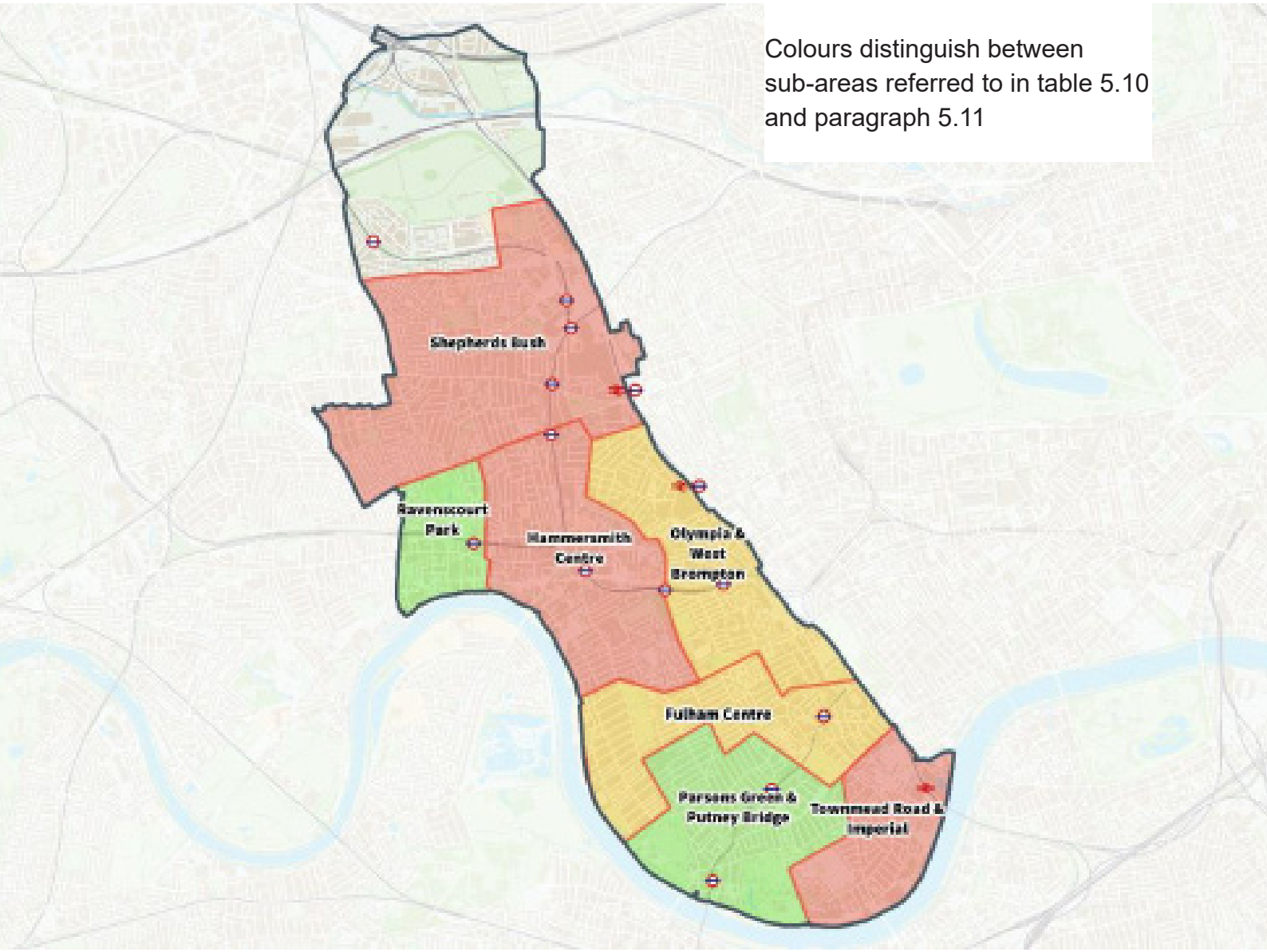
4.5. This approach also ensures that support is provided where need is greatest and pressures are highest[3].

4.6. The areas in the borough identified in the report submitted November 2020, as having demand for commercial development and need for affordable workspace are shown below:

Discounts to Market Rents for Subareas

- Shepherd's Bush (mixed-use commercial);
- Hammersmith Town Centre (mixed-use commercial);
- Fulham Centre (mixed-use commercial);
- Olympia and West Brompton (mixed-use commercial); and
- Townmead and Imperial (industrial).

Image 1: Discounts Market Rents for Subareas



Source: Hatch and Turley, 2020

5. APPROACHES TO MEETING NEEDS

5.1. This chapter considers the question: Is 'affordable' viable in Hammersmith & Fulham?

5.2. The Affordable Workspace Viability Study identifies and justifies areas of the borough where new offices/employment space is sought, and where the market fails to provide access to meet demand for SMEs start- ups and priority sectors. The market rental discounts and alternative offers listed in this section are also applicable to re-accommodating and/or relocating existing occupiers on sites being redeveloped through intensification as required by Policy E2.

5.3. Any provision is to be specific to the area or location in which the development is being undertaken and ensure that support for SMEs and start-ups is distributed across the borough. Negotiation of the type of workspace sought will also take account of the specific requirements in local areas, for example Shepherd's Bush, which is home to Media City, and the Imperial College Campus. The Council is aware that even discounted rents may not always be affordable to micro and small businesses or may not be the most important consideration in choosing to locate in the borough. The Council has therefore committed to assessing the genuine affordability of any new workspaces, type premises and the lease terms and conditions that it delivers on a case by case basis. and will consider other options to support local small businesses and start- ups. Where applicants already have occupiers and/or an Affordable Workspace Provider committed, the SPD will guide dicussions to best meet these needs.

5.4. Whether the affordable workspace space is secured at a discounted market rent on a proportion of overall office floorspace in a new development, or through alternative measures such has flexible pay-as-you go desks and as listed in *Table 5.10* below will depend on a number of factors and on the circumstances of the site and development.

5.5. The council will always aim for the optimal outcome for local residents and small businesses . Factors taken into account would include:

- The location on high streets, office hubs/flexible desk spaces can contribute to regeneration by occupying long-vacant units, providing and active frontages and new footfall for local shops and services;
- 'local business demand' responsive to local clusters such as digital and media;
- demand from local start-ups for very small spaces for few hours a week, and/or accessible beyond the /normal 'working day where short leases area key consideration to test out business ideas and encourage local entrepreneurship;
- where new large office developments have a defined end-user and where floorplates cannot be easily broken up to provide on-site affordable workspace and payments in lieu may be preferable;
- where there is an approved affordable workspace provider on board who operate a particular 'model' and where viability needs to achieve a degree of economies of scale;
- demand from non-profit sectors and the degree of social value achieved.

5.6. Active engagement with business occupiers to identify their needs, and to ensure business continuity will need to be demonstrated as part of the planning application process. The need for affordable workspace has been evidenced in the adopted Local Plan (2018) and updated London Plan (2021), and is a key tenet of the council's Industrial Strategy. Therefore any affordable workspace offer provided in accordance with Local Plan Policy E1 (and E2) will be expected to be delivered "in perpetuity" until any subsequent Local Plan review no longer identifies this need.

Discounted Market Rents

5.7. Evidence for the range and location of market discounts is based on the results of a sensitivity analysis which was carried out applying varying discounts to market rents in different locations, and for different sectors and sizes of workspace to identify the circumstances where discounted rents would be viable.

5.8. The analysis identifies levels of market rental discounts, depending on scenarios tested at or above new development of 1,000 sqm (gross) or more. Testing included a range of locations and floorspace/benchmark turnover rates, the current and 'normal' economic climate, and testing different levels of discounts.

5.9. The conclusions of this exercise support a range of discounts to be applied in these areas. Full details of the methodology are set out in the accompanying viability study report.

5.10. Discounted Rents and Floorspace will be required on new commercial developments over 1,000 sqm (gross) as follows:

Table 5.10: Discounted Market Rents Requirements

APPLICATION OF DISCOUNT MARKET RENT REQUIREMENTS	
Townmead and Imperial	Major industrial developments to include affordable industrial space with a discount to market rent of 40% or higher; apportioning 20% of space in industrial developments over 1,000 sqm
Hammersmith Centre	Major commercial developments to include affordable workspace with a discount to market rent of 40% or higher; apportioning 20% of space in developments over 1,000 sqm
Olympia and West Brompton	Major commercial developments to include affordable workspace with a discount to market rent of 20% or higher; apportioning 20% of space in developments over 1,000 sqm
Shepherd's Bush	Major commercial developments to include affordable workspace with a discount to market rent of 40% or higher; apportioning 20% of space in developments over 1,000 sqm
Fulham Centre	Major commercial developments to include affordable workspace with a discount to market rent of 20% or higher; apportioning 20% of space in developments over 1,000 sqm

5.11. Parsons Green and Putney Bridge, and Ravenscourt Park: On the basis that average rents are generally lower than the areas listed in the table above, no discount to market rent will normally be required. The council will however, keep this under review by monitoring rents and the loss of small office and industrial space through Permitted Development Rights (PDR).

5.12. Within the areas listed above:

- The proportion of gross floorspace to be occupied as affordable workspace must be set out as part of the planning application.
- Social value will also be a consideration in decision making.
- A mix of discounted rents and other affordable /supportive measures -as suggested intable 5.19 - to meet needs of the start-up/ SME and priority sectors may be appropriate

5.13. Outside of these areas, other low-cost as well as affordable/alternatives may be sought. Further guidance on alternative and additional measures to support affordable and flexible workspace requirements is provided below.

Viability Update October 2021

5.14. The viability of providing affordable workspace as set out in chapter 4 of the original study report (November 2020) has been re-visited in an updated viability assessment[4]. This research has been based on the latest post-pandemic economic and build-cost data. The viability assessment report found that:

- It can be reasonably expected that developments in Fulham Town Centre, Hammersmith Town Centre, Olympia and West Brompton, Shepherds Bush and Townmead and Imperial can provide up to 20% affordable workspace at the proposed discounts to market rents, based on the current inputs. Whilst Townmead has been tested on an industrial basis, it may be possible to achieve a level of affordable workspace through mixed-use schemes which may generate a higher Gross Development Value overall, though this depends upon the practicality of delivering schemes with large scale office/mixed-commercial use in a largely industrial location.

- Whilst Parsons Green and Putney Bridge and Ravenscourt Park were listed initially, these areas are not considered to be locations where there is demand for commercial development and need for affordable workspace and on this basis were not re- tested.

5.15. The council considers it prudent to take a flexible approach considering site-specific circumstances (and associated costs), noting that the Benchmark Land Values set out act as a guide only.

Alternative Measures to Support Affordable and Flexible Accommodation

5.16. Where workspace has been specified as affordable and/or flexible to meet the council's defined needs, then the council will work with developers to agree appropriate terms/means of affordability on a case-by-case basis. In addition, it will take account of the evidence and recommendations in the Affordable Workspace Viability Study.

5.17. The list in the following *Table 5.19* gives examples of alternatives to discounted market rents, as well as complementary provision to meet the council's defined needs, applicable on schemes below the 1000 sqm gross viability threshold for market discounts.

Points to Consider:

5.18. Finding workspace that is affordable is a major challenge for many businesses in Hammersmith and Fulham - particularly SMEs and those in less productive and not-for-profit sectors. Whilst affordable accommodation is often a key determinant in choosing where to locate, other factors such as flexible lease terms to encourage start-ups, manage risk and allow businesses to adapt to changing market need and changing circumstances, can be equally important.

4 Affordable Workspace Study - Viability Review, London Borough of Hammersmith and Fulham, October 2021

5.19. It should be noted that Local Plan policy E2 requires that existing occupiers of flexible and affordable accommodation are not displaced such as through intensification and/ or replacement by large floorplate developments.

5.20. The Council will expect applicants to provide evidence of engagement with, and secured reprovision locally of existing tenants in this sector within the borough on comparable terms.

Table 5.19: Alternative measures to support affordable and flexible accommodation

EXAMPLES OF ALTERNATIVE MEASURES TO SUPPORT AFFORDABLE AND FLEXIBLE ACCOMMODATION	
A proportion of desks within an open workspace (hot-desking) area to be offered at a substantial discount of market value	The proportion and level of discount to be agreed on a site -by - site basis taking account of location, implementation and overall affordability
Discounts to 'membership models' (i.e. virtual offices, providing fixed desks, hot desks and small offices) throughout a development	
A proportion of the floorspace to be offered to an affordable workspace provider (either on the council's list or to be approved by the council) at a 'peppercorn rent' typically provided in range of smaller sizes and flexible commitment/occupation that is let to a workspace operator, and which will allow for occupation by the end-users in one or more sectors on favourable terms	Refer to LBHF approved providers list
Discounted desks within a larger office space	Will normally require a Workplace Management Plan
Fit out: to ensure that the space has been fitted out to Category A standard - typically includes raised floors and suspended ceilings; installation of mechanical and electrical services; basic fire detection systems; internal surface finishes; toilets; and blinds. Alternatively, an appropriate rent-free period offered to occupiers to cover fit-out costs/ or to meet needs of defined occupiers at zero cost	Fit out costs can be a barrier to entry, therefore the council will resist provision at shell and core, and fit out will be agreed through a clause in a Workspace Management Plan (Refer to Appendix A)
Timescales for the duration of affordable workspace to be as a default 'in perpetuity" until such time that the Local Plan is reviewed and a policy seeking affordable workspace is no longer required	Refer Appendix A for model WMP

Implementation via Workspace Management Plan (WMP) - to ensure that the affordable workspace approved is delivered as agreed, monitored/ reported and that management of the space does not undermine affordability	Refer Appendix A for a template WMP. A supporting statement with the planning application addressing the criteria in the template may also be acceptable
Off-site only in exceptional circumstances.	Refer Appendix B Any replacement accommodation must be in close proximity to existing accommodation, and agreed and ready for occupation prior to the grant of planning permission
Cash in lieu payment - by exception	Refer Appendix B Applicant to demonstrate to the council's satisfaction that this would deliver the optimal offer regarding affordable and flexible accommodation, taking account of policy objectives, and delivering significant economic and/ or social advantages. May also be preferable where the new development provides large floorplate accommodation for a defined occupier, and which cannot effectively be subdivided.

6. IMPLEMENTATION

6.1. The council will take a flexible approach to reflect site specific considerations, and to deliver the best outcome for the council against policy objectives.

6.2. Pre-application discussions are encouraged and discussions should include how the affordable workspace arrangements will be delivered. This must be agreed with the council prior to the determination of a planning application.

6.3. Appropriate arrangements for managing the workspace are considered to be:

A. Developer leases space to an affordable workspace provider on the council's approved provider list; or

B. Affordable workspace lease directly to an end user on council's approved business list.

6.4. Alternatively the council may also consider direct management of the affordable workspace by the owner of the new development. To be considered favourably by the council, it must be demonstrated that they have the necessary skills and meet the council's criteria for accredited workspace providers. This method is not likely to be suitable where an end-user has not been secured.

It is highly recommended that an affordable workspace offer and draft Workspace Management Plan form part of pre-application discussions.

6.5. The council will provide a list of local businesses and local voluntary/not-for-profit organisations looking for affordable accommodation. The council will also provide a list of Accredited Workspace Providers.

6.6. A model Workplace Management Plan is provided in the Appendix A. More details on payments in lieu (PiL) and, for phased or delayed developments, end-of-scheme reviews are set out in the Appendix B.

7. CONCLUSIONS

7.1. This SPD sets out a range of requirements to secure affordable workspace to be delivered through the planning application process, as well as more detail on implementation to ensure policy objectives are delivered. The requirements have been justified as viable and recommended by the evidence base reports.

7.2. A flexible approach is promoted, focussing on key policy objectives, social value and optimal outcomes for the council. Discounted market rents on a proportion of floorspace on large commercial schemes above 1000 sqm gross; and alternatives to discounted market rents which may be applicable to smaller schemes too – such as flexible leases; discounted desks; flexible workspace/cafe hubs. The SPD will also help ensure that existing affordable workspace/ SME occupiers are reprovided for in regeneration/intensification and major redevelopment schemes.

7.3. Following public consultation and adoption, the affordable workspace SPD will provide more detail on the application of the strategic and borough-wide policies in the local plan. Implementation will improve the deliverability of local plan policy objectives and the key aims of the industrial strategy.

7.4. The SPD will be a material consideration in planning decisions although it will not be part of the development plan.

7.5. In line with best practice in the NPPF, further viability updates will take place at least every 5 years.

8. APPENDICES

APPENDIX A - MODEL WORKSPACE MANAGEMENT PLAN

8.1. It is strongly recommended that a draft Workspace Management Plan (WMP) form part of pre-application discussions to assist in agreeing priorities and negotiations on a site-by-site basis.

8.2. The WMP will normally be finalised and signed off via the S106 following the grant of planning permission.

8.3. A suggested Workspace Management Plan (WMP) headlines are as follows:

Table A1: Workspace Management Plan

I) Date by which the facility has to / is allowed to be completed, opened or made available, and fitted out (default Cat A standard).

II) Proposed arrangements for liaison between the facility, the development, residents and/or the council.

III) Pricing policy - e.g. rents, service charges, and additional management charges which would be chargeable to occupiers.

IV) Rent and service charge review terms; details of leases and lease terms. Include a break clause.

V) How it will be managed - ie approved Affordable Workspace Provider from the council's list. Details should cover making arrangements for cleaning, general maintenance/ caretaking/ concierge facilities.) Set out in WMP who is responsible for managing this.

VI) Arrangements for advertising vacant workspace (ie details of websites, publications, council nominations, voluntary sector/council website etc) and length of advertisement period.

VII) How it is anticipated that the affordable workspace element will be occupied (e.g. local residents/not-for -profit organisations, focus and targetted groups)

VIII) What types of activities will be likely to take place (including implications for noise, vibration, air quality etc.).

IX) Staffing arrangements when the building is open/closed -ie on site or off site, out of hours staffing and security.

X) Arrangements for how any changes in the above arrangements will be managed; and arrangements for regular review of the plan at certain intervals (usually 6 months, 3 years, 5 years and 7 years after inception).

XI) Monitoring and reporting: annually ie report on and provide evidence that these are affordable over the whole term; any increases in rents and charges; types of business occupier and number of businesses -voids and occupier turnover.

XII) Cost of preparation to borne by developer.

8.4. Points to Consider in Drafting/Discussing the WMP:

- Community access or other publicly accessible provisions;
- Times at which the workspace will be open, if there is a door which can prevent access; and arrangements for times when the building is closed;
- Staffing arrangements when the building is open/closed -ie on site or off site, out of hours staffing and security;
- Construction, delivery and/or servicing of a development including waste and recycling facilities;
- Sustainable travel to and from the facility: accessible parking place/drop-off point, secure cycle parking; electric vehicle charging point - details to be submitted to and approved in writing by the Council, prior to the occupation of the Development;
- Ensure that Inclusive Design is integral to the build, fit out and management to ensure inclusive workspaces; and
- That opportunities for urban greening measures and sustainable design are maximised.

8.5. There should be some flexibility provided within the WMP to allow for changes to be made to ensure that it continues to be delivered against agreed provisions.

EMPLOYMENT AND SKILLS

8.6. An Employment And Skills Code has been provided outside of this SPD, nevertheless it is an important consideration and applicants are encouraged to have regard to this in pre-application discussions.

8.7. In line with Local Plan Policy E4 the council will encourage developers to work in partnership with the council's Economic Development Team to secure job opportunities for local people including: employment, training, apprenticeship opportunities, outreach programmes including schools to raise aspirations and awareness of job opportunities, including during construction and end-use phases.

8.8. Securing an agreed employment and skills package in line in the council's Code can significantly improve the social value to local people in the outcome the development.

SUPPLY CHAIN PROCUREMENT

8.9. Similarly, a Supply Chain Procurement Code has been provided outside of this SPD. it is an important consideration and applicants are encouraged to have regard to this in pre-

8.10. In line with Local Plan Policy E4 The council will encourage developers to work in partnership with the council's Economic Development Team to include local Small to Medium Enterprises (SMEs) in the supply chain of developments, during the construction phase as well as the end-use phases of commercial developments.

8.11. Securing an agreed supply chain procurement package in line in the council's Code can significantly improve opportunities for local SMEs, promote growth and create jobs locally.

APPENDIX B - PAYMENTS IN LIEU CALCULATOR, AND END OF SCHEME REVIEWS

8.12. In line with the Hammersmith and Fulham Local Plan, and the strategic London Plan, use of payments in lieu (PiL) of direct on-site provision of affordable workspace will not be acceptable. The council does however, recognise that there may be exceptional circumstances where a payment in lieu is preferable, and this decision will be at the discretion of the council. These considerations may include:

- Where the council considers there are significantly more positive economic impacts.
- Where large floorplate developments for a named provider cannot be easily reconfigured or subdivided to provide on-site accommodation for affordable workspace/affordable workspace provider.
- Where the council is satisfied that the developer/owner has been unable, having made all attempts to lease the affordable workspace to an approved affordable workspace provider, or directly to an approved charitable/ not for profit-end-user within a given timeframe (usually 12-18 months).

8.13. Where it is accepted that a payment in lieu of direct provision of affordable workspace is the optimal outcome for the Council, then a payment in lieu will be sought. The evidence supporting this SPD considered the potential for off-site contributions where on-site provision is either physically inappropriate or unacceptable in terms of viability. It identifies a model calculator to ensure that there is no benefit to the developer in providing a payment in lieu rather than workspace on site.

8.14. Suggested Model Formula for Payment in Lieu Calculations

Table B1: Formula for Payment in Lieu

Step 1: C=AxB; Step 2: E=DxC; Step 3: G=ExF; Step 4: H=G-E; Step 5: J=(1/I); Step 6: K=HxJ.

The letters refer to:

A Total lettable employment floorspace (sq m)

B Percentage of floorspace to be discounted

C Amount of floorspace subject to discount

D Market rent per sqm before discount

E Market rent for discounted floorspace before discount

F Percentage discount

G Rent after discount

H Value of discount

I Investment yield

J Income multiplier

K Capital value of discount

DETERMINING MARKET RENTS

8.15. The definition of 'Normal' market rent to apply the discount will be agreed with the council to take into account site-specific circumstances. The council's evidence recommends that an allowance should be made for 'normal' rents to shift and change over time depending on market conditions. Any increases should be limited by inflation to ensure space continues to remain as affordable as possible. The council should be informed of any changes to rents and may need to charge a monitoring fee to cover the costs associated with this.

END OF SCHEME REVIEWS

8.16. These are generally applicable to large and /or phased schemes.
End of scheme reviews are justified to capture uplift in rising market conditions and/or where there is a long timeframe between date of planning permission and delivery.
End of scheme reviews will normally be written into a planning condition and/or a S106 agreement.

8.17. Viability reviews may be required at key stages:

I) Near end of scheme -ie 75% / End of schemes: The trigger for the review is normally occupation of 75% of the market floorspace - any additional affordable workspace is delivered or a commuted sum is paid.

II) Phased developments: An additional viability review may be required prior to "substantial completion" of development phases (mid-term review) to secure any uplift on subsequent phases.

8.18. The council will expect the review to be provided at the cost of the developer/owner.

Hammersmith & Fulham

MARCH 2022

HATCH Turley

London Borough of Hammersmith and Fulham

Affordable Workspace Study



Contents

1.	**Introduction**	**1**
	Approach	1
	COVID-19, Brexit and the Planning System	2
2.	**What is affordable workspace?**	**5**
	Best Practice Case Studies	12
3.	**Who needs affordable workspace?**	**19**
	Policy Review	19
	Data Analysis	20
	Priority Sectors	27
4.	**What does 'affordable' mean for Hammersmith & Fulham?**	**34**
	Business Turnover	34
	Turnover to Rent Ratios	41
	Defining 'Affordable' For Hammersmith & Fulham	43
5.	**Is 'affordable' viable in Hammersmith & Fulham?**	**57**
	Viability Tests	64
6.	**What are the next steps?**	**67**
	Overarching Recommendations	67
	Sub Area Recommendations	68

Introduction



1. Introduction

1.1 Workspace affordability has become an increasingly important issue across London in recent years. Limited supply and strong demand have pushed rents up and space has become unaffordable for many businesses.

1.2 Ensuring that there is enough affordable space for businesses to become established and grow in is important in ensuring a healthy and dynamic economy. Affordable space can encourage entrepreneurialism, support innovation, attract inward investment, help retain existing businesses, create social value and, ultimately, drive economic growth.

1.3 Although it is recognised that the affordability of workspace is a challenge for lots of businesses across London, many of these challenges are highly place and/or sector specific. As such, whilst the Draft London Plan includes a general definition of affordability local authorities are left to interpret and determine what 'affordable' workspace means in their places.

1.4 This research focuses on this for the London Borough of Hammersmith & Fulham. It defines what 'affordable' workspace means for the borough, demonstrates the viability of the definition and makes a series of practical recommendations. The work will inform the development of the borough's emerging Economic Development Planning Obligation Supplementary Planning Document (SPD) which responds and contributes to their Industrial Strategy as set out below.

Hammersmith and Fulham Industrial Strategy

The London Borough of Hammersmith & Fulham has recently published an Industrial Strategy called *Economic Growth for Everyone (2017)*. The ambition is to make the borough the best place to do business in Europe and to ensure that everyone benefits from growth rather than a favoured few.

The strategy sets out four key priorities: (1) West Tech Innovation District; (2) Encouraging Enterprise; (3) A Great Place in London; and, (4) Economic Growth for All.

A key pillar that cuts across all of these priorities is *Creating Affordable Workspace*. There is particular reference to the need to support the Science, Technology, Engineering and Mathematics (STEM) sectors, as well as the digital and creative industries to help overcome the high rents faced by SMEs in some parts of the borough.

A range of mechanisms are set out to do this, but one of the most prominent is to create an Economic Development SPD which has a major focus on the delivery of affordable workspace through the planning system. It will also cover employment, skills and local procurement.

This Industrial Strategy is expected to be updated in response to COVID-19 and the recession, but it is likely that *Creating Affordable Workspace* will continue to be at the forefront. The recommendations set out in this report will shape and influence the updated document.

Approach

1.5 This report is structured around five key questions:

1. **What is affordable workspace?**

   High-level overview of how 'affordable' is defined across London and in other boroughs.

2. **Who needs affordable workspace?**

   Details the current strategic context and economic performance of Hammersmith & Fulham and identifies which sectors should be prioritised for affordable workspace.

3. **What does 'affordable' mean for Hammersmith & Fulham?**

   Provides analysis on business turnover and commercial rents which is used, in turn, to identify which parts of the borough may be unaffordable and to define what level of discount to market rent should be applied in different places.

4. **Is 'affordable' viable in Hammersmith & Fulham?**

   Demonstrates the viability of the proposed discounts to market rent across different parts of the borough.

5. **What are the next steps?**

   Sets out recommendations on how Hammersmith & Fulham can deliver more affordable workspace through its Economic Development Planning Obligation SPD.

1.6 A clear methodology was used to provide the intelligence required for this study. Several different types of methods were used to triangulate the findings and build a robust picture as set out below.

Figure 1.1) Research Methodology



1.7 The study is primarily informed by the analysis of quantitative data from secondary data sources. This includes data from a number of publicly available datasets (including NOMIS and other ONS datasets) and privately held sources (e.g. from CoStar). This data has been substantiated by qualitative insight from council officers and workspace providers.

COVID-19, Brexit and the Planning System

1.8 This report comes at a unique time. COVID-19, Brexit and potential changes to the planning system are expected to fundamentally impact the economy in both the short and longer term. In turn, the demand for and supply of commercial property will also be affected. These factors present both threats and opportunities for affordable workspace in Hammersmith & Fulham.

1.9 This report recognises these pressures but given the uncertainty about how things will pan out, and the expectation that development levels will resume in the borough, it provides robust analysis and recommendations based on the best available evidence at this point in time.

1.10 The context is, however, changing rapidly. An addendum to this report is therefore being produced to explore the potential impact of these pressures, including on viability, and alternative mechanisms to deliver affordable workspace in the borough. The viability testing set out in this report will also be updated in six months' time to give an accurate picture of the current context. This, together with the content set out here, will provide the Council with all the evidence required to negotiate positively with developers on affordable workspace whatever happens moving forward.

1.11 The values data underpinning the recommendations in this report will be reviewed in six months' time. If the context has significantly changed the viability tests will be reviewed and re-run to take this into account.

What is affordable workspace?



2. What is affordable workspace?

2.1 Workspace affordability has become a strategic focus across London in recent years reflecting constraints in supply, rising rents and an evolution in the type and spatial distribution of demand across the city.

2.2 At the city level, the Greater London Authority (GLA) recognise the importance of affordable workspace and have developed research and policy to support the development and evolution of affordable workspace.

2.3 The Draft London Plan demonstrates this as it sets out guidance on affordable workspace and its role within London's economic landscape. It defines affordable workspace as:

> *"Workspace that is provided at rents maintained below the market rate for a specific social, cultural, or economic development purpose. It can be provided directly by a public, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently by planning or other agreements".*

2.4 The term 'workspace' covers a broad range of different typologies, from conventional office and industrial space to more niche shared spaces, including artist studios, maker spaces, labs and co-working spaces.

2.5 Building on this, and local pressures on workspace, 12 of the 32 London boroughs have developed their own approaches to defining and supporting affordable workspace. This currently includes:

- Brent
- Camden
- Hackney
- Hammersmith & Fulham
- Havering
- Islington
- OPDC
- Lambeth
- Redbridge
- Richmond upon Thames
- Southwark
- Tower Hamlets
- Wandsworth

2.6 There is, however, wide variation in the depth of analysis that has been undertaken on the issue as the Draft London Plan is not as clear and directive as it could be on the matter. Only a limited number have clearly defined what is meant by 'affordable' in the context of their borough. The most developed definitions are set out below.

London Borough of Havering	London Borough of Islington
A workspace provided where rent and service charges, excluding business support services, are on average at least 20% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, rents may be need be even lower to render them affordable to target occupiers).	Affordable workspace is defined as workspace that has a rental value below the market rate - generally 80% of the market rate or less. However, within Islington rents of up to 80% of market value may not always be affordable to micro and small businesses. The Council has therefore committed to assessing the genuine affordability of any new workspaces that it delivers on a case by case basis.
London Borough of Camden	**London Borough of Tower Hamlets**
Affordable workspace in Camden is determined based on the circumstances of each development. Past definitions include: • 20% of large workspaces provided at 50% of comparable market values • Workspace leased to affordable workspace providers (approved by the Council) • 20% of the desks in an open workspace (hot-desking) area to offered at 50% of market value	Tower Hamlets define affordable workspace as "flexible workspace" that is let to a workspace operator, and which will allow for occupation by the end users in one or more sectors on terms: • substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; • at a rate comparable with similar facilities available in Tower Hamlets or (if sufficient comparator premises do not exist in the borough) across London as a whole; and, • at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).

2.7 There are also several differences in how boroughs approach affordable workspace. A range of policy approaches have been taken which are at different stages of maturity in terms of development, adoption and effective application. The table below sets out some of the key characteristics that boroughs have developed as part of their workspace policies and how these policies are used. A series of observations are also set out below.

Policy Observations

- The most common requirement is for **10%** of new floorspace in commercial or mixed-use developments to be affordable, although this is higher in some boroughs (e.g. 20% in Havering and Camden);
- Many boroughs typically have a **minimum threshold** before a development has a requirement for affordable workspace, which is usually at least **1,000sqm**;
- The most common discount to market rate is **20%**;
- In some places different discounts are applied to **different geographies** (e.g. in Lambeth it varies between a 20% to 50% discount on market rents depending on the geography);
- There is limited detail within policy on how authorities determine 'local market rents' against which discounts can be set. This creates difficulties for developers and authorities in setting standards and in creating certainty through the planning process;
- Timescales for the duration of affordable workspace varies from **five years to in perpetuity**;
- Some boroughs allow the on-site provision of affordable workspace to be mitigated by off-site and **cash in lieu payments**, particularly where a case can be made for more positive economic impacts for the area;
- Some boroughs (e.g. Lambeth) allow affordable workspace to be offered via **discounts to membership models** (i.e. virtual offices, fixed desks, hot desks and small offices) throughout a development rather than in a dedicated and separate space;
- Islington's policy allows them to offer heavily discounted space to businesses and organisations that deliver significant social value. Most other boroughs do not ask for such high discounts but may allow developers to offer *less* space that is *more* affordable than policy should it be above a minimum stated threshold; and,
- Some authorities have **approved providers lists** and look to proactively build relationships through policy obligations that affordable workspace must be disposed or leased to an approved workspace provider.

Borough	% of Affordable in New Workspace / Floorspace	% Discount	Discount Priced Against	Duration	Off-Site Allowed?	Other	Approved Providers
Brent	10% of total floorspace in mixed-used developments totalling 3,000 sqm or more in Growth Areas.	No more than 50% of open market rents	Open market rents.	For the lifetime of the development, disposed at a minimum lease term for 15 years to an affordable workspace operator.	Off-site only in exceptional circumstances. Cash in lieu also possible by exception / with case made.	Be disposed of for a minimum of 15 years to an affordable workspace provider approved by the Council.	Yes, affordable workspace will be let and managed by a council-approved provider.
Camden	20% of large workspaces (to include 20% of desks in hot desking areas).	50% (to include 20% of desks in hot desking areas)	Average of market rents paid of an equivalent type, sector and quality of space.	N/A	N/A	LBC will resist shell and core only, seeking fit out to Cat. A so that fit out is not a barrier to entry.	Yes, but on a case-by case approach. Sometimes an element must be leased to an approved provider at a peppercorn rent or otherwise.
Hackney	All Priority Office Areas (POAS): At least 10% of floorspace (gross).	Shoreditch POA: 40% of market rent. Remaining POAs: no more than 60% of market rent.	POA locality market rent.	In perpetuity.	Off-site only in exceptional circumstances. Cash in lieu also possible.	Where planning submissions bring total employment workspace over 1,000 sqm, affordable workspace requirement applies.	First preference for legal agreement with a Council registered workspace provider.
Hammersmith & Fulham	At least 5%.	Considered within overall viability envelope for a scheme.	N/A	N/A	N/A	Flexible leasing, cross-subsidy etc, reduced rents and start up spaces noted amongst acceptable approaches.	N/A

Borough	% of Affordable in New Workspace / Floorspace	% Discount	Discount Priced Against	Duration	Off-Site Allowed?	Other	Approved Providers
Havering	20% of total gross commercial floorspace for major commercial and mixed-use developments.	Average of at least 20% below comparable market rents, but in some locations/sector higher. Preference for a sliding scale of 60% from years 1 to 2; 80% from years 3 to 5; and 90% thereafter.	N/A	Min. 5 Years.	N/A	In redevelopment schemes, re-provision of low-value employment space reliant upon sub-market rents is required to tackle displacement.	N/A
Islington	Within CAZ, Priority Employment Locations and town centres at least 10% affordable workspace as a proportion of overall gross B- use floorspace. For proposals involving 10,000 sqm or more gross B-Use floorspace, 10% affordable workspace.	80% or less of market rent, although concede that this may not be affordable so case by case review.	N/A	At least 20 years, with some spaces in perpetuity.	Priority given to on-site provision.	N/A	Leased to the Council at a peppercorn rate. Council will sub-let to a Council approved operator.
Lambeth	Major developments that include B1 floorspace should provide a proportion of affordable workspace as per the below: - Waterloo and Vauxhall 10% - Oval, Kennington and Clapham 10% - Brixton CEZ 10%	- Waterloo & Vauxhall 50% - Oval, Kennington and Clapham 80% - Brixton Small (up to 5,000 sqm GIA): 50% - Brixton Medium (5001-10,000 sqm GIA): 35% - Brixton Large (10,000 sqm GIA+): 20%	Developers to provide valuation based on similar recent transaction in the area, but Council may seek independent advice to verify.	Waterloo and Vauxhall 15 years; Oval Kennington and Clapham 15 years; Brixton CEZ 25 years.	On-site preferred but payment in-lieu by exception where off-site would have greater economic impact. Will consider affordable workspace propositions that involve offering discounts to membership models (i.e. virtual offices, fixed desks, hot desks and small offices) throughout a development rather than in a dedicated and separate space.	Affordable workspace arrangements can take one of three models: (1) Developer lease space to an affordable workspace provider on the Council's approved provider list; (2) Affordable workspace is managed directly by the owner of the new development where they have the skills; and, (3) Affordable workspace lease directly to an end user on Council's approved business list.	Affordable workspace providers approved list; Register of approved businesses that require non-managed affordable workspace.

Borough	*% of Affordable in New Workspace / Floorspace*	*% Discount*	*Discount Priced Against*	*Duration*	*Off-Site Allowed?*	*Other*	*Approved Providers*
Redbridge	No % target but focus on new commercial or mixed-use developments, or Growth Areas, mixed use schemes in Local Business Areas, and in non-designated employment land.	N/A	N/A	N/.	N/A	Flexibility of units and preferences around unit sizes expressed by the Council.	Developers encouraged to engage with workspace providers at the design stage.
Richmond upon Thames	At least 10% of proposed office floor space (where over 1,000 sqm. office space is proposed).	Rent and service charge less than 80%.	Local market rates.	Minimum of 10 years.	N/A	A revised Planning Obligations SPD will contain guidance to assist in the implementation of policy requirements on affordable employment space, including guidance on design and financial arrangements.	N/A
Southwark	Major development proposing 500 sqm. GIA or more employment floorspace (B class use) must deliver at least 10% of employment floorspace as affordable workspace at discounted market rents.	N/A	N/A	At least 30 years.	Payment in lieu for off-site.	Prioritise affordable workspace for existing small and independent businesses on the site at risk of displacement. Where not feasible, affordable workspace must be targeted for small and independent businesses from the local area with an identified need.	No, but must collaborate with the council to identify the businesses that will be nominated for occupying affordable workspace.
Tower Hamlets	10% of new floorspace in commercial (at least 1,000 sqm.) and mixed-use developments.	At least 10% below market rate.	Rate comparable with similar facilities available in Tower Hamlets.	At least 10 years.	N/A	N/A	Encouraged to work with recognised providers on the Council's list.

Borough	% of Affordable in New Workspace / Floorspace	% Discount	Discount Priced Against	Duration	Off-Site Allowed?	Other	Approved Providers
Wandsworth	Major schemes should provide 10% of floorspace.	At least 20% of market rate across borough, and above this in Nine Elms due to high commercial values.	Royal Institute of Chartered Surveyors (RICS) recognised method to assess the Market Rent valuation.	Affordable rent in perpetuity *or* affordable managed workspace offered for time agreed with Economic Development Office as part of a Workspace Management Plan.	Financial contributions acceptable if not feasible to have on site and will be put towards: (a) new provision of similar workspace nearby; (b) pooling of investment towards key areas designated for employment space; or (c) investment in existing affordable workspaces. The contribution will be equivalent to the rental discount that would have otherwise been offered.	Workspace is to be provided for: • Specific sectors that have social value such as charities or social enterprises; • Specific sectors that have cultural value such as artists' studios and designer-maker spaces; • Disadvantaged groups starting up in any sector; • Educational or research driven outcomes through connections to schools; • Colleges or higher education; and, • Supporting start-up businesses or regeneration.	No, but developers must work with Economic Development Office to complete a Workspace Management Plan which focuses on how the space will benefit target groups and what will be done to achieve this.
OPDC	"Proposals that generate new employment floorspace should incorporate an appropriate quantum of (i) affordable workspace offered at below; (ii) share workspaces; and/or (iii) small business units".	N/A	N/A	N/A	N/A	Flexible and small workspace is as important as affordable workspace in planning policy.	Affordable workspaces to be managed by providers that meet specific criteria. OPDC will have a list of approved providers but will also consider them on a case by case basis,

Best Practice Case Studies

2.8 Affordable workspaces can deliver a wide range of benefits for businesses *and* communities. A series of case studies has been provided below to illustrate the value that affordable workspaces can bring to an area and to provide inspiration and learning for Hammersmith & Fulham.

Pop Brixton: Diversifying and Supporting Town Centre Vitality

Context

2.9 Pop Brixton is a community project, event venue and workspace home to a range of independent retailers, restaurants, street food start-ups, businesses and social enterprises.

2.10 Located in the heart of Brixton, the project was conceived as a meanwhile use for a vacant site owned by the London Borough of Lambeth. The aim was to deliver a temporary project focused on local enterprise and employment.

2.11 The site, which opened in May 2015, is currently run and managed by Makeshift. It has over 50 shipping containers configured to provide a mix of business and community space.

2.12 It is home to a range of business activities related to the food, drink, retail, creative, professional and third sectors. Example businesses include Massolit, Bharat & Jean, Convey, Restoration Brixton and Blackstar London.

2.13 It also provides space for events and community activities. It hosts a number of community focused projects such as the People's Fridge, Pop Farm and Reprezent Radio.

Wider Value

2.14 A recent evaluation of Pop Brixton[1] illustrates that it has delivered a wide range of positive impacts for businesses, people and the local area.

2.15 Most significantly, evidence demonstrates that it has helped to improve and support the vitality of Brixton town centre. A visitor survey undertaken by Hatch indicates that:

- 88% of visitors believe that Pop Brixton has strengthened the town centre overall
- For every £10 spent by visitors at Pop Brixton around £5 is spent in other places in the town centre
- Around 50% of visitors to Pop Brixton visit other parts of the town centre
- Most visitors use the town centre more frequently because of Pop Brixton

2.16 Pop Brixton has also brought a range of new and interesting businesses to the town centre, particularly in the food and beverage sectors (e.g. Kricket, Halo Burger, Alpes and Roe). This has helped to diversify the town centre offer and has encouraged a range of similar and new businesses to the area. Brixton is now regarded as one of the most vibrant areas of London for independent retail, food and drink.

2.17 The evaluation also demonstrates that the project has delivered a range of positive economic benefits to the area. For example, it hosts around 47 businesses which support 197 jobs and delivers around £9m to the economy per annum. 50% of the businesses

[1] Pop Brixton Evaluation (2017): Hatch Regeneris, Lambeth Council and Makeshift

hosted are start up businesses who reported that they were attracted by flexible leases affordability.

3Space @ Keeton's and Collett: Boosting Local Spend and Benefits

Context

2.18 3Space @ Keeton's and Collett is a 25,000 sq ft meanwhile workspace in the former Lewisham and Southwark College building in Bermondsey. The site was purchased by Grosvenor in 2013 as part of wider regeneration plans and was temporarily leased to 3Space in 2016.

2.19 The aim of the workspace is to support local enterprise, entrepreneurialism and experimentation while putting social value and placemaking at its heart. The project provides a wide range of options for tenants, ranging from private offices, fixed desks, hot desks, lab space, meeting space and events space.

2.20 The building is currently home to around 44 businesses across several different sectors (including tech, professional services, architecture, creative, charity and the third sector). Example tenants include Resi, Advizzo, Idea Drop, RefuAid and GreenLab. These organisations employ around 128 people, generating around £8m in Gross GVA every year.

2.21 Formal events are also run each month, focusing on topics like business support, education, art and community. Some support tenants to grow and prosper, but others are outreach programmes to community groups and schools.

Wider Value

2.22 A recent evaluation of 3Space @ Keeton's and Collett[2] by Hatch demonstrates that the workspace has had positive economic, social and environmental impacts. High-level economic impacts include:

- £14m gross annual turnover;
- £8m gross annual economic output (GVA);
- £4.5m gross annual salary; and,
- £6m gross annual supply chain spend (purchase of goods, materials and services).

2.23 Significantly, however, a large proportion of these benefits are retained locally in Southwark and South East London. Evidence indicates that around 20% of those working in Keeton's and Collett live in Southwark (where it is located) and 45% live in South East London (including Southwark). Similarly, 20% of supply chain spend is within the borough and 45% in South East London (including Southwark). Based on this, it is estimated that:

- Up to £1m gross annual salary is paid to residents living in Southwark and £2m to those in South East London; and,
- £1.1m gross annual supply chain spend is in Southwark and £2.5m is in South East London.

2.24 It is also worth noting that the workspace has supported local enterprise in the local area – 35% of business owners are from Southwark and 64% from South East London. A

[2] Pop Brixton Evaluation (2017): Hatch Regeneirs, Lambeth Council and Makeshift

significant proportion of these businesses are new entities that have been supported to start up, flourish and grow due to the affordable rates and flexible leases available.

3Space @ International House: Delivering Social Value and Building Community Wealth

Context

2.11 International House is an eleven-storey, 50,000 sq ft office block in Brixton. The building belongs to the London Borough of Lambeth who previously used it as an office for Council staff. With the restoration and renovation of Brixton Town Hall and the consolidation of Council staff into it, International House was deemed surplus to requirements and was handed over to the Council's Investment and Growth team for the Brixton Central Masterplan regeneration scheme. As this is unlikely to come forward for a number of years, the Council decided to transform the building into a temporary meanwhile workspace to introduce a range of new businesses to Brixton.

2.12 Rather than focusing on maximising financial returns, the Council wanted to support town centre regeneration, placemaking and social value. As such, a competitive tender process was developed to select an operator who could deliver an interesting, innovative and affordable workspace which maximised social value while also providing a small financial return. 3Space were selected to run and manage the building and signed a lease in September 2018.

Wider Value

2.13 As the Council agreed to lease the building below market rates, 3Space are able to operate their Buy, Give, Work model which was successfully piloted at their previous meanwhile workspace in Bermondsey. The model involves commercial businesses paying market rent for space (Buy) and using this to cross-subsidise low or no rent space for not-for-profits that benefit the local area, early stage start-ups with a local founder and experimental projects (Give). This activity is supported by events and networks (Work).

2.14 While the workspace has delivered significant economic value through the establishment of a new design-focused quarter in Brixton, the provision of space for a range of local and third sector organisations is a major added benefit. As the table below demonstrates, International House provides five 'Give' floors for a range of interesting and valuable organisations. Paying tenants are also expected to put aside time and resources to support organisations benefitting from 'Give' space, particularly through mentoring, work experience and volunteering.

2.15 While the impact of this activity has not yet been quantified, it is undoubtedly delivering significant social value to Lambeth and Brixton. Research from a range of organisations (e.g. The Centre for Local Economic Strategies) demonstrates that the provision of space for small and local businesses is key to building economic and social wealth in communities. Evidence shows that local or socially minded enterprises are more likely to employ, buy and invest locally. This means that rather than extracting wealth they make significant contributions to local economic development.

Ground Floor	*Youth Innovation Hub*	*Photography Services Floor*	*Community Initiatives Floor*	*Fabric Floor*
Free of charge event space for building members with a comprehensive events program. Also includes space for an accelerator programme.	Space given to Youth Entrepreneurship Hub Business Launchpad which is a youth entrepreneurship charity that supports young people aged 16-30 at every stage of their business. Co-working, desk and music studio space is available.	Floor has been given to Photofusion who are a photographic services charity who have been based in Brixton since 1991. The floor includes photography space, dark rooms, a classroom and a digital print studio.	Space is available free of charge for local charities, non profits and social enterprises. Organisations must be based in Lambeth or deliver programs which directly benefit Lambeth Residents. 37 organisations currently have access to desk space.	Space is managed by Assemble who provide space to fashion and textiles studio businesses. It is designed to support a range of practitioners from different backgrounds, and at different stages in their development. All tenants have 24/7 shared access to a 19m^2 classroom, kitchenette and maintained workshop with communal machinery and 1.5 x 3m work table.

The Granville: Linking Workspace and Communities

Context

2.16 The Granville is a mixed-use community centre and workspace in South Kilburn, London. It is run by the South Kilburn Trust who lease the building from the London Borough of Brent for a peppercorn rent. There are 15 studios available and a small co-working and hotdesking area. Studios typically rent for £500-600 per month and desks are available for £175 per month making them accessible to small enterprises. Plans are in place to extend and expand the building, which will involve providing traditional offices and additional community uses.

Wider Value

2.17 While the London Borough of Brent are not making a financial return on their asset, they are catalysing significant economic and social returns. The South Kilburn Trust are committed to supporting local, small enterprises to grow. This is achieved by leasing space to local businesses that subscribe to the Trust's values of community inclusion and involvement. Tenants also have free access to two specialist business advisors that support enterprises to scale, grow and prosper. In 2019, the workspace safeguarded or created 35 jobs and supported 12 businesses to grow.

2.18 The South Kilburn Trust has also recently developed a new scheme called Community Give Back, which links businesses in the Granville to the South Kilburn community. The aim is to support and inspire local people to work or set up businesses in new industries. Businesses provide a range of support services to local people, including mentoring, advice, school events, provision of work placements and support with job interviews. Local people who are interested in setting up a business are also able to access the specialist business advisors for free, which is a service not typically offered by workspaces. A recent audit shows that since formation the Granville has delivered 48 trainee placements, 600 skills workshops/seminars and has engaged almost 2000 people.

2.19 The rental income from the workspace is also used to cross-subsidise other free community focused activities in the building. These include a youth programme, creche and wellbeing services.

Platfo9m: Demonstrating the Viability and Opportunity for new Commercial Development

Context

2.20 Platfo9m is a co-working, office, meeting and event space for the creative sector in East Sussex. It is located in Hove Town Hall and has recently expanded to a second site. The workspace has a membership of over 80 small businesses who also receive business and collaboration support. Businesses range from film-makers to PR agencies, illustrators, charities, accountants, writers, graphic designers and others. A carefully curated series of regular creative and artistic events are held across the two sites.

Wider Value

2.21 Brighton & Hove Council identified the need for more managed workspace in the city during the development of the Brighton & Hove Economic Strategy. It was clear however that this type of space was not coming forward to due a lack of market confidence from the private and third sector. To demonstrate the viability and opportunity for this type of space in the area, they decided to rent part of Hove Town Hall to a workspace provider. The workspace became a success and space was filled relatively quickly. This was an important step change as it changed perceptions which, in turn, helped to catalyse a wide range of flexible workspaces to start up in the area (e.g. Project, Spaces, The Werks and The Skiff). Agents report that the city is now well-served by managed workspaces, investors are confident in the viability of the market and that the digital and creative sector has become a key strength of the economy.

Deptford Foundry: Security Through Ownership

Context

2.22 Deptford Foundry is a 30,000 sq ft affordable studio space run by Second Floor Studios in Deptford, Lewisham. It comprises 85 affordable purpose-built studios home to 115 artists and makers supported by a further 40 employees, apprentices and interns.

2.23 The facility is home to a range of practitioners including artists, glass makers, architects, restorers, designers, product designers, publishers, graphic designers, fashion designers, jewellers, photographers, printmakers, illustrators, sculptors and weavers. Businesses in creative sectors that generate a higher financial return (e.g. architects and graphic designers) pay in the region of £23 / sq ft, which while still affordable cross-subsidises lower cost space for artists (£15 / sq ft) and start-ups (£12 / sq ft).

2.24 The studio sits within a mixed-use scheme on Arklow Road and takes up ground and first floor space. The scheme is a new development from Anthology (Developer), Rolf Judd (Architect) and Sisk (Main Contractor) consisting of 316 new homes.

Wider Value

2.25 The provision of affordable workspace was negotiated as part of the planning application by the London Borough of Lewisham following discussions with Anthology. The Council does not have a specific Affordable Workspace policy. Following engagements with several potential operators Anthology identified Second Floor Studios as a preferred partner.

2.26 Rather than renting the space for a limited period Second Floor Studios bought the space from Anthology at a discount to market rate agreed as part of a S106 agreement. Second Floor Studios took an open book approach with Anthology, the London Borough of Lewisham and the Mayor of London to illustrate what they could afford to pay for them to offer affordable rates to end users. The S106 agreement also stipulated that the space had to be fitted out to shell and core before any homes could be sold which incentivised the developers to provide good quality space quickly. A Good Growth Fund grant was used to fully fit out the space.

2.27 The major benefit of purchasing the site is that the space will now be available in perpetuity *and* it ensures that Second Floor Studio are insulated from rent fluctuations. This advantage will be passed onto the creative community who will continue to have genuinely affordable space for years to come in a prime London location.

2.28 It also means that the organisation does not need to rely on external funding to ensure rents remain affordable which will help the studios be more resilient over time. A careful financial and succession plan has also been put in place to protect the space for artists and makers for the next six generations.

2.29 Linked to this, ownership allows Second Floor Studios to provide space for artists and makers at a price point they believe is truly affordable. They recognise that artists cannot afford to pay as much as other sectors due to the profitability and nature of their work. The discount to market rate approach is less relevant to artists as they tend to be able to afford the same amount of space wherever they are based.

2.30 They have joined other studio providers to create London's Affordable Artist Studios Network (LASSN) to define what affordable means for artists. In London they are clear that end users can afford £12-19 / sq ft (including service charge) and therefore landlords need to rent space at £6-9.50 / sq ft to operators. This is far below the discounts suggested in this document, so Hammersmith & Fulham may want to consider a specific policy where artist studios are preferred. Their preference is to purchase space if possible and a cost of £85-100 / sq ft is seen as sustainable for shell at core.

Challenges

2.31 The major challenge Second Floor Studios have faced is accessing a mortgage to fund the purchasing of sites as many financial institutions perceive the risk to be high. Financiers preference is for workspaces to be fitted out to Cat A standard before lending to affordable operators. Councils can support operators by providing loan or grant funds or by stipulating Cat A fit outs in planning policy. The issue with the latter is that it is unlikely developers will fit spaces out to the standard and configuration that operators want.

Who needs affordable workspace?



3. Who needs affordable workspace?

Policy Review

3.1 The London Borough of Hammersmith & Fulham's policies and strategies provide strategic insight on who needs affordable workspace, in terms of business typology, sectors and local communities. They also provide insights on the type of workspace required in the borough's regeneration areas.

3.2 Several key observations are set out below and these provide the starting point in understanding who workspace should be targeted at and where opportunities exist.



The council want to make Hammersmith & Fulham into **"West Tech",** a global beacon for innovation and growth. Key to this vision is providing affordable workspace for **creative, digital and STEM industries**.

Source: Hammersmith & Fulham Industrial Strategy; Hammersmith & Fulham Local Plan



Delivery of affordable workspace is to build upon the existing concentrations of **TV, programming and broadcasting** businesses around Media Village and **science and research businesses** at Imperial College's White City Campus.

Source: Hammersmith & Fulham Industrial Strategy



There is an appreciation that **small and micro businesses** face specific space challenges in the borough. The recent employment study identifies that 62% of space requirements are for businesses needing 93-465m^2 and that 74% of office conversions through permitted development were below 100m^2.

Source: Hammersmith & Fulham Employment Study (2016); Hammersmith & Fulham Local Plan



The **White City Opportunity Area** is a key priority for affordable workspace to support industries around Media City and the emerging innovation district around Imperial College's new Campus. The area has capacity to deliver **10,000 jobs** by 2035 and for substantial mixed-use development, with opportunities to build in affordable workspace requirements.

Source: Hammersmith & Fulham Local Plan Policy E1



The **Fulham Regeneration Area** also provides a major opportunity for workspace delivery, aiming to deliver **9,000** jobs by 2035. There is a focus on delivering sites that benefit the wider community, including providing new local job opportunities. The **South Fulham Regeneration Area** and **Hammersmith Regeneration Area** are also identified for significant employment growth.

Source: Hammersmith & Fulham Local Plan



The **West Kensington and Earls Court Opportunity Area** will be preferred locations for new office development above **2,500m^2** alongside Shepherds Bush and the other town centres. The council will support proposals including mixed use schemes for new employment uses, especially those that recognise strengths in creative industries, health services, bio-medical and other research industries.

Source: Hammersmith & Fulham Local Plan Policy E1

3.3 The Council has also recently identified the Green and Low Carbon Economy as a sector that they would like to support grow. This is in response to Hammersmith & Fulham's ambition to become the greenest borough in London and to put environmental issues at the front and centre of policy and delivery. This is a broad sector and activities associated with it cut across a range of other broad sectors such as Life Science, Creative and Digital and Financial and Professional Services. As such it is not defined as a sector in its own right in the proceeding analysis.

3.4 The priority sectors identified in Hammersmith & Fulham's policies align with ambitions set out in the National Industrial Strategy and the Mayor of London's Economic Development Strategy:

- The National Industrial Strategy emphasises the importance of the STEM, creative and digital industries as exemplified by sector deals for the aerospace, artificial intelligence, automotive, life science, creative, nuclear, offshore wind and rail industries. Other priorities include construction and tourism.
- The Mayor of London's Economic Development strategy explicitly references the need to support the cultural, creative, life sciences, low carbon, environmental, tech and digital sectors. Other priority areas include tourism, advanced urban services and financial & business services.

Data Analysis

3.5 Analysis of publicly available economic data is also an important source of information to help identify who needs affordable workspace.

3.6 Evidence shows that the Hammersmith & Fulham economy is diverse and is home to around **140,000 jobs** and at least **14,000 businesses**. Recent performance over the last five years has been positive but below London averages:

- Employment grew by **+7%** between 2013 and 2018, which is higher than West London Alliance[3] at +3% but lower than 11% across London; and,
- The number of businesses grew by **+13%** over the last five years, which is lower than West London Alliance (24%) and +27% growth in London.

3.7 The economy is characterised by strengths in higher value activities and high street businesses. The largest employment sectors are the Public Sector (27,000 jobs); Creative and Digital (24,600 jobs); Hospitality, Leisure and Recreation (18,000 jobs); Business Support (16,000 jobs); and Retail (16,000 jobs). The largest sectors by the number of businesses are Financial and Professional; and, Creative and Digital, comprising nearly half of all businesses in the borough.

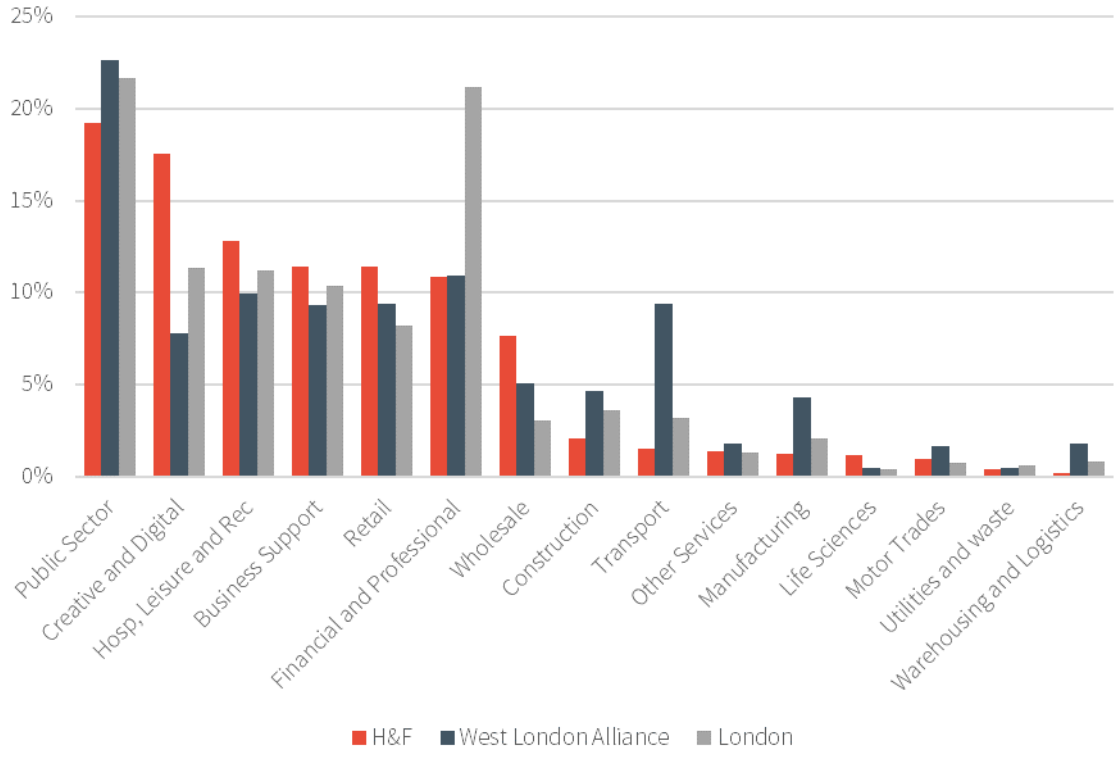
3.8 The key trends associated with Hammersmith & Fulham's broad sectors are provided in tables and charts on the following pages, which give an overview of the make-up of the business and employment base in terms of size, degree of specialisation and growth trajectory. These highlight several key findings:

- There are a number of employment sectors (e.g. Hospitality, Leisure and Recreation; Retail; and, Life Sciences) and business sectors (e.g. Creative and Digital; Retail; Hospitality, Leisure and Recreation; Wholesale; and, Life Sciences) that are both **growing and specialised**;
- The economy is more **balanced** than other boroughs in terms of sector representation;

[3] The West London Alliance is a sub-regional partnership of Western London boroughs and includes Barnet, Brent, Ealing, Harrow, Hillingdon, Hounslow and Hammersmith and Fulham

- Most sectors are **growing**;
- Some of the largest and most specialised sectors in Hammersmith & Fulham are **higher value** in terms of economic output, driving higher wage growth and supply chain spend in the local economy (e.g. Creative and Digital and Life Sciences); and,
- The **creative and digital sector** is large and specialised but has experienced an **8% decline** in employment in recent years and business numbers have remained relatively static.

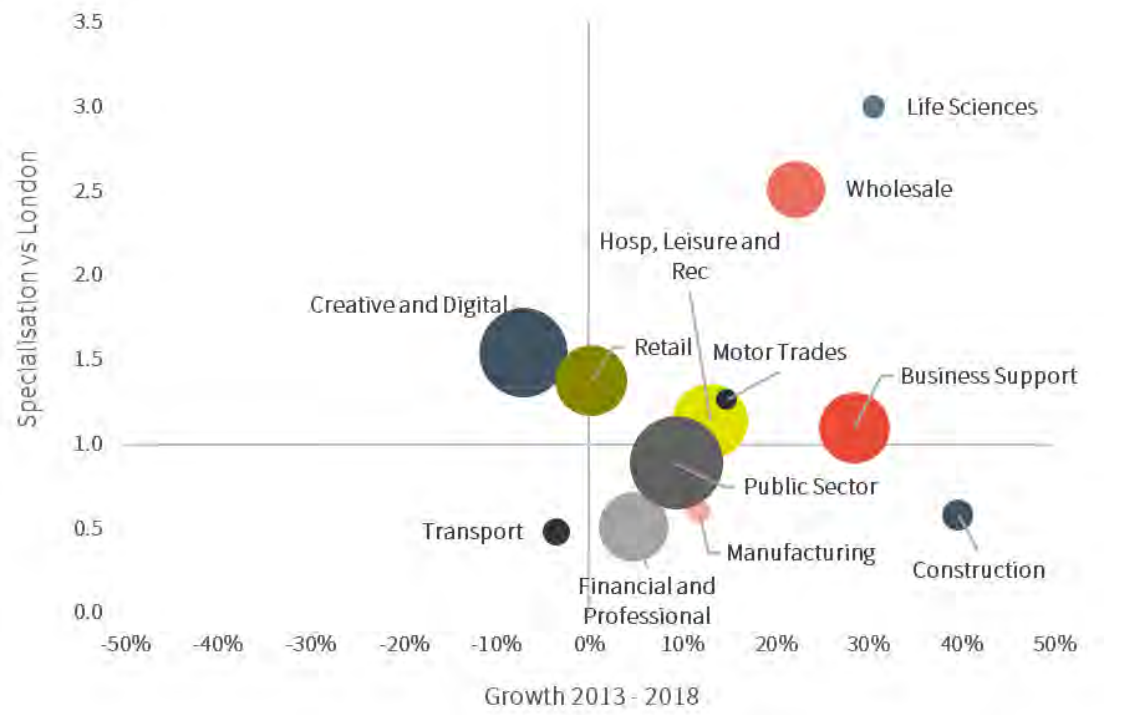
Figure 3.1) Broad Sector Breakdown vs the West London Alliance and London (Employment (2018) Above, Business (2019) Below)

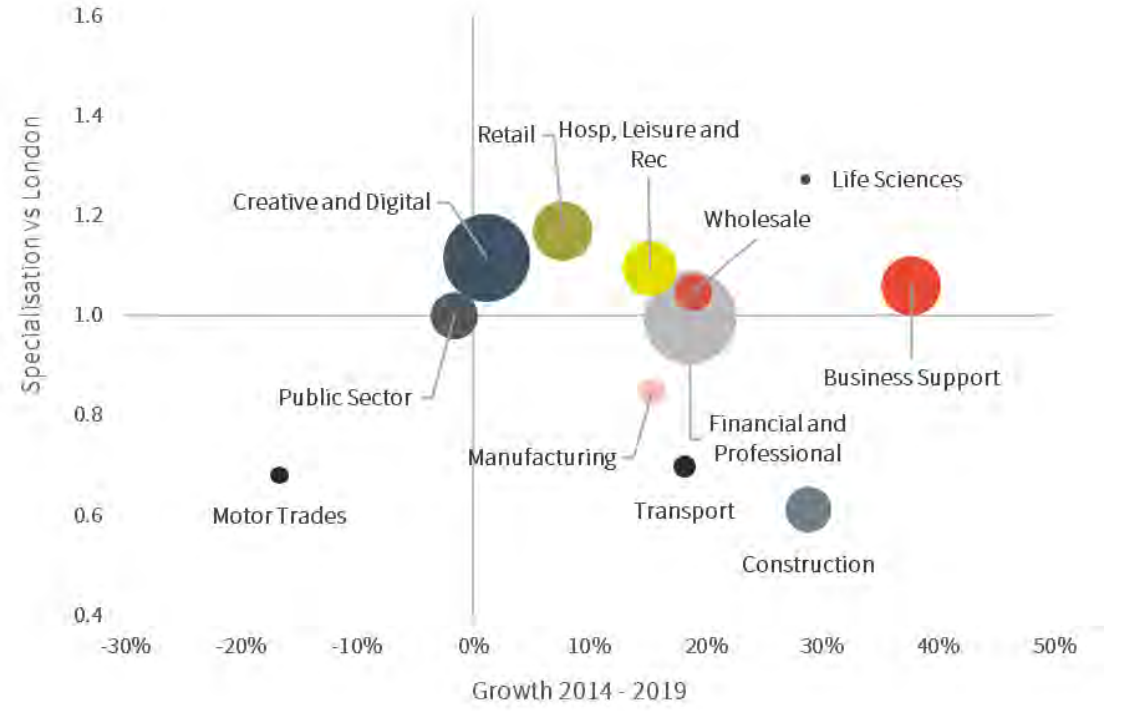




Source: BRES, 2018; UK Business Count, 2019

Figure 3.2) Broad Sector Performance: Size, Concentration and Growth (Employment Above, Business Below)





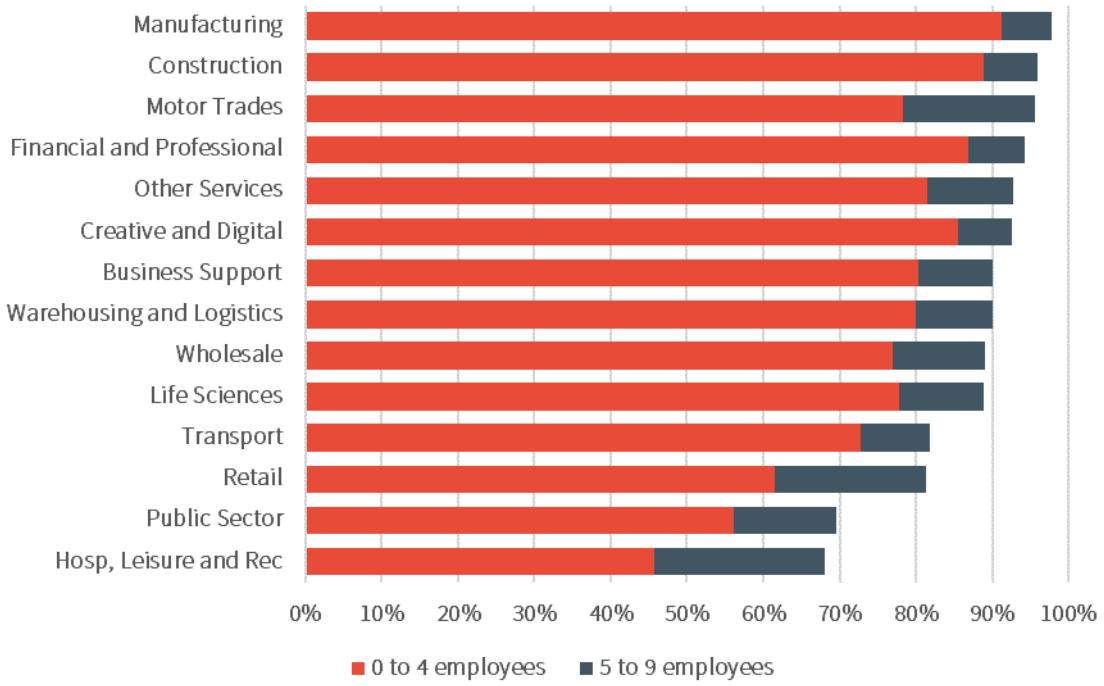
Source: BRES, 2013 – 2018; UK Business Count 2014 – 2019

Note: Charts illustrate the size, concentration and growth of employment and business sectors. The size of the bubble denotes the size of the sector in terms of employment (above) and number of businesses (below), the X axis shows employment/business number growth and the Y axis shows the level of specialisation vs London (anything over 1 indicates a specialism).

3.9 The borough's economy is also characterised by micro businesses that employ fewer than 10 employees. Around **88%** of businesses are micro businesses, including **9%** that are sole traders. Whilst the proportion of micro businesses differs by sector, data indicates that a number of sectors have at least 90% microbusinesses (Manufacturing; Construction; Creative and Digital; Financial and Professional; and, Other Services).

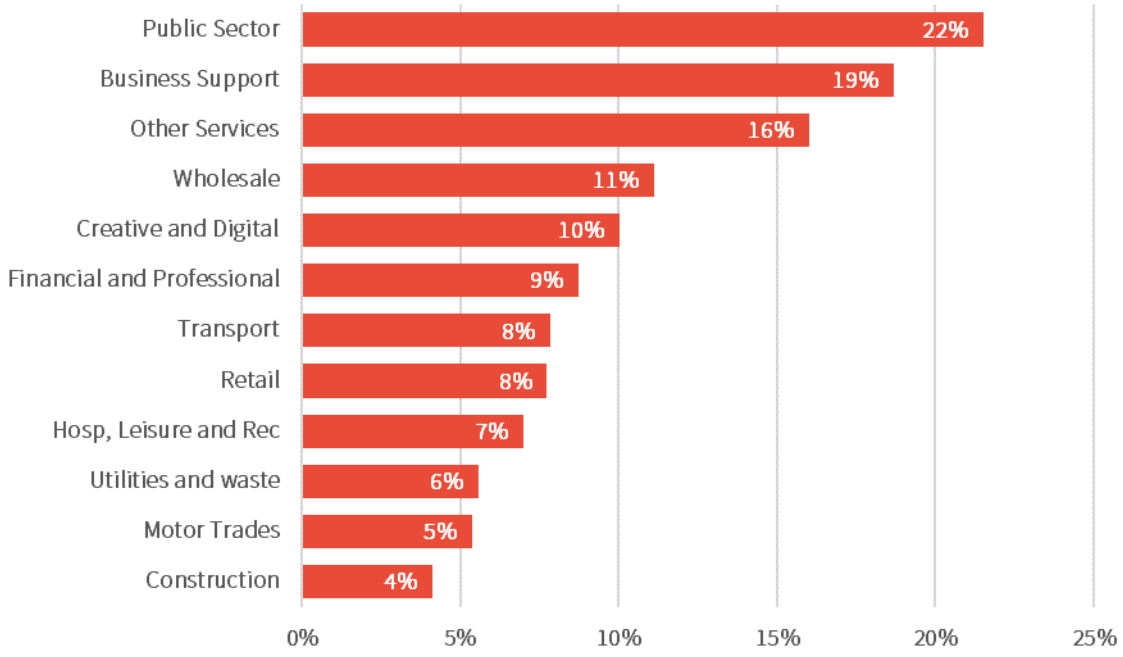
3.10 The number of sole traders is also relatively high in sectors such as other services; business support; wholesale; creative and digital; and, financial and professional services. These very small companies require bespoke support in order to start and survive, including affordable workspace, collaborative networks and funding. Co-location and agglomeration are critical to supporting these businesses to survive and scale.

Figure 3.3) Proportion of Micro Businesses by Broad Sector, 2019



Source: UK Business Count, 2019

Figure 3.4) Proportion of Sole Traders by Broad Sector, 2019



Source: UK Business Count, 2019

Note: Life sciences, manufacturing and warehousing & logistics have 0 sole traders reported and are not included.

Table 3.1) Detailed Sector Overview

Overarching Sector	Detailed Sector	Business					Employment			
		Number	% of total businesses	% SMEs	LQ vs London	% change 2014 - 2019	Number	% of total employment	LQ vs London	% change 2013 - 2018
Business and Professional Services	Financial and Professional	3,590	25%	98%	1.0	+19%	15,250	11%	0.5	+4%
	Creative and Digital	3,115	22%	96%	1.1	+1%	24,620	18%	1.5	-8%
	Business Support	1,460	10%	96%	1.1	+38%	16,050	11%	1.1	+28%
	Other Services	495	3%	98%	1.2	+30%	1,945	1%	1.1	-23%
	Life Sciences	45	0%	100%	1.3	+29%	1,665	1%	3.0	+30%
	Total	*8,705*	*60%*	*97%*	-	*+15%*	*59,530*	*42%*	-	*+3%*
Local Service Sectors	Retail	1,475	10%	96%	1.2	+8%	15,985	11%	1.4	+0%
	Hosp, Leisure and Rec	1,215	8%	98%	1.1	+15%	17,935	13%	1.1	+12%
	Motor Trades	125	1%	92%	0.7	-17%	1,360	1%	1.3	+14%
	Total	*2,815*	*19%*	*96%*	-	*+9%*	*35,280*	*25%*	-	*+6%*
Construction and Manufacturing	Construction	870	6%	98%	0.6	+29%	2,975	2%	0.6	+39%
	Manufacturing	300	2%	77%	0.8	+15%	1,750	1%	0.6	+11%
	Total	*1,170*	*8%*	*92%*	-	*+25%*	*4,725*	*3%*	-	*+27%*
Wholesale, Logistics and Transport	Wholesale	565	4%	88%	1.0	+19%	10,720	8%	2.5	+22%
	Transport	195	1%	82%	0.7	+18%	2,185	2%	0.5	-4%
	Warehousing and Logistics	50	0%	100%	0.5	-9%	335	0%	0.3	-42%
	Total	*245*	*2%*	*86%*	-	*+11%*	*13,240*	*9%*	-	*+13%*
Public Sector	Public Sector	925	6%	87%	1.0	-2%	27,015	19%	0.9	+9%
Primary Activity	Utilities and waste	40	0%	75%	0.6	+100%	545	0%	0.6	+210%
Total		***14,470***	***100***	***95%***	**-**	***13%***	***140,375***	***100%***	**-**	***7%***

Source: BRES, 2013 – 2018; UK Business Count, 2014 - 2019

3.13 This data is concerned with the period before COVID-19 and therefore does not take account of more recent impacts on employment or business trends as a result of the ongoing economic instability. Whilst there is still much uncertainty and limited available data resources, many local authorities are beginning to take stock and attempting to understand the short, medium and long-term impacts on their local economies.

3.14 A recent study from Oxford Economics commissioned by the West London Alliance does exactly this and includes specific analysis for Hammersmith & Fulham. The study provided two forecast growth scenarios to estimate the total workplace employment in the borough.

3.15 For the **baseline scenario**[4] it is estimated that jobs will decline by -4% (41,000 jobs) in 2020 (higher than the rate across London (2.8%)) with a rebound of +2% in 2021. Between 2019 and 2025 total employment is expected to increase by an annual average of 0.5%, resulting in an additional 34,000 workplace jobs from the baseline position in 2019.

3.16 Under the more **conservative downside scenario**[5], employment is expected to contract by -4% in 2020 with no return to growth until 2022. The severity of the contraction combined with a later recovery means that overall job growth between 2019 and 2025 would be around 13,600 workplace jobs. This represents a job growth rate that would be a third of London as a whole.

3.17 Sector performance differs and is dependent on a range of factors, including social distancing measures, adaptability of businesses and changes in demand for products and services. The study[6] provides a baseline forecast change in workplace employment by sector between 2019 to 2025 and identifies a number of headline findings:

- Hammersmith & Fulham is ranked as having below average exposure to COVID-19 challenges. Low exposure to manufacturing and transport sectors and the presence of high growth businesses improve the borough's resilience. Factors which leave the borough more vulnerable include the relative importance of hospitality, retail and the large share of small businesses in the area;
- Several sectors are projected to increase in total jobs, including information and communication (+5,600 jobs), administration and support services (+5,600 jobs), professional, scientific and technical (+2,200 jobs) and wholesale trade (+3,600 jobs);
- A number of sectors are projected to decrease in total jobs, including manufacturing (-5,700 jobs), transport and storage (-600 jobs) and financial and insurance activities (-500 jobs); and,
- Structural shifts to the retail and hospitality sectors (e.g. rise of online retailing and other online trends such as Airbnb and Deliveroo) are expected to be accelerated over the next six months due to COVID-19 which is likely to create significant implications due to the prominence of these sectors in the borough.

Priority Sectors

3.18 Drawing on the policy review, data and secondary literature four priority sectors for affordable workspace have been identified. It is important to identify priority sectors because it allows limited resources and opportunities to be directed to where they can have the most significant

[4] Impact of COVID-19 for the West London Alliance Economy, Oxford Economics (June 2020)

[5] ibid

[6] ibid

impact and contribute to wider strategic objectives. It also ensures that support is provided where need is greatest and pressures are highest.

3.19 This process has also drawn on our wider knowledge of the affordable workspace market, which has meant that some sectors that are not commonly associated with affordable workspace have been excluded. Priority sectors are set out in Table 3.2 below.

Table 3.2) Hammersmith & Fulham's Priority Sectors

Priority Sector	Definition	Rationale	Policy Context
1: Creative and Digital	This is a standard overarching sector that includes a range of business activities, including publishing, television, media production, telecommunications, web design, marketing film and photography	The sector is a key contributor to the borough's economy, accounting for around one fifth of all businesses, and is specialised (LQ of 1.1 for businesses and 1.5 for employment) compared to London. Despite this, employment growth declined by -8% in recent years which is a concern. This may link to the high number of freelancers and SMEs in the field (96% of the sectors businesses are SMEs in Hammersmith and Fulham).	Creative and digital sectors are key to delivering the council's "West Tech" vision for Hammersmith & Fulham to be a global leader for innovation and growth. The sector is also specifically referenced in the UK's Industrial Strategy to unlock growth of one of the fasting growing sectors in the UK.
2: Life Sciences	This is a standard overarching sector that includes specific activities relating to life sciences, such as manufacturing of pharmaceutical products, medical supplies and equipment, as well as research and experimental development in natural sciences, biotechnology and engineering.	Whilst the sector is relatively small, it is highly specialised (LQ of 1.3 for businesses and 3.0 for employment) and is one of the fastest growing sectors in the borough (+30% growth in business and employment in the last five years) which should be encouraged. The sector is being driven by small business, with 100% classified as SME and 90% classified as a micro business.	Like the creative and digital sector, the life science sector will contribute to delivering the council's "West Tech" vision for Hammersmith & Fulham. This is particularly relevant in response to the innovation district in White City, driven by the partnership with Imperial College. At the regional level the sector is also referenced in the new Draft London Plan as a sector that has specific business growth opportunities, particularly as part of the London, Cambridge and Oxford 'golden triangle'. At the national level it is identified as a key sector in the UK's industrial strategy, with the aim to ensure the UK remains at the forefront of innovation in the life science industry.
3: Financial and Professional	This is a standard overarching sector that includes a range of business activities including banking, investment,	Another key contributor to the borough's economy, accounting for the largest proportion of businesses (25%) and	The draft new London Plan (2019) identifies Financial and Professional Services as a priority sector for business

	insurance, trading, property management, technical consultancy (including engineering), language and accountancy.	around 11% employment. It has also experience growth in recent years, both in terms of business (+19%) and employment (+11%) which can be encouraged. The West London Alliance COVID-19 Impact report is a concern as it indicates that the financial and insurance sector could decline in the next five years by 500 jobs, making the case to provide greater support to retain the sector.	growth. The ambition is to sustain and enhance London's position as a global financial services hub along with a diverse range of professional and business services. The GLA's Employment Projections (2016) also set out that Finance and Insurance Activities as well as Professional services should drive London's growth moving forward (assuming London grows at 2.5% in terms of economic output per year, they expect employment in these sectors to increase by 0.5% and 1.5% respectively each year).
4: Manufacturing	This is a standard overarching sector that includes a range of manufacturing activity, including food, high tech, general and creative and media manufacturing.	The manufacturing sector is relatively small (2% of businesses and 1% of employment) but has experienced growth in recent years (+15% in businesses and +11% in employment) which should be supported. The West London Alliance COVID-19 Impact report also indicates that the manufacturing sector is projected to decline in the next five years by 5,700 jobs, making the case to provide greater support to retain the sector.	While manufacturing is not referenced as a priority sector for growth in the new draft London Plan, it is recognised that it makes an important contribution to the economy of Greater London and should be retained and encouraged where possible. This, among other factors, has driven the development of policies related to Strategic Industrial Locations (SILs) which are in place to protect and enhance industrial areas. Boroughs are expected to develop policies to intensify, co-locate and increase the attractiveness of these areas.

Focus On: Workspace Requirements

3.20 Finding workspace that is affordable is a major challenge for many businesses in London, particularly SMEs and those in less productive sectors. It is often a key determinant in choosing where to locate.

3.21 The affordability of workspace is, however, not always the most important factor influencing business owners' location decisions. There are a wide range of other relevant factors, some of which are specific to the type of business activity undertaken. Examples include proximity to similar businesses, access to specific infrastructure, flexible lease terms and the type of location.

3.22 It is therefore important to consider other factors that are important to businesses across the priority sectors. An overview of their general requirements and premises needs is provided in the table overleaf.

3.23 It is also important to note that the relative importance of sectors to regional economies changes and fluctuates over time. As technology develops and we enter the fourth industrial revolution, these changes may occur more rapidly as new solutions and products are developed more quickly.

3.24 Due to this, it is worth noting that several commercial property requirements cut across all sectors. Research shows that the availability of high quality, flexible commercial space that is adaptable to changing circumstances is most important. This needs to be supported by good infrastructure, particularly high-speed internet connectivity, with access to fast and reliable transport options.

3.25 Businesses are also increasingly demanding flexible lease terms to manage risk and allow them to adapt to changing market need. While there are clear distinctions between businesses that require office and industrial space, there are a range of similar requirements within these groups.

Table 3.3) Workspace Requirements of Hammersmith & Fulham's Priority Sectors

Priority Sector	General Requirements	Premises Needs	Opportunity Areas*
Creative and Digital	• Proximity to skilled workforce • Proximity to similar and supply chain businesses • Accessibility to labour, partners, customers and markets • Strong public transport connections • Ultrafast broadband connectivity • Flexible and adaptable premises	• Small, flexible workspace • Studios and makerspace • Industrial units– B1a and B8 (data centres) • Office and co-working space • Town centre locations • Business/industrial parks • Creative and dynamic feel • Flexible lease terms	• Shepherd's Bush • Hammersmith Centre • Townmead Road and Imperial • Ravenscourt Park • Fulham Centre
Life Sciences	• Proximity to similar businesses • Proximity to highly skilled workforce • Strong public transport connections, with access to major international airports • Access to leading technologies and innovative environments • Proximity to major universities, hospitals and researchers • Strong digital and physical infrastructure and access to labour, customers and markets	• Incubator centres • Innovation spaces • High quality office space • Lab/R&D space • Adaptable industrial units • Town centre locations • Science parks • Business/industrial parks	• Shepherd's Bush • Hammersmith Centre • Townmead and Imperial • Parsons Green and Putney Bridge
Financial and Professional Services	• High quality facilities in prestigious locations • Quick access into central London via public transport • Accessibility to labour, customers and markets • Access to research institutions and collaborators • Good public transport links	• High quality private offices • Flexible workspaces • Home working reducing need for space and increasing demand for co-working space • Town centre locations • Business parks	• Hammersmith Centre • Fulham Centre • Ravenscourt Park • Olympia and West Brompton
Manufacturing	• Flexible industrial space that is adaptable • Quick access to road network, with connections to other cities and ports • High speed broadband and internet • Close proximity to workforce • Close proximity to supply chain companies	• Light industrial space • Workshops • Yard space • Storage space • Access to tools, technology, meeting rooms etc • Edge of town centre locations • Business/industrial park locations • Ability to receive/take deliveries from large vehicles • Flexible lease terms or ability to purchase property	• Imperial Road and Townmead • Parsons Green and Putney Bridge

**More detail on how the borough has been sub-divided is provided in the next chapter.*

What does ‘affordable’ mean for Hammersmith & Fulham?



4. What does 'affordable' mean for Hammersmith & Fulham?

4.1 The cost of occupying commercial premises at an 'affordable' rent for any business can vary substantially depending on the size, turnover and sector of the business and the additional overheads they need to account for as part of their operation.

4.2 Some businesses may be prepared to accept a higher rent for the benefits that a particular location or type of space might bring, whilst other businesses will be operating at a more marginal scale whereby paying only a very low proportion of their turnover in rent will allow them to remain viable.

4.3 Generally, a lower ratio between turnover and rent will offer a greater degree of stability for those businesses that may experience fluctuating costs and demand - factors that are particularly relevant for start-up businesses and heightened by the current and on-going impact of COVID-19 and Brexit on the economy.

To understand what 'affordable' means for businesses in Hammersmith & Fulham, the starting point has been to consider the ratio of annual turnover to rent[7] for businesses.

4.4 This ratio is a critical decision-making tool for any business in choosing where to locate or in selecting a particular premises. For all businesses there will be a point at which the ratio becomes too high and threatens their ability to remain operational in an area – in much the same way as a household's ability to afford housing is a function of the cost of paying rent as a proportion of their income. Unlike in the housing market, there are no readily available or industry standard benchmarks for a typical ratio of annual turnover to rent.

4.5 In the retail sector, where turnover leases are more common, the ratio can range between **2%** and **12%** with most not paying more than 10%. Anchor tenants tend to drive a lower ratio to reduce the risk of taking up a larger amounts of space. Business insight commentators in the US[8] suggest similar ratios for retail and professional service sectors, with up to **15%** for those seeking more prestigious locations.

4.6 Across other sectors of the economy, particularly those that are more specialised, there are no standard benchmarks. Businesses simply negotiate the lowest rent achievable based on their turnover, other overheads and the necessity to be in a particular location.

4.7 Despite a lack of readily available benchmarks, it is possible to reach a view on an appropriate benchmark for Hammersmith & Fulham based on a **bottom-up analysis** of business turnovers and rents across different sectors of the borough's economy.

Business Turnover

4.8 Business turnover data for 2019 is available at a broad sector level from the Inter-Departmental Business Register (IDBR). It provides a useful understanding of the relative scale and performance of Hammersmith & Fulham's businesses compared to Inner and Outer London.

[7] This excludes other occupancy costs such as insurance and business rates which may be applicable.

[8] BizStats; AZCenral; Womply

4.9 This data is set out in Table 4.1 below, which shows the average turnover per business for Hammersmith & Fulham vs Inner and Outer London for each sector. For consistency, IDBR's standard sectors have been matched with the broad sectors identified in the Evidence Review in Chapter 3 (as per Table 4.2 below).

4.10 The data indicates that the average annual turnover of businesses in the borough was **£3.4 million** in 2019. There is a wide variation by sector within the area, ranging from **£31.9 million** per business for **Wholesale** to **£0.7 million** for Construction.

4.11 The average turnover per business in the borough is around half of the average for Inner London of £7.1 million but nearly **three times higher than the Outer London average of £1.3 million**.

4.12 At the sector level there are some other notable points of difference between Hammersmith & Fulham and Inner and Outer London in terms of turnover:

- The average turnover per business for the **Wholesale** sector in both Hammersmith & Fulham and Inner London is significantly *higher* than Outer London;
- The **Transport** and **Warehousing and Logistics** sectors in Hammersmith & Fulham have a *higher* turnover per business relative to both Inner and Outer London;
- The **Financial and Professional** sector has the second highest turnover per businesses ratio for Inner London, yet is relatively low in Hammersmith at £0.9 million per business;
- The average turnover of **Creative and Digital** businesses in the borough is almost on a par with Inner London (£2.1m vs £2.2m);
- The average turnover for the **Life Sciences** sector around half of the average for Inner London at £0.9 million per business; and,
- **Manufacturing** businesses in the borough have a far lower average turnover versus both inner *and* outer London.

4.13 It is worth noting that differences in turnover per businesses between Hammersmith & Fulham and wider comparators is not a direct reflection on business performance, but more likely down to the average business size and the nature of available commercial space. This data is, however, key to understanding what businesses can afford to spend on rent and demonstrates how this will differ on an area by area basis and within sectors.

Table 4.1) Turnover per business, 2019 (£ million)

Broad Sector	Hammersmith & Fulham	Inner London	Outer London
Wholesale	£31.9	£27.7	£4.3
Transport	£15.2	£8.4	£3.5
Warehousing and Logistics	£15.2	£8.4	£3.5
Retail	£2.9	£4.5	£1
Public Sector	£2.7	£2.8	£1.2
Business Support	£2.2	£2	£1.2

Creative and Digital	£2.1	£2.2	£0.6
Hospitality, leisure and recreation	£1.7	£2.1	£0.6
Manufacturing	£1.4	£12	£3.5
Financial and Professional	£0.9	£13.4	£1.3
Life Sciences	£0.9	£1.9	0.4
Construction	£0.7	£2.5	£0.6
Average	**£3.4**	**£7.1**	**£1.3**

Source: IDBR, March 2019 **Note:** Turnover data not available for Motor Trades, Other Services and Utilities and Waste.

Table 4.2) Alignment of Sector Analysis to IDBR Sectors

Broad Sector	IDBR Sector
Business Support	• Business admin and support
Creative and Digital	• Information and communication • Professional, scientific and technical
Life Sciences	• Professional, scientific and technical
Financial and Professional	• Finance & insurance • Professional, scientific and technical
Other Services	• n/a
Retail	• Retail
Hosp, leisure and recreation	• Accommodation and food • Arts, entertainment and rec
Motor Trades	• n/a
Construction	• Construction
Manufacturing	• Production
Wholesale	• Wholesale
Transport	• Transport and storage
Warehousing and Logistics	• Transport and storage
Public Sector	• Education • Health
Utilities and Waste	• n/a

Source: Hatch Regeneris

Focus On: Commercial Property Trends

A set of subareas has been identified to guide commercial analysis. This is because the borough is not contiguous and has a range of commercial property submarkets. Undertaking analysis at the borough level would mask place-based variations and miss specific needs and opportunities.

Seven subareas were selected using the borough's Employment Land Review as a basis, alongside insights from Co-Star, the Local Plan and an understanding of the characteristics and economic function of different parts of the borough. These subareas incorporate priority regeneration areas identified in Policy E1 of the Local Plan.

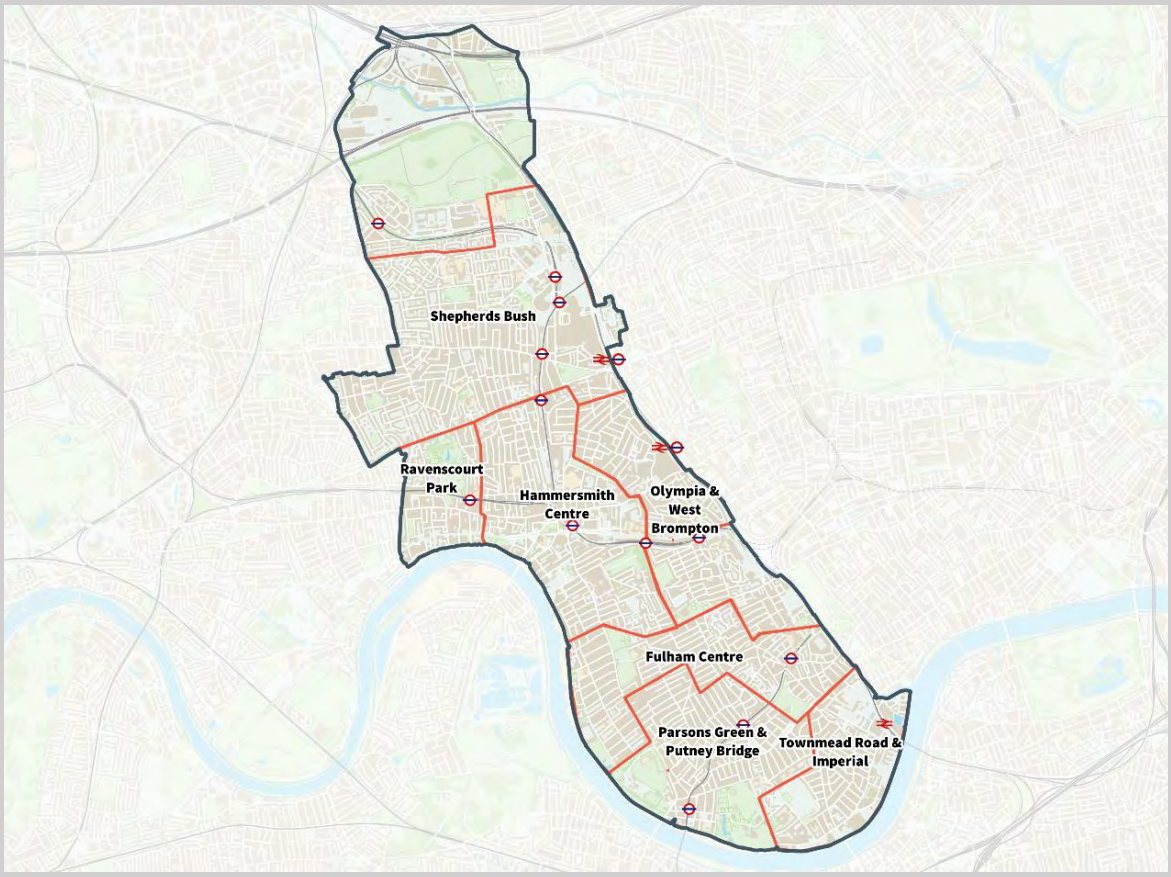
The sub-areas are:

- **Shepherds Bush:** This is in the north of the borough and is home to Shepherds Bush and White City. Its major commercial assets are concentrated in the White City Regeneration Area and include Media City, the emerging innovation district around Imperial College's new Campus and Westfield London. It has the highest office rental values[9] in the borough at £53 / sq ft and average industrial rental values of £20 / sq ft.
- **Townmead Road & Imperial:** This is on the south eastern edge of the borough, home to both Townmead Road and Imperial Wharf. The area has contributes around half of the boroughs industrial space with rental values at around £37 / sq ft. There is also a significant amount of office space with rental values at around £31 / sq ft.
- **Hammersmith Centre:** This is in the centre of the borough with the majority of commercial activity concentrated in the Hammersmith and Regeneration Area in close proximity to Hammersmith Underground Station. Other key areas include King Street and the river frontage to the south. Hammersmith Centre has the highest proportion of office floorspace in the borough with rental values of around £51 / sq ft.
- **Olympia & West Brompton:** This is located in the central eastern part of the borough and contains both Kensington Olympia to the North, home the large exhibition space Olympia London, and West Brompton to the south which is largely residential in nature apart from the Empress State Building. North End road is a key high street connecting the two areas. Rental values for office space are around £42 / sq ft and there is no significant amount of industrial space.
- **Fulham Centre:** This is located to the south of the borough home to Fulham Town Centre (part of the Fulham Regeneration Area). Rental values for office space are around £43 / sq ft and there is not a significant amount of industrial space.
- **Parsons Green & Putney Bridge**: This is on the southern edge of the borough and includes both Parsons Green, Putney Bridge and part of Fulham High Street. Rental values are around £42 / sq ft for office space and £26 / sq ft for industrial space.
- **Ravenscourt Park:** This is located at the western End of the borough. Ravenscourt Park, King's Street and residential areas are its key assets. The area is home to a small proportion of the borough's office and industrial space, with rental values at around £45 / sq ft and £17 / sq ft respectively.

It is worth noting that the remaining area to the north with Old Oak Common, Hythe Road and Wormwood Scrubs are not included as a sub area as local planning authority functions belong to Old Oak and Park Royal Development Corporation (OPDC).

[9] All rental values quoted in this subsection are *asking* rental prices retrieved from CoStar in May 2020. Intelligence is gathered from CoStar agents who update values on a regular basis.

Figure 4.1) Hammersmith & Fulham Subareas for Analysis



Contains OS data © Crown copyright and database right 2019

According to data from CoStar, the average rents across the borough are **£48 / sq ft** for **office** space and **£18 / sq ft** for **industrial** space[10]. Average office rental values are slightly lower than the London average of **£50 / sq ft** whilst average industrial values are higher the London average of **£14 / sq ft**. Office rents are higher than average rental values in the West London Alliance geography (£38 / sq ft) as are industrial rents (£14 / sq ft).

The borough is not however a single spatial or economic entity. Each sub-area has unique characteristics and differing levels of affordability.

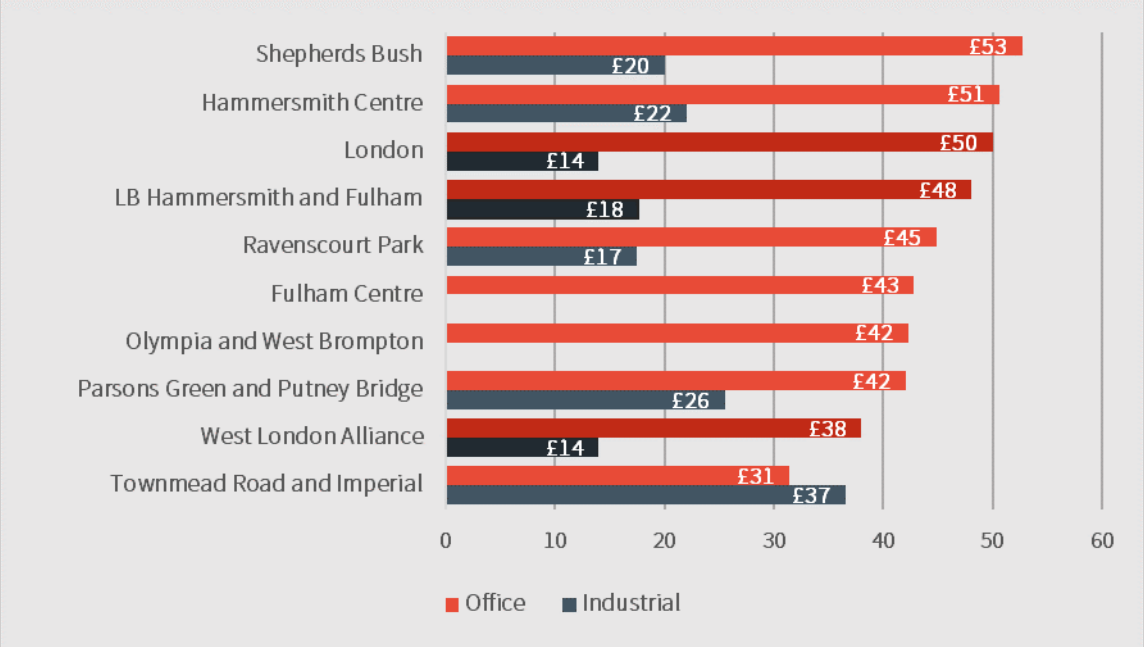
The most expensive office locations are **Shepherd's Bush** and **Hammersmith Centre** at around **£53 / sq ft** and **£51 / sq ft** respectively. These areas contain roughly 60% of all office floorspace in the borough.

Olympia and West Brompton is more affordable than other parts of the borough with the average at around **£42 / sq ft** and contains around 20% of office floorspace in the borough. This is lower than the London average **(£50 / sq ft),** but still higher than across the West London alliance **(£37 / sq ft). Townmead Road and Imperial** is also comparatively affordable at **£31 / sq ft** despite the high quality office space that exists in the area.

The most prominent and expensive industrial location is, in contrast, **Townmead Road and Imperial**, which has around 50% of all industrial stock in the borough and costs around **£37 / sq ft**, well above the London average (£18 / sq ft). Remaining industrial stock is spread across the borough, with rental

values in **Shepherd's bush (£22 / sq ft), Parsons Green and Putney Bridge (£26 / sq ft)** and **Hammersmith Centre (£22 / sq ft)** all above the London average**. Ravenscourt Park (£17 / sq ft)** is the only area below the London average.

Figure 4.2) Average Asking Rent by Hammersmith & Fulham Sub Area and Typology, 2020 (YTD)



Source: CoStar, 2020

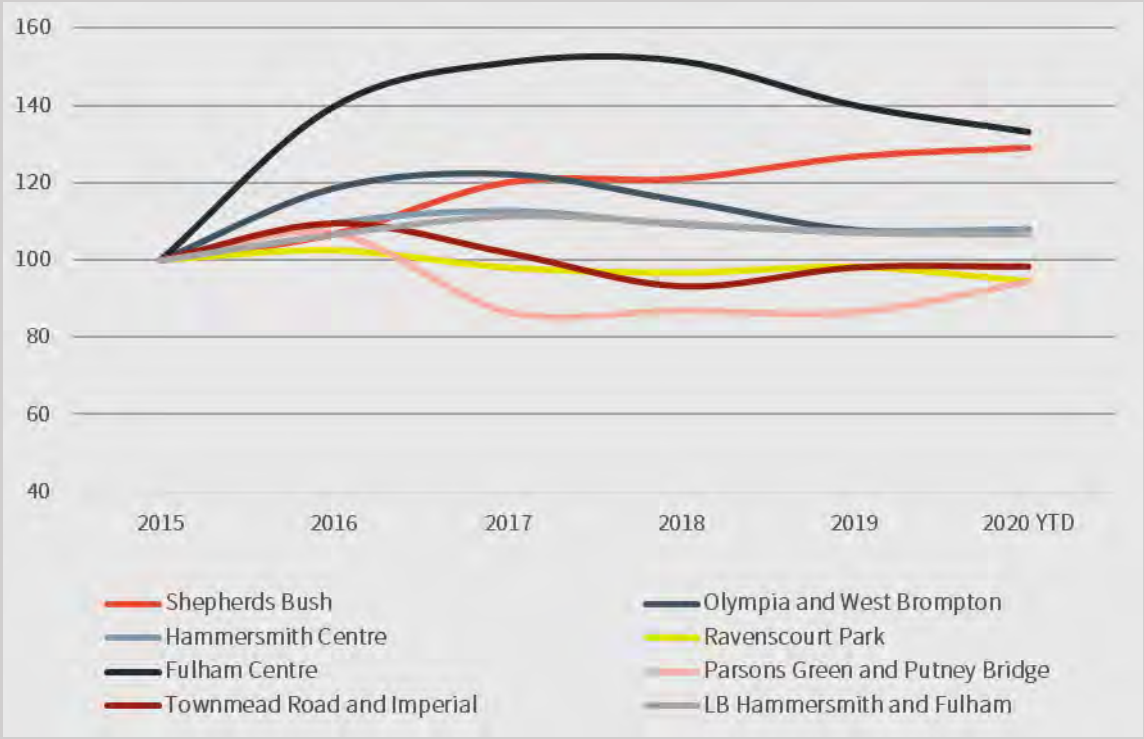
Note: YTD data downloaded May 2020; Insufficient industrial data for Fulham Centre and Olympia and West Brompton

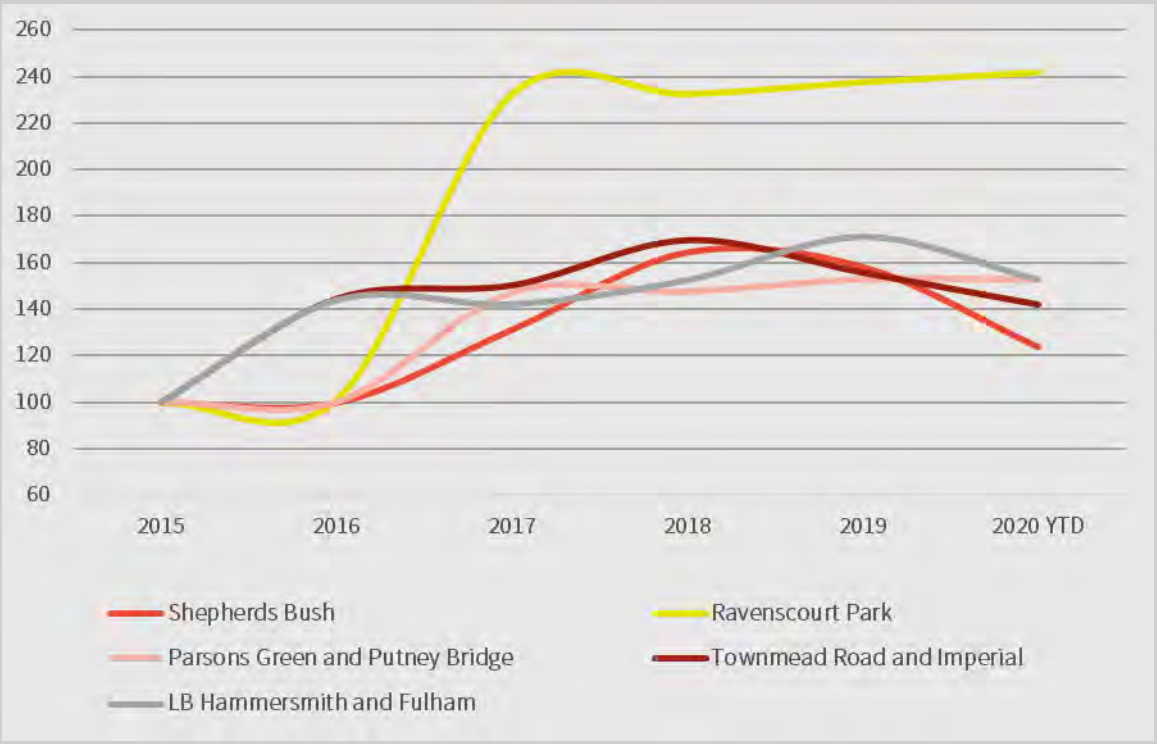
Over the last five years office rental prices have grown from **£45 / sq ft** to **£48 / sq ft** on average across the borough.

Growth in office rental prices is largely attributable to **Shepherds Bush and Olympia and West Brompton**. This likely reflects provision of new or refurbished high-quality office developments for coming on to the market (such as redevelopment of the BBC TV centre, BBC Media Village and Kensington Village) and forthcoming regeneration schemes.

Industrial space has risen more sharply than office space from **£12 / sq ft** to **£18 / sq ft** over the last five years. This is likely due to increased pressure on the supply of industrial space driving up prices across the borough. The largest increase in industrial rents has been in **Ravenscourt Park**, reflecting a very low starting rate in 2015 and a gradual increase to average rents across the borough.

Figure 4.3) Indexed Rental Growth (100 = 2015): Office (Top) and Industrial (Bottom)





Source: CoStar, 2020

Note: Industrial transaction data from 2015 to 2020 (YTD) not available for Olympia and West Brompton, Hammersmith Centre and Fulham Centre; YTD data downloaded May 2020

Turnover to Rent Ratios

4.14 Having examined trends in business turnovers and commercial property market rents, the next step is to estimate the likely proportion of turnover that businesses are paying on rent in Hammersmith & Fulham.

4.15 The following steps were taken to do this:

1) **Calculating average rent paid per business by use class**

- *Detailed transaction records from CoStar on over 3,000 commercial premises in Hammersmith & Fulham were used to identify the total premises and rent paid across different* use classes. *Records include information on location, typology, floorspace (NIA sqm), achieved rent, tenancy type (single or multiple) and number of floors.*

- *CoStar records do not provide data on individual businesses, as such premises data had to be converted to business data. It is assumed that a single tenancy premises has one business and multiple tenancy premises have the same number of businesses as floors (i.e. a multi tenancy premises with 6 floors has 6 businesses). This was considered the most robust method in the absence of other readily available assumptions, such as floorspace per business in the borough.*

2) **Assigning turnover per business by use class**

- *Average turnover per business data by sector were assigned to use classes most appropriate to the sector activity as shown in turnover to ratio Table 4.3 overleaf (e.g. Finance & Insurance was assigned to office space).*

3) **Calculating turnover to rent ratio**

- *The average rent paid per business by use class was lastly divided by the average turnover per business by use class to calculate the proportion of turnover used to pay rent.*

4.16 This method provides an indication of the proportion of turnover that businesses in Hammersmith & Fulham currently pay on rent assuming they have an average turnover. This is summarised in Table 4.3 below and suggests that the upper end of the range is around 15% to 20%, with only one sector paying over 20%.

Table 4.3) Turnover to Rent Ratios by Sector and Use Class

Sector	Turnover per business (£million)	Turnover to Rent Ratio		
		Office	Light Industrial	Industrial
Business Support	£2.2	7%	-	-
Construction	£0.7	-	18%	30%
Creative and Digital	£2.1	7%	6%	-
Finance and professional	£0.9	17%	-	-
Hospitality, leisure and rec	£1.8	9%	7%	-
Life Sciences	£0.9	18%	15%	-
Manufacturing	£1.4	-	9%	16%
Transport	£15.2	-	1%	1%
Warehousing and Logistics	£15.2	-	1%	1%
Wholesale	£31.9	-	0%	1%

Source: IDBR, 2019 (Turnover per business); CoStar, 2020 (Rent paid per business). Analysis by Hatch Regeneris

Note: Turnover to Rent Ratios were not included for sectors that do not occupy B class uses, including Public Sector and Retail. Sector and use class combinations have not been included where they are not likely to be found in the market (for example, finance and insurance is likely to only occupy office space).

4.17 As noted earlier, turnover to rent ratios differ dependent on the sector, type of space used and stage of business. The difference is due to a range of factors:

- **Operating costs:** Businesses will have different running costs depending on the type of sector they operate in. For example, Transport and Wholesale (1% turnover to rent ratio respectively) are more likely to spend less on rent, given the higher costs for logistics, machinery, tariffs and stock. In contrast, professional service businesses using office or light industrial space are likely to spend a higher proportion of turnover on rent as they have fewer overheads to cover.
- **Size of business:** Smaller businesses are more likely to spend a higher proportion of turnover on rent in the earlier stages of the business life cycle. This usually reduces as the business becomes bigger, more established and has greater choice. The average size of business differs across sectors which is reflected in rental prices.
- **Desirability of location:** Businesses may be willing to spend more money on rent to be in a more desirable location. Desirability is highly dependent on the sector the business operates in, but can related to transport accessibility, clustering, agglomeration, footfall, access to talent, access to finance and wider amenities for staff. Desirability from sectors will differ on a borough by borough basis (as well as within sub areas of a borough) and could therefore affect the average rent businesses are willing to pay as a proportion of turnover.

Taking these factors into account, together with the analysis set out in Table 4.3 above, a conservative benchmark of 15-20% for the maximum turnover to rent ratio businesses can pay is considered reasonable for Hammersmith & Fulham.

Defining 'Affordable' For Hammersmith & Fulham

4.18 The maximum affordability benchmark of 15% to 20% has been applied to a range of theoretical turnovers and premises sizes to provide an indication of the rental values businesses of different sizes and scales are able to afford. This information is set out in the tables overleaf.

4.19 The 'affordable' rental values have then been compared to actual average rental values across different parts of the borough to understand which areas are unaffordable in order to define a suitable discount to market rate in each area. This is set out later in this subsection.

4.20 It should be noted that:

- The data indicates the level of rent that a business can pay based on the turnover to rent benchmarks of 15% and 20%. A business with a turnover of around £100,000 seeking a premises of 500 sq ft, for example, would be able to afford a maximum of £30 per sq ft using the 15% benchmark or £40 per sq ft at 20%;
- Analysis excludes other occupancy costs such as insurance, business rates (where paid by the end user) and utilities that may be required in addition to rent;
- The number of employees (left hand column) is indicative of the potential size of businesses occupying the space and is based on standard employment densities for a range of managed workspace types;
- Industrial and light industrial occupiers will typically require larger sized units at lower densities; and,
- Cells are left blank and shaded grey where the permutation of turnover to size of premises is potentially unrealistic (e.g. very small turnover and a large number of employees).

Table 4.4) Office Rent Implications for different sized turnovers (£) and premises

Rent / sq.ft at 15% of annual turnovers

Employees	Size (sq.ft)	£100,000	£150,000	£250,000	£500,000	£1,000,000	£1,500,000
2 – 3	500	£30.00	£45.00	£75.00	£150.00	£300.00	£450.00
3 – 7	1,000	£15.00	£22.50	£37.50	£75.00	£150.00	£225.00
7 – 13	2,000			£18.75	£37.50	£75.00	£112.50
10 – 20	3,000				£25.00	£50.00	£75.00
17 – 30	5,000					£30.00	£45.00
35 – 65	10,000						£22.50

Rent / sq.ft at 20% of annual turnovers

Employees	Size (sq.ft)	£100,000	£150,000	£250,000	£500,000	£1,000,000	£1,500,000
2 – 3	500	£40.00	£60.00	£100.00	£200.00	£400.00	£600.00
3 – 7	1,000	£20.00	£30.00	£50.00	£100.00	£200.00	£300.00
7 – 13	2,000		£15.00	£25.00	£50.00	£100.00	£150.00
10 – 20	3,000			£16.67	£33.33	£66.67	£100.00
17 – 30	5,000				£20.00	£40.00	£60.00
35 – 65	10,000					£20.00	£30.00

Average Market Rents /sq.ft by Sub Area, 2020

Sub Area	Office
Fulham Centre	£42.78
Hammersmith Centre	£50.65
Olympia and West Brompton	£42.25
Parsons Green and Putney Bridge	£42.02
Ravenscourt Park	£44.87
Shepherd's Bush	£52.70
Townmead Road and Imperial	£31.44
LB Hammersmith & Fulham	*£48.07*

Source: Hatch Regeneris

Cells in the tables above have been highlighted in green, amber and red to reflect the variations in potential affordability when compared to average market rents:

■ **Red:** Businesses with these turnovers and seeking space of this size would be unable to afford to rent offices in most sub-areas based on the benchmarks of 15 – 20% of annual turnover.

■ **Amber**: businesses with these turnovers and seeking space of this size would be unable to afford rent for office space in the highest priced sub-areas based on the benchmarks of 15 to 20% of annual turnover.

■ **Green**: businesses with these turnovers and seeking space of this size would be able to afford rents for officespace in all sub-areas based on the benchmarks of 15 to 20% of annual turnover.

Cells are left blank and shaded grey where the permutation of turnover to size of premises is potentially unrealistic (e.g. very small turnover and a large number of employees).

Table 4.5) Industrial Rent Implications for different sized turnovers (£) and premises

Rent / sq.ft at 15% of annual turnovers

Employees	Size (sq.ft)	£100,000	£150,000	£250,000	£500,000	£1,000,000	£1,500,000
3 – 7	1,000	£15.00	£22.50	£37.50	£75.00	£150.00	£225.00
7 – 13	2,000		£11.25	£18.75	£37.50	£75.00	£112.50
10 – 20	3,000			£12.50	£25.00	£50.00	£75.00
17 – 30	5,000				£15.00	£30.00	£45.00
35 – 65	10,000					£15.00	£22.50

Rent / sq.ft at 20% of annual turnovers

Employees	Size (sq.ft)	£100,000	£150,000	£250,000	£500,000	£1,000,000	£1,500,000
3 – 7	1,000	£20.00	£30.00	£50.00	£100.00	£200.00	£300.00
7 – 13	2,000		£15.00	£25.00	£50.00	£100.00	£150.00
10 – 20	3,000			£16.67	£33.33	£66.67	£100.00
17 – 30	5,000				£20.00	£40.00	£60.00
35 – 65	10,000					£20.00	£30.00

Average Market Rents /sq.ft by Sub Area, 2020

Sub Area	Industrial
Fulham Centre	-
Hammersmith Centre	£22.00
Olympia and West Brompton	-
Parsons Green and Putney Bridge	£25.53
Ravenscourt Park	£17.46
Shepherd's Bush	£20.00
Townmead Road and Imperial	£36.53
LB Hammersmith & Fulham	*£17.62*

Source: Hatch Regeneris

Cells in the tables above have been highlighted in green, amber and red to reflect the variations in potential affordability when compared to average market rents:

■ **Red:** Businesses with these turnovers and seeking space of this size would be unable to afford rents to light industrial and industrial space in most sub-areas based on the benchmarks of 15 – 20% of annual turnover.

■ **Amber**: businesses with these turnovers and seeking space of this size would be unable to afford rent for light industrial and industrial space in the highest priced sub-areas based on the benchmarks of 15 to 20% of annual turnover.

■ **Green**: businesses with these turnovers and seeking space of this size would be able to afford rents for light industrial and industrial space in all sub-areas based on the benchmarks of 15 to 20% of annual turnover.

Cells are left blank and shaded grey where the permutation of turnover to size of premises is potentially unrealistic (e.g. very small turnover and a large number of employees).

4.21 The analysis shows that the size of the business and premises size being sought is crucial in terms of affordability. The rent that business can afford according to the 15% benchmark very quickly reduces for those businesses with small turnovers seeking premises of 1,000 sq ft or more. This is of course not all that surprising and reaffirms the relevance of affordable workspace for small and start-up businesses. For those businesses operating at the margins it also highlights the importance of other factors in terms of affordability such as flexible lease terms.

4.22 Affordability is also impacted by the type of space required. For example:

- Rental values for office space are higher than industrial but businesses are able to operate in smaller spaces due to high density. Businesses operating at the lower end of the market (<£100,000) would have to pay a higher ratio than the benchmark of 15-20% for office space across all sub areas except for Townmead Road and Imperial. Businesses with turnovers of £150,000 would still be required to spend more than the 15–20% ratio of turnover for space larger than 500sq ft.
- Industrial space is less expensive than office space, but businesses require larger premises for business operations. With this in mind affordability for industrial space should be considered for premises of 1,000sq ft or over. At this level there are affordability challenges for industrial businesses with turnovers of £150,000 or less; they are only able to afford industrial space in some areas of the borough.

Discount to Market Rent

4.23 Proposed discount to market rents have been set out for office and/or industrial space for most of the subareas based on all the intelligence and analysis set out above. The discounts aim to support the *smallest* businesses with the *lowest turnovers* to access workspace in the borough while also being cognisant of viability. These businesses are the focus as they are most in need of affordable workspace and make up the largest proportion of businesses in the borough.

For office space this involves bringing rents to around £30-40 per sq ft, which is below the borough average, and for industrial to as close to £20 per sq ft as possible which is near the borough average.

4.24 Using this as a basis, alongside an appreciation of the role, function and future of different parts of the borough, the subareas have been classified as high, medium or low priority for affordable workspace *and* discounts to market rents:

- **High priority** areas are key locations for affordable office and/or industrial space as they are strategic business locations, have major commercial development coming forward and require the highest discounts to market rents.
- **Medium priority** areas are also important places for affordable workspace as they are already established business locations, have some development on the horizon and are not as affordable as they could be.
- **Low priority** areas are less of a priority as they have less well established business locations, are expected to have little development over the short and medium term and are likely to be more affordable for most businesses already.

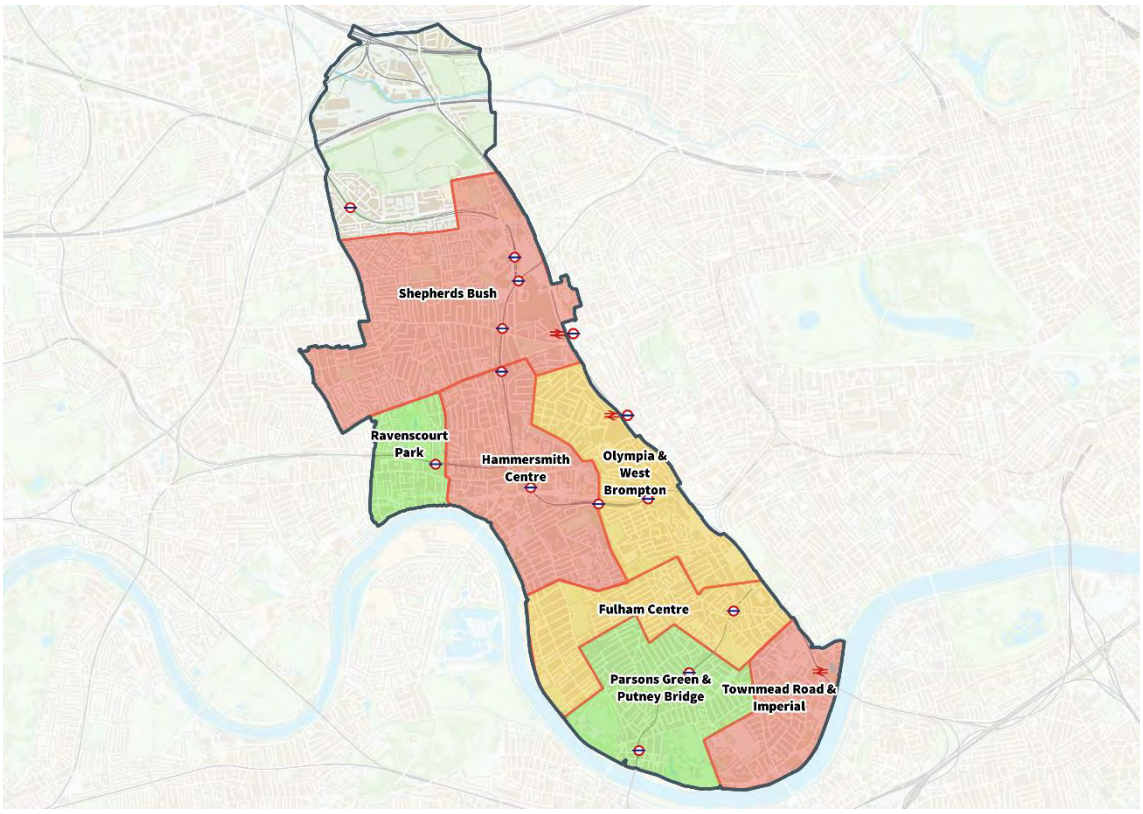
4.25 The table below summarises the priority level for each subarea, the proposed discount to market rent for office and/or industrial space and the rationale behind this. This is followed by a deep dive into each area which goes into more detail and also identifies which sectors should be prioritised for affordable workspace in each place.

4.26 It is important to note that the discount to market rent is consistent across priority levels as current commercial rents and affordability benchmarks for the smallest and lowest turnover businesses have been used to select the priority level for each place. These discounts apply to office ***or*** industrial space depending on the nature of the subarea:

- High: 40% discount
- Medium: 20% discount
- Low: 0% discount

More detail on how this is applied is set out below.

Figure 4.4) Priority Levels for Affordable Workspace *and* Discounts to Market Rents for Subareas



Source: Hatch Regeneris, 2020

Legend: Red = High Priority, **Amber** = Medium Priority, **Green** = Low Priority

Table 4.6) Summary of Sub Areas and Priority Levels

Sub Area	Priority Level	Priority for office?	Priority for industrial?	Rationale	Proposed Discount
Shepherds Bush	High	✓	✗	• Office rents are high (£53 / sq ft) • Office rents prohibitive for most businesses with turnovers less than £250k • Development expected as part of the White City Opportunity Area	Office: 40% Industrial: N/A
Townmead and Imperial	High	✗	✓	• Industrial rents are high (£36 / sq ft) • Industrial rents prohibitive for most businesses with turnovers less than £250k • Significant development expected around Chelsea Harbour, in the South Fulham Regeneration Area and in other parts of the subarea	Office: N/A Industrial: 40%
Hammersmith Centre	High	✓	✗	• Office rents are high (£51 / sq ft) • Office rents prohibitive for most businesses with turnovers less than £250k • New development expected in the Hammersmith Regeneration Area	Office: 40% Industrial: N/A
Olympia and West Brompton	Medium	✓	✗	• Office rents are more affordable but still high for smaller businesses with lower turnovers (£42 / sq ft) • Significant new development expected as part of the West Kensington and Earl's Court Opportunity Area	Office: 20% Industrial: N/A
Fulham Centre	Medium	✓	✗	• Office rents are more affordable but still high for smaller businesses with lower turnovers (£43 / sq ft) • Commercial development is expected to come forward as part of the Fulham Regeneration Area	Office: 20% Industrial: N/A
Parson's Green and Putney Bridge	Low	✗	✗	• Office and industrial rents are reasonably affordable and little major commercial development is expected to come forward	Office: N/A Industrial: N/A
Ravenscourt Park	Low	✗	✗	• Office and industrial rents are reasonably affordable and little major commercial development is expected to come forward	Office: N/A Industrial: N/A

Source: Hatch Regeneris, 2020

Shepherds Bush

Sub Area Name	Shepherds Bush			
Priority Level	High			
Office	✓			
Industrial	×			
Characteristics	Shepherd's Bush occupies the northern part of the Borough and is a strategic **office** location for Hammersmith & Fulham, home to Media City and the growing innovation district around Imperial College Campus. The area has changed dramatically in recent years due to the development of Westfield from 2009 and the designation of the White City Opportunity Area in 2013. The area is popular with office suppliers due to excellent transport links via Shepherds Bush, White Centre and Wood Lane providing Central line and Overground Links. It features some of the larger and new office buildings in the borough, such as the Shepherds Building on Rockley. It has a substantial pipeline which will deliver additional workspace. The area is home to a concentration of creative, digital and life science businesses and continues to attract small companies within these sectors. It is a desirable location and has the highest office rental values in the borough at £53 / sq ft, higher than the £48 / sq ft average in London. Affordability is also becoming worse, with average rental value growth of +30% from £40 / sq ft in 2015.			
Rationale for priority level	Shepherd's Bush is key to the borough's creative, digital and life science sectors but office space is prohibitive for most businesses with a turnover of less than £250k. Even businesses with a turnover of £500k would struggle to afford 2,000 sq ft of space (typically associated with 7-13 employees). Micro businesses, which have lower turnover, are particularly important in supporting the creative and digital sectors, accounting for over 90% of all businesses. Given the current trajectory of office rental growth, the opportunities for affordable workspace provision with new developments, and the importance of this area to the sectoral aspirations of the borough, this area should be prioritised for affordable office space and discounts to market rents.			
Proposed discount	40% for office space			
Priority Sectors	Creative and Digital	✓	Financial and Professional	✓
	Life Sciences	✓	Manufacturing	

Townmead and Imperial

Sub Area Name	Townmead and Imperial			
Priority Level	High			
Office	✗			
Industrial	✓			
Characteristics	Townmead and Imperial is in the south east of the Borough and is home to Chelsea Harbour and the New King's Road. Imperial Wharf station provides London Overground and Southern services. It contains around half of all **industrial** stock in the borough and rental values are around £36 / sq ft, the most expensive of the sub-areas and well above the London average. The most prominent industrial buildings include Parson's Green Depot, 27 Bagleys Lane and Albert Wharf. The area is currently undergoing significant development at Chelsea Harbour, which has already seen new high-quality office floorspace in the Design Centre East and Harbour Yard (in addition to a hotel, marina and residential homes). Despite this, new office stock rental values for office remain relatively affordable at around £31 / sq ft. Redevelopment in the area will bring new opportunities in terms of office, studio and light industrial workspace provision which may cause this rate to shift over time.			
Rationale for priority level	There is a need to tackle the affordability issue associated with industrial space in the area, given its prominence as an industrial location and the potential for existing stock to be lost or redeveloped. At the moment small businesses with turnovers less than £250k would struggle to afford any space in the area. Even those with £500k turnovers would struggle to afford space that is 2,000 sq ft or over. It is likely that further development will come forward particularly in the South Fulham Riverside Regeneration Area, which will impact rents but also provide opportunities for affordable workspace.			
Proposed discount	40% for industrial			
Priority Sectors	Creative and Digital	✓	Financial and Professional	
	Life Sciences		Manufacturing	✓

Hammersmith Centre

Sub Area Name	Hammersmith Centre			
Priority Level	High			
Office	✓			
Industrial	×			
Characteristics	Hammersmith Centre is a hub of commercial activity centred around Hammersmith Underground Station. It is a key **office** location for the borough with around 40% of its office floorspace. It has good transport connectivity and is well placed to provide affordable workspace for businesses looking for alternatives to central London. Despite this, rental values are currently above the London average at around £51 / sq ft and have remained largely the same over the last five years.			
Rationale for priority level	There is a clear rationale to prioritise affordable workspace in the area, particularly to help it to continue to be a desirable location for small businesses looking to operate outside of central London. Like Shepherd's Bush, office space is prohibitive for most businesses with a turnover of less than £250k. Unlike Shepherd's Bush however, rental levels appear to be more stable (£45 / sq ft in 2015 vs £51 / sq ft in 2020) but new development is expected as part of the plans for the Hammersmith Regeneration Area. This should provide more opportunities for affordable workspace in the town centre.			
Proposed discount	40% for office			
Priority Sectors	Creative and Digital	✓	Financial and Professional	✓
	Life Sciences		Manufacturing	

Olympia and West Brompton

Sub Area Name	Olympia and West Brompton			
Priority Level	Medium			
Office	✓			
Industrial	×			
Characteristics	Olympia and West Brompton is the third largest **office** location behind Hammersmith Centre and Shepherd's Bush, but is more affordable with rental values of around £42 / sq ft compared to above £50 / sq ft in these locations. This is still higher than most small and low turnover businesses can afford however. The office market has improved in recent years, following improved frequency of trains from Kensington Olympia and the renovation and expansion of the Olympia Exhibition Centre between 2011 and 2013. This has provided good transport connections and a strong anchor institution to attract new business into the area. Kensington Village is the largest office estate in the submarket. It is a recent redevelopment of a 19th century warehouse to provide purpose build office buildings, surrounding gardens, a café and gym. Small scale developments and refurbishments such as Kensington Village will continue to deliver additional workspace provision in the short term. In the long term the mixed-use regeneration of the 77 acre site in the West Kensington and Earls Court Opportunity Area will bring about workspace opportunities in conjunction with the delivery of housing and other commercial uses.			
Rationale for priority level	The area is more affordable than other parts of the borough, but SMEs with turnovers less than £250k would still struggle to afford office space in the area. With regeneration momentum on the horizon, the area could see greater confidence from investors to deliver commercial workspace, providing opportunities for workspace provision. This could also push rents higher than they already are.			
Proposed discount	20% for office			
Priority Sectors	Creative and Digital	✓	Financial and Professional	✓
	Life Sciences		Manufacturing	

Fulham Centre

Sub Area Name	Fulham Centre			
Priority Level	Medium			
Office	✓			
Industrial	×			
Characteristics	Fulham Centre has developed as a small **office** centre due to the strength of the local shops and amenities, in addition to good transport links via Fulham Broadway Underground. The main office buildings in the area include 20 Fulham Broadway and the Blue Building on Vanston Place. The Fulham Regeneration Area is focused on the delivery of community uses and will provide opportunities for workspace, particularly utilising affordable models to provide for local residents.			
Rationale for priority level	The area is more affordable than other parts of the borough, but the smallest businesses with low turnovers would still struggle to afford the area with rents around £43 / sq ft. As the Local Plan has identified the Fulham Regeneration Area as a priority for 8,500 jobs it is also likely that some major commercial developments will come forward in the medium to longer term that could be harnessed to provide affordable space for small businesses.			
Proposed discount	20% for office			
Priority Sectors	Creative and Digital	✓	Financial and Professional	✓
	Life Sciences		Manufacturing	

Parsons Green and Putney Bridge

Sub Area Name	Parsons Green and Putney Bridge			
Priority Level	Low			
Office	✗			
Industrial	✗			
Characteristics	This is on the southern edge of the borough and is home to both Parsons Green Station, Putney Bridge Station, Fulham High Street and part of the New King's Road. It has a relatively small **office** market and around 11% of the borough's **industrial** floorspace, with rental values at around £42 / sq ft and £26 / sq ft respectively. Both of these figures are slightly higher than the smallest and lowest turnover businesses could afford. The sub area has good local amenities and provides a more pleasant and less urban environment compared to other locations in the borough. The New King's Road is famous for antiques and interiors and has been a pull for attracting design and fashion companies to the area. Some of the main office locations include a cluster of warehouse style offices in Heathmans Road and the Piper Centre on Carnwarth Road.			
Rationale for priority level	Parsons Green and Putney Bridge serves a small localised market and is reasonably affordable compared to the rest of the borough. Even though the area is not as affordable as it could be, there are few major development opportunities in the pipeline so it is not necessary to designate the area as a priority.			
Proposed discount	N/A			
Priority Sectors	Creative and Digital	✓	Financial and Professional	✓
	Life Sciences		Manufacturing	

Ravenscourt Park

Sub Area Name	Ravenscourt Park			
Priority Level	Low			
Office	✗			
Industrial	✗			
Characteristics	Ravenscourt Park is on the western edge of the borough and has two underground stations (Ravenscourt Park and Stamford Brook) both providing district line connections. The area to the north is mostly comprised of residential uses and green space, while King Street, Great West Road and the Thames frontage to the south provides a strong amenity offer, with a large range of pubs, bars, restaurants and some other businesses. It has the lowest proportion of office floorspace (3%) compared to other sub areas in the borough and a low proportion (10%) of industrial floorspace. Rental values are around £42 / sq ft for office space and £17 / sq ft for industrial space. While office rents are not as affordable as they could be, they are more affordable than most other areas and it is particularly affordable for industrial space.			
Rationale for priority level	The sub area is not a key office or industrial location and has no major development opportunities in the pipeline. The office and industrial space that is present is relatively affordable in comparison to other sub areas. As such, this area is considered as a low priority for the provision of affordable workspace.			
Proposed discount	N/A			
Priority Sectors	Creative and Digital	✓	Financial and Professional	✓
	Life Sciences		Manufacturing	

Is ‘affordable’ viable in Hammersmith & Fulham?



5. Is 'affordable' viable in Hammersmith & Fulham?

5.1 Hammersmith & Fulham's Local Plan (February 2018) states that applications for large new commercial schemes will be expected to provide affordable workspace which could be via cross-subsidised rent through S106 Agreements, reduced rent arrangements, the provision of co-hubs, start up space and/or flexible leasing arrangements.

5.2 Any provision is to be specific to the area or location in which the development is being undertaken. This is highlighted earlier in this report, for instance, where there are specific requirements in local areas. An example of this is Shepherd's Bush, which is home to Media City, the Imperial College Campus and office space providers due to excellent transport links.

5.3 Local Plan Policy E1 – Providing for a Range of Employment - sets out the borough's aspirations for mixed-use and new employment schemes and the retention, enhancement and intensification of existing employment uses. The Council recognise the existing strengths in the borough in creative industries, health services, life science and other research-based industries. Policy E1 states that these industries 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 and subject to viability.

5.4 The areas in the borough identified earlier in this report as having demand for commercial development and need for affordable workspace are:

- Shepherd's Bush (office);
- Hammersmith Town Centre (office);
- Fulham Centre (office);
- Olympia and West Brompton (office); and,
- Townmead and Imperial (industrial).

The viability of providing affordable workspace at the level of discount to market rent presented in Chapter 4 have been tested for different size thresholds and proportions as set out later in this chapter. Whilst Parsons Green and Putney Bridge and Ravenscourt Park were listed initially, these areas are not considered to be locations where there is demand for commercial development and need for affordable workspace and on this basis have not been tested.

Focus On: Viability Assumptions

Testing has been undertaken on the basis of commercial floorspace only. Mixed-use scheme testing has not been included at this time in order to establish whether purely commercial floorspace can viably support affordable workspace.

Reference has been made to the original Hammersmith & Fulham Community Infrastructure Levy Study (Peter Brett, 2014) in order to maintain consistency across the borough. Due consideration has also been given to the Car Giant scheme in Hythe Road (Old Oak & Park Royal Development Corporation ("OPDC") as examined by the Planning Inspector, September 2019) as this has been a recent assessment which has assisted in deliberations regarding land values across the borough.

Benchmark Land Values

Local Plan testing utilises industrial land values to establish Benchmark Land Values (BLV's), to ensure that land values are not set too high. Turley consider that land values should be set according to location for the purpose of this report. Peter Brett's Hammersmith & Fulham CIL Viability Testing 2014 provided a wide range of industrial land values across the borough. Peter Brett adopted a BLV of £14m per hectare/£5.66m per acre in viability testing 'Hammersmith Town Centre' and 'outside Hammersmith Town Centre' for commercial uses.

Industrial land values have been established through assessing relevant literature. Most notably, evaluation of the Car Giant scheme (OPDC) where the Planning Inspector[11] (P.W. Clark, 2019) agreed with CBRE (representing OPDC) on a figure of £14m per hectare/£5.67m per acre. However, it must be acknowledged that in establishing this land value, CBRE did so by undertaking an appraisal based on an alternative use value (AUV) on behalf of Car Giant. Their appraisal produced a residual land value based on a hypothetical industrial redevelopment. Turley therefore consider £14m per hectare/£5.67m per acre to be at the midpoint of industrial land values for the borough.

In terms of BLV's, we have taken into account both the original Peter Brett CIL Viability testing (2014) and the Whole Plan Viability Study[12] (undertaken by BNP Paribas, 2017) prepared for the Old Oak Park Development Corporation (OPDC), which details their consideration of Land Value at the Car Giant site (information provided by LBHF), at £11.64m per hectare/ £4.71m per acre for 'Secondary Office and industrial (high)'. It is considered that BNP Paribas would be taking a view that in this location Industrial land values would be low. Turley have therefore adopted £4.75m for the lower end of the adopted land values (in order to reflect the passage of time since the Whole Plan Viability Study was undertaken to the present day).

Moreover, Turley have inflated the adopted values from Peter Brett's report (£5.67m) to the present day accordingly which equates to c. 15% uplift (arriving at a land value of £6.5m). This figure represents the upper end of adopted land values for this research.

Turley have considered the rents adopted by Hatch to establish Low, Medium and High Value locations in terms of Benchmark Land Values. There is clearly a High, Medium and Low value range established from the rents identified. To arrive at a midpoint for the adopted land values, Turley have simply taken the midpoint between the lower adopted value (£4.75m) and higher adopted value (£6.5m) to arrive at £5.625m. This is set out in the following table:

[11] P.W. Clark (2019) OPDC Local Plan Examination – Interim Findings on viability of Car Giant proposal

[12] BNP (2017) Old Oak and Park Royal Development Whole Plan Viability Assessment

Table 5.1) Benchmark Land Values By Sub-Area

Location	Rental value (ft^2)	Value (Location)	£ per Acre	£ per Hectare
Townmead and Imperial	£36/ft^2	**Low**	£4,750,000	£11,750,000
Fulham	£43/ft^2	**Medium**	£5,625,000	£14,000,000
Olympia/West Brompton	£42/ft^2			
Hammersmith	£51/ft^2	**High**	£6,500,000	£16,000,000

Plot Ratios

Turley have considered plot ratios as part of the benchmarking exercise. Plot ratios are defined as "a ratio representing the density of building in a specified area of land."

To inform the input of Plot Ratio, Turley cross checked Peter Brett's Hammersmith & Fulham CIL Viability Study (2014). Peter Brett assumed a Plot Ratio of approximately 1.9:1. In layman's terms, an office building with an area of 4,645 sqm can be built on a site area of 2,500 sqm. Peter Brett has used this assumption for 'Hammersmith Town Centre' and 'outside Hammersmith Town Centre'. Relevant detail is provided below.

Table 5.2) Peter Brett Viability Testing Assumptions

Ref	Zone	Net Site Area	Commercial CIL Chargeable Floor Space sqm	Residual Value		Benchmark		Overage
		HA	*GIA sq m*	*Per Ha*	*Per £psm*	*Per Ha*	*Per £psm*	*Per £psm*
HTC1	HTC Offices	0.25	4,645	£23,920,183	£1,287	£14,000,000	£753	£534

Turley have assumed that the development land is less efficient and adopted a ratio of 1.5:1. This is because the occupier market is becoming more geared towards providing more user-friendly communal gardens, adequate car parking and bicycle storage. Turley note that plot ratios are site specific and are influenced by the make-up of the surrounding area, planning policy/context and with impacts on density and storey height. Land values will naturally be higher on developments permitted to build increasing storey heights.

GL Hearn[13] (2019) undertook a study which informed plot ratios, however this was informed mainly by B8 industrial land, with a suggested a ratio of 0.65:1. This aligns with the draft London Plan[14], which seeks to retain sufficient industrial, logistics and related capacity by seeking no net loss of industrial floorspace. Floorspace capacity is defined in the Draft London Plan (2019) as either the existing industrial and warehousing on site, or the potential floorspace that could be accommodated on a site

[13] GL Hearn (2019) West London Employment Land Evidence

[14] Draft London Plan (2019)

at 65 per cent plot ratio.B8 uses tend to have low site coverage given the need for circulation space for vehicles. Turley therefore expect that for hybrid testing of a range of B uses the plot ratio is going to be more efficient.

With regard to plot ratios, we have adopted a 1.5:1 (office building: development plot). Turley have also adopted a plot ratio of 0.65:1 (industrial building: development plot) for the Townmead appraisals. The plot ratios: GIA office/industrial building areas are summarised in the below table.

Table 5.3) Commercial Development and Plot Ratios

Quantum of Offices (sq m)	Plot Area (sq m)	Plot Area (sq ft)	Plot Area (in acres, rounded)	Plot Area (hectares)
1,000	666.67	7,175.93	0.16	0.07
2,500	1,666.67	17,939.83	0.41	0.17
5,000	3,333.33	35,879.67	0.82	0.33
Quantum of Industrial (sq m)	Plot Area (sq m)	Plot Area (sq ft)	Plot Area (in acres, rounded)	Plot Area (hectares)
1,000	1,538	16,555	0.38	0.15
2,500	3,846	41,398	0.95	0.38

It has been assumed that the development land is slightly less efficient than assumed in Peter Brett's (2014) CIL study for the office space, to incorporate a wider range of commercial users and to integrate the provision of communal space, ample parking space and bicycle storage (for example) in development coming forward. As discussed plot ratios are site and user specific, and will vary based on the context of the area and scale/massing.

Stamp Duty, Agent and Legal Fees

Stamp Duty has been included at the prevailing rate together with 1% Agents Fee and 0.80% Legal Fee. This is standard industry input for these costs.

Commercial Floorspace Thresholds

Commercial floorspace thresholds have been tested at:

- 1,000sqm;
- 2,500sqm and;
- 5,000sqm GIA of commercial space.

It is considered that 1,000sqm would be the minimum threshold to trigger a requirement for affordable workspace.

Percentage of Affordable Workspace

The following percentages have been tested in each of the floorspace at the following affordable provision thresholds:

- 5%;
- 10% and;
- 20% affordable provision.

With regard to work that other London Boroughs have undertaken on Affordable Workspace, it appears that 10% is the most common percentage of affordable workspace sought.

Construction Cost for Commercial Floorspace

The Construction Costs have been adopted from BCIS Offices 'Generally' and BCIS Purpose Built Warehouses both of which fall between BCIS Upper Quartile and Median Quartile, which we believe provides a reasonable allowance. We have therefore not included for Abnormals or Demolition. The view would be that as each site comes forward it is tested on its own merits.

Commercial build costs of £2,600 per sq m / £241 per sq ft – were recommended by the Planning Inspectorate at the Car Giant site. This falls between median and upper quartile for offices generally therefore this figure has been adopted for the appraisals in this report. This assumes fit out to Cat A specification.

Industrial build costs for warehouses in LBHF are listed at £1,215/m^2 (£113/ft^2) which has been adopted in the appraisals.

Plot Externals (Construction Costs)

Plot externals have been incorporated at 10%. The usual rate adopted on development schemes can be anywhere from 10% to 15%. It is considered that 10% for commercial floorspace is appropriate for testing purposes.

Professional Fees

Professional fees usually appear within a range of 8% - 12% depending upon the complexity and duration of the development scheme.

Turley have adopted 10% which is considered to make appropriate allowance for a range of commercial schemes.

Contingency

A 5% contingency has been applied to the construction costs. This is a standard construction industry assumption. However, it is acknowledged that this could be higher in cases where Listed buildings are used for commercial space, owing to the specialist nature of construction related to listed buildings and heritage implications. This could have an impact on particular areas of the borough where such buildings are more prevalent.

Profit

Viability testing across the boroughs comprise mixed-use schemes, which are predominantly residential-led and provide a level of affordable housing. Typically, the combined profit level seen on these schemes is between 15-20% Profit on Cost. This is dependent on the level of the Affordable housing within the appraisals, as 20% Profit on Cost is accepted on the private market housing, and 6%

Profit on Cost for the affordable element. As we are assessing commercial only, Turley have adopted 15% Profit on GDV for commercial development.

This profit reflects the risk in the current market, due to both Covid-19 and Brexit factors. Turley note that the adopted Profit Margin in the Car Giant scheme was 20% Profit on Cost, which roughly equates to 17.5% Profit on GDV. We therefore consider 15% Profit on GDV to be an appropriate assumption.

Marketing/Sales Agent and Legal fee

A total of 3% sale, marketing and legal fee has been adopted. This is considered to be a reasonable level of cost to be attributed to disposal of units. This reflects the costs adopted in the Car Giant scheme.

Letting Agent/Legal fee

- 10% Letting Agent Fee (calculated from the headline rent)
- 5% Letting Legal Fee (calculated from the headline rent)

This reflects industry standard inputs.

Finance

7% debt finance has been adopted. This is a reasonable level of debt finance assuming 100% debt finance.

Rent Free Period

A rent free period of 12 months has been adopted. This reflects a market facing incentive to allow an occupier to fit out commercial space to their own specification.

Rents, Discounts and Yields

The rents identified in Chapter 4 have been included together with the proposed discounts for each area. With regard to yields, these are informed by comparable evidence identified for these particular locations, which are also corroborated by the evidence at Car Giant. The BNP Car Giant study adopted yield of 5.5% on rents of between £40/ft^2 to £50/ft^2. Turley consider that this is an appropriate yield to test all locations given the rental values being achieved. This includes Townmead/Imperial, where the rents reflect high levels for industrial rent, however industrial yields are considered to be more robust in the current market. The following rents, discounts and yields have been adopted for the areas tested.

Table 5.4) Location Specific - Applied Rents, Discounts and Yields

Location Specific	Use	Yield	Market Rent	Affordable Rent	Discount
Fulham	Office	5.5%	£43	£37.40	20%
Hammersmith TC	Office	5.5%	£51	£30.60	40%
Shepherds Bush	Office	5.5%	£53	£31.80	40%
Olympia and West Brompton	Office	5.5%	£42	£33.60	20%
Townmead/Imperial	Industrial	5.5%	£36	£21.60	40%

Community Infrastructure Levy (CIL)

Development schemes are very sensitive to CIL, especially in areas where construction costs are high and revenues are low by comparison. This sensitivity also applies where land values are high. Only one location in LB Hammersmith & Fulham incorporates Borough CIL (BCIL) and Mayoral CIL (MCIL) and that is Hammersmith Town Centre, which applies these as BCIL of £80psqm and MCIL of £80psqm. These rates have been incorporated in the appraisals for Hammersmith Town Centre.

Construction Timescale

The following construction timescales are tabled below per each of the threshold floorspaces tested.

Table 5.5) Construction Timetable

Construction Timeline (Months)	Threshold Tested		
	Offices (1,000 sqm)	*Offices (2,500 sq m)*	*Offices (5,000 sqm)*
Pre-construction	6	6	6
Construction	9	12	18
Sale	1	1	1
Total Months	**16**	**19**	**25**

Viability Tests

5.5 As the tables below show, all locations and sizes are viable at the proposed discounts to market rents set out in the previous chapter (i.e. where the Residual Land Value exceeds the Benchmark Land Value as highlighted in green).

5.6 It can be reasonably expected that developments in Fulham Centre, Hammersmith Town Centre, Olympia and West Brompton, Shepherds Bush and Townmead and Imperial can provide up to 20% affordable workspace at the proposed discounts to market rents based on the current inputs.

5.7 Turley consider that the affordable workspace should be assessed in line with the market and discounted accordingly. This could be reviewed every five to ten years, or more regularly, depending on the terms of the leases. The duration of time the Affordable workspace is provided for can also depend on whether the building has a change of use, or the market dictates that the existing use becomes unviable.

5.8 Whilst Townmead has been tested on an Industrial basis, it may be possible to achieve a level of affordable workspace through mixed-use schemes which may generate a higher Gross Development Value overall, though this depends upon the practicality of delivering schemes with large scale office use in a largely industrial location.

Table 5.6) 5% Affordable Workspace

GIA Area	1000sqm	2,500sqm	5,000sqm	LAND VALUE	LAND VALUE (per hectare) Ha
Plot (Acres)	0.15	0.45	0.85	(per acre)	
Plot (Acres)*	0.38	0.95	1.95		
Fulham Centre	RLV	RLV	RLV		
5%	£1,431,824	£3,444,386	£6,411,993	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Hammersmith TC	RLV	RLV	RLV		
5%	£2,016,991	£5,347,479	£10,060,071	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Olympia and WB	RLV	RLV	RLV		
5%	£1,331,342	£3,197,502	£5,935,064	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Shepherds Bush	RLV	RLV	RLV		
5%	£2,381,652	£5,778,115	£10,920,280	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Townmead/Imp	RLV	RLV	RLV		
5%	£2,230,522	£5,483,283	£10,387,412	£4,750,000	£11,750,000
BLV	£1,805,000	£4,512,500	£9,262,500		

**Townmead plot ratio*

Table 5.7) 10% Affordable Workspace

GIA Area	1000sqm	2,500sqm	5,000sqm	LAND VALUE	LAND VALUE (per
Plot (Acres)	0.15	0.45	0.85	(per acre)	hectare)
Plot (Acres)*	0.38	0.95	1.95		
Fulham Centre	RLV	RLV	RLV	£	£
10%	£1,431,824	£3,444,386	£6,411,993	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Hammersmith TC	RLV	RLV	RLV		
10%	£1,915,460	£5,073,152	£9,530,127	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Olympia and WB	RLV	RLV	RLV		
10%	£1,331,342	£3,197,502	£5,935,064	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Shepherds Bush	RLV	RLV	RLV		
10%	£2,381,652	£5,778,115	£10,920,280	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Townmead/Imp	RLV	RLV	RLV		
10%	£2,230,522	£5,483,283	£10,387,412	£4,750,000	£11,750,000
BLV	£1,805,000	£4,512,500	£9,262,500		

**Townmead plot ratio*

Table 5.8) 20% Affordable Workspace

GIA Area	1000sqm	2,500sqm	5,000sqm	LAND VALUE	LAND VALUE
Plot (Acres)	0.15	0.45	0.85	acre	Ha
Plot (Acres)*	0.98	0.95	1.95		
Fulham Centrre	RLV	RLV	RLV	£	£
20%	£1,308,059	£3,140,296	£5,824,554	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Hammersmith TC	RLV	RLV	RLV		
20%	£1,712,400	£4,524,497	£8,470,239	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Olympia and WB	RLV	RLV	RLV		
20%	£1,210,466	£2,900,509	£5,361,334	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Shepherds Bush	RLV	RLV	RLV		
20%	£2,065,727	£5,001,888	£9,420,769	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Townmead/Imp	RLV	RLV	RLV		
20%	£2,015,937	£4,911,048	£9,368,902	£4,750,000	£11,750,000
BLV	£1,805,000	£4,512,500	£9,262,500		

**Townmead plot ratio*

What are the next steps?



6. What are the next steps?

6.1 Based on the evidence and analysis presented within this report a series of recommendations have been identified to inform the Economic Development Planning Obligations SPD and ultimately enable the borough to deliver affordable workspace through the planning system.

Overarching Recommendations

6.2 A series of overarching implications have been identified for the borough. These are as follows:

- **Focus on priority sectors:** It is sensible to focus on priority sectors for affordable workspace because there may be limited opportunities and resources and these should be directed to where they can have the most significant impact and contribute to wider strategic objectives. It also ensures that support is provided where need is greatest and pressures are highest. The four priority sectors identified as part of this study are: (1) Creative and Digital; (2) Financial and Professional; (3) Life Sciences and; (4) Manufacturing.
- **Geographically varied discount rates:** The evidence suggests there is scope to vary the discount geographically to align with those areas that have been identified as high, medium and low priority based on demand, need and the commercial pipeline. This is discussed in more detail in the sub-area recommendations below.
- **Focus on small and start-up businesses:** Evidence suggests that as turnovers increase above £250,000 affordability is less constrained by geography and size of premises. This highlights the importance of focusing interventions on start-up and micro businesses (1-10 employees) with low turnovers (<£250,000) typically occupying space of 1,000 sq ft or less, or for scaling businesses occupying space of up to 2,000 sq ft. This cuts across all priority sectors.
- **Minimum size threshold:** Affordable workspace operators may not be interested in taking on small spaces. It may therefore be prudent to have a minimum size threshold (based on soft-market testing with operators) for affordable workspace and put in place alternative mechanism where smaller workspaces are proposed (e.g. payments in lieu).
- **Flexible lease terms:** Evidence suggests that occupiers of affordable workspace often equally value flexibility in lease terms in order to manage risk and allow them to adapt to changing market need. Identifying and working with operators who offer flexible lease terms to end users will be important in securing space that is genuinely accessible.
- **Potential for off-site contributions:** Hammersmith & Fulham could consider implementing off-site contributions where on-site provision is either physically inappropriate or unacceptable in terms of viability. A formula would need to be created to ensure that there is no benefit to the developer in providing a payment in lieu rather than workspace on site (see box below).
- **Specific rates for artist studios and not-for-profits:** As set out earlier in the report, the London Affordable Artist Studios Network (LASSN) highlight that artists cannot afford to pay as much as other sectors due to the profitability and nature of their work. A set specific rate could be introduced in the SPD for artist studios in locations where they may be desirable and contribute to other strategic objectives. A similar approach could be taken for not-for-profits or social enterprises that deliver significant social value.

- **Balancing space and affordability requirements:** In some instances it may be preferable for a developer to offer greater discounts to market rates but provide less affordable space overall. This could be considered on a case-by-case basis but it might be helpful to offer the flexibility where a developer has to provide a large quantum of space due to the proposed size of the development or where the proposed discount to market rate is still not affordable for specific target groups (e.g. artists or not-for-profits). This may also be relevant where developments include shared events/networking and meeting space that contribute to the facilities and services that affordable occupiers can access, even if not specifically desk space.
- **Flexibility over membership models:** Some developers may prefer to pepper pot small businesses and start-ups throughout their commercial space to encourage collaboration and networking between different types of businesses. This could be offered in the form of appropriately discounted memberships rather than dedicated and separate space (e.g. discounted desks, touch down spaces, small offices, virtual offices etc). This could be considered where a developer or operator has a strong vision and track record in providing such space. A Payment in Lieu formula or calculator could again be used to determine the value of the discount that should be provided on an annual basis.

Payment in Lieu Calculations

Several London boroughs consider Payment in Lieu as an alternative to affordable workspace provision, often where proposed space is too small or has been too difficult to let. Specific formulas and/or calculators are used to determine the size payment and to ensure that it is not more cost effective for developers to make a payment than provide space on site. A similar type of approach could be used in Hammersmith & Fulham.

One of the clearest formulas is set out in the London Borough of Lambeth's Draft Local Plan. The formula is as follows: **Step 1: C=AxB; Step 2: E=DxC; Step 3: G=ExF; Step 4: H=G-E; Step 5: J=(1xI); Step 6: K=HxJ.** The letters refer to:

A. Total lettable employment floorspace (sq m)

B. Percentage of floorspace to be discounted

C. Amount of floorspace subject to discount

D. Market rent per sqm before discount

E. Market rent for discounted floorspace before discount

F. Percentage discount

G. Rent after discount

H. Value of discount

I. Investment yield

J. Income multiplier

K. Capital value of discount

Determining Market Rent

The Council will need to set out how developers should determine a 'normal' market rent to apply a discount to. We recommend that this is done on a case-by-case basis to ensure that the nature and location of proposals are considered. The Council and developer could jointly commission an independent market valuation; both parties could commission independent valuations to be compared; or, a developer could commission an independent valuation that the Council could verify independently if they disagree with the conclusions. It will be important to allow 'normal' rents to shift and change over time depending on market conditions, but any increases should be limited by inflation to ensure space continues to remain as affordable as possible. The Council should be informed of any changes to rents and may need to charge a monitoring fee to cover the costs associated with this.

Sub Area Recommendations

6.3 Subareas have been categorised into low, medium and high priority for affordable workspace based on the commercial data and rent to turnover analysis set out in Chapter 4. A suggested discount to market rates is also made based on the proposed discount in Chapter 4 and the subsequent assessment of viability set out in Chapter 5. On this basis, sub-area recommendations are set out below.

6.4 It is important to note the proposed discount to market rate is for the end user rather to a workspace provider[15]. Discounts also do not account for services charges, so the Council will need to be clear in policy that service charges should be set at a reasonable level that does not offset the overall affordability of the space provided.

Shepherd's Bush

6.5 Shepherd's Bush has been categorised as a **high priority area** for affordable **office** space on the basis of its contribution to the borough's strengths in the creative, digital and life science sectors combined with the prohibitively high rents to small and micro sized businesses with turnovers of less than £250k.

6.6 A discount to market rent of **40%** is recommended for high priority areas based on the rent to turnover analysis set out in Chapter 4. The viability assessment has demonstrated that it is viable for 20% of new commercial developments over 1,000 sqm to be put aside for affordable workspace in the sub-area.

6.7 Recommendation: Major commercial developments to include affordable workspace with a discount to market rent of 40% or higher. Testing shows that apportioning 20% of space in developments over 1,000 sqm is viable.

[15] The viability analysis set out in the Addendum to this report provides an overview of how viability changes when certain parameters are changed and includes a statement on the viability 'tipping point' for each place. This should be helpful in determining viability should an operator be used to manage and run the space.

Townmead and Imperial

6.8 Townmead and Imperial has been categorised as a **high priority area** for **industrial** space given its prominence as an industrial location, the potential for further space to come forward via the South Fulham Riverside Regeneration Area and the relatively high rents which are unaffordable to businesses with turnovers of less than £250k.

6.9 A discount to market rent of **40%** is recommended for high priority areas based on the rent to turnover analysis set out in Chapter 4. The viability assessment has demonstrated that it is viable for 20% of new industrial developments over 1,000 sqm to be put aside for affordable workspace in the sub-area.

6.10 Recommendation: Major industrial developments to include affordable industrial space with a discount to market rent of 40% or higher. Testing shows that apportioning 20% of space in industrial developments over 1,000 sqm is viable.

Hammersmith Centre

6.11 Hammersmith Centre has been categorised as a **high priority area** for **office** space on the basis of its desirability as a location for small businesses looking to operate outside of central London, prohibitively high rental levels to small businesses and the strong potential for new development to come forward.

6.12 A discount to market rent of **40%** is recommended for high priority areas based on the rent to turnover analysis set out in Chapter 4. The viability assessment has demonstrated that it is viable for 20% of new commercial developments over 1,000 sqm to be put aside for affordable workspace in the sub-area.

6.13 Recommendation: Major commercial developments to include affordable workspace with a discount to market rent of 40% or higher. Testing shows that apportioning 20% of space in developments over 1,000 sqm is viable.

Olympia and West Brompton

6.14 Olympia and West Brompton has been categorised as a **medium priority** area for office space. Whilst it is more affordable than other parts of the borough, there is evidence to suggest that start-ups and SMEs with turnovers of less than £250k would still find rents unaffordable. This combined with potential for regeneration in the area including opportunities for workspace provision indicates that it is a medium priority area.

6.15 A discount to market rent of **20%** is recommended for medium priority areas based on the rent to turnover analysis set out in Chapter 4. The viability assessment has demonstrated that it is viable for 20% of new commercial developments over 1,000 sqm to be put aside for affordable workspace in the sub-area.

6.16 Recommendation: Major commercial developments to include affordable workspace with a discount to market rent of 20% or higher. Testing shows that apportioning 20% of space in developments over 1,000 sqm is viable.

Fulham Centre

6.17 As with Olympia and West Brompton, Fulham Centre is more affordable than other parts of the borough but would nonetheless likely remain out of reach for small and start-up businesses with

low turnovers in priority sectors. With the likelihood of commercial development coming forward within the Fulham Regeneration Area, Fulham Centre has therefore been categorised as a **medium** priority area for **office.**

6.18 A discount to market rent of **20%** is recommended for medium priority areas based on the rent to turnover analysis set out in Chapter 4. The viability assessment has demonstrated that it is viable for 20% of new commercial developments over 1,000 sqm to be put aside for affordable workspace in the sub-area.

6.19 Recommendation: Major commercial developments to include affordable workspace with a discount to market rent of 20% or higher. Testing shows that apportioning 20% of space in developments over 1,000 sqm is viable.

Specified Area vs. Floorplates

Any requirements set out in the SPD specifying the proportion of affordable floorspace to be provided on-sites coming forward will not always fit neatly onto floorplates being planned by developers. In these instances the Council could consider introducing flexibilities on a case-by-case basis to account for this. This could work in several ways:

- Developers could provide *more* space but with adjusted discounts to market rents;
- Developers could provide *less* space but make a Payment in Lieu relative to the space lost; or,
- Developers could provide other facilities that contribute to the quantum and type of space accessed by affordable tenants, including shared networking and events space. When not being used by affordable tenants this space could be cross subsidised by market rate paying tenants for the remainder of the time.

The option alighted on would depend on the nature and location of the development, the Council's priorities for the area, the Council's internal workspace programme and a range of other factors. We recommend that the Council should, however, seek to ensure as much affordable space as possible is provided and only make small adjustments where it is practical to do so.

Parsons Green and Putney Bridge and Ravenscourt Park

6.20 Both of these sub-areas have been categorised as low priority for both industrial and office space on the basis that they serve a small localised market, with limited major development opportunities and reasonably affordable rental levels relative to other sub-areas.

6.21 Nonetheless, they are important locations for local businesses including in some priority sectors (e.g. creative and digital and financial and professional). With this in mind, we make the following recommendations:

- No discount to market rent is currently required, however, it would be prudent to continue to monitor rents, particularly within any new development that comes forward;

- Continue to monitor the loss of small office and industrial space through Permitted Development Rights (PDR) in order to understand the potential scale of erosion of existing affordable workspace for these sectors;
- Consider the potential to utilise other levers in relation to workspace to encourage the retention and growth of these sectors within the sub-area, including;
    - Repurposing of existing stock and council-own assets to provide affordable workspace and meanwhile uses;
    - Convene with local landlords and lobby to offer flexible lease terms; and,
    - Explore opportunities to open meanwhile spaces in buildings that become temporarily vacant.



Affordable Workspace Study – Viability Review

London Borough of Hammersmith and Fulham

October 2021

Turley

Contents

1.	Introduction	3
2.	Planning Policy Context	5
3.	Commercial Market Commentary	8
4.	Viability Assumptions	9
5.	Viability Testing	16

Client
London Borough of Hammersmith and Fulham

Our reference
LOND3016

October 2021

1. Introduction

1.1 Workspace affordability has become an increasingly important issue across London in recent years. Limited supply and strong demand have pushed rents up and space has become unaffordable for many businesses.

1.2 Ensuring that there is enough affordable space for businesses to become established and grow in is important in ensuring a healthy and dynamic economy. Affordable space can encourage entrepreneurialism, support innovation, attract inward investment, help retain existing businesses, create social value and, ultimately, drive economic growth.

1.3 Although it is recognised that the affordability of workspace is a challenge for many businesses across London, a significant number of these challenges are highly place and/or sector specific. As such, whilst the Draft London Plan includes a general definition of affordability local authorities are left to interpret and determine what 'affordable' workspace means in their places.

1.4 Hatch Regeneris are instructed on behalf of London Borough of Hammersmith & Fulham to assess the market and deliverability of Affordable Workspace, along with Turley as Sub-Consultant to understand the viability, which is the subject of this report. The viability analysis set out in the report will inform the development of the borough's emerging Economic Development Planning Obligation Supplementary Planning Document (SPD) which responds and contributes to their Industrial Strategy as set out below.

Hammersmith and Fulham Industrial Strategy

1.5 The London Borough of Hammersmith & Fulham has recently published an Industrial Strategy called Economic Growth for Everyone (2017). The ambition is to make the borough the best place to do business in Europe and to ensure that everyone benefits from growth rather than a favoured few.

1.6 The strategy sets out four key priorities: (1) West Tech Innovation District; (2) Encouraging Enterprise; (3) A Great Place in London; and, (4) Economic Growth for All.

1.7 A key pillar that cuts across all of these priorities is Creating Affordable Workspace. There is particular reference to the need to support the Science, Technology, Engineering and Mathematics (STEM) sectors, as well as the digital and creative industries to help overcome the high rents faced by SMEs in some parts of the borough.

1.8 A range of mechanisms are set out to do this, but one of the most prominent is to create an Affordable Workspace SPD which has a major focus on the delivery of affordable and flexible workspace through the planning system.

1.9 This Industrial Strategy is expected to be updated in response to COVID-19 and the recession, but it is likely that Creating Affordable Workspace will continue to be at the forefront. The recommendations set out in this report will shape and influence the updated document.

1.10 As identified in the report submitted in November 2021, The London Borough of Hammersmith & Fulham's policies and strategies provide strategic insight on who needs Affordable Workspace, in terms of business typology, sectors and local communities. They also provide insights on the type of workspace required in the borough's regeneration areas

1.11 There is an appreciation that small and micro businesses face specific space challenges in the borough. The recent employment study identifies that 62% of space requirements are for businesses requiring 93-465m^2 and that 74% of office conversions through permitted development were below 100m^2.

1.12 Analysis of publicly available economic data is also an important source of information to help identify who needs Affordable Workspace.

1.13 Evidence shows that the Hammersmith & Fulham economy is diverse and is home to around 140,000 jobs and at least 14,000 businesses. Recent performance over the last five years has been positive but below London averages:

- Employment grew by +7% between 2013 and 2018, which is higher than West London Alliance[1] at +3% but lower than 11% across London; and,

- The number of businesses grew by +13% over the last five years, which is lower than West London Alliance (24%) and +27% growth in London.

Approach & Methodology

1.14 Turley's sole focus for the review is to identify if 'affordable' is viable in Hammersmith & Fulham.

1.15 The main focus of this report is to identify and understand any difference in Viability following market changes (rents and costs), due to COVID-19 and various market factors. Turley undertook an updated comparable evidence research exercise (utilising CoStar), in order to identify any changes in each of the sub-markets from the initial submission and demonstrates the viability of the proposed discounts to market rent, as demonstrated in Table 4.6 of the Affordable Workspace Research Study (hereafter 'AWRS'), across different parts of the borough.

[1] The West London Alliance is a sub-regional partnership of Western London boroughs and includes Barnet, Brent, Ealing, Harrow, Hillingdon, Hounslow and Hammersmith and Fulham

2. Planning Policy Context

COVID-19, Brexit and the Planning System

2.1 COVID-19, Brexit and potential changes to the planning system are expected to fundamentally impact the economy in both the short and longer term. In turn, the demand for and supply of commercial property will also be affected. These factors present both threats and opportunities for Affordable Workspace in Hammersmith & Fulham.

2.2 This report recognises these pressures but given the increased uncertainty with how the market may perform in the short to medium term, and the expectation that development levels will resume in the borough, it provides robust analysis and recommendations based on the best available evidence at this point in time.

2.3 An addendum to the AWRS was submitted in January 2021 to explore the potential impact of these pressures, including on viability, and alternative mechanisms to deliver Affordable Workspace in the borough. The viability testing set out in this report is an update 9 months on from when the AWRS was undertaken. The base values in the Addendum report were the same as the original report, as there was not ample market evidence to update the values. This, together with the content set out here, will provide the Council with all the evidence required to negotiate positively with developers on Affordable Workspace moving forward.

The London Plan

Policy E3 Affordable Workspace

2.4 In defined circumstances set out in 1.18 and 1.19 below, planning obligations may be used to secure Affordable Workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose such as:

1) for specific sectors that have social value such as charities, voluntary and community organisations or social enterprises;

2) for specific sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace;

3) for disadvantaged groups starting up in any sector;

4) supporting educational outcomes through connections to schools, colleges or higher education; and

5) Supporting start-up and early stage businesses or regeneration.

2.5 Consideration should be given to the need for Affordable Workspace for the purposes in 1.17 above:

1) where there is Affordable Workspace on-site currently, or has been at any time since 1 December 2017, except where it is demonstrated that the Affordable Workspace has been provided on a temporary basis pending redevelopment of the site

2) in areas identified in a local Development Plan Document where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones)

3) in locations identified in a local Development Plan Document where the provision of Affordable Workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.

2.6 Boroughs, in their Development Plans, should consider detailed Affordable Workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations or defining areas of need for certain kinds of Affordable Workspace.

2.7 Affordable Workspace policies defined in Development Plans and the terms set out in Section 106 agreements should ensure that the objectives in 1.17 above are monitored and achieved, including evidence that the space will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage in the planning process to ensure that the space is configured and managed efficiently.

2.8 Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in 1.17, over the long-term.

Policy SD6 Town Centres and High Streets

2.9 The vitality and viability of London's varied town centres should be promoted and enhanced by:

1) The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for affordable and suitable business space (Policy E2 Providing suitable business space, Policy E3 Affordable Workspace).

Policy SD9 Town centres: Local partnerships and implementation

2.10 Boroughs should:

1) introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification.

Hammersmith & Fulham Local Plan (2018)

2.11 Hammersmith & Fulham's Local Plan (February 2018) states that applications for large new commercial schemes will be expected to provide Affordable Workspace which could be via cross-subsidised rent through S106 Agreements, reduced rent arrangements, the provision of co-hubs, start up space and/or flexible leasing arrangements.

2.12 Any provision is to be specific to the area or location in which the development is being undertaken. This is highlighted earlier in this report, for instance, where there are specific requirements in local areas. An example of this is Shepherd's Bush, which is home to Media City, the Imperial College Campus and office space providers due to excellent transport links.

2.13 Local Plan Policy E1 – Providing for a Range of Employment - sets out the borough's aspirations for mixed-use and new employment schemes and the retention, enhancement and intensification of existing employment uses. The Council recognise the existing strengths in the borough in creative industries, health services, life science and other research-based industries. Policy E1 states that these industries 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 and subject to viability.

3. Commercial Market Commentary

3.1 Turley has sought to understand changing market factors, in order to update the findings of the AWRS and forecast future trends from leading market experts.

Demand

3.2 According to the Carter Jonas' 'London Office Market' report[2], demand is likely to remain subdued for the foreseeable future as businesses seek to reduce their property footprint and real estate costs to underpin profitability. The migration of some London jobs to the regions by a number of large-scale employers is unlikely to ease the situation for landlords.

3.3 The lack of demand, combined with the ongoing rise in the availability of good quality, ready fitted out, tenant-controlled, Grade A sub-let space, and the completion of office refurbishments and new developments that were initiated before the pandemic, is likely to put pressure on landlords to secure fewer footloose tenants in a market where there is more choice.

Advertised Rents

3.4 The fall in demand and increase in vacancy means it is likely that advertised rents will begin to decline. Reductions in advertised rents for poorly specified accommodation are already manifesting themselves as occupiers increasingly focus their searches on new, refitted and good quality refurbished Grade A space.

Rent Discounts

3.5 The levels of discount that can presently be negotiated on advertised rents have widened from 1.5 – 3.5%, at the beginning of 2020, to typically around 5 – 10%. Rent discounts have been at this level since the autumn of last year.

Rent Free Periods

3.6 Rent free periods have, ultimately, been the key element in lease negotiations, reflecting the decline in demand since the onset of the COVID-19 pandemic, and have typically widened by 3 – 5 months for a 5 – 10 year lease since Q1 2020.

Market Summary

3.7 Carter Jonas' research indicates that occupiers are increasingly becoming footloose, with a focus on good quality refurbished Grade A space. This presents opportunities for LBHF, whereby occupiers are looking to relocate from more established commercial/office markets e.g. West End and Docklands to more affordable, but still well connected, London locations.

[2] Carter Jonas, The London Office Market, Q2 2021. A Guide to Rents, Rent Free Periods & Market Trends

4. Viability Assumptions

4.1 The areas identified in paragraph 5.4 of the AWRS submitted November 2020, as having demand for commercial development and need for Affordable Workspace are:

- Shepherd's Bush (mixed-use commercial);
- Hammersmith Town Centre (mixed-use commercial);
- Fulham Centre (mixed-use commercial);
- Olympia and West Brompton (mixed-use commercial); and
- Townmead and Imperial (industrial).

4.2 The viability of providing Affordable Workspace at the level of discount to market rent has been tested for different size thresholds and proportions as set out in chapter 4 of the AWRS. Whilst Parsons Green, Putney Bridge and Ravenscourt Park were listed initially, these areas are not considered to be locations where there is high demand for commercial development and Affordable Workspace; these areas have therefore not been tested.

Focus On: Viability Assumptions

4.3 Testing has been undertaken on the basis of commercial floorspace only. Mixed-use scheme testing has not been included at this time in order to establish whether purely commercial floorspace can viably support Affordable Workspace.

4.4 Reference has been made to the original Hammersmith & Fulham Community Infrastructure Levy Study (Peter Brett, 2014) in order to maintain consistency across the borough. Due consideration has also been given to the Car Giant scheme in Hythe Road (Old Oak & Park Royal Development Corporation ("OPDC") as examined by the Planning Inspector, September 2019) as this has been a recent assessment which has assisted in deliberations regarding land values across the borough.

Benchmark Land Values

4.5 Turley has adopted the same values from the AWRS.

4.6 Turley have considered the rents adopted by Hatch to establish Low, Medium and High Value locations in terms of Benchmark Land Values.

4.7 There is a High, Medium and Low value range for BLVs within LBHF, established from the rents identified. To arrive at a midpoint for the adopted land values, Turley have simply taken the midpoint between the lower adopted value (£4.75m) and higher adopted value (£6.5m) to arrive at £5.625m. This is set out in the following table:

Table 4.1: Benchmark Land Values By Sub-Area

Location	Rental Value (ft^2)	Value (Location)	£ per Acre	£ per Hectare
Townmead and Imperial	£36/ft^2	Low	£4,750,000	£11,750,000
Fulham	£42/ft^2	Medium	£5,625,000	£14,000,000
Olympia/West Brompton	£44/ft^2			
Hammersmith	£55/ft^2	High	£6,500,000	£16,500,000
Shepherds Bush	£53/ft^2			

Source: Hatch Regeneris/Turley

Plot Ratios

4.8 With regard to plot ratios, we have adopted a 1.5:1 (office building: development plot). Turley have also adopted a plot ratio of 0.65:1 (industrial building: development plot) for the Townmead appraisals. The plot ratios adopted are the same as those included in the AWRS.

4.9 The plot ratios: GIA office/industrial building areas are summarised in the below Table 4.2 overleaf.

Table 4.2: Commercial Development and Plot Ratios

Quantum of Offices (sqm)	Plot Area (sqm)	Plot Area (sqft)	Plot Area (in acres, rounded)	Plot Area (hectares)
1,000	666.67	7,175.93	0.15	0.06
2,500	1,666.67	17,939.83	0.45	0.18
5,000	3,333.33	35,879.67	0.85	0.34
Quantum of Industrial (sqm)	Plot Area (sqm)	Plot Area (sqft)	Plot Area (in acres, rounded)	Plot Area (hectares)
1,000	1,538	16,555	0.38	0.15
2,500	3,846	41,398	0.95	0.38
5,000	7,692	82,799	1.95	0.79

Source: Turley Analysis

Stamp Duty, Agent and Legal Fees

4.10 Stamp Duty has been included at the prevailing rate together with 1% Agents Fee and 0.80% Legal Fee. This is standard industry input for these costs.

Commercial Floorspace Thresholds

4.11 Commercial floorspace thresholds have been tested at:

- 1,000sqm;
- 2,500sqm and;
- 5,000sqm GIA of commercial space.

4.12 It is considered that 1,000sqm would be the minimum threshold to trigger a requirement for Affordable Workspace.

Percentage of Affordable Workspace

4.13 The following percentages have been tested in each of the floorspace at the following affordable provision thresholds:

- 5%;
- 10% and;
- 20% affordable provision.

4.14 With regard to work that other London Boroughs have undertaken on Affordable Workspace, it appears that 10% is the most common percentage of Affordable Workspace sought.

Construction Cost for Commercial Floorspace

4.15 The Construction Costs have been adopted from BCIS Offices 'Generally' and BCIS Purpose Built Warehouses both of which fall between BCIS Upper Quartile and Median Quartile, which we believe provides a reasonable allowance. We have therefore not included for Abnormals or Demolition costs. The view is that each site comes forward and is tested on its own merits.

4.16 For Office use, the commercial build cost is £2,723 per sq m / £253 per sq ft for Quarter 3, 2021. This falls between median and upper quartile for offices generally therefore this figure has been adopted for the appraisals in this report. This assumes fit out to Cat A specification.

4.17 Industrial build costs for warehouses in LBHF are listed at £1,238/m2 (£115/ft2) Quarter 3, 2021 which has been adopted in the appraisals.

Table 4.3: Difference in Build Costs

Use	Build Costs Q4 2020 (£ per sqm / £ per sqft)	Build Costs Q3 2021 (£ per sqm / £ per sqft)	% Change
Office	£2,600 / £241	£2,723 / £253	4.9%
Industrial	£1,215 / £113	£1,238 / £115	1.9%

Source: Turley Analysis, RICS BCIS data

4.18 The build costs for office development has increased considerably since Q4 2020, by nearly 5%. The costs for industrial development has increased less significantly, by around 2%. Turley expects these change in build cost to materially affect the viability of bringing forward commercial developments in LBHF.

4.19 The Build Cost inflation in 2021 is due to both increase in construction materials and shortage of labour supply. Gardiner & Theobald[3] state that it is uncommon to have nearly all material prices move upwards at any one time as they have in recent months, putting substantial pressure on contractors to pass these rises on to increased tender prices. Input costs have increased for the following items:

- M&E components: 2-3% (Jan-Jun 2021)
- Concrete Reinforcing Steel Bars: 37.3% (April 2020 – April 2021)
- Construction Industry Wage Growth: 4.9% (year-on-year three month average growth to Apr 2021)
- Imported Sawn or Planted Wood: 22.0% (April 2020 – April 2021)

4.20 Inflationary pressures include reduced EU labour supply, increased shipping and logistics costs and global/manufacturing capacity unable to keep up with demand.

[3] Gardiner & Theobald (2021) Tender Price Indicator Q3 2021

Plot Externals (Construction Costs)

4.21 Plot externals have been incorporated at 10%. This is the same adopted rate as the AWRS.

Professional Fees

4.22 Turley have adopted 10% for Professional Fees. This is the same adopted rate as the AWRS.

Contingency

4.23 A 5% contingency has been applied to the construction costs. This is the same adopted rate as the AWRS.

Profit

4.24 Turley have adopted 15% Profit on GDV for commercial development, the same values from the AWRS report

Marketing/Sales Agent and Legal fee

4.25 A total of 3% sale, marketing and legal fee has been adopted, the same values from the AWRS report.

Letting Agent/Legal fee

- 10% Letting Agent Fee (calculated from the headline rent)
- 5% Letting Legal Fee (calculated from the headline rent)

4.26 This reflects industry standard inputs.

Finance

4.27 7% debt finance has been adopted. This is considered to be a reasonable level assuming 100% debt finance.

Rent Free Period

4.28 A rent free period of 12 months has been adopted. This reflects a market facing incentive to allow an occupier to fit out commercial space to their own specification. Turley note from speaking with commercial agents that typical rent free periods have not changed since Q4 2020.

Rents, Discounts and Yields

4.29 The rents identified have been included together with the proposed discounts for each area. With regard to yields, these are informed by comparable evidence identified for these particular locations, which are also corroborated by the evidence at Car Giant. The following rents, discounts and yields have been adopted for the areas tested.

Table 4.4: Location Specific - Applied Rents, Discounts and Yields (September 2021)

Location Specific	Use	Yield	Market Rent Per sqft	Affordable Rent Per sqft	Discount to Market Rent
Fulham	Office	5.5%	£42	£33.60	20%
Hammersmith TC	Office	5.5%	£55	£33	40%
Shepherds Bush	Office	5.5%	£53	£31.80	40%
Olympia and West Brompton	Office	5.5%	£44	£35.20	20%
Townmead/Imperial	Industrial	5.5%	£36	£21.60	40%

Source: Turley Analysis

Table 4.5: Location Specific | Comparison of Headline Rents Achieved

Location Specific	Use	Market Rent 2020 Per sqft	Market Rent 2021 Per sqft	% Change
Fulham	Office	£43	£42	-1%
Hammersmith TC	Office	£51	£55	8%
Shepherds Bush	Office	£53	£53	0%
Olympia and West Brompton	Office	£42	£44	5%
Townmead/Imperial	Industrial	£36	£36	0%

Source: Turley Analysis

4.30 Turley's review of comparable data from January 2021 to September 2021 demonstrates there has been a shift in values for some of the sub-markets. Turley has adopted the discount rate stated in Table 4.4 (taken from Table 4.6 of the AWRS). In Fulham and Shepherds Bush, there has been little change in the office/commercial market transactions, with values falling by 1% in Fulham and 0% in Shepherds Bush.

4.31 Both Hammersmith and Olympia and West Brompton have seen an uplift in office/mixed-use commercial values, with Hammersmith increasing by 8% and Olympia and West Brompton by 5%.

4.32 The market rent for industrial properties in Townmead remains at £36 per sqft as per the original report, however, this is due to limited market transactions and therefore Turley has kept the same values as Hatch Regeneris as per the AWRS.

4.33 London Borough of Hammersmith & Fulham's CIL Rate has not changed since the original submission in November 2020. Therefore, the same rates will be adopted.

4.34 Turley consider the rental value changes achieved across LBHF are generally positive, and demonstrate the borough has market resiliency in light of COVID-19 and associated market changes. However, Turley comment that further interrogation of the market is needed to understand whether the volume of deals completed is comparable with recent years.

4.35 With regard to yields, evidence demonstrates these have broadly stayed the same since Q4 2020. Investor appetite has remained consistent, perhaps due to being positively influenced the London Plan and LBHF policies allowing for intensification and opportunities to value-add.

4.36 It remains to be seen if larger floorplates desired by corporate businesses are still in high demand, or whether these spaces are going to be increasingly subdivided. Smaller floorplates and flexible tenancies would appeal to a wider, more diverse range of occupiers. The flexible Use Class E has also allowed a mix of commercial end users to occupy space without the requirement to seek planning permission. These positive changes have assisted in negating negative sentiment created by COVID-19 and the increasing prevalence of employees working from home.

Construction Timescale

4.37 The following construction timescales are tabled below per each of the threshold floorspaces tested. These remain the same as per the AWRS.

Table 4.6: Construction Timetable

Construction Timeline (months)	Threshold Tested		
	Offices (1,000 sqm)	Offices (2,500 sqm)	Offices (5,000 sqm)
Pre-construction	6	6	6
Construction	9	12	18
Sale	1	1	1
Total Months	**16**	**19**	**25**

Source: Turley Analysis

5. Viability Testing

5.1 The viability results are set out in Table 5.1, 5.2 and 5.3 below/overleaf. The RLV is highlighted in green where there is a surplus, and red where there is a deficit.

Table 5.1: 5% Affordable Workspace

GIA Area	1,000 sqm	2,500 sqm	5,000 sqm	Land Value	Land Value
Plot (acres)	0.15	0.45	0.85	(per acre)	(per hectare)
Plot (acres)*	0.38	0.95	1.95		
Fulham Centre	RLV	RLV	RLV		
5%	£1,186,384	£2,838,394	£5,229,778	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Hammersmith TC	RLV	RLV	RLV		
5%	£2,270,251	£5,494,320	£10,322,176	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Olympia and WB	RLV	RLV	RLV		
5%	£1,382,411	£3,320,032	£6,160,204	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Shepherds Bush	RLV	RLV	RLV		
5%	£2,233,206	£5,410,439	£10,198,442	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Townmead/Imperial	RLV	RLV	RLV		
5%	£2,205,958	£5,377,426	£10,267,877	£4,750,000	£11,750,000
BLV	£1,805,000	£4,512,500	£9,262,500		

*Source: Turley Analysis, *Townmead Plot Ratios*

Table 5.2: 10% Affordable Workspace

GIA Area	1,000 sqm	2,500 sqm	5,000 sqm	Land Value	Land Value
Plot (Acres)	0.15	0.45	0.85	(per acre)	(per hectare)
Plot (Acres)*	0.38	0.98	1.95		
Fulham Centre	RLV	RLV	RLV		
10%	£1,145,810	£2,738,703	£5,037,196	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Hammersmith TC	RLV	RLV	RLV		
10%	£2,160,879	£5,225,593	£9,813,049	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Olympia and WB	RLV	RLV	RLV		
10%	£1,340,060	£3,215,977	£5,959,191	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Shepherds Bush	RLV	RLV	RLV		
10%	£2,127,991	£5,151,923	£9,699,044	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Townmead/Imperial	RLV	RLV	RLV		
10%	£2,134,430	£5,201,681	£9,928,373	£4,750,000	£11,750,000
BLV	£1,805,000	£4,512,500	£9,262,500		

*Source: Turley Analysis, *Townmead Plot Ratios*

Table 5.3: 20% Affordable Workspace

GIA Area	1,000 sqm	2,500 sqm	5,000 sqm	Land Value	Land Value
Plot (Acres)	0.15	0.45	0.85	(per acre)	(per hectare)
Plot (Acres)*	0.38	0.95	1.95		
Fulham Centre	RLV	RLV	RLV		
20%	£1,064,662	£2,539,322	£4,652,032	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Hammersmith TC	RLV	RLV	RLV		
20%	£1,942,135	£4,688,137	£8,774,796	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Olympia and WB	RLV	RLV	RLV		
20%	£1,255,359	£3,007,866	£5,557,164	£5,625,000	£14,000,000
BLV	£843,750	£2,531,250	£4,781,250		
Shepherds Bush	RLV	RLV	RLV		
20%	£1,917,559	£4,634,893	£8,700,247	£6,500,000	£16,000,000
BLV	£975,000	£2,925,000	£5,525,000		
Townmead/Imperial	RLV	RLV	RLV		
20%	£1,991,373	£4,850,191	£9,249,366	£4,750,000	£11,750,000
BLV	£1,805,000	£4,512,500	£9,262,500		

*Source: Turley Analysis, *Townmead Plot Ratios*

5.2 As Table 5.1, 5.2 and 5.3 demonstrate, all locations and sizes are viable at the proposed discounts to market rents set out in the previous chapter (i.e. where the Residual Land Value exceeds the Benchmark Land Value as highlighted in green).

Conclusion

5.3 It can be reasonably expected that developments in Fulham Centre, Hammersmith Town Centre, Olympia and West Brompton, Shepherds Bush and Townmead and Imperial can provide up to 20% Affordable Workspace at the proposed discounts to market rents based on the current inputs.

5.4 Whilst Townmead has been tested on an Industrial basis, it may be possible to achieve a level of Affordable Workspace through mixed-use schemes which may generate a higher Gross Development Value overall, though this depends upon the practicality of delivering schemes with large scale office/mixed-commercial use in a largely industrial location.

5.5 As aforementioned, Turley consider that each site should be assessed on its own merits (and associated costs), and that the Benchmark Land Values set out act as a guide only.

5.6 An alternative to providing Affordable Workspace as part of a proposed development, is to secure a Payment in Lieu (PiL). PiL is typically the monetary equivalent of contributing the Affordable Workspace on-site, calculated via Viability Appraisal and agreed between the Applicant and Council. Turley consider that if the applicant has demonstrated that delivery of workspace is unviable and cannot afford a contribution, LBHF should seek to secure an early/late stage review to capture any uplift in value with changing market conditions, to secure a PiL and contribute towards Affordable Workspace.

5.7 Turley consider that the Affordable Workspace should be assessed in line with the market and discounted accordingly. This could be reviewed every five years at a minimum, or more regularly, depending on the terms of the leases. The duration of time the Affordable Workspace is provided for can also depend on whether the building has a change of use, or the market dictates that the existing use becomes unviable.

APPENDIX 3 - Affordable Workspace Supplementary Planning Document (Consultation draft)
Full Equality Impact Analysis

(Note: the Equality Impact Analysis contained herein is referred to as EQIA, and not EIA for the purposes of this report. This is to avoid confusion with Environmental Impact Assessments, which are known as EIA in planning terms.)

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2021 Q4
Name and details of policy, strategy, function, project, activity, or programme	The Supplementary Planning Document (SPD) aims to improve implementation of affordable workspace policy objectives such as providing a threshold where a market discount is required and setting out these discounts; more guidance and clarification of re-provision of space for existing tenants and more information on flexible leases and flexible accommodation which will be required for smaller schemes; information on workspace management plans, requiring a workspace provider to manage the space to make sure it is implemented and targeted at local businesses. The SPD establishes more detailed guidance on the application and implementation of policies that seek affordable space in larger schemes, and more flexible space to meet a clear borough need for local start-ups and SME's. This SPD can address social value as local charities and voluntary organisations can benefit from discounted rates. The SPD is accompanied by an evidence base report on viability of seeking discounted market rents and alternative affordable and flexible options. The SPD and accompanying evidence should improve implementation and delivery of policy objectives which reflect the Council's vision to achieve a stronger local economy that provides training and job opportunities for local people; and securing and promoting employment. The SPD as all supplementary planning documents, does not propose new policy but strengthens the ability to achieve Local Plan's objectives guiding planning applications that will come forward for affordable workspace provision. As the SPD draws upon policies in the Local Plan and principles in the Planning Guidance SPD, it should be read in conjunction with these policy documents.
Lead Officer	**Name**: Eleonora Tafuro **Position**: Planning officer, Policy & Spatial Planning Team, Economic Department **Email**: **Eleonora.Tafuro@lbhf.gov.uk** **Telephone No**: 07776672695

Date of completion of final EQIA	November 2021

Section 02	**Scoping of Full EIA**
Plan for completion	**Timing:** This Equality Impact Assessment (EQIA) will support the consultation of the SPD and adoption of the document which is due to take place in Winter 2021/22. **Resources**: Officer time **Lead Officer**: David Gawthorpe, Team Leader Development Planning Team
What is the policy, strategy, function, project, activity, or programme looking to achieve?	The purpose of the Affordable Workspace SPD is to provide guidance on affordable workspace provision, principles and requirements to developers, planners and other stakeholders. The document sets out best practice advice on implementation of affordable workspace policy informing negotiations from early discussion to planning obligations. The SPD seeks to secure affordable workspace at rents maintained below the market rate for specific sectors that have social and cultural value such as charities, voluntary and community organisations, artists and creative industries as well as start-ups. As the document focusses on evidenced requirements and implementation, it provides an important resource for identifying maximising the opportunity to meet the needs of a range of small SMEs, start-ups and non-profit organisations which otherwise could not afford to locate in the borough. This should help retain a more diverse local economy and offset losses of business space through permitted development.

Section 03	**Analysis of relevant data and/or undertake research**
Documents and data reviewed	The following documents and data have been used to help inform this Equality Impact Analysis: **Consultation on our Draft Equalities Plan 2021-25**

	The Council's draft Equality Plan 2021-2025 set out the Council's vision for tackling inequality and responding to the public sector equality duty. The document draws on five objectives: 1. Everyone in our borough must feel valued when the Covid-19 pandemic ends. 2. Removing barriers to inclusion. 3. Ensuring that our services tackle the disproportionate impact on young people of the risks of street crime and exploitation by gangs. 4. Improving opportunities for all. 5. Becoming an employer of choice and fostering greater inclusion **Community Strategy** The Hammersmith and Fulham Business Plan 2018-2022 sets a framework of the council's main priorities which are fundamental to the Local Plan and the Draft Equality Plan. The plan combines opportunity, with social responsibility and social justice to assist the vast majority of people in the borough to help themselves while supporting the most vulnerable in the community. This is therefore considered to be consistent with the statutory codes in relation to race, gender, disability, and other equalities characteristics. **Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-2021** Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-2021 sets out an ambitious vision for improving the health and wellbeing of people in the borough and securing a sustainable system for the future. The strategy is for a people-centred health and social care system that supports communities to stay well, consistently providing the high quality care and support the most vulnerable people in the community. This includes tackling health inequalities within our communities, overcoming high levels of child poverty and child obesity and severe mental illness in the country. the strategy is therefore considered to be compliant with the statutory codes in relation to equalities characteristics. **Census 2011** The 2011 Census describes the resident population of the UK and its constituent countries, by age and sex, and provides information on how the population has changed over time. **Greater London Authority (GLA) projections 2018 and 2020**

The trend-based projections 2020 is the most recent set of projections released in September 2021 by the Greater London Authority (GLA).

Office for National Statistics (ONS) population estimates 2020

The Office for National Statistics provide the annual population estimates in mid-2019 to mid-2020. These figures inform the Equality Impact Analysis on population changes and growth reflecting the impact of the first wave of coronavirus (COVID-19) pandemic and they cover the period up to 30 June 2020.

Demographics of Equality Target Groups

A summary of the demographic situation in relation to each of the equality groups is given below. This provides a starting point for the analysis of likely impacts of the Railway Arches SPD on these groups.

Population

The Population of Hammersmith and Fulham has risen by 8%% from 169,374in 2001 to 182,455 in 2011 has whilst it has had a slightly increase (0,6%) between 2011 and 2020[1]. It has been estimated that the total population will increase to 190,130[2] people in the year 2022.

Currently, the total population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about half of all households having moved in the previous five years. Nearly half of the population (45%) is between the ages of 20 and 40 years old which is significantly higher than in London (32%) and the rest of the country (27%). The borough has a high proportion of single people, the fourth highest proportion (55.9%) in London. Furthermore, 3 in 10 (29%) of all households consist of one person (Source: 2011 Census).

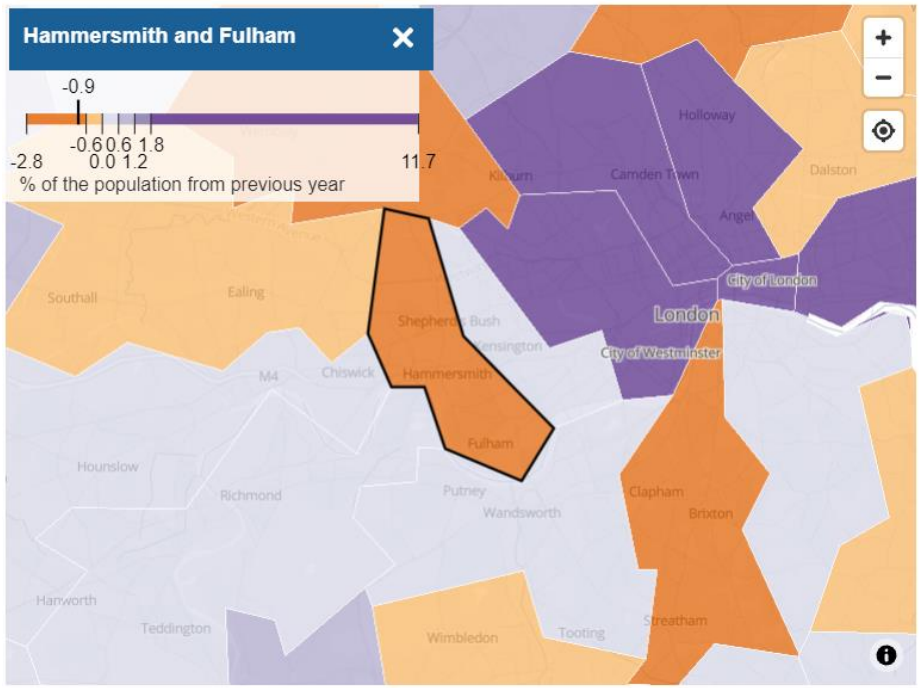
[1] Source of data is the UK population estimates mid-2020, Table MYE4 - Population estimates: Summary for the UK, mid-1971 to mid-2020, ONS, 2021

[2] Source of data is the 2018-based household projections for local authorities and higher administrative areas within England (principal projection), Table 426: Projected household population, local authorities and higher administrative areas in England, mid-2001 to mid-2043.

	According to the 2020 GLA Population projections the borough's population is expected to increase by 20,840[3] people (11.4%) between 2018 and 2043. The projected increase in population between 2021 and 2031 is 7.2%; a similar level as the London average (7.9%). From mid-2019 and 2020 there have been changes in local populations driven by different factors (migration, births and deaths). Despite the effects of the coronavirus (COVID-19) pandemic and a slowing of national population growth in the year to mid-2020, in this period, ONS estimated the population grew in 294 out of the 374[4] local authorities of the UK. A decrease of population has been registered in the borough of Hammersmith and Fulham (negative 0.9%) according to the Office for National Statistics, as shown in figure 1 below. ***Figure 1: Population change and components of change in Hammersmith & Fulham mid-2019 and mid-2020***

[3] Source of data is the 2018-based household projections for local authorities and higher administrative areas within England (principal projection), Table 426: Projected household population, local authorities and higher administrative areas in England, mid-2001 to mid-2043.

[4] Source of data is Population estimates for the UK, England and Wales, Scotland and Northern Ireland: mid-2020 paragraph 3. Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)



Source: Official National Statistics, Population estimates (2021)[5]

Age

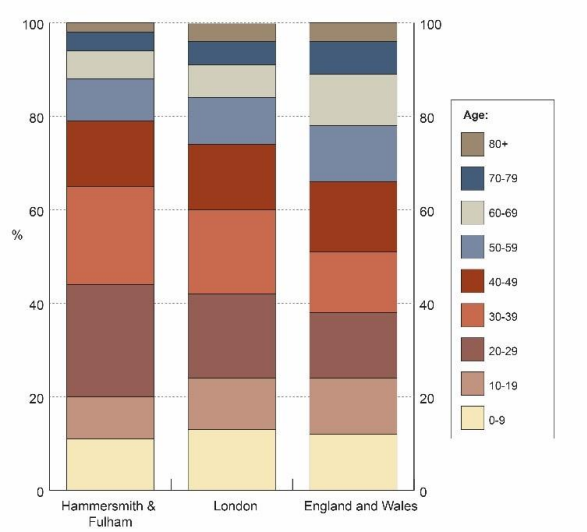
In 2011, the borough had a higher proportion of young adults aged 25-39 (35.7%) than London (28%) and England and Wales (20%). Conversely, the proportion of children and young adults (0-24) in the borough was lower than in London (26.7% compared to 32.2%) and England and Wales (30.7%). 12.7% of the population is aged 60 or over, which is slightly lower than the London (15.2%) and England and Wales (20.3%) averages.

Similar trends have been reported by the GLA 2020 population projections and by the Office of National Statistics (ONS) whereby in 2020 the higher proportion of population in Hammersmith and Fulham was of young adults aged 25-34.

[5] Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk) accessed 17/11/2021

It has been estimated that while there will be growth in the borough's population in all age groups, the main growth will occur for people aged 84 and over. The population in that age group is expected to increase by 1,273 by 2031, equivalent to 42.8%[6]. The population aged 64-83 is expected to grow by 33.9% during the same period and population aged 50 to 63 to grow by 13.3%. This trend is reflected similarly in London with 37.7% and 33% of increase respectively for people aged 64-83 and over.

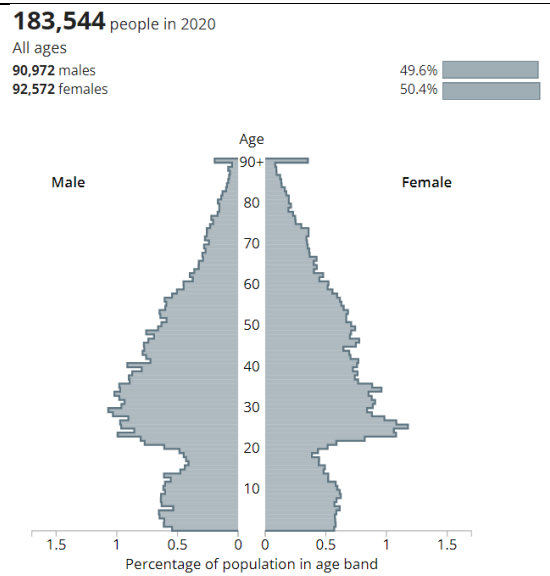
Figure 2: Age structure (% of total population, Census 2011)



Source: Office for National Statistics, Census 2011

Figure 3: Age and Sex structure in Hammersmith and Fulham

[6] GLA 2020-based Demographic Projections, London Borough population projections trend model, 2020 CC central upper



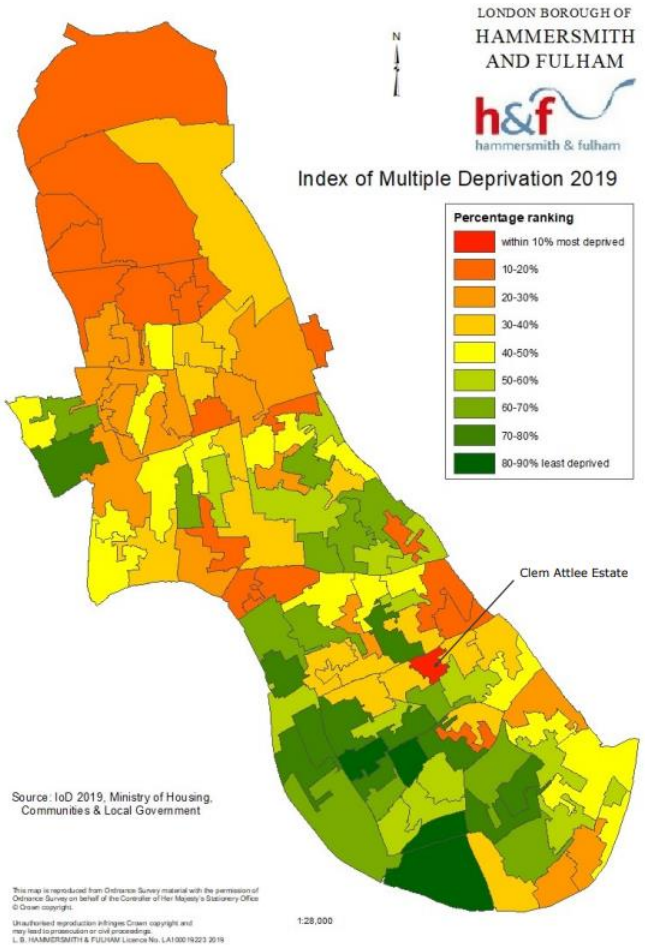
Source: Office for National Statistics, Population age and sex structure, 2020

Deprivation

The borough has high levels of deprivation. According to the 2019 Indices of Deprivation (IoD), Hammersmith and Fulham was ranked 112 out of 317 local authority area in the country (91 in 2015). Of the 113 Lower Super Output Areas (LSOAs) one (0.9%) is in the most deprived 10% nationally (Clem Attlee estate). Most of the areas in the north of the borough are in LSOAs 10-20% worst nationally[7].

Figure 4: Index of Deprivation in Hammersmith and Fulham

[7] Source of data is Deprivation in Hammersmith and Fulham 2019, Hammersmith and Fulham Council, September 2019



Source: Deprivation in Hammersmith and Fulham | LBHF, 2019

Hammersmith and Fulham not only has high levels of deprivation, it is polarised socially and economically. In the context of London this is demonstrated by the fact that the borough has some wards that have the highest and lowest rankings for the levels of income[8]. Palace Riverside appears in the rankings as having the one of the highest income

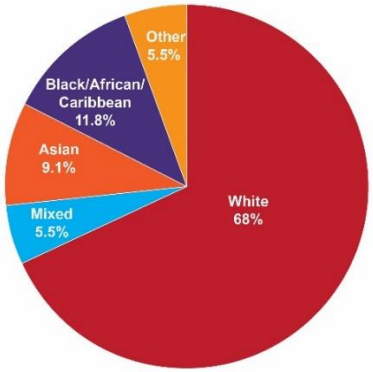
[8] https://data.london.gov.uk/download/indices-of-deprivation/5f72f768-7092-45b5-accf-dc004fa670a9/Indices%20of%20Deprivation%202019%20ward%20level%20summary%20measures%20for%20London.pdf, accessed 18/11//2021.

	ranks as well as highest Index of multiple deprivation ranks. On the contrary Wormholt and White City has statistically the one of the lowest income ranks and lowest index of multiple deprivation ranks[9]. The above image shows this effectively, with the brighter range colours signifying parts of the borough which have high deprivation levels and conversely the brighter green areas showing low levels of deprivation. In the last census (2011) 41.6% of the households have classified themselves as "managers or professionals", while more than a quarter said they were entirely dependent on benefit. Some 23.9% of households in Hammersmith and Fulham depend on less than £20,000 per annual compared to 27% of London and 34.9% for Great Britain. Just under 40% of borough households have a household's income between £50k and £80K per year. 16.2% of households have an income greater than £80k per annum; this is equivalent to nearly 13,000 households. Until the 1970s, social housing and council estates tended to be occupied by households with a greater mix of incomes than is now the case. The mix under social housing tenants has come to include proportionally more people on lower incomes, some experiencing multiple deprivation. Approximately 53% of households living in social housing in Hammersmith and Fulham are currently workless and dependent on benefits and they make up the largest single group within the estimated 13,150 (2011 Census) workless households in the borough. Nearly 2,000 lone parents are dependent on out-of-work benefits and a further 2,800 are claiming Working Tax Credit and/ or Child Tax Credit benefits. Deprivation and low household incomes also impact on health inequalities and result in high levels of child poverty. About 20% of people are in poverty in Hammersmith and Fulham compared to 32% of children in poverty. Childhood poverty in Hammersmith and Fulham does not follow the general north-south divide but is more scattered geographically across the borough. Further details of health, wellbeing and social care needs of the borough can be found in the Joint Strategic Needs Assessment 2016-2021 carried out by the Council and the NHS Hammersmith and Fulham Clinical Commissioning Group. **Disability** In 2011, 12.6% of the borough population reported long term health problem or disability that limited the day-to-day activities. This figure was lower compared to London (14.1%) and England & Wales (17.9%). In the north of the borough the percentage of residents suffering from disabilities is higher. The wards with highest rates were in College Park and Old Oak, Wormholt and White City, Shepherd's Bush Green, Hammersmith Broadway and Askew.

[9] GLA 2019, London Wards Summary Measures Document.

	We recognise that people with disabilities and those that support them may be represented in one or more of the other equality groups. The other related group that is usually referenced is age, in particular, we recognise that people with disabilities who can experience difficulty accessing services and accessing the built environment are often children and young people, older people, and those who may provide care for older and younger disabled people. As disability covers a broad spectrum, we also recognise that adaptations for people with mobility impairments may not make the built environment accessible for people with sensory impairments, and that people with mental health or long-term limiting illnesses may have different requirements from their environment. It is for these reasons that we actively engaged with the Hammersmith and Fulham Disability Forum, the local user group representing disabled people. **Race** According to the Census 2011, 31.9% of the borough's population in 2011 belonged to ethnic groups other than White. The main ethnicity in the borough was White (68 %) followed by Black African/Caribbean origin (11.8%), Mixed (5.5%), Asian (9.1%) and the other (5.5%). In Hammersmith & Fulham, there has been a 45 % increase in the number of residents from Black and Minority ethnic groups between 2001 and 2011. GLA population projections (2018)[10] indicates that the main ethnicity in LBHF was White (British, Irish and other White) 65.5% followed by BAME 34.5% which included Black, Asian and Minority Ethnic. ***Figure 5: Ethnic groups in Hammersmith & Fulham***

[10] GLA Population Projections (https://data.london.gov.uk/dataset/projections)



Source: Office for National Statistics, Census 2011

Ethnicity	Number	%
White - British □	71,685	38.9
White - Irish □	6,286	3.4
Other White □	42,655	23.2
BAME □	63,424	34.5
White and Black Caribbean □	2,421	1.3
White and Black African □	1,649	0.9
White and Asian □	3,048	1.7
Other Mixed □	3,722	2
Indian □	3,305	1.8
Pakistani □	1,598	0.9
Bangladeshi □	936	0.5
Chinese □	3,697	2
Other Asian □	8,726	4.7
Black African □	10,883	5.9
Black Caribbean □	6,736	3.7
Other Black □	4,649	2.5
Arab □	6,593	3.6
Any other ethnic groups □	5,461	3

Source: Greater London Authority[11], 2018

Religion

The religious profile of the borough is less diverse than in London as a whole. In 2011, 54.1% of residents in the borough were Christians, 10% Muslim and 23.8% stated that they had no religion. This partly reflects the ethnic profile of the borough, with a higher White population who are predominantly Christian and a lower Asian population who have a more diverse religious profile.

The policies in the SPD are not aimed specifically at religious groups, but it is noted that members of this population will also be represented through one or more other equality strands and that race and religion are often linked, meaning that benefits will be experienced by this group in more subtle ways. For example, through increased employment opportunities and quality of built environment.

Gender

In 2011, there were more females (51.3%) in the borough than males (48.7%). This was slightly higher that the regional and national average but still there were more females than males.

[11] Ethnic makeup of Hammersmith and Fulham (2018), London Datastore, Greater London Authority

	The economic activity rate for females was 70.1 % and for males 78.2%. These figures are higher than the London figures of 66% for females and 77.5% for males (Source: Census 2011). Hammersmith & Fulham has a higher proportion of male residents in employment (85.7%) than the London (77.6%) and national averages (77.6%). The proportion of female residents in employment (66.9.1%) which is a bit less than the London (69.8%) and national averages (71.2%).[12] For commentary regarding transgendered or transitioning people, see 'sexual orientation (and transgender)' below. For the assessment of policies, transgendered or transitioning people are represented in the gender category (see section 05). **Sexual Orientation (and transgender)** The nature of issues facing LGB people can be similar to transgendered or transitioning people as well, hence the council often use the term LGBT (lesbian, gay, bisexual and transgender). Data published by the Office for National Statistics (ONS) revealed that in 2019 4.5% of London's population were LGBT. There are no accurate statistics for the numbers of lesbian, gay and bisexual residents in the borough, the 2011 census recorded that 568 people (or 1.1% of couples), aged 16 and over, were living as same sex couples in Hammersmith and Fulham. In 2011, there were 299 same sex civil partnerships in the borough. This gives us some of the picture but within the parameters of the DTI figures, we note that these local statistics may hide single LGB people, or LGB people who have not entered into civil partnerships. We do not have specific data on transgendered or transitioning people. The policies in the SPD are not aimed specifically at LGBT people but it is noted that members of this population will also be represented through one or more other equality strands, meaning that benefits will be experienced by this group in more subtle ways. For example, through increased employment opportunities and quality of built environment. **Conclusions** The above document aims to set a context for the forth coming SPD with regards to the Councils Public Sector Equalities Duty as set out in s149 of the Equality Act 2010. The study completed here is grounded in a demographic

[12] Source: ONS annual population survey, Employment Jul 2020-Jun 2021, Nomis

	study of the existing total population of the borough, both in the recent past and looks to demographic projections for the next few years. The document is then used to analyse impact of the Policies and strategies being proposed in the SPD on this demographic considering the Act. The document looks at what the implications are and what might be in future and sets out the steps the council will consider ensuring all are treated equally. The implementation of the SPD will be monitored on an ongoing basis as well as potential implications/impacts for/on the protected characteristics.
New research	N/A

Section 04	**Undertake and analyse consultation**
Consultation	The preparation and adoption of the Affordable Workspace SPD is governed primarily by the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The SPD has been produced in consultation with head of service and managers in Regeneration and Business teams, Development Management and the planning obligation (S106) officer. A public consultation will take place in mid-November 2021 and will be carried out for four weeks in accordance with the consultation requirements of regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The adoption of the SPD is expected in March 2022.
Analysis	**Methodology of the Analysis &Protected characteristics and the Public Sector Equality Duties PSED)** This EQIA analyses the likely impacts of the Supplementary Planning Document on statutorily identified protected characteristics (age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex, and sexual orientation), human rights and children's rights. It also assesses the SPD principles against the Public Sector Equality Duties in s149 of the Equality Act 2010 which states that in the exercise of its functions the council must have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and
- foster good relations between people who share a protected characteristic and those who do not.

The relevance of the policies to the protected characteristics is categorised as:

- High (H)
- Medium (M)
- Low (L)
- Not Applicable (NA)

and the magnitude of the impact on the protected characteristics are categorised as:

- Positive (+),
- Negative (-)
- Neutral (blank)

The SPD sets out a range of requirements to be delivered through the planning application process, as well as more detail on implementation to ensure policy objectives are delivered:

- Market rents: discounted market rents on a proportion of floorspace on large commercial schemes above 1000 sq. m gross;
- Affordable workspace approaches: alternatives to discounted market rents which may be applicable to smaller schemes too – such as flexible leases; discounted desks; flexible workspace/cafe hubs; ()
- Ensuring that existing affordable workspace/ SME occupiers are re-provided for in regeneration/redevelopment schemes;
- Workspace management Plans: improving implementation and promoting early negotiations by setting out model Workspace Management Plans and links to Affordable Workspace Providers and local small businesses looking for premises.

The impacts of the above sections set out in the SPD have been assessed against the protected characteristics as follows and sets out commentary relating to the way in which the SPD is likely to impact upon the protected characteristics:

1. Age

	2. Disability 3. Gender reassignment 4. Marriage/ Civil Partnership 5. Pregnancy/ Maternity 6. Race 7. Religion/Belief 8. Sex 9. Sexual Orientation 10. Human/ Children's Rights Act

Section 05	**Analysis of impact and outcomes**

Analysis

Sections	Age	Disability	Gender Reassignment	Marriage /Civil Partnership	Pregnancy/Maternity	Race	Religion/ Belief	Sex	Sexual Orientation	Human/Children's rights	Commentary
Market rents	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	This section provides guidance and requirements on discounted markets rents for affordable workspace. It will not generally impact on those with protected characteristics
Affordable workspace approaches	M+	M+	N/A	N/A	M	M+	N/A	N/A	N/A	M	This section provides alternatives to discount market rents to help supporting small local businesses, start-ups and not-for-profit sector. This section will not generally impact on the protected characteristics. However, it could create employment opportunities for all including those with protected characteristics and provide subsided accommodation for charities and voluntary organisations working for groups with such protected characteristics. Positive impacts could be on people of working age, people with impairments and people with different ethnical backgrounds

Existing affordable workspace	M+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	This section will not have impacts on those with protected characteristics, However, by retaining existing affordable workspace and ensuring that this space will be re-provided in redevelopment schemes, this would help supporting SMEs, local start-ups and ensuring they can remain and thrive in the borough. This would also decrease the levels of unemployment within the borough, having therefore positive socio-economic benefits.
Workspace management Plans/ affordable workspace providers	H+	H+	M+	N/A	M+	M+	N/A	M+	N/A	H	The SPD seeks to improve implementation of the Council's affordable workspace policy by including a template Workspace Management Plan to include details of accredited affordable workspace providers, monitoring and implementation requirements in respect of target occupiers. The SPD encourages this to be produced at pre application stage, and planning applications will be required to produce a Workspace Management Plan, the provisions of which will be secured by a planning obligation. The Workspace Management Plan also sets out the requirement for workspace providers to monitor the beneficiaries of the workspace including protected characteristics. This section is likely to have beneficial impacts on those protected characteristics by ensuring that affordable workspace is managed by certified providers who will promote the workspace to residents, including those in priority groups, ensuring equality and supporting end users.
Human Rights and Children's Rights											

	The Principles in the SPD will not affect Human Rights as defined by the Human Rights Act 1998. The Principles in the SPD are not likely to affect Children's Rights, as defined by the UNCRC 1992.	

Section 06	Reducing any adverse impacts
Outcome of Analysis	The equalities impact analysis of the proposed SPD has found that in general, there is unlikely to be any potential unlawful discrimination against protected groups associated with the implementation of these policies. However, the council welcomes comments from the public and other stakeholders on the findings of this equalities impact analysis. The analysis has shown that not all protected characteristics will be impacted upon in a similar manner by the implementation of the SPD. The analysis has revealed that, generally, the SPD will have a POSITIVE or NEUTRAL impact upon all protected groups and characteristics and will increase employment opportunities for all people in these groups. The protected characteristics of Age, Disability, Pregnancy and Maternity will be positively impacted upon most by the implementation of the SPD. The implementation of the SPD through consideration and determination of planning applications is unlikely to adversely impact upon Human and Children's rights. The council will take the following actions to promote its equalities duties: • it will monitor the implementation of the SPD on an ongoing basis. It will require that affordable and flexible workspace delivered is monitored and reported to avoid any issues that may adversely impact on the protected characteristics. The relevant SPD principles may then be amended accordingly, through a statutory review process, to help resolve these issues. • it will undertake public consultation on the SPD and associated documents, including the EQIA. The consultation will provide people with an opportunity to comment on the SPD evidence. • it will monitor the development of equalities legislation and associated case law to help ensure that the SPD remains legally compliant. It is not considered the SPD will adversely affect human rights as defined by the Human Rights Act 1998. It is considered that the SPD will have a NEUTRAL impact on children's rights under the United Nations Convention on the Rights of the Child (UNCRC), including the following: • The right to life, survival and development;

	• Health and welfare rights, including rights for disabled children, the right to health and health care, and social security; and • The right to education, leisure, culture and the arts

Section 07	**Action Plan**
Action Plan	

Issue identified	**Action (s) to be taken**	**When**	**Lead officer**	**Expected outcome**	**Date added to business/service plan**
Ensure that the SPD remains legally compliant with respect to equalities matters	Monitoring emerging equalities related case law and any future legislative amendments.	Ongoing	To be confirmed	The SPD will continue to remain legally compliant with respect to equalities matters.	N/A
Ensuring that the plan making process promotes the Council's commitment to the involvement of people (including those with protected characteristics) in decision making.	Ensuring that adequate consultation is carried throughout the plan making process as well as through the implementation of the plan through the development management and regeneration procedures and practices.	Ongoing	To be confirmed	The Council will not only enable legal compliance; however, it will enable social inclusion.	N/A

Section 08	Agreement, publication and monitoring
Chief Officer sign-off	Name: Position: Email: Telephone No:
Key Decision Report	Date of report to Cabinet/Cabinet Member to adopt the Affordable Workspace SPD: February 2022

Section 09	References
	Department for Communities and Local Government (2017), *The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017*, available at < The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 (legislation.gov.uk)> Disabled people's commission Hammersmith and Fulham (2018) *Nothing About Disabled People Without Disabled People Report*, available at https://www.lbhf.gov.uk/councillors-and-democracy/resident-led-commissions/disabled-people-s-commission Doug Pyper, House of Commons (2010), *The Public Sector Equality Duty and Equality Impact Assessments*, available at < http://www.parliament.uk/commons-library> Greater London Authority (2018), *Hammersmith and Fulham Report*, London Area Profiles, London Database, available at < London Borough Overview (windows.net)> GLA (2019), *London Wards Summary Measures Document*, available at < Indices of Deprivation - London Datastore> Hammersmith and Fulham Council (2011), *Core Strategy-Local Development Framework*, Chapter 3 Challenges - Deprivation p.7, available at Core Strategy - Local Development Framework October 2011 (lbhf.gov.uk). Hammersmith & Fulham Council (2016), *Joint Health and Wellbeing Strategy 2016-2021*, available at < Health and Wellbeing Strategy | LBHF>

Hammersmith and Fulham Council (2012), *2011 Census Statistics: Hammersmith and Fulham Briefing*, <Key statistics | LBHF>

Hammersmith and Fulham Council (2021), *Consultation on our Draft Equalities Plan 2021-25*, available at < http://www.lbhf.gov.uk/equality>

Index of Multiple Deprivation (IMD) 2019, available at < Indices of Deprivation 2015 and 2019 (communities.gov.uk)>

Milan Ognjenovic, Business Intelligence Team (PSR), Hammersmith and Fulham Council (2018), *Borough Profile 2018,* available at <https://www.lbhf.gov.uk/councillors-and-democracy/about-hammersmith-fulham-council/ward-profiles>

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GLA Data (2019) available at <Indices of Deprivation - London Datastore>

GLA Data (2020) available at <Trend-based population projections - London Datastore>

ONS Data (2020) available at <Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)>

Appendix 4

London Borough of Hammersmith & Fulham

Schedule of Representations & Officer Responses to the Affordable Workspace SPD Consultation

The proposed changes are expressed as ~~strikethrough~~ for deletions and underlining for additions to the text.

NB. Officer comments and amendments have been made against the Affordable Workspace SPD, therefore please refer to the Supplementary Planning Document when looking at this schedule.

Contents – Schedule of Changes and Officer Responses in Representor Order

Hammersmith and Fulham Disability Forum Planning Group……...3

Westfield Europe Limited……...4

Deloitte LLP…….....8

Patrizia……..….9

Romulus Construction Limited…….….13

Yoo Capital……...20

Stanhope PLC……..26

Earls Court Development Corporation ……35

Natural England……...43

TfL Commercial……45

Mark Richardson……....50

Ministry of Defence……....52

Nadine Grieve……..53

Technical Changes Schedule.....53

Rep. no	Name/Org	Consultation point	Representation	Officer Response
1	Jane Wilmot OBE H&F Disability Forum Planning Group	General Comment	12. We welcome council's draft Affordable Space SPD. 13. It would be helpful for this SPD to mention the council's strategic aim of being the most accessible and inclusive borough in England. This is something to be proud of and it is everyone's responsibility to support Hammersmith and Fulham Council to achieve this across the borough. 14. We support several of the principles in para 4.1 on the Industrial Strategy, Economic Growth for Everyone (2017): · To provide workspace that is local, affordable and accessible for small and medium businesses, start-ups, and not-for-profit (3rd sector) organisations · To provide jobs, local enterprise and opportunity for all in the borough · To deliver social value 15. However, if the council is serious about workspace that is local, affordable and accessible and to provide opportunity for all (including disabled residents and disabled entrepreneurs) then this SPD must include a policy on inclusive workspace. 16. We are not sure why there are no references to London Plan; Local Plan and LBHF Planning SPD policies on inclusive design. We recommend that this SPD adapts paragraph 5.8 on Design or para 5.9 on Accessible and Inclusive Design from the Railway Arches SPD as appropriate for inclusive workspaces. 17. This SPD will want to be explicit that planning applications need to show how designs for proposed workspaces will be inclusive whether it is new build or repurposing existing buildings. The council may need to provide advice or funding to assist SMEs provide inclusive workspaces. 18. This SPD should also remind SMEs of their obligations under the Equality Act 2010 to meet the access needs of disabled employees or disabled entrepreneurs in the section on Workspace Management Plan. It would be useful to include information about Access to Work funding etc.	In response to the Disability Forum's comments to the SPD it is agreed that the SPD could be amended to clarify that new development of affordable workspace should be accessible and inclusive in terms of design and access, including access to new employment opportunities. **Change** Appendix A, paragraph 8.1.4 Add a new bullet point on accessible and inclusive design into 'Points to Consider': Ensure that Inclusive Design is integral to the build, fit out and management to ensure inclusive workspaces.

2	Jane Wilmot OBE H&F Disability Forum Planning Group	EqIA	19. Finally, we do not consider that the EQIA properly deals with the impact of this SPD on disabled employees or disabled entrepreneurs. We are unclear why the section on Disability does not mention inclusive workspaces or inclusive management plans. 20. The Council's draft Equality Plan 2021-2025 set out the Council's vision for tackling inequality and responding to the public sector equality duty. The document draws on five objectives: · Everyone in our borough must feel valued when the Covid-19 pandemic ends. · Removing barriers to inclusion. · Ensuring that our services tackle the disproportionate impact on young people of the risks of street crime and exploitation by gangs. · Improving opportunities for all. · Becoming an employer of choice and fostering greater inclusion 21. We consider that this SPD needs to remind SMEs they should remove barriers to inclusion; improve opportunities for all and become employers of choice and fostering greater inclusion. 22. We recommend the council reviews the EQIA to address these issues.	Comments noted. These matters are somewhat beyond the remit of this document. However individual applications will need to accord with all planning policies and guidance, and accessible and inclusive design provision is considered to be covered by other policies and standards within the Local Plan, which in turn have been subject to an EqIA .
3	*Westfield Europe Limited*	*Evidence Reports*	*Representations on the evidence base and on Chapter 5 Approaches to meeting needs have been considered together in representation no. 6 below.*	
4	Westfield Europe Limited	General Comment	Westfield Europe Limited have a longstanding land interest within White City, specifically the Westfield London Shopping Centre. Below we comment on the guidance outlined which is relevant to the Westfield Shopping Centre included within the SPD consultation. **Approaches to Meeting Needs and Shepherd's Bush Sub-area** The SPD outlines that the document is supported by an Affordable Workspace Viability Study which identifies and justifies areas of the borough where new offices/ employment space is sought, and where the market fails to provide access to meet demand for SMEs start- ups and priority sectors. Furthermore, it acknowledges that the provision of affordable workspace will depend on a number of factors and on the circumstances of the site and development. This acknowledgment is welcomed and considered appropriate. The SPD proposes six sub-areas where affordable workspace is considered appropriate to be located. Westfield London Shopping Centre would fall within	Support welcomed

			the Shepherd's Bush sub-area. It seeks for new commercial development of 1,000 sqm (gross) or more within the Shepherd's Bush sub-area to include affordable workspace with a discount to market rent of 40% or higher and apportioning 20% of space within this rental level. We support the provision of affordable workspace within the borough and consider this a key benefit that new commercial development can deliver. In summary, we support the preparation of the Affordable Workspace SPD and aspirations this seeks for future commercial developments within the borough.	
5	Westfield Europe Limited	General Comment	However, we do consider that this guidance needs to be applied flexibly to take into account individual site characteristics alongside other planning benefits of proposed development in order to achieve additional affordable workspace in the identified sub-areas. With that said, we propose that the percentage and level of discount to market should always be 'subject to viability' and this premise must be incorporated within the main guidance text to recognise this flexibility.	It is considered that the SPD clearly states that the Council will take into account viability on a case-by-case basis, and that the Council will take a flexible approach taking into account site specific considerations in achieving the best outcome. For example: paragraphs 1.8, 5.15, and 6.1 in the SPD, and within Local Plan policy E1. No change
6	Westfield Europe Limited	Chapter 5 Approaches to Meeting Needs, and Evidence Reports	However, the proposed discount for the Shepherd's Bush sub-area is a significant reduction compared to some of the other sub-areas identified. We note that these figures have been derived from viability evidence dated November 2020. It is important to note that the viability of developments is continuously evolving depending on policy objectives, site characteristics but also external drivers for example build costs and wider issues such as the Covid-19 pandemic. The risk of increasing costs unmatched by equivalent increases in rental values is acknowledged by Turleys in its Affordable Workspace Study – Viability Review (October 2021), where it notes that construction costs alone have increased by 4.9% in the past 12 months	The bespoke evidence to inform the SPD has justified thresholds, the definition of sub areas of need, and a range of discounts. A viability update was carried out in 2021 using the latest published industry data. Both reports make clear that they act as a guide and recommend that a site-specific approach is taken. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability and impact on delivery and this is carried through into the SPD.

				It is relevant to note that updates to viability evidence normally take place every 5 years. No change
7	Westfield Europe Limited	Para 5.14 and table 5.10	Paragraph 5.14 of the SPD does recognise that the Council should take a flexible approach considering site-specific circumstances (and associated costs), noting that the Benchmark Land Values set out act as a guide only. This is welcomed but we consider additional wording must be included within Table 5.10 to make this explicit and should incorporate the term 'subject to viability' which would further assist with this premise. Indeed, the suggestion by Turleys (at paragraph 5.5) – "that each site should be assessed on its own merits (and associated costs), and that the Benchmark Land Values set out act as a guide only" – would seem to us to be appropriate wording for the SPD.	Support welcomed. It is considered that the SPD clearly states that the Council will take into account viability on a case-by-case basis and that the Council will take a flexible approach taking into account site specific considerations in achieving the best outcome. This is likely to include agreement on land values and benchmark data at time of the planning application. For example: paragraphs 1.8, 5.15, and 6.1 in the SPD, and within Local Plan policy E1. No change
8	Westfield Europe Limited	Table 5.19	In addition, whilst the draft SPD mentions the possibility for alternative means for delivering affordable workspace in Chapter 5, the examples of such alternatives appear to only be set out in Table 5.19 (which applies to developments of less than 1,000 sqm). If our understanding is correct, we would suggest that this Table is amended so that it is similarly applicable to schemes in excess of 1,000 sqm and, in addition, there should be express wording in the SPD confirming that the examples in Table 5.19 are not exhaustive.	Whilst this matter is already covered in paragraph 5.11 states that a mix of discounted rents and other delivery measures (i.e. such as those set out in Table 5.19), it is agreed that minor wording and formatting changes can improve clarification: **Change last sentence in paragraph 5.11 to form a new paragraph 5.12**: Within the areas listed above... **Change Paragraph 5.12** **Add text to 3rd bullet point:** A mix of discounted rents and other affordable /supportive measures as

				suggested in Table 5.19 to meet needs of the start-ups/SMEs and priority sectors may be appropriate depending on site circumstances **Change Table 5.19 Heading:** 'Examples of Alternative Measures to Support Affordable and Flexible Accommodation'
9	Westfield Europe Limited	**Para 5.10/General**	As a general point, and in order to avoid any confusion in interpretation, the SPD should state that the requirement for affordable workspace should apply only to a percentage of the office space provided in the scheme. This would be a useful clarification as a mixed-use scheme would not be expected to provide a percentage of affordable workspace across the entirety of its space but only the office element within it. A suggestion would be to amend paragraph 5.10 to read as follows: "Subject to viability, Discounted Rents and Floorspace will be required on the office floorspace comprised within new developments where the provision of new office floorspace is over 1,000 sqm (gross) as follows:"	Comments noted. The remit of Local Plan policy E1, this SPD and supporting evidence does not extend to mixed use developments. The SPD is not intended to be a redevelopment strategy for mixed-use development and provides general planning guidance. Mixed use schemes are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. No change.
10	Westfield Europe Limited	Chapter 6 Implement-ation, and Chapter 5 Approaches to Meeting Needs	Furthermore, we consider that the SPD should promote flexibility in the way that the guidance is applied as the affordable workspace package should be bespoke to the site, building, project, tenant and/or the type of workspace that is being provided. LBHF should avoid applying a strict percentage area of floorspace that is carved out to provide separate affordable workspace and should promote a flexible approach to the provision within schemes. This could include blended office schemes and co-working developments, which provide discounted fixed and hot desking, and discounted meeting rooms and conference spaces.	It is considered that the SPD clearly promotes a flexible approach as does Local Plan Policy E1. The SPD also confirms that the Council will take into account viability on a case-by-case basis, and site-specific considerations in achieving the best outcome. Chapter 6 and the Appendices provide more guidance on how different typologies and delivery mechanisms can be provided. No change

11	Deloitte LLP	Evidence Reports: Sensitivity analysis	…the Viability Review states at paragraph 5.3 that the reasonable expectation to provide the proposed level is “based on current inputs”. This caveat is repeated at paragraph 5.13 of the draft AWS SPD. In the absence of any sensitivity analysis and Turley’s own caveat about the current inputs, we consider that the requirement for 20% affordable workspace is not based on “adequate and proportionate” evidence, as required by paragraph 31 of the National Planning Policy Framework.	Both evidence reports make clear that they act as a guide and recommend that a site-specific approach is taken. This Affordable Workspace SPD is a guidance document to support the adopted development plan policies, and while being a material planning consideration, it does not include new policy requirements.
12	Deloitte LLP		On this basis, we suggest that the SPD should be reviewed in the light of a more detailed viability assessment, with adequate sensitivity analysis that is publicly available.	The bespoke evidence to inform the SPD is considered to be robust, using the latest available local data, an industry-standard methodology, and bench marking against other London boroughs. It is considered that the evidence has sufficiently justified the definition of sub areas and a range of discounts. Both evidence reports make clear that they act as a guide and recommend that a site- specific approach is taken. This Affordable Workspace SPD is a guidance document to support the adopted development plan policies, and while being a material planning consideration, it does not include new policy requirements. No change
15	Deloitte LLP	Chapter 5 Approaches to Meeting Needs and para 5.13	The Viability Review states at paragraph 5.3 that the reasonable expectation to provide the proposed level is “based on current inputs”. This caveat is repeated at paragraph 5.13 of the draft AWS SPD. In the absence of any sensitivity analysis and Turley’s own caveat about the current inputs, we consider that the requirement for 20% affordable workspace is	Refer to response to representation 12 above. No change

			not based on “adequate and proportionate” evidence, as required by paragraph 31 of the National Planning Policy Framework.	
16	Deloitte LLP	Table 5.10 and general approach in Chapter 5	Consistent with other London Boroughs, we expect that the Council’s requirement for affordable workspace provision should be no higher than 10%. In any case, the AWS SPD does not override the test in Policy E1 Providing for a range of employment uses in the Hammersmith & Fulham Local Plan 2018 that the amount of affordable workspace suitable can be justified by the type and nature of the proposal and be subject to viability. If the Council pursues an SPD requirement that seeks too much affordable workspace, it could place at risk its Local Plan policy objective to provide economic growth in accordance with Policy E1.	The SPD is a guidance document and does not set policy. It is considered that the SPD clearly promotes a flexible approach as does Local Plan Policy E1. The SPD also confirms that the Council will take into account viability on a case-by-case basis, and site-specific considerations in achieving the best outcome rather than stifle delivery. No change.
17	Deloitte LLP	Table 5.19 and para 5.16	We have reviewed the alternative measures to support affordable and flexible accommodation in Table 5.19 of the AWS SPD. We request that paragraph 5.16 is clarified to confirm that the alternative measures can be used for all developments (and not just those below the 1,000 sqm gross viability threshold), in accordance with the viability test in Policy E1. We have the following comments on the proposed alternative measures: Where fit out costs are required to be covered by the developer, the costs of those works should be taken into account when assessing the amount of affordable workspace to be provided Affordable workspace should not be provided in perpetuity. We propose that the space is retained for at least 30 years unless otherwise agreed with the determining authority We support the principle of allowing off-site provision or payments in lieu where supported by the viability of the proposed development	This suggested change is not accepted in the case of all developments. However, officers agreed that the site-specific approach discussed in the preceding paragraph 5.15 could mean that the best outcome on delivery may be a mix of discounted rents and alternative measures to secure affordable workspace such as those shown in table 5.19. Minor changes for clarification have been made as set out in response to representation no. 8
18	Patrizia (Daniel Watney LLP)	Evidence Reports: Viability in Hammer-smith	The draft SPD states that within Hammersmith Town Centre, 20% of floorspace within major commercial developments will be required to be provided at a discount to market rent of 40% or higher. In short, Patrizia considers that there is no evidence that there is a need for this amount of affordable workspace in major new development, nor a robust evidence base which demonstrates that the approach is viable.	The bespoke evidence to inform the SPD is considered to be robust, using the latest available local data, an industry-standard methodology, and bench marking against other London boroughs. It is considered that the evidence has sufficiently justified the definition of sub areas and a range of discounts. Both evidence reports make clear that they act as a guide and

				recommend that a site- specific approach is taken. This Affordable Workspace SPD is a guidance document to support the adopted development plan policies, and while being a material planning consideration, it does not include new policy requirements. No change
19	Patrizia (Daniel Watney LLP)	Evidence Reports:	It is considered that the Viability Report supporting the draft SPD, and in particular its October 2021 update, is not credible evidence demonstrating that the approach is viable. Curiously the market commentary provided in chapter 3 of the 2021 update refers to the changing market conditions due to COVID, however, the commentary is not then reflected in the assumptions set out in section 4. Examples are provided below: The October 2021 viability report uses a headline rent in Hammersmith Town Centre of £55/sqft, which is an increase of 8% from the 2020 version. Advice from Patrizia's agents is that this level of rent is absolute prime and reflects a very few number of lettings in a fewer number of developments within the Town Centre. It is not reflective of the overall market level. Rents for refurbished office stock, which is also new development and should therefore be relevant, have fallen and are between £40/sqft and £50/sqft. The rent-free periods being offered at the moment to secure lettings are substantial, and in the order of 15-18 months on a 5- year term, rather than the 12 months referred to in the viability report. Construction costs have risen dramatically and continue to do so. The rise has been broadly 10-20%; and the 5% allowance in the viability report is a significant underestimation. The use of 15% profit on GDV as the level of return being sought by investors is inaccurate. Most approach on an IRR basis, which in the current economic climate, probably equates to 20-25% profit on cost if not more.	The bespoke evidence to inform the SPD is considered to be robust, using the latest available local data, an industry-standard methodology, and bench marking against other London boroughs. It is considered that the evidence has sufficiently justified the definition of sub areas and a range of discounts. Both evidence reports make clear that they act as a guide and recommend that a site- specific approach is taken.
20	Patrizia (Daniel Watney LLP)	General Comment	We write on behalf of Patrizia, a major investor in Hammersmith Town Centre, to provide comment on the above document. Patrizia is supportive of the Council's objective to encourage local businesses. It also recognises that Policy E1 of the adopted Local Plan states that the Council 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 and subject to viability.	Support noted The SPD is a guidance document only. Whilst it will be a material consideration in determining planning applications, it does not attempt to set or go beyond existing policy.

			Patrizia is however concerned, and therefore objects to, the amplification of this policy as set out in the draft SPD and in particular, its approach towards Hammersmith Town Centre	It is considered that the SPD clearly promotes a flexible approach as does Local Plan Policy E1. The SPD also confirms that the Council will take into account viability on a case-by-case basis, and site-specific considerations in achieving the best outcome rather than stifle delivery. No change.
21	Patrizia (Daniel Watney LLP)	Chapter 4 Who Needs Affordable Workspace	1 Lack of evidence of need: There is no market failure that needs to be addressed through such an excessive approach as that referred to in the draft SPD. Evidence from Co-star indicates that there is currently in excess of 1 million sqft of vacant office floorspace within Hammersmith Town Centre representing 14.7% of the total stock. This is the highest level since before the financial crisis and has occurred as occupiers have released space during the pandemic, and as leasing activity has slowed. Vacancy has increased by circa 11% since 2020 and is projected to continue increasing towards 1.5 million sqft by 2024. Much of the accommodation is low cost and rents have been, and are, falling. The overall market rent is 3% less than its peak a few years ago, with the fall of rents for secondary offices considerably greater. There is therefore already a large supply of available office floorspace within the Town Centre that provides a range of business unit sizes and prices, without a need to specify that a significant proportion of major new development should also be made available at a highly discounted rate.	The London Plan 2021, and the Hammersmith and Fulham Local Plan identify market failures and a resulting need for affordable workspace, and both have been supported by appropriate evidence. The bespoke evidence to inform the SPD has justified thresholds, the definition of sub areas of need, and a range of discounts. A viability update was carried out in 2021 using the latest published industry data. Both reports make clear that they act as a guide and recommend that a site- specific approach is taken. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability, and impact on delivery and this is carried through into the SPD The SPD is a guidance document and does not set policy. No change.
22	Patrizia (Daniel Watney LLP)	Chapter 5 Approaches to Meeting Needs and para 5.13	2. Lack of robust evidence which demonstrates that the approach is viable It is considered that the Viability Report supporting the draft SPD, and in particular its October 2021 update, is not credible evidence demonstrating that the approach is viable. Curiously the market commentary provided in chapter 3	The bespoke evidence to inform the SPD is considered to be robust, using the latest available local data, an industry-standard methodology,

			of the 2021 update refers to the changing market conditions due to COVID, however, the commentary is not then reflected in the assumptions set out in section 4. Examples are provided below: The October 2021 viability report uses a headline rent in Hammersmith Town Centre of £55/sqft, which is an increase of 8% from the 2020 version. Advice from Patizia's agents is that this level of rent is absolute prime, and reflects a very few number of lettings in a fewer number of developments within the Town Centre. It is not reflective of the overall market level. Rents for refurbished office stock, which is also new development and should therefore be relevant, have fallen and are between £40/sqft and £50/sqft. The rent-free periods being offered at the moment to secure lettings are substantial, and in the order of 15-18 months on a 5- year term, rather than the 12 months referred to in the viability report. Construction costs have risen dramatically and continue to do so. The rise has been broadly 10-20%; and the 5% allowance in the viability report is a significant underestimation. The use of 15% profit on GDV as the level of return being sought by investors is inaccurate. Most approach on an IRR basis, which in the current economic climate, probably equates to 20-25% profit on cost if not more.	and bench marking against other London boroughs. It is considered that the evidence has sufficiently justified the definition of sub areas and the range of discounts. Both reports make clear that they act as a guide and recommend that a site- specific approach is taken. It is relevant to note that that the SPD is a guidance document and does not set policy, and that it confirms that the Council will take into account viability and site-specific considerations on a case-by-case basis. No change.
23	Patrizia (Daniel Watney LLP)	Chapter 5 Approaches to Meeting Needs And General comment	3. Conclusion In light of the above, Patrizia requests that the Council re-looks at the evidence base to the draft SPD and reconsiders whether the SPD is necessary. Patrizia considers that it is not, certainty at this point in time and seeks a pause and reflection to enable a full assessment of post-lockdown office requirements and viability. Policy E1 of the Local Plan already provides a mechanism through which affordable workspace can be negotiated on a case-by-case basis having regard to the circumstances of an individual scheme; and this is a better approach than now adding as an additional layer, the overly prescribed, and excessive approach of the draft SPD given current uncertainties in the office market. Indeed, it is considered that the progression of the draft SPD would be counter-productive to securing new investment and office development in Hammersmith Town Centre which will be important to economic recovery. A covenant to make available 20% of space at a discount of 40% or higher has potentially a very significant impact on the attractiveness of pursuing major new office development. It has a considerable impact on viability and raises the prospect of significant design inefficiencies through a need to provide separate facilities, dual entrances, cores and communal spaces in order to keep the service charges associated with the affordable space down. It also compromises the ability to attract commercial tenants and pre-lets which are essential to funding as it places constraints on the space available and on the design specification. The complexity that it raises in relation to the practical management of the space is considerable as well, including how to determine when a business has become too successful to occupy such accommodation. In	The SPD has been drafted to improve implementation of Local Plan policy E1 and the Council's Industrial Strategy objectives. The SPD encourages early discussions and sets out a range of measures to deliver affordable workspace. The bespoke evidence to inform the SPD has justified thresholds, the definition of sub areas of need, and a range of discounts. A viability update was carried out in 2021 using the latest published industry data. Both reports make clear that they act as a guide and recommend that a site- specific approach is taken. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability, and impact on delivery and this is

			this context, it should only be pursued if there is a compelling and credible evidence base to support it, which there currently is not	carried through into the SPD. The SPD is also in line with the London Plan policy objectives. It is relevant to note that that the SPD is a guidance document and does not set policy, and that it confirms that the Council will take into account viability and site-specific considerations on a case-by-case basis. Management of the resulting affordable workspace achieved will normally be carried out by the Council's approved Affordable Workspace Providers with an approved management plan in place, and a suggested template included in the SPD (Appendix A) which covers the monitoring and reporting of occupiers/ tenants. No change
24	Romulus Construction Limited (Gerald Eve)	Evidence Reports	**Viability** The SPD states that local viability analysis on discounted rent has been carried out and refers to a supporting evidence document titled 'Affordable Workspace Study – Viability Review' dated October 2021. The study uses BCIS, which does not account for inflation or any changes to sustainability legislation and the significant costs with achieving net zero carbon, which is another priority for the Borough. From the information provided, it is also unclear whether the evidence is based on new build schemes in central London. It would be helpful to understand if this proposal has been benchmarked against the build costs for recent London office schemes (non zone 1). If this is not the case then we would suggest that such testing is undertaken. Local Need and Evidence Base The draft SPD policy should also allow flexibility to respond to the market and the local need at the time of the determination of an application. It should also allow for reviews to be undertaken to ensure any policy is relevant to the ever-evolving workspace market, particularly in the context of changing workspace habits prompted unprecedent events such as COVID-19. What is clear from data collected for our clients is that even before	The bespoke evidence to inform the SPD is considered to be robust, using the latest available local data, an industry-standard methodology, and bench marking against other London boroughs. It is considered that the evidence has sufficiently justified the definition of sub areas and a range of discounts. Both evidence reports make clear that they act as a guide however and recommend that a site- specific approach is taken. This Affordable Workspace SPD is a guidance document to support the adopted development plan policies,

			COVID-19 the office market in Hammersmith was oversupplied and softening, and headline rents for offices and serviced office desks were beginning to fall. COVID-19 has made this worse, and the over-supply is greater and rents are falling. These are market conditions which the proposed draft SPD would simply ignore	and while being a material planning consideration, it does not include new policy requirements. No change
25	Romulus Construction Limited (Gerald Eve)	General Comment	We write on behalf of Romulus Construction Limited to make representations to the Draft LB Hammersmith and Fulham Draft Affordable Workspace Revised SPD, dated November 2021. Our clients have taken legal advice. We are advised that there is no doubt that the proposed affordable workspace policy has been inadequately consulted upon, and goes beyond the scope of the Local Plan. The case of *Wakil (t.a. Orya Textiles) v LB Hammersmith and Fulham (2013)* is directly on the point. There has not been sufficient meaningful consultation in accordance with the Town and Country Planning (Local Planning (England) Regulations 2012 with interested parties. Moreover the matters dealt with in the policy properly fall within the definition of a Development Plan Document in the 2012 Regulations as 'any document prepared by a local planning authority ……, which contains statements regarding one or more of the following— (i)the development and use of land which the local planning authority wish to encourage during any specified period'. (ii)the allocation of sites for a particular type of development or use;…… (iv)development management …. policies, which are intended to guide the determination of applications for planning permission;' By contrast Regulation 2(1) defines SPD as follows "supplementary planning document" means any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan "local plan" is defined as any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv…..and for the purposes of section 17(7)(a) of the Act these documents are prescribed as development plan documents; For this reason, it is clear that the SPD is not a Development Plan Document, and that it would be unlawful to proceed. We set out our comments and concerns below regarding the proposed approach to the delivery of affordable workspace. I**ssues Arising from the Proposed Affordable Workspace SPD** Notwithstanding our position that our client does not agree that it would be lawful to adopt affordable workspace requirements as an SPD or indeed necessary, we set out our comments and concerns below regarding the principles set out in the draft SPD. **Plan Making**	The comments appear to have misinterpreted the role of the SPD. See response to representation 24. The Affordable Workspace SPD is a guidance document to support the adopted development plan policies and while being a material planning consideration, it does not present new policies. It supports the Local Plan, which alongside the supporting Local Plan evidence, has been found sound. The SPD has been prepared and consulted on in full compliance with the Regulations. Reference to the tests of soundness in this context are not relevant therefore.

			The National Planning Policy Framework February 2021 identifies that Plans are "sound" if they are: (a) Positively prepared – provided a strategy which, as a minimum seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; (c) Effective – deliverable over the planned period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and (d) Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this framework. Paragraph 11 of the NPPF states plans and decisions should apply a presumption in favour of sustainable development. "For plan making" this means that: (a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; (b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless; (i) The application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or (ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole." Paragraph 15 notes that inter alia up-to-date plans should provide a framework for addressing housing needs and other economic, social and environmental priorities. At paragraph 16 it is noted that plans should "be prepared positively, in a way that is aspirational but deliverable"… and "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals".	
26	Romulus Construction Limited (Gerald Eve)	General Comment	**Conclusion** As currently written, it is considered that the draft SPD is both unsound and unlawful when assessed against the tests set by the NPPF. The draft requirements, which include delivering affordable workspace in perpetuity, are substantially more onerous when compared to other affordable workspace requirements in London and do not account for changing markets, inflation, unprecedented events and significantly exceeds the plan period, to which the draft SPD relates. This could have the adverse impact of discouraging developers from investing in the Borough, which in turn could have an adverse impact on the supply of affordable workspace.	Refer to responses to representations nos 24 and 25 above.

			Our clients will keep this matter under close review and will wish to challenge any move which seeks to extend Development Plan Documents unlawfully. The Council should not seek to proceed with this policy as SPD	
27	Romulus Construction Limited (Gerald Eve)	Chapter 2 Policy Context	**Economic Growth** Section 6 of the NPPF relates to building a strong, competitive economy. It states: “Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development…" The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.” Hammersmith and Fulham published an Industrial Strategy ‘Economic Growth for Everyone” in 2017, which seeks to ensure that economic growth in the borough is supported and inclusive. The Strategy emphasises the need to create affordable workspace. It is understood that the draft Affordable Workspace SPD which the Council have produced would help with the delivery of this strategy, as well as building a strong economy in line with the objectives of the NPPF. From reviewing the draft document, we note that there are some key factors which need to be addressed, to ensure a balance is made between delivering necessary affordable workspace and encouraging investment in LB Hammersmith and Fulham, particularly in the context of other London Boroughs, which have less onerous affordable workspace requirements. **London Plan 2021 – Affordable Workspace** Policy E2 states that Boroughs should include policies that include a range of business sizes and an appropriate range of rents to meet the needs of micro and SME units. The threshold should be for development proposals including new B class business floorspace greater than 2,500 sqm or a locally determined lower threshold. Policy E3 states that requirement for affordable workspace should be based on need and viability. The policy requires the terms of affordable workspace to be set out in S106 agreements, including evidence that the space will be managed by a workspace provider that has a long term commitment to social, cultural and economic impacts. **Local Plan 2018** Policy E1 states that schemes which include new employment uses, 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 and subject to viability. When considering new employment floorspace or the extension of existing floorspace the council will also take into account:	Comments noted. Refer to response to representation no 23.

			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; d) whether there will be displacement of other uses such as community facilities or housing; and e) the Hammersmith and Fulham Economic Growth Plan and the council economic strategies.	

28	Romulus Construction Limited (Gerald Eve)	Chapter 4, Who Needs Affordable Workspace- Paragraph 4.6	**Issues Arising from the Purpose and Principle of Affordable Workspace** In addition to the fundamental concern with the proposed procedure for securing affordable workspace in the Borough, our client is concerned that the principle of seeking to secure affordable workspace in the Borough, in the context of the economic and market situation at the current time would be counter-productive. At present, there is an over-supply and reduction in effective office rents in Hammersmith, for both leased and serviced office stock. Prior to COVID-19 there was an oversupply of office stock, with headline rents simultaneously falling. This trend has then been exacerbated by the pandemic, resulting in a greater oversupply and further reduced rents. It is unclear how the proposed SPD and affordable workspace requirements address and acknowledge this wider market issue surrounding office stock. To evidence this point, please find enclosed two letters from agents within the office market who have provided an overview of the market position. This includes a letter Frost Meadowcroft whom are a local agency in the Borough and a letter prepared by JLL, whom can provide commentary on the wider market situation.	Additional background information noted. The SPD has been drafted to improve implementation of Local Plan policy E1 and the Council's Industrial Strategy objectives. The SPD encourages early discussions and sets out a range of measures to deliver affordable workspace. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability and impact on delivery and this is carried through into the SPD. It is relevant to note that that the SPD is a guidance document and does not set policy, and that it confirms that the Council will take into account viability and site-specific considerations on a case-by-case basis. The bespoke evidence to inform the SPD has justified thresholds, the definition of sub areas of need, and a range of discounts. A viability update was carried out in 2021 using the latest published industry data. Both evidence reports make clear that they act as a guide and recommend that a site- specific approach is taken.

29	Romulus Construction Limited (Gerald Eve)	Chapter 5 Approaches to Meeting Needs	Refer representations on Viability and Market Analysis in Evidence Base comments above	See response to representation no 26 above
30	Romulus Construction Limited (Gerald Eve)	Paras 5.8-5.10 ; Table 5.10 and para 5.13	The draft Supplementary Planning Document seeks to set out the requirement for discounted rents and floorspace will be on new commercial developments over 1,000sqm and that evidence has supported a range of discounts to be applied, across the different wards in the Borough. **Quantum** Each location set out in the draft document requires 20% of all commercial floorspace to be provided as affordable workspace, with a discount market rent of 40% or higher in Hammersmith Centre, which is an area of particular interest to our client, Romulus. Whilst it is noted that Policy E1 of the Local Plan sets out that this is subject to viability, this is a substantially higher requirement than other comparable London Boroughs, which are all seeking a provision of 10% of office floorspace. Furthermore, other Boroughs have calculated the provision on the basis of uplift, not gross floorspace. The draft document suggests that the requirements are in relation to gross floorspace, which would penalise and discourage applicants seeking to improve and upgrade existing redundant commercial floorspace. Given the potential adverse consequences, we would suggest that the policy only applies to uplift and uplift should be defined as NIA uplift, as GIA does not consider ancillary space such as back of house or circulation space, which is not linked to any specific users of large multi-let buildings. This has been recently tested in the Lambeth Local Plan Examination in Public at the end of 2020, where the Inspector amended the draft policy wording to apply to uplift in office area rather than gross and considered that this would encourage more SME provision. Notwithstanding that the draft policy is considerably more onerous than comparable policies across London, it also does not reflect the market context. As outlined earlier in the letter, there was an oversupply of office floorspace prior to COVID-19, which saw a fall in headline rents. The pandemic has since exacerbated this, with oversupply levels now even greater and rents lower than prior to COVID-19. As a result, the proposed 20% requirement does not reflect the current market situation, nor does it encourage and promote recovery in the office market following the COVID-19 pandemic.	Comments noted. The bespoke evidence to inform the SPD has justified thresholds, the definition of sub areas of need, and a range of discounts. A viability update was carried out in 2021 using the latest published industry data. Both reports make clear that they act as a guide and recommend that a site- specific approach is taken. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability, and impact on delivery and this is carried through into the SPD. As the SPD is guidance, the Council considers the current wording is acceptable. Discussions would be informed by how far a schemes would take forward local plan policy and Industrial Strategy objectives, however these are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. No change

			It is therefore considered that the SPD should seek a maximum of 10% of net office floorspace uplift, as NIA (Class E (g)), given that the floorspace would also be liable to pay CIL and also expected to be zero carbon. This amendment to the draft policy would strike a balance between providing a supply of affordable workspace in the Borough, whilst continuing to encourage the required investment in the area, which is necessary to deliver the affordable workspace.	
31	Romulus Construction Limited (Gerald Eve)	Table 5.19 and Appendix A Table 8.1.3	**Timescales** The draft SPD requires that the affordable workspace should be provided in perpetuity. There is no clear financial viability evidence to support this position. This approach is considered wholly inappropriate as it is longer than the plan period and is therefore contrary to the NPPF, which states that for plans to be sound they need to be effective. Effective is defined as deliverable over the plan period. Other comparable London Boroughs require the provision of affordable workspace for a period ranging from 15-20 years. It is strongly suggested that this approach should be reviewed and adopted in the SPD as well.	The SPD has been drafted to improve implementation of Local Plan policy E1 and the Council's Industrial Strategy both of which identify affordable workspace needs. The timescales do in fact reflect those in other London boroughs. The policy has been found to be sound deliverable over and beyond the plan period until there is sufficient evidence that this need can be satisfied by the prevailing local market conditions. As the SPD is guidance, the Council considers the current wording is acceptable.
32	Romulus Construction Limited (Gerald Eve)	Table 5.19 and Appendix A Table 8.1.3	**Timing of Delivery** It should be recognised that the non-affordable workspace provision and occupation enables the delivery of the affordable workspace elements. The draft SPD does not refer to timescales but we would suggest a phased approach to the delivery is included, to enable a percentage of the non-affordable workspace to be delivered and occupied prior to the affordable workspace elements. This provides a mechanism to both secure the affordable workspace in a timely manner, whilst also assisting with funding and cashflow, enabling the affordable workspace to be delivered. For masterplan schemes there should be an ability to 'pro rata' the affordable workspace provision.	Comments noted. The timing of delivery/phasing are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. As this is guidance, the Council considers the current wording is acceptable.
33	Yoo Capital (Gerald Eve)	General	We write on behalf of our client to formally comment on the guidance contained within the draft Affordable Workspace Supplementary Planning Document. The consultation seeks comment on draft policy guidance relating to the requirement for the provision of affordable workspace on new commercial office floorspace. It is understood that that consultation period is open for comment until 17th December 2021. Our client has interests in a number of sites within the borough,	

			most notably Kensington Olympia and is the majority freeholder of the Shepherd's Bush Market Site. They actively monitor sites suitable for regeneration and redevelopment in the borough and have a keen interest in Hammersmith and Fulham. While the need for the delivery of affordable workspace from new commercial office floorspace is recognised, we have set out below some comments in relation to the proposed approach to the delivery of affordable workspace.	
34	Yoo Capital (Gerald Eve)		**Plan Making** The National Planning Policy Framework February 2021 identifies that Plans are "sound" if they are: a) Positively prepared – provided a strategy which, as a minimum seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the planned period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this framework. Paragraph 11 of the NPPF states plans and decisions should apply a presumption in favour of sustainable development. "For plan making" this means that a. Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; b. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless; i. The application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. (ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole." Paragraph 15 notes that inter alia up-to-date plans should provide a framework for addressing housing needs and other economic, social and environmental priorities.	The comments appear to have misinterpreted the role of the SPD. Refer to response to representation 24. The Affordable Workspace SPD is a guidance document to support the adopted development plan policies and while being a material planning consideration, it does not present new policies. It supports the Local Plan, which alongside the supporting Local Plan evidence, has been found sound. The SPD has been prepared and consulted on in full compliance with the Regulations. Reference to the tests of soundness in this context are not relevant therefore.

			At paragraph 16 it is noted that plans should "be prepared positively, in a way that is aspirational but deliverable"… and "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". **The Draft SPD Principles** It is considered that the proposed affordable workspace policy goes beyond the scope of the Local Plan and has not been correctly consulted upon. The case of Wakil (*t.a. Orya Textiles) v LB Hammersmith and Fulham (2013)* is relevant to this. There has not been sufficient meaningful consultation in accordance with the Town and Country Planning (Local Planning (England) Regulations 2012 with interested parties. The matters dealt with in the policy properly fall within the definition of a Development Plan Document in the 2012 Regulations as 'any document prepared by a local planning authority…, which contains statements regarding one or more of the following: i. the development and use of land which the local planning authority wish to encourage during any specified period'. ii. the allocation of sites for a particular type of development or use; iii. any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and iv. development management… policies, which are intended to guide the determination of applications for planning permission; Regulation 2(1) defines SPD as follows: "supplementary planning document" means any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan. For this reason, the policy is not an SPD and it is considered it would be unlawful to proceed.	
35	Yoo Capital (Gerald Eve)	Chapter 2 Policy Context	**Compliance with National Framework** Chapter 6 of the NPPF relates to 'Building a strong, competitive economy.' The policy sets out that 'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'	The comments appear to have misinterpreted the role of the SPD. See response to representation 24. The Affordable Workspace SPD is a guidance document to support the adopted development plan policies and while being a material planning consideration, it does not present new policies. It supports the Local

			The onerous nature of the SPD clearly hampers the ability to support economic growth in so far as it encourages developers to consider alternative land use proposals in order to ensure the viability of development proposals. **Compliance with London Plan policy** The London Plan 2021 supports 'improvements to the to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.' Again, the onerous nature of the draft policies relating to affordable workspace compromises the ability for this ambition to be achieved in Hammersmith and Fulham and prejudices the wider London Plan strategy. In addition to the above, representations on the viability evidence used to support the draft policy should be cross referred to in other Gerald Eve representations submitted on behalf of other clients. I trust the above provides a helpful representation of our clients view on the proposed approach to affordable workspace. The concluding view is that it is disproportionate to requirements in other boroughs and so ultimately viability issues are likely to arise on a number of schemes coming forward which will adversely affect the stock of workspace floorspace across the borough. The provisions of the draft SPD should be reconsidered in respect of: 1) The quantum of space sought for affordable workspace in development schemes; 2) The levels of discount against market rates to be applied; 3) The requirement for affordable workspace to be provided in perpetuity as opposed to for a fixed term; 4) The Payment in Lieu Calculator; 5) The offsite provision; and 6) The application of the above points to gross development floorspace. We'd strongly recommend the policy revisited to avoid developers considering sites in alternative boroughs to ensure viability of office stock coming forwards in order to meet the aims of both the NPPF and the London Plan 2021.	Plan, which alongside the supporting Local Plan evidence, has been found sound. It is also in line with the London Plan policy objectives. The SPD has been prepared and consulted on in full compliance with the Regulations. Reference to the tests of soundness in this context are not relevant therefore.
36	Yoo Capital (Gerald Eve)	Chapter 5 Paras 5.8-10 and table 5.10	The Supplementary Planning Document sets out the requirement for discounted rents and floorspace will be on new commercial developments over 1,000sqm and that evidence has supported a range of discounts to be applied: <u>Townmead and Imperial</u> Major industrial developments to include affordable industrial space with a discount to market rent of 40% or higher; apportioning 20% of space in industrial developments over 1,000 sqm	The bespoke evidence to inform the SPD is considered to be robust, using the latest available local data, an industry-standard methodology, and bench marking against other London boroughs.

			Hammersmith Centre Major commercial developments to include affordable workspace with a discount to market rent of 40% or higher; apportioning 20% of space in developments over 1,000 sqm Olympia and West Brompton Major commercial developments to include affordable workspace with a discount to market rent of 20% or higher; apportioning 20% of space in developments over 1,000 sqm Shepherd's Bush Major commercial developments to include affordable workspace with a discount to market rent of 40% or higher; apportioning 20% of space in developments over 1,000 sqm Fulham Centre Major commercial developments to include affordable workspace with a discount to market rent of 20% or higher; apportioning 20% of space in developments over 1,000 sqm Furthermore, the guidance proposes that the discount market rent will be in perpetuity. The first point to be made is the comparison between this and other boroughs for example which shows the draft LBHF requirement to be significantly more onerous than other boroughs, both in terms of the quantum of floorspace to be given over as affordable workspace and the level of discount to market rate to be applied. Our principal concern with the SPD drafted is the quantum and level of discount sought. In Camden, the Employment CPG document (Camden planning guidance) sets out that developers should work with Camden's Inclusive Economy Team to agree appropriate levels of affordability on a case-by-case basis. Whilst the benchmark is set at 20% provision at 50% market discount, our experience on a number of schemes is that provision has ranged from 4-19%. The discount agreed has ranged between 20% and 50% for a period of 10 years. LB Southwark have recently adopted their new Local Plan 2019-2036 and set out clearly that development proposing over 500sqm GIA of employment floorspace must deliver 10% affordable workspace provision for a period of at least 30 years. LB Lambeth require affordable workspace on uplift of office floorspace at varying levels dependent on the location of the site: • In Waterloo/Southbank and Vauxhall developments proposing at least 1000m2 gross office floorspace should provide 10 per cent of the rentable floorspace (Net Internal Area (NIA)) at 50 per cent of market rents for a period of 15 years;	It is considered that the evidence has sufficiently justified the definition of sub areas and a range of discounts. Both evidence reports make clear that they act as a guide and recommend that a site- specific approach is taken. This Affordable Workspace SPD is a guidance document to support the adopted development plan policies, and while being a material planning consideration, it does not include new policy requirements. No change

<table>
<tr><td></td><td></td><td></td><td>• In Oval, Kennington and Clapham developments proposing at least 1000m2 gross office floorspace should provide 10 per cent of the rentable floorspace (NIA) at 80 per cent of market rents for a period of 15 years;
• In the Brixton Creative Enterprise Zone (CEZ) developments proposing at least 1000m2 gross office floorspace should provide 10 per cent of the rentable floorspace (NIA) as affordable workspace for a period of 25 years with the following discounts on market rents

<table><tr><th></th><th>CEZ within town centre boundary</th><th>CEZ outside town centre boundary</th></tr><tr><td>Between 1000sqm and 5000sqm</td><td>No discount</td><td>50% of market rents</td></tr><tr><td>Between 5001sqm and 10,000sqm</td><td>65% of market rents</td><td>65% of market rents</td></tr><tr><td>Greater than 10,000sqm</td><td>50% of market rents</td><td>80% of market rents</td></tr></table></td><td></td></tr>
<tr><td>37</td><td>Yoo Capital (Gerald Eve)</td><td>Table 5.19 and Appendix A para 8.1.3</td><td>Lifespan of the policy
The proposal to require discounted market rents in perpetuity in LBHF presents an extremely onerous demand on developers and doesn’t take into account any change in market which may affect the viability of the floorspace coming forwards at a discounted market rent. It is considered wholly inappropriate as it is longer than the plan period. Other comparable London Boroughs require the provision of affordable workspace for a period ranging from 15-20 years.</td><td>See response no. 31</td></tr>
<tr><td>38</td><td>Yoo Capital (Gerald Eve)</td><td>Para 5.10</td><td>Quantum
Furthermore, the draft policy is applied to gross floorspace as opposed to uplift [which is the case in most other boroughs], which means developers are penalised on redundant existing floorspace. The implication being that the incentive for developers to redevelop redundant and not fit for purpose office stock will be significantly reduced, perhaps even removed.

The significantly more onerous requirement proposed runs a serious risk of compromising employment floorspace. It is likely developers will opt for alternative land use proposals if the affordable workspace requirements are found to make schemes unviable.

In policy terms, the National Planning Policy Framework sets out that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.</td><td>See response no. 30</td></tr>
</table>

			As detailed above the lifespan of the policy does not take into account relevant market signals and so in that regard, the preparation of the SPD does not comply with the national policy framework for plan-making.	
39	Yoo Capital (Gerald Eve)	Paras 5.18-19 and Table 5.19	**Offsite Provision** The Draft SPD sets out that affordable workspace maybe provided off-site only in exceptional circumstances. It must be in close proximity to existing accommodation and agreed and ready for occupation prior to the grant of planning permission. It is considered that to have the off-site space ready for occupation prior to the grant of planning permission is entirely onerous. This would require the applicant to have agreed terms with the off-site location, and requires significant upfront funding to provide the space, all prior to obtaining planning permission on the main site which is obviously incredibly high risk. It is suggested that this should be amended to require the provision of the off-site space to be ready for occupation within 6 months of the main site being occupied. This allows for the funds to provide the workspace to be derived from the main site delivery.	As recommended in the Evidence reports, the SPD clarifies that a flexible, site-specific by site approach will be taken, with the overall aim to achieve the optimal outcome rather than stifle development. Discussions would be informed by how far a schemes would take forward local plan policy and Industrial Strategy objectives however these are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. This would include discussions to provide the certainty and details on how the off-site affordable workspace would be delivered. No change.
40	Stanhope PLC (Gerald Eve)	Evidence Reports	There are fundamental issues raised with the viability study that has been used as the foundation upon which the affordable workspace SPD has been drafted.	The purpose of the viability evidence reports is to provide borough-wide evidence for an SPD. This means that broad assumptions had to be made, and therefore the outputs are more general in order to inform a borough-wide SPD, rather than be targeted in terms of specific site testing. Therefore it is a guide to provide a starting point to assist site-specific discussions. The report acknowledges that BCIS is a generic benchmarking tool and has been used as a guide, and the viability of their inclusion, as with other inputs into viability is

				appropriate to agree on a case by case basis The bespoke evidence to inform the SPD has justified thresholds, the definition of sub areas of need, and a range of discounts. A viability update was carried out in 2021 using the latest published industry data. Both reports make clear that they act as a guide and recommend that a site- specific approach is taken. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability, and impact on delivery and this is carried through into the SPD. As the SPD is guidance, the Council considers the current wording is acceptable.
41	Stanhope PLC (Gerald Eve)	Evidence Reports/ Chapter 4	**Affordable Workspace Demand:** It is not clear what market evidence the Local Authority has gathered to justify the need to provide 20% affordable workspace in terms of local demand. It is considered that the office market in Hammersmith and Fulham was oversupplied before the pandemic with rents for offices beginning to fall. COVID-19 has then exacerbated this oversupply. Clear evidence should be published to justify the need for the provision the SPD is seeking.	See comment to no 40.
42	Stanhope PLC (Gerald Eve)	Evidence Reports: Viability Update Report 2021/ and Chapter 5 para 5.13	**Viability** The SPD states that local viability analysis on discounted rent has been carried out and refers to a supporting evidence document titled 'Affordable Workspace Study – Viability Review' dated October 2021. **Benchmark Land Value** All the testing is based on an assumption of the BLV being industrial land and it doesn't test for any alternative or more valuable site uses being redeveloped for office. It also cross references the H&F CIL	See response no 40. The bespoke evidence to inform the SPD has justified thresholds, the definition of sub areas of need, and a range of discounts. A viability update was carried out in 2021 using the latest published industry data.

			Viability Study undertaken by Peter Brett in 2014 and the £10m - £14m per hectare BLV it adopts. The study only allows a 15% increase on this but doesn't evidence where this is from. Adopting the "only industrial land" approach since 2014 where industrial rents have increased and yields have come in – the 15% cannot be justified. **Yields** 5.5% has been adopted but there does not appear to be any differentiation for the yield on the affordable workspace which will naturally have a tenant with a far weaker covenant. **Construction Costs and BCIS** The study uses BCIS which is naturally backward looking and does not account for inflation to today or recent changes to sustainability legislation and planning policy requiring net zero carbon buildings and the significant increased costs associated with this. When using the BCIS and specifically Office data, the system defaults to schemes since 2013. If this is then filtered for New Build (i.e. no conversions / refurbs etc) the system gives only 13 examples, none of which are central London. The BCIS tool is completely irrelevant to provide data for London Office schemes. From experience of recent London (non Zone 1) schemes with stand-alone offices that form part of them, the build costs are all higher than the ones used in the viability study. We would be happy to provide you examples of these. The below costs have been sourced from the Cost Data section of Building Magazine. Two models are available as set out here. It is considered these are more realistic and relevant. **Capital Contributions** Given the intended nature of the affordable workspace occupiers, our experience from other Boroughs (mostly Hackney where affordable workspace policy has been around for many years) is that they are seeking significant capital contributions in addition to the discounted rent. The viability study does not appear to take any account of these costs. If these were included, it would change the conclusions of the viability study would change and the policy would need to be updated to reflect this.	Both reports make clear that they act as a guide and recommend that a site- specific approach is taken. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability, and impact on delivery and this is carried through into the SPD. As the SPD is guidance, the Council considers the current wording is acceptable. Discussions would be informed by how far a schemes would take forward local plan policy and Industrial Strategy objectives, however these are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD.

Model type	£/m2	Date of Model	£/m2 (Q4 2021)	£/sqft (Q4 2021)
Fringe London Office	3155	Q3 2109	3305	307
Net Zero Office	3616	Q2 2021	3834	356

43	Stanhope PLC (Gerald Eve)	General	While the need for the delivery of affordable workspace is recognised, we have set out below some comments in relation to the proposed approach to the delivery of affordable workspace.	Supporting comment noted
44	Stanhope PLC (Gerald Eve)	General	**Plan Making** The National Planning Policy Framework February 2021 identifies that Plans are "sound" if they are: (a) Positively prepared – provided a strategy which, as a minimum seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; (c) Effective – deliverable over the planned period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and (d) Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this framework. Paragraph 11 of the NPPF states plans and decisions should apply a presumption in favour of sustainable development. "For plan making" this means that: (a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; (b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless; (i) The application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or (ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole." Paragraph 15 notes that inter alia up-to-date plans should provide a framework for addressing housing needs and other economic, social and environmental priorities. At paragraph 16 it is noted that plans should "be prepared positively, in a way that is aspirational but deliverable"… and "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". **The Draft SPD Principles** As currently written, it is considered that the SPD is unsound as it goes beyond the scope of the Local Plan and has not been correctly consulted upon.	The comments appear to have misinterpreted the role of the SPD. See response to representation 24. The Affordable Workspace SPD is a guidance document to support the adopted development plan policies and while being a material planning consideration, it does not present new policies. It supports the Local Plan, which alongside the supporting Local Plan evidence, has been found sound. The SPD has been prepared and consulted on in full compliance with the Regulations. Reference to the tests of soundness in this context are not relevant therefore.

			The case of Wakil (t.a. Orya Textiles) v LB Hammersmith and Fulham (2013) is relevant to this. There has not been sufficient meaningful consultation in accordance with the Town and Country Planning (Local Planning (England) Regulations 2012 with interested parties. The matters dealt with in the policy properly fall within the definition of a Development Plan Document in the 2012 Regulations as 'any document prepared by a local planning authority ……, which contains statements regarding one or more of the following— (i) the development and use of land which the local planning authority wish to encourage during any specified period'. (ii) the allocation of sites for a particular type of development or use; iv) development management …. policies, which are intended to guide the determination of applications for planning permission; Regulation 2(1) defines SPD as follows "supplementary planning document" means any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan "local plan" is defined as any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv…..and for the purposes of section 17(7)(a) of the Act these documents are prescribed as development plan documents; For this reason, the policy is not an SPD and it is considered it would be unlawful to proceed.	
45	Stanhope PLC (Gerald Eve)	Chapter 2 Policy context	**Policy Context** **Economic Growth** Section 6 of the NPPF relates to building a strong, competitive economy. It states: "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development…" The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future." Hammersmith and Fulham council has published an Industrial Strategy 'Economic Growth for Everyone" in 2017, which seeks to ensure that economic growth in the borough is supported and inclusive. A key feature of the strategy is 'Creating Affordable Workspace'. It is understood that this draft SPD aims to help deliver this together with building a strong economy in line with the NPPF. However, there are some key factors that need to be addressed to ensure this draft SPD and its requirements do not have the reverse effect and discourage future investment in LB Hammersmith and Fulham, compared to other London boroughs that are considered to have more realistic expectations of what can be delivered.	See response no 23.

			London Plan 2021 – Affordable Workspace Policy E2 states that Boroughs should include policies that include a range of business sizes and an appropriate range of rents to meet the needs of micro and SME units. The threshold should be for development proposals including new B class business floorspace greater than 2,500 sqm or a locally determined lower threshold. Policy E3 states that requirement for affordable workspace should be based on need and viability. The policy requires the terms of affordable workspace to be set out in S106 agreements, including evidence that the space will be managed by a workspace provider that has a long term commitment to social, cultural and economic impacts. **Local Plan 2018** Policy E1 states that schemes which include new employment uses, 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 and subject to viability. When considering new employment floorspace or the extension of existing floorspace the council will also take into account: 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; d) whether there will be displacement of other uses such as community facilities or housing; and e) the Hammersmith and Fulham Economic Growth Plan and the council economic strategies	
46	Stanhope PLC (Gerald Eve)	Chapter 3 What is Affordable Workspace And, Chapter 4 Who Needs Affordable Workspace: Para 3.2; Paras 4.1- 4.4	Indeed, Policy E3 of the London Plan 2021 sets out the Mayors approach to affordable workspace and notes that the intention is to secure office use with rents that are below the market rate for social, cultural or economic development purposes such as charities and space for cultural uses including rehearsal space. Part A of Policy E3 of the draft London Plan states: “In defined circumstances set out in Parts B and C below, planning obligations may be used to secure affordable workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose such as: 1) for specific sectors that have social value such as charities, voluntary and community organisations or social enterprises 2) for specific sectors that have cultural value such as creative and artists’ workspace, rehearsal and performance space and makerspace 3) for disadvantaged groups starting up in any sector	Comments noted. The Affordable Workspace SPD is a guidance document to support the adopted development plan policies and while being a material planning consideration, it does not present new policies. The SPD also confirms that the Council will take into account viability on a case-by-case basis, and site-specific considerations in achieving the best outcome. Chapter 6 and the Appendices provide more guidance on how

			4) supporting educational outcomes through connections to schools, colleges or higher education 5) supporting start-up and early stage businesses or regeneration". Furthermore, paragraph 6.3.2 states that: "Affordable workspace is defined here as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose" With this in mind, it is therefore considered that the intention of the policy should allow such space to be provided on a basis that can best support local needs and not be restricted by the Use Class but rather a definition of workspace. The requirements and needs of the new enterprises benefitting from affordable workspace are still evolving and Stanhope consider the policy should allow for this.	different typologies and delivery mechanisms can be provided.
47	Stanhope PLC (Gerald Eve)	Chapter 5 Approaches to Meeting Needs Table 5.19	**Timescales for Provision** The draft SPD requires that the affordable workspace be provided in perpetuity without providing any evidence or justification to support this approach. This approach is considered wholly inappropriate as it is longer than the plan period and needs of the future economy need to be flexible and adaptable to change. Other comparable London Boroughs require the provision of affordable workspace for a period ranging from 15-20 years. It is strongly suggested that this approach should be adopted in the SPD as well	Refer to response no.31
48	Stanhope PLC (Gerald Eve)	Paras 5.7-5.10 and Table 5.10	**Market testing** There is growing evidence in other Boroughs where affordable workspace obligations have been adopted that there is a disconnect between the affordable rent the policy allows/requires and the rent that the approved affordable workspace providers will pay. It is considered that the council should test the demand / ability of affordable workspace providers to pay the rents that would result from this proposed policy. If affordable workspace providers cannot afford to pay the rents suggested then the reality is that the developer has to discount even deeper to deliver the obligation.	The SPD is guidance and will be applied flexibly to ensure that the optimal outcome is achieved against the policy requirements but is not so onerous as to be unviable. The Local plan policy, SPD and Viability evidence reports state that a site-by-site consideration is appropriate. This can include a mix of discount and other mechanisms as suggested by, but not necessarily those limited to those set out in the SPD
49	Stanhope PLC (Gerald Eve)	Table 5.19 and Appendix A para 8.2.1	**Payment in Lieu Calculator** We believe there is an error in the formula in the SPD. Input "H" is "rent after discount" less "market rent for the discounted floorspace before discount". This naturally generates a negative number. So when H is then used in the final calculation (multiplying it by the yield factor) it produces a negative number. As such the PIL is always negative.	Officers welcome the comment identifying a minor typographical error which has been corrected as follows: **Change:**

				Payments in Lieu calculator: correction • Step 5 from **J=(1xl)** to **J= (1/l)**
50	Stanhope PLC (Gerald Eve)	Table 5.10 Para 5.11 Appendix A	**The Offer** Whilst the principle of seeking provision of affordable workspace is supported, it is considered that some flexibility should be built into the policy to enable a truly meaningful offer to be delivered. It is considered that a floorspace only offer would not go far enough to meet the aspirations the policy is trying to achieve.	Supporting comment noted. The SPD has been drafted to improve implementation of Local Plan policy E1 and the Council's Industrial Strategy objectives. The SPD encourages early discussions and sets out a range of measures to deliver affordable workspace. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability and impact on delivery and this is carried through into the SPD. It is relevant to note that that the SPD is a guidance document and does not set policy, and that it confirms that the Council will take into account viability and site-specific considerations on a case-by-case basis.
51	Stanhope PLC (Gerald Eve)	Chapter 6 Implementation	Stanhope have experience of affordable workspace hubs at their other Sites such as the Gateway site in White City and believe that discounted space is more effective if supporting services are provided also. These services are vital to the success of new start-up companies such as mentoring services, lectures, co-working arrangements, technical support, coaching, amenities, synergy with an industry in close proximity etc. In addition, where you have a significant quantum of office workspace being provided, other forms of affordable workspace that fall under alternative use classes can be beneficial to supporting that office element and can provide much needed discounted space for start-up businesses in line with local need. For example: • Coffee shop/ restaurant units • Fitness / health & Wellbeing start; and • Social and community uses such as a community space for use by a charity, or social group that cannot afford to pay full rent for hire etc.	Comments noted.

52	Stanhope PLC (Gerald Eve)	Chapter 4, Who Needs Affordable Workspace- Paragraph 4.6	**Local Need** The draft SPD policy should also allow for local need to be assessed at the time of determination of an application but should allow for reviews to be undertaken to adapt and evolve local requirements in the future.	Comments noted. As recommended in the Evidence reports, the SPD clarifies that a flexible, site-specific by site approach will be taken, with the overall aim to achieve the optimal outcome rather than stifle development and as such a range of measures in included to promote affordable workspace delivery, such as discounted deskspace, flexibility and site-by site considerations are explicitly referred to.
53	Stanhope PLC (Gerald Eve)	Table 5.19 and Appendix A Table 8.1.3	**Timing of Delivery** It should be recognised that the non-affordable workspace provision and occupation enables the funds for the delivery of the affordable workspace elements and therefore it may be helpful to include a timed approach that enables a percentage of non-affordable workspace to be delivered and occupied prior to the affordable workspace elements; or a mechanism that requires delivery of affordable workspace within 6 months of occupation of the non-affordable workspace.	Refer to response no 32
54	Stanhope PLC (Gerald Eve)	Chapter 6 Implementation and Appendix B Para 8.3.5	Separately on masterplan/ phased schemes, there should be the ability to 'pro rata' the affordable workspace provision. For example, if a scheme has several office plots that will all be delivered at different times, then the minimum requirement should be for the affordable workspace element associated with the floorspace of the office floorspace in that phase to be delivered.	As recommended in the Evidence reports, the SPD clarifies that a flexible, site-specific by site approach will be taken, with the overall aim to achieve the optimal outcome rather than stifle development and as such a range of measure in included to promote affordable workspace delivery, such as discounted deskspace, flexibility and site-by site considerations are explicitly referred to. The SPD is not intended to be a redevelopment strategy for specific /major regeneration sites. It provides general planning guidance. Discussions would be informed by how far a schemes would take forward local plan policy and Industrial Strategy objectives

				however these are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD.
55		Appendix B Para 8.3.5	**Viability Reviews** Late stage reviews on “large” (undefined!) schemes are sought, and late stage and interim stage reviews on phased schemes. There is currently no detail included on how this will be structured. On phased schemes, and in particular the interim reviews, the suggestion is that any additional requirement will be put on future phases. Given the pre-let nature of office development and funding, It is considered that providing additional floorspace as additional affordable workspace in the later phases would not work in practice. Comparably, we are not aware of review mechanisms being imposed on affordable workspace in other Borough policies. Given the current market pressures around office, and the conflicting / competing requirements of affordable housing reviews we’d question whether such obligations are reasonable or would act as a disincentive for office development. It would certainly increase risk.	Comments noted. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability and impact on delivery and this is carried through into the SPD. The SPD also confirms that the Council will take into account viability on a case-by-case basis, and site specific considerations in achieving the best outcome. Chapter 6 and the Appendices provide more guidance on how different typologies and delivery can be achieved. This includes use of review mechanisms, however as befits a guidance document, these are not prescriptive.
56	ECDC (Earls Court Development Company)	Evidence Reports:	**Comments on evidence base** ECDC are concerned to ensure that the draft SPD has been informed by robust analysis, particularly as it is applied to complex sites such as Earls Court which are allocated for mixed-use development and where a bespoke approach would be appropriate. a. Absence of local needs analysis Criteria C of Policy E3 (Affordable Workspace) of the London Plan states that Boroughs should consider detailed affordable workspace policies in light of local needs and viability. Paragraph 1.5 of the draft SPD itself recognises that the SPD’s focus is on local needs. However, it is not apparent that the draft SPD has been formulated with an understanding of what local needs actually comprise. Whilst the supporting original Hatch/Turley report includes examples of affordable workspaces and sets out general trends and generic workspace requirements (paragraph 3.20 to 3.25), it provides no analysis about how much affordable workspace exists, what can be expected to be delivered through consented development and the extent of any local demand/shortages (including whether this differs geographically across the borough). The evidence base supporting the adopted Local Plan also	Refer to responses no 30, 40-41 The SPD is not intended to be a redevelopment strategy for specific /major regeneration sites. It provides general planning guidance.

			doesn't provide an up-to-date understanding of local needs. For example, the February 2016 Employment Study prepared by Frost Meadowcroft is more than 5 years old and only provides data on the different sizes of business not on the need or supply of affordable workspace. Evidence on these matters would help to inform the scale and nature of what is required. At a very basic level, we would expect there to have been analysis of established or recent affordable workspace provision in the borough and its success or otherwise. Several major planning permissions in the borough (including Fulham Gas Works, Olympia, The Gateway Site, Hammersmith Town Hall) have included significant employment components and S106 obligations have imposed affordable workspace requirements – often with 5% of net additional floorspace and differing approaches to discounts and payments in lieu. No evidence has been provided to explain why the approach taken in these permissions, which is significantly less than is now being suggested, is no longer sound.	
57	ECDC (Earls Court Development Company)	Evidence Reports	b. Technical comments KF/JLL have a number of observations on the methodology adopted in the original Hatch/Turley report which we share below and which we trust will be given careful consideration: Figure 3.3 the proportion of micro businesses shown is useful but needs quantifying to try to determine demand. Company data from IDBR for LBHF would provide an understanding of where companies are based across the Borough and also what type of space they occupy. A number of sole traders may well have a higher propensity to work from home and so may not need affordable workspace but could need other business support. Para 3.15 The employment numbers relate to West London not just Hammersmith & Fulham; however, the wording seems to indicate that the scenarios relate to LBHF. Page 37 This is entitled 'Focus on commercial property trends' and cites asking rents rather than achieved rents. Achieved rents are a better indication of what companies have actually paid. Incentives also do not appear to have been taken into consideration, which in the current market have increased and therefore have reduced the rent paid by many tenants. Para. 4.15 (Calculating average rent paid by business) - it is difficult to understand how the sector breakdown has been derived. It states that "CoStar do not provide data on individual businesses- so premises data is converted to business data." In fact, CoStar do provide data on individual tenancies so it would be possible to be more accurate. With this data it is possible to consider the differences in rents paid between different sizes of business. Table 4.4. Floorspace per worker is high and doesn't consider any changes resulting from hybrid working. It is based on standard employment densities for a range of managed workspace types without a source being provided. It would be	Refer to responses no 30, 40-41 The SPD is not intended to be a redevelopment strategy for specific /major regeneration sites. It provides general planning guidance.

			more relevant to consider employment bands relating to SMEs for example to be consistent with the business analysis.	
58	ECDC (Earls Court Development Company)	Evidence Reports	c. Viability Page 58 of the Hatch/Turley Report confirms that viability has been tested solely on the basis of employment floorspace. No reliance can therefore be placed on the viability aspect of the evidence base for major mixed-use schemes such as Earls Court where, as explained, there are important site specific costs and the commercial aspect must help to underpin the deliverability of future comprehensive development. KF/JLL have also queried several other aspects of the viability analysis in the Hatch/Turley report: • Whilst the viability work indicates that the schemes are viable at 20% affordable, there is no robust justification for the 20% of new floorspace to be affordable - given that the report clearly states that most other boroughs' requirement is 10% and no assessment of demand has been included. • The October 2021 update report mentions that demand is expected to be subdued in the future. This may also have an impact on the demand for affordable space, which combined with a rising supply may lead to reduced rents and increased incentives across the borough and will impact on affordability. This would also impact on the viability of new schemes. • Section 5 (viability appraisal) - costs are considered to be on the low side, particularly given cost inflation. For example, 10% professional fees, 10% externals and 5% contingency are all relatively low. Construction at £253 per sq ft to Cat A level is very light in comparison to the type of product which Earls Court could deliver. • The Benchmark Land Values are unclear – it seems that these have been derived from a 2014 Peter Brett Associates report (inflated by 15%) which assessed industrial land value at Old Oak Park as well as a 2019 CBRE review of a Car Giant scheme at Hythe Road. We would question how relevant these values are to an office site in Earl's Court/West Brompton and recommend a more bespoke approach	Refer to responses no 30, 40-41
59	ECDC (Earls Court Development Company)	General Comment	We write on behalf of the Earls Court Development Company ('ECDC'), in response to the Borough's consultation on its Affordable Workspace Supplementary Planning Document ('the SPD'). ECDC are in the early stages of preparing new mixed-use application proposals for the Earls Court site, which will include a significant employment component. Along with homes and other uses, new commercial floorspace at Earls Court will be very important for its success as a new destination by contributing to placemaking and providing a range of employment opportunities and amenities for residents and visitors to the area. ECDC see affordable workspace an	Comments on the proposed provision of new affordable workspace are noted.

			important part of its ambition to provide a showcase for research, innovation and production at Earls Court.	
60	ECDC (Earls Court Development Company)	General Comment	As we explain below, it is important for the SPD to avoid being overly prescriptive in respect of the affordable workspace provision at the Earls Court site in recognition of the unique scale and nature of the opportunity, local requirements and viability considerations.	Comments noted. The SPD is not intended to be a redevelopment strategy for specific /major regeneration sites. It provides general planning guidance.
61	ECDC (Earls Court Development Company)	General Comment	**Summary and conclusions** Along with homes and other uses, new commercial floorspace at Earls Court will be very important for its success as a new destination by contributing to placemaking and providing a range of employment opportunities and amenities for residents and visitors to the area. As part of the employment offer, ECDC share many of the Council's objectives and see affordable workspace as an important part of its ambition to provide a showcase for research, innovation, growth and production at Earls Court. ECDC have significant concerns about fixing high proportions of workspace at Earls Court, which far exceed the proportion being sought in other boroughs in London. These headline figures are not supported by evidence of need and such a high provision for Earls Court is unlikely to be viable and unlikely to deliver the right character of affordable space that local businesses will need. As set out in these representations, we therefore strongly recommend treating Earls Court differently from other sites with no more than 10% of employment floorspace to be provided on the basis of discounts and/or other incentives. A bespoke Earls Court Affordable Workspace Scheme needs to be carefully curated, taking account of a range of factors including the scale, location and character of workspace on the Site and how this it set up to incubate firms and complement employment clusters elsewhere in the borough.	Ref to response no 60. The remit of Local Plan policy E1, this SPD and supporting evidence does not extend to mixed use developments. The SPD is not intended to be a redevelopment strategy for mixed use development and provides planning guidance to support Local Plan policy E1. Mixed use schemes are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. No change
62	ECDC (Earls Court Development Company)	Chapter 4 Who Needs Affordable Workspace	**3 Practical considerations Avoiding oversupply of the wrong type of workspace** Initial feasibility work suggests that some parts of a future masterplan for Earls Court would be well suited to affordable workspace and could help to create a richer mix of uses and more varied character. However, physically accommodating a significant proportion of workspace would require spaces better suited to other uses or prime commercial floorspace to be inhabited instead. KF/JLL advise that even at a reduced level of say 10%, this would require a huge quantity of separate deals for SMEs who will typically require small spaces on flexible leases. They advise that new-build commercial space is not necessarily always the right fit for potential affordable workspace occupiers, and a 'corporate headquarters'	Comments noted. Refer to response no. 61. In addition, and in line with Local Plan Policy E1, the SPD does set out that in exceptionally payment in Lieu or off-site provision of affordable workspace can be appropriate delivery mechanisms, and the focus will be to achieve the optimal output rather than stifle development. No change.

			atmosphere not always appropriate for the local, creative and cultural uses that an affordable workspace policy should be targeting. KF/JLL consider this could create significant practical difficulties, including the type of space not being particularly well suited to occupiers needs, where for instance, larger footplate employment buildings may be more difficult to subdivide for the needs of smaller start-ups. ECDC want the affordable workspace to form an integral and successful part of the employment mix and are concerned that over provision of the wrong type of space could lead to a significant level of vacant space across the site. It is therefore critical to also consider matters from a masterplanning perspective to identify the best locations for affordable workspace taking account of likely business needs and potential incentives that will allow businesses to grow and adapt. Again, a bespoke approach at Earls Court would be appropriate.	
63	ECDC (Earls Court Development Company)		**3 Practical considerations Avoiding oversupply of the wrong type of workspace** Initial feasibility work suggests that some parts of a future masterplan for Earls Court would be well suited to affordable workspace and could help to create a richer mix of uses and more varied character. However, physically accommodating a significant proportion of workspace would require spaces better suited to other uses or prime commercial floorspace to be inhabited instead. KF/JLL advise that even at a reduced level of say 10%, this would require a huge quantity of separate deals for SMEs who will typically require small spaces on flexible leases. They advise that new-build commercial space is not necessarily always the right fit for potential affordable workspace occupiers, and a 'corporate headquarters' atmosphere not always appropriate for the local, creative and cultural uses that an affordable workspace policy should be targeting. KF/JLL consider this could create significant practical difficulties, including the type of space not being particularly well suited to occupiers needs, where for instance, larger footplate employment buildings may be more difficult to subdivide for the needs of smaller start-ups. ECDC want the affordable workspace to form an integral and successful part of the employment mix and are concerned that over provision of the wrong type of space could lead to a significant level of vacant space across the site. It is therefore critical to also consider matters from a masterplanning perspective to identify the best locations for affordable workspace taking account of likely business needs and potential incentives that will allow businesses to grow and adapt. Again, a bespoke approach at Earls Court would be appropriate.	Comments noted. Refer to responses nos. 61-62. No change.

64	ECDC (Earls Court Development Company)	Chapter 4 Who needs affordable workspace and Chapter 5 para 5.8-19 and Table 5.10	**Refer to comments on evidence above**	
65	ECDC (Earls Court Development Company)	Chapter 5 General points on approaches to meeting needs	**Refer to Evidence comments above** KF/JLL advise that it is important to avoid blanket approaches and, for instance, rather than providing 20% of total employment space with say a 20% discount, it may be better to provide a lower percentage with a higher discount or to subsidise other costs. For instance, they advise that start-ups typically have limited capital to pay for fit out costs and it may be better to target subsidies towards Cat B fit out costs. A higher discount helps to differentiate the space and makes it more appealing to start-ups and scale-ups. Such incentives could have a bigger impact on small businesses **a**nd the wider start-up community and options might also include: o Providing fitout to a good quality standard – turnkey; o Providing membership to an incubator community; and o Proposing an innovation hub with programming for knowledge exchanges, development, mentoring and networking. The Earls Court Team want to work with the Council to identify the best approach. Work is at an early stage and it may be that Earls Court affordable workspace would work best in a defined building or buildings, possibly as an Ideas Factory/Incubator, with a mix of educational and office space. Members of the ECDC team have been instrumental in delivering successful incubator space at Here East at Stratford and there are also good examples at Level 39, One Canada Square. LBHF have identified tech, life science, and research sectors as priority tenants and creative/digital and financial services particularly for Olympia/West Brompton. Earls Court could target these or other sectors, and there is clearly potential to create an ecosystem where tenants come in from research hubs, start off in incubator space and then progress to taking 'market space' on the wider scheme. To avoid a situation where vacancy exists due to a lack of suitable affordable tenants, KF/JLL stress the importance of time limited discounts as seen across other schemes. If the space was unlet, it would then allow it to go back to the market and let the space to market tenants, rather than simply leaving large portions of the scheme untenanted.	Comments noted. Refer to responses nos 30-31 and 56

			In respect of providing discounted desks, KF/JLL stress the importance of practical considerations including access requirements. For instance, whether conventional and affordable occupiers use the same entrance or will they have separate entrances; the former could have a detrimental impact on lettability and terms that could be achieved for a conventional occupier whereas the latter could create a 'them and us' situation.	
66	ECDC (Earls Court Development Company)	Chapter 5 General points on approaches to meeting needs	Infrastructure and other constraints mean that the viability of redeveloping the Earls Court Site will be challenging. Viability was tested in the Borough's 2014 Community Infrastructure Levy (CIL) Study, which concluded that sites within the ECWKOA Opportunity Area were handicapped in terms of viability and could not afford the additional burden of CIL and were accordingly 'zero CIL rated'. Since previous permissions were granted on the Earls Court site in 2014 and CIL viability was tested in 2014, expectations about the proportion of affordable housing in the London Plan and adopted LBHF Local Plan have increased, and this is expected to place additional burdens on viability. It is therefore important that affordable workspace forms part of a comprehensive, deliverable package and doesn't undermine deliverability further. Ultimately, high expectations for affordable workspace are likely to reduce the ability to deliver other public benefits such as affordable housing and an appropriate balance will need to be struck. Matters are expected to be finely balanced and therefore it important to consider a site-specific approach for Earls Court separately.	Comments noted. Refer to responses nos 30-31 and 56 The SPD is not intended to be a redevelopment strategy for specific /major regeneration sites, It provides general planning guidance. The SPD advocates early discussions, which on sites such as Earls Court would be informed by how far a scheme would take forward Local Plan policy and Industrial Strategy objectives as a whole. Policy and infrastructure requirements are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD.
67	ECDC (Earls Court Development Company)	Table 5.10	**Suggested Change 1:** Table 5.10 should be revised to allow an Affordable Workspace Scheme at Earls Court to be considered separately. Paragraph 5.15 of the draft SPD refers to agreeing appropriate terms/means of affordability on a case by-case basis. However, ECDC are concerned that by identifying Earls Court as being subject to a 20% space requirement with a 20% discount, this represents the wrong starting point from which to work with the Council. A site specific approach to affordable workspace at Earls Court is considered to be essential to ensure that policy does not hinder the deliverability of this important but stalled site. Such an approach would also allow better outcomes for occupiers and the employment mix at Earls Court.	Comments and suggested change noted. Refer to responses nos. 40-42. No change

			Under any circumstances, and given the exceptional size of the Earls Court site, ECDC do not consider that any more than 10% of the employment floorspace should be affordable workspace at Earls Court. As the Hatch/Turley report notes, it is more common across London to see a smaller quantum of space (10%) being provided, often at a slightly higher discount. In the ECDC Team's experience this is more suitable – the smaller quantum can add to the ingredients of a scheme and when a higher quantum of affordable workspace is provided (as per LB Southwark) this can often sit unused as not enough tenants 'tick all the boxes' to be able to take the space. Taking this into account the Policy for Earls Court could be as follows: 'The employment component for proposals at Earls Court should include Affordable Workspace (up to 10% of employment floorspace). The proportion of affordable workspace, level of discount and alternative measures to support affordable and flexible accommodation should be agreed as an Affordable Workspace Scheme, as part of a site-wide employment strategy submitted with any planning application, taking into account viability, deliverability and the needs for potential affordable workspace occupiers.	
68	ECDC (Earls Court Development Company)	Page 13-14	**Suggested change 2:** Page 13 and 14 of the SPD should be redrafted to make it clear what policy requires, including that provision would be subject to viability, occupier requirements, masterplanning considerations and review mechanisms to ensure that the best outcomes are achieved. At present these pages are a mix of explanation (summarising what is in the evidence base) and policy requirements and they need to be reformulated to make it clear what policy itself requires, with supporting text clarifying policy and summarising the justification from supporting evidence. It should make it clear that Table 5.10 should only be considered as a starting point for discussions and subject to other considerations. Alternative text could read as follows: 'With the exception of Earls Court, the starting point for affordable workspace will be the discounted market rents requirements indicated in [Table 5.10]. For all future major development, the Council recognises that there is a cost associated with the provision of affordable workspace which will impact on the overall viability of the development. The Council recognises that the securing of an element of affordable workspace, in preference to an element of conventional employment floorspace will make a deeper per/m2 cut into the viability of a development. It is thus acknowledged that for the same amount of development of a higher value use, a smaller amount of affordable workspace will be secured than for a conventional employment product.	Comments and suggested change noted. Refer to responses nos. 40-42. No change

			There may be circumstances when residential is used to cross subsidise an affordable workspace use, and the Council will require the viability study to identify what level of affordable workspace and affordable housing are possible on a site.	
69	ECDC (Earls Court Development Company)	Table 5.19	Tailoring provision to the needs of occupiers In principle ECDC support the alternative measures to support affordable and flexible accommodation summarised on page 15 and 16. However, there are practical difficulties with some of the measures suggested and other potential opportunities to tailor provision to the needs of affordable workspace occupiers.	Supporting comment noted.
70	Natural England	General	While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues: Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this. Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.	It is agreed that the SPD should be amended to clarify that these considerations can be relevant to the development of affordable workplaces. **Change** Add a new bullet point to Appendix A para 8.1.4 'Points to consider' • That opportunities for urban greening measures and. sustainable design are maximised.

			Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".	
71	Natural England	General	**Biodiversity enhancement** This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.	Comments noted. Provision for Biodiversity enhancement is already contained in the Council's Local Plan and Planning Guidance SPD. It is not considered necessary to duplicate this in the Affordable Workspace SPD.
72	Natural England	General	**Landscape enhancement** The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die. Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).	It is agreed that the SPD should be amended to clarify that these considerations can be relevant to the development of affordable workplaces. **Change** Add a new bullet point to Appendix A, para 8.1.4 'Points to consider' • That opportunities for urban greening measures and. sustainable design are maximised.

73	Natural England	General	**Strategic Environmental Assessment/Habitats Regulations Assessment** An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again	Response noted relating to Strategic Environmental Assessment/Habitats Regulations Assessment are noted. A separate representation on SEA screening has been made and a response is-provided below.
74	Natural England	Screening Request: Strategic Environ-mental Assessment (SEA)	It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan. Therefore Natural England does not feel a Strategic Environmental Assessment (SEA) is required	We welcome the feedback on the SEA screening assessment. No SEA will be needed for the SPD.
75	TfL Commercial	Evidence Reports:	In principle and practice, as demonstrated by our curation of more than 150 railway arches and other workspace in the borough, TfL CD supports the provision of different types of affordable workspace to serve a diverse range of small, independent businesses, charities, voluntary and community organisations, social enterprises, creators and makers. However, we concur with ECDC's representations that the evidence base does not appear to identify local needs for affordable workspace that would justify the scale and nature of what is sought. In addition, by adopting higher requirements for affordable workspace than in other parts of London (borough's with requirements have generally set these at 10% of floorspace, half the suggestion here) H&F may become a less attractive location for commercial development.	Supporting comments noted. Refer to responses nos. 40-42. No change
76	TfL Commercial	General	Please note that the views expressed in this letter are those of the TfL CD planning team in its capacity as a significant landowner and developer only, and do not form part of the TfL corporate / statutory response. Our colleagues in TfL Spatial Planning may provide a separate response to this consultation in respect	Comments noted. Refer to responses nos. 40-42. And 54 The SPD is not intended to be a redevelopment strategy for specific

			of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. We are aware that the Earls Court Development Company (ECDC) has also prepared a separate response in respect of land at Earls Court. The ECDC is owned by Earls Court Partnership Limited (ECPL) – a joint venture (JV) between TfL and Earls Court (London) LLP, itself a joint venture between Delancey's client funds DV4 and APG. ECDC has been set up to prepare and submit a planning application/s for comprehensive redevelopment if the Earls Court site which straddles both LBHF and RBKC. Please note that our representations below cover all TfL CD land and property interests in the borough but are inevitably often focussed on the Earls Court project, which is the largest site in which we have an interest. It is a major opportunity for the sustainable development of new homes, jobs, cultural, entertainment and community activities, and open space which can make a real difference to the surrounding communities and both boroughs. … as indicated above, we have significant interests in land at Earls Court where the 40 acre site within the Earls Court and West Kensington Opportunity Area (OA) provides a major opportunity to deliver new homes (including affordable housing), jobs, local services, public realm and other public benefits within a high-quality designed, mixed-use scheme. Within the LBHF this includes the former Earls Court Exhibition Centre (EC2) and adjacent land owned by ECPL, as well as Lille Bridge Depot (LBD), Ashton House and other adjacent land. LBD is a London Underground works and maintenance depot and Ashton House is a training facility, both owned by TfL. It is proposed to relocate the exiting activities to other sites within TfL's operational portfolio in order that LBD, Ashton House and other adjoining land can be brought into the comprehensive plans for the wider OA at Earls Court and West Kensington. ECDC is at a relatively early stage of preparing plans to deliver large components of new offices, workspace, research and development, educational, cultural, community and other commercial uses, along with thousands of new homes, as part of its comprehensive, mixed-use plans for the site in LBHF and RBKC. Officers will be aware that the extant planning permission secured by CapCo at Earls Court and the adjoining estates proved to be undeliverable. ECPL's fresh start includes a more balanced mix of uses which will include a higher quantum and proportion of office, workspace and R&D floorspace in order to create greater social, economic and financial value and, ultimately, a deliverable scheme. We and ECDC also consider that new commercial, community and	/major regeneration sites, It provides general planning guidance. The SPD advocates early discussions, which on sites such as Earls Court would be informed by how far a scheme would take forward Local Plan policy and Industrial Strategy objectives as a whole. Policy and infrastructure requirements are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD.

			cultural floorspace will be critical to the success of the new development as a destination - it will contribute to placemaking and provide a range of employment opportunities and amenities for residents and visitors to the area. It will also be important in nurturing new research, innovation and production at Earls Court. Importantly, the higher quantum, of commercial floorspace as part of a sustainable, blended mix of uses is also intended to help support and therefore enable the viable delivery of a higher percentage of affordable housing (compared to the extant permission), cultural and community uses, a landscape-led approach and other significant public benefits. It is therefore important that any new requirements for affordable workspace at Earls Court do not adversely affect viability such that the important public benefits would be jeopardised	
77	TfL Commercial	General	**Comments on Draft Affordable Workspace SPD** As a general comment, the draft SPD reads as being most relevant to single-use commercial developments for offices and workspaces. In our view it does not suitably address mixed-use and housing-led schemes which also include delivery of offices, workspace and other commercial floorspace. As set out below, this results in the draft SPD inadequately addressing how the provision of affordable workspace should be balanced against other public benefits of mixed-use development schemes.	The remit of Local Plan policy E1, this SPD and supporting evidence does not extend to mixed use developments. The SPD is not intended to be a redevelopment strategy for mixed use development and provides general planning guidance. Mixed use schemes are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. No change.
78	TfL Commercial	General	**TfL's Existing Affordable Workspace** We would imagine that we are already the largest provider of more-affordable workspaces in the borough. It is very important for TfL to generate long-term, sustainable income from our commercial assets, including1,000 retail units and 800 railway arches across London, to reinvest in our transport network. These existing premises should not be subject to the requirements of this SPD.	Comment noted. Local Plan policy E1 provides for a flexible approach, taking account of site-specific circumstances, viability, and impact on delivery and this is carried through into the SPD. As the SPD is guidance, the Council considers the current wording is acceptable.
79	TfL Commercial	Chapter 2 Policy context Para 2.2 Representation also relevant to	The SPD (para 2.2) recognises the importance of STEM, digital and creative industries for the local economy. STEM is one part of TfL's extensive programme of property and construction skills which includes training for young Londoners at our skills hub in Earls Court, within the borough, and our Built Environment Schools Outreach Programme.	Comments noted. The SPD advocates early discussions, which would be informed by how far a scheme would take forward Local Plan

		Chapter 4 paras 4.1-4.3 and Appendix 8 para 8.1.6-8.1.11	As part of this programme, together with ECPL, we have already 'adopted' Fulham Cross School, within the borough, and are running work experience programmes, and providing resources for use in lessons and clubs. It is important that the SPD should recognise that there are a number of ways in which young and under represented people can be helped into work and economic activity and that such contributions should be balanced with any requests for e.g. rental discounts. Given the viability challenges that many development schemes face (particularly on public land with a higher requirement for affordable housing provision) it would be unfortunate if a drive for affordable workspace in the borough was at the expense of other important social and economic 'levelling-up' contributions.	policy and Industrial Strategy objectives as a whole. Policy and infrastructure requirements are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. The Council has its own Local Procurement and Skills and Employment Codes which are referred to in the Industrial Strategy. Local Plan (Policy E4) and carried through into the SPD.
80	TfL Commercial	Chapter 4 Image 1	Image 1 on page 10 presumably needs a key relating to the different colours	It is agreed that including a Key to Image 1, can improve clarification. **Change** • Insert a Key to Image 1 to explain the colour of each sub-area.
81	TfL Commercial	Chapter 5 Para 5.11	We note that in paragraph 5.11, "social value will also be a consideration in decision making". We take this to mean that it would enable provision of affordable workspace to be off-set against other training and social and economic 'levelling-up' contributions such as TfL's industry-leading property and construction skills offer and our Built Environment Schools Outreach Programme, referred to above. Please can this be confirmed in the SPD.	The SPD advocates early discussions, which would be informed by how far a scheme would take forward Local Plan policy and Industrial Strategy objectives as a whole Policy and infrastructure requirements are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. The Council has its own Local Procurement and Skills and Employment Codes which are referred to in the Industrial Strategy. Local Plan (Policy E4) and carried through into the SPD.

82	TfL Commercial	Para 5.10 , Table 5.10, para 5.13 and Chapter 6 Implementation para 6.1	**Viability and Deliverability Concerns** In each of the identified sub-areas, the SPD (paragraph 5.10, Table 5.10) proposes that 20% of new floorspace in commercial developments should be affordable workspace, with discounts to rent of between 20% and 40% "or higher". In paragraph 5.13 it is clarified at that most of these areas could viably provide "up to 20% affordable workspace" but this is not currently reflected in Table 5.10. Although we support the provision of affordable workspace in principle, we do have concerns that 20% provision with 20-40% discounts to market rents would impact scheme viability, particularly at mixed-use schemes on public land which are expected to deliver 50% affordable housing. TfL CD believes that, given the capital's housing access and affordability crisis, the provision of affordable housing should be prioritised. Viability challenges are exacerbated for TfL by the abnormal and generally higher costs associated with developing sites with significant transport infrastructure and operational constraints. For example, there may be the need to relocate existing transport operations to other site/s; there will usually be a need to protect, safeguard, upgrade or replace existing infrastructure to enable the development; and there are often engineering and operational requirements that will need to be taken into account, such as building at or adjacent to cuttings and embankments, and in general building adjacent to railway lines which will require e.g. higher standards of sound and vibration insulation. All these constraints apply to the Earls Court site which is particularly complex with above and below ground railway infrastructure crossing various parts of the site at different levels. Coupled with edge conditions which include listed buildings and other heritage assets, and established residential communities, this makes site development challenging and expensive. There are also abnormal costs associated with the timing and methodology for demolition and construction of schemes on our land. For example, development over or close to our railway tracks will require robust protection measures to maintain service operations and the health and safety of the network and passengers; this will include track closures for some work which has significant costs including lost fare revenue and implementation of replacement bus services. These constraints and requirements create substantial additional costs which can have viability implications. This pressure on viability may mean that affordable workspace provision is not always possible on TfL land.	Comments noted. Refer to responses nos.41-42 The SPD is not intended to be a redevelopment strategy for specific /major regeneration sites, It provides general planning guidance. The SPD advocates early discussions, which on sites such as Earls Court would be informed by how far a scheme would take forward Local Plan policy and Industrial Strategy objectives as a whole. Policy and infrastructure requirements are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. No change.

			Therefore, we would request that the draft SPD is amended to recognise the viability challenges associated with the development of housing-led and mixed-use schemes on public land, and particularly on sites with transport and other infrastructure constraints. In addition to this, the SPD should seek lower provision of affordable workspace in association with mixed use schemes which deliver more than 35% affordable housing; this would ensure that affordable housing remains the priority. We also suggest that it should be made clear that affordable workspace is just one of a wide range of public benefits which may be sought from a development and that it should be balanced in each case against other, potentially higher-priority benefits such as affordable housing, community infrastructure, open and playspace provision etc. These changes could be incorporated at or following paragraph 6.1 which says that "The council will take a flexible approach to reflect site specific considerations".	
83	TfL Commercial	Chapter 5	We also support ECDC's suggestion that due to the OA designation, unique circumstances and challenges, and the potential scale of delivery of residential, commercial and community uses, there should be a site specific, bespoke approach to affordable workspace at the Earls Court site. This flexible approach would enable a consistent approach to the provision of affordable workspace between H&F and RBKC across the single development site. It should also help to avoid over-provision of affordable workspace on this very large site and minimise vacant units.	Comments noted. The SPD is not intended to be a redevelopment strategy for specific /major regeneration sites, It provides general planning guidance. The SPD advocates early discussions, which on sites such as Earls Court would be informed by how far a scheme would take forward Local Plan policy and Industrial Strategy objectives as a whole. Policy and infrastructure requirements are considered to be matters more appropriate to site-by-site discussions rather than a blanket inclusion in the SPD. No change.
84	Mark Richardson	General	I believe that there is generally a lack of affordable workspace in H&F so any addition to this would be good, whether in railway arches or otherwise. A good number of commercial coworking & temporary office spaces have opened in the	Comments noted.

			Borough in the past few years presumably responding to demand and also availability of space. Almost all are office space and mostly in the centre and North of the borough. The South of the borough is relatively poorly served, I think not because there is a lack of demand but because there is a lack of availability. The commercial co working spaces are good but in the end are intended to make a profit. So I think more affordable coworking/temporary office space would be desirable particularly in the South of the borough whether in converted railway arches or not, particularly to help new businesses particularly in the first years of existence when they are unlikely to be making a profit. However I think that there is a lack of studio/workshop space in the borough. I think that the model of Open Cell which occupies the Old Laundry Yard in Shepherds Bush (presumably on meanwhile use) is interesting; it has recently taken on more space to replicate its original model in westworks at White City Place; it offers serviced space to life science companies, with shared facilities. Also Coda Studios and the Worx are interesting models of more studio type workspaces with shared facilities. So more workshop/studio spaces available would be desirable particularly if serving particular company typologies. There are definite advantages for similar companies to be in close proximity whether serviced or not. Open Cell is successful at least in part because of its proximity to the life sciences hub surrounding Imperial College and White City. There are other areas of the borough with concentrations of particular types of business - around Imperial Wharf there is a concentration of Interior design business which extends to the interior design shops on Kings Road and includes the prestigious Chelsea Harbour Design Centre and Roca London Gallery – however most of the potential workshop space would be too expensive for the small companies that might service them such as furniture restorers, upholsterers and similar. Also more widely in Fulham there is a concentration of Graphic Designers – if you search for Graphic Designers in Fulham on Google – more than 100 names come up.	

			I think that using railway arches for leisure/retail rather than as workspaces would be a mistake as there are bound to be an increasing number of this type of space on local high streets as shopping habits change.	
85	Ministry of Defence	General	The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. This response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments. Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas). Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction. Having reviewed the supporting documentation in respect London Borough of Hammersmith and Fulham' Affordable Workspace and Railway Arches Consultation Supplementary Planning Document (SPD)Consultations, the MOD have an area of interest in RAF Northolt. The authority area of the London Borough of Hammersmith and Fulham encompasses areas within the Statutory Aerodrome Height Safeguarding Zone surrounding the aerodrome. RAF Northolt lies approximately 5.7km North of London Borough of Hammersmith and Fulham local authority area. The Aerodrome Height safeguarding zone serves to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely. In summary, the MOD has no concerns or suggested amendments to the current draft of the London Borough of Hammersmith and Fulham's Affordable Workspace and Railway Arches Supplementary Planning Documents that forms the subject of the current consultation	Comments noted.

86	Nadine Grieve	General Comment	Affordable Workspace document 1. I was pleased to see some mention of affordable space being made available to third sector organisations -- I assume this would be office space? 2. In view of the number of people likely to choose to "work from home" to avoid a daily commute to the office in the future, even if the pandemic ends, maybe the Council can provide for a daily fee "working from home" hubs - desks, wifi,etc - as an alternative to people working in cafes or libraries.	Support noted. Affordable workspace can include a number of typologies including 'maker space' as well as office-type space. Comment on the Council as a provider of work hubs are noted, but this goes beyond the remit of planning guidance.

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Cabinet

Date: 07/03/2022

Subject: Railway Arches Supplementary Planning Document

Report of: Councillor Andrew Jones, Cabinet Member for the Economy

Report author: David Gawthorpe, Team Leader, Policy and Spatial Planning

Responsible Director: Jonathan Pickstone, Strategic Director for the Economy

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SUMMARY

This report seeks approval from Cabinet to adopt the Railway Arches Supplementary Planning Document (SPD). The SPD includes policies that supplement the Council's Local Plan, which in turn sets out the Council's vision to see more people in decent affordable homes; a stronger local economy that provides training and job opportunities for local people; a 'greener' borough; and securing and promoting health facilities for residents. The SPD establishes more detailed guidance on the application of policies that are concerned with managing development proposals for railway Arches in the borough. The SPD is not in conflict with the adopted Local Plan and is in conformity with the London Plan.

RECOMMENDATIONS

1. That Cabinet carefully considers the public consultation responses in appendix 4.

2. That Cabinet approves the SPD for adoption incorporating amendments following the public consultation.

Wards Affected: All

Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	The SPD seeks to retain viable commercial premises in railway Arches and encourage appropriate alternative uses.
Creating a compassionate Council	The Council will be providing guiding principles for development associated with Railway Arches.
Doing things with local residents, not to	Planning together for growth and well-

them	being.
Being ruthlessly financially efficient	See financial impacts below.
Taking pride in H&F	Giving residents an opportunity to contribute towards the growth of the borough.
Rising to the challenge of the climate and ecological emergency	The Council helping support local residents plan their neighbourhoods.

Financial Impact

The costs of consulting on and adopting the Railway Arches SPD will be met from existing revenue budgets, mainly those relating to staffing and minor printing costs within the Policy and Spatial Planning budget.

Comments and verification by Andrew Lord, Head of Strategic Planning and Monitoring – Corporate, January 2022

Legal Implications

The preparation and adoption of the SPD is governed primarily by the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). They require that the SPD be in conformity with the London Plan and not conflict with the adopted development plan. This report confirms that the proposed SPD is not in conflict with the adopted development plan and conforms with the London Plan.

Once adopted, the SPD will supplement other planning documents such as the Local Plan and the London Plan. It does not provide new policy but provides more detailed guidance to the Local Plan policies. It will be a material consideration to which regard will have to be had when considering any planning application.

Poonam Rajput, Senior Planning Licensing Solicitor, 31st January 2022

Background Papers Used in Preparing This Report

None

DETAILED ANALYSIS

Proposals and Analysis of Options

1. The SPD provides guidance for development associated with Railway Arches (see Appendix 1). It contains a brief identification of the overarching policy

context, including national and London wide policy relevant to the development of railway Arches.

2. The SPD is informed by the first ever comprehensive survey of the railway Arches in Hammersmith and Fulham. This includes information on the location of the Arches, the uses taking place, vacancies and the character of the immediate and surrounding area. As such the document provides an important resource for identifying the Arches and understanding their importance to the local economy and the context in which they are situated.

3. The SPD provides guidance for applicants, planners and other stakeholders on the railway Arches in the borough. This includes relevant planning policy considerations and an analysis of the key findings across the borough by area. The SPD covers topics that frequently need to be addressed when considering proposals and applications for development of railway Arches, eg appropriate use, residential amenity, design, access, parking and public realm improvements.

4. The Options available to the Council are as follows:

    - To adopt the Railway Arches SPD incorporating amendments following the public consultation;

    - To withdraw the proposed SPD.

5. The recommendation is Option one above, that the Council adopt the SPD incorporating the amendments following the public consultation. Option two would leave a gap in planning guidance for the borough.

Post adoption requirements

6. After adoption, it will be necessary under the Town and Country Planning (Local Planning) (England) Regulations 2012 to make the SPD, available for inspection and to publish on the Council's website. The Council must also make an adoption statement available and notify any person who requested to be notified of the publication of the SPD. The adoption statement must be sent to the Secretary of State.

7. The Council were not required to carry out a sustainability appraisal for the SPD (this now only applying to development plan documents) pursuant to the Planning and Compulsory Purchase Act 2004. However, the policies were considered against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and a draft screening statement was made available.

8. There were no objections to the Council's view that the SPD was not likely to have significant environmental effects. As a consequence, the decision was taken that a Strategic Environmental Assessment (SEA) was not required because, amongst other things, the SPD is a low level planning policy document among the suite of Council planning policy documents; it only supplements adopted policy and does not introduce new policy; and it supplements adopted planning policies that have been subjected to Sustainability Appraisals.

Reasons for Decision

9. To progress the Railway Arches SPD to adoption to ensure that up-to-date guidance is in place to support the adopted Local Plan and to comply with regulatory requirements

10. The adoption of the Railway Arches SPD will provide more detail on the application of the strategic and boroughwide policies in the Local Plan. The SPD will be a material consideration in planning decisions although it will not be part of the development plan.

Equality Implications

11. An Equalities Impact Assessment (EQIA) has been carried out, in relation to the SPD (see appendix 2), and it shows only neutral or positive impacts of the planning guidance on protected groups.

12. The EQIA assists the Council in demonstrating compliance with its public sector equality duty under Section 149 of the Equality Act 2010.

Risk Management Implications

13. The report sets out a clear rationale for adopting the Affordable Workspace Supplementary Planning Document (SPD). The SPD is intended to support, through information, evidence and guidance on local plan policies, the identification and introduction of affordable workspace, particularly for small local businesses, start-ups and not-for-profit sector. This is in line with the council priority of building shared prosperity, by seeking to retain viable commercial premises in Railway Arches and encourage appropriate alternative uses. The report also demonstrates how the council priority of doing things with and not to residents through the consultation process has been addressed.

Implications completed by: David Hughes, Director of Audit, Fraud, Risk and Insurance, tel: 07817 507 695 – 28 January 2022

Climate and Ecological Emergency Implications

14. The built environment accounts for 79% of the borough's direct emissions, with significant emissions arising from both the construction and operation of new development. Effective planning policy and guidance is therefore essential to ensure new development adheres to the highest possible low-carbon and biodiversity standards.

15. The public consultation and adoption of an SPD for the Arches enables the Council to better assess planning applications for new development within and adjacent to these structures and this will help the built environment contribute to achieving net zero greenhouse gas emissions. By protecting viable employment uses in the Arches there may be indirect benefits, such as reducing the need for small business owners to travel outside of the borough to access affordable premises. Whilst the positive impacts of this SPD on climate change may be minimal, it will contribute towards strengthening the local economy and this in turn maybe a driver for change and investment in green infrastructure.

Implications verified by: Jim Cunningham (Climate Policy & Strategy Lead – 07468 365829) – 31st January 2022

Local Economy and Social Value

16. The Railway Arches are important assets for the borough, providing vital business space to several local SMEs. The Arches are an excellent example of how spaces can be re-purposed in a way that provide direct benefits to the local economy whilst maintaining the borough's buildings of heritage, thereby acting as incubators of sustainable economic growth. By adopting the SPD the Council will secure the future of these spaces for use by local businesses, as well as diversifying the range of business floorspace in the borough such as affordable office space, makers space and retail.

Implications verified/completed by: Sam Ridley, Economic Development Officer, 07766 720080 – 31st January 2022

Section 106

18. Railway Arches are key assets for the borough from an infrastructure, economic and amenity perspective. Securing them in appropriate uses will ensure they are maintained and their contribution to place-making and the local economy is maximised. Further, the SPD will ensure the Council secures appropriate conditions or obligations to mitigate any effects arising from their use, such as increased traffic movements or impacts on neighbouring residential amenity, and that the areas around the Arches are appropriately enhanced through improvements to access and to the adjacent public realm.

Implications verified/completed by: Matthew Paterson, Head of Spatial Planning, Tel: 07776672447 – 31st January 2022

Consultation

19. Public consultation on the draft SPD began on 19th November for 4 weeks and ended on 17th December 2021. The SPD was made available at the borough reference libraries and on the Council's website in accordance with the Council's Statement of Community Involvement. In addition, the Council wrote to specific consultation bodies outlined in the regulations and to general consultation bodies, such as amenity groups, resident associations, businesses and others.

20. The Council received representations from 15 organisations and individuals. A brief summary of the consultation responses is set out below. Full details of the representations and how these have been addressed will be appended to the Cabinet Report.

21. Responses to the consultation were received from a number of key stakeholders including Historic England, Natural England & Transport for London's commercial arm, as well as active resident & amenity groups in the borough including the H&F Disability Forum, Shepherds Bush Market Tenants Association, Ravenscourt Action, St Peter's Residents Association and Friends of Ravenscourt Park.

22. Overall, representations were generally supportive for the SPD and the benefits that the Arches can provide in terms of workspace, employment and accessible routes. Many commented on how the guidance prepared in the SPD would prove beneficial and useful to applicants. However, changes were suggested regarding potential uses of the Arches, residential amenity and detail regarding specific Arches and protection for tenants.

23. A number of comments were received from both developers and resident groups on the key principles. Strong support was received from resident groups to Key Principle AR1 on retention of employment uses and control of retail and café uses in residential areas, whilst TfL commercial requested for this principle to be more flexible and less prescriptive to allow for the Arches to be occupied by a variety of uses and tenants.

24. A large number of representations were submitted relating to the design, access and conservation of Arches, with helpful comments from Natural England, Historic England and amenity groups, including the H&F Disability Forum. These focused on the need to explore opportunities to retrofit green infrastructure in urban environments, the need for alterations and redevelopment of Arches to be sympathetic to their heritage importance, and detailed comments from the H&F Disability Forum on barriers to inclusion, accessible and inclusive design principles for surrounding public spaces and commercial uses. Resident groups also raised the need for the Arches and surrounding areas to be monitored by CCTV and be better lit.

25. A detailed response including suggested changes was received from the Shepherd's Bush Market Tenants Association who felt the SPD was vague in relation to the Shepherd's Bush Market Arches. They requested that the whole of Shepherds Bush Market Area be protected from redevelopment in order to safeguard the traditional function of the market. This particular request would be out of the remit of this SPD. They also raised concern about the poor condition of the Arches at Shepherds Bush Market and that the burden of paying for improvements should not be put on the tenants. The tenants also provided useful background documents on the recent history of the Arches including petitions and legal cases. The tenants also wanted further details regarding the arch survey that took place to support the SPD.

26. Recommendations and wording changes were also suggested by TfL commercial on all sections of the SPD. They queried the prescriptive policy approach which seeks to locate and protect only certain types of uses in the

Arches suggesting that it will limit opportunities for groups of Arches to be successful. They called for more reference to the London Plan to make sure these unique spaces are best utilised by providing a range of low-cost units available for smaller businesses in a range of uses to complement town and local centres. They stated that diversifying the uses of Arches will support the local economy and ensure existing tenants are able to better recover from the impacts of the pandemic in Hammersmith and Fulham and across London. They also suggested that the Council should adopt a separate policy regarding railway Arches in future Local Plans and that this guidance could enable this future approach.

27. A small number of comments were received that focussed on specific Arches and the need to review inaccurate information in the SPD on access points and entrance ways. In addition, there were comments from residents on the need to explore opportunities to open up specific Arches to relieve traffic congestion and make the roads adjacent to Arches more pedestrian and cycle friendly.

28. As a result of the consultation, only minor changes are considered necessary to the SPD prior to adoption.

29. The proposed minor changes to the SPD resulting from the consultation responses are summarised below:

Section of SPD/Topic	**How the SPD will be amended**	**Reason**
Accessibility	*A new bullet point on accessible and inclusive design will be inserted into Key Principle AR1:* *" Any new development (including change of use) involving the railway Arches should be accessible and inclusive in terms of design"*	*In response to the Disability Forum's comments to the SPD it is agreed that the SPD could be amended to clarify that new development involving the railway Arches should be accessible and inclusive in terms of design.*
Green Infrastructure	*Additional text promoting green infrastructure will be inserted into Key Principle AR1:* "Encourage and promote thermal energy efficiency measures, heat recovery ventilation, electric heating, and green infrastructure in development proposals for arches, where appropriate."	*In response to Natural England's comments and our own Climate Change Action Plan, a new bullet point will be added to promote and encourage green infrastructure when Arches are developed in the borough.*
Town and Local Centres	*Further clarification on the town centre first principle will be provided in para 3.6.*	*In response to TfL, clarification on the town centre first principle in the National Planning Policy framework will be provided. This will help applicants understand the sequential approach to commercial premises out of centre.*

Planning Permissions	*Reference to relevant planning permissions will be inserted where relevant in the arch profiles.*	*In response to TfL commercial, it is agreed that planning permission references could help provide context to some of the arch areas.*
Parsons Green Depot	*The section on Parsons Green Depot will be reviewed to remove reference to the depot beyond the existing archway.*	*In response to TfL commercial it is agreed that the wider Parsons Green Depot area is beyond the remit of the SPD and the SPD text will be amended to only make reference to the one Archway that exists at Parson's Green Depot.*
LBHF Arches 2020	*Add some additional text to the introduction of the SPD to clarify the content and methodology of the Arches survey.*	*In response to Shepherds Bush Market Tenants Association more explanation of the Arches Survey 2020 will be included in the introduction of the SPD.*
Factual errors and amendments	*A number of minor factual errors will be rectified in document.* *A factual change to correctly state the current Shepherds Bush market managers is also required in para 4.10 as follows:* ~~*WMC Retail Partners Enterprises Ltd*~~ *Tandem Property Management*	*The comments from a number of resident groups request factual changes to be remedied. These relate to entrances and alleyways adjacent to the Arches and surrounding areas of Dalling Road, Ravenscourt Road, Ravenscourt Road and Ravenscourt Park. See appendix 3 – Representations schedule for full details*

30. Full details of the representations and how these have been addressed are appended to the Cabinet Report (see appendix 3). The minor text changes have been inserted into the SPD (Appendix 1).

LIST OF APPENDICES

Appendix 1 – Railway Arches Supplementary Planning Document
Appendix 2- Equalities Impact Assessment
Appendix 3 – Railway Arches SPD Representations Schedule

Hammersmith and Fulham

Appendix 1

RAILWAY ARCHES

SUPPLEMENTARY PLANNING DOCUMENT

MARCH 2022





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Table of Contents

1. INTRODUCTION 4

2. PURPOSE OF THE SPD 5

3. POLICY CONTEXT 5

4. ARCHES PROFILES 8

A. White City to Trussley Road 10

B. Cambridge Grove to Goldhawk Road 17

C. River Thames to Parsons Green 24

D. Imperial Wharf 30

5. KEY PRINCIPLES 32

1. INTRODUCTION

1.1. Hammersmith and Fulham is an economically vibrant borough, located to the west of Central London and is an attractive location for business and enterprise. It has a thriving and diverse economic base, with the 8th highest rate in businesses per hectare in England. It is also home to over 186,000 residents, who live side by side with these businesses, who use local services and help contribute to its business success. Like most parts of the UK, the Covid-19 pandemic had an impact on some parts of the local economy in the borough. Although the long-term implications are still unknown, there are a number of local and national interventions and policies emerging to help support businesses and economic recovery and early information indicates that Hammersmith and Fulham has in parts recovered fairly well. The railway arches were originally surveyed in 2019 prior to the pandemic and more recently in August 2021. This was an observational survey and current vacancy rates may be different from those observed. This latest survey identified that despite some businesses in the railway arches closing down, other new uses have moved in and economic activity within the arches remains robust. The businesses in the arches continue to be an important part of the local economy.

1.2. The railway arches in Hammersmith and Fulham are mainly located under the Transport for London (TfL) District Line and Hammersmith and City line tracks. The arches are formed where the rail tracks are at high level above brick structural supports below. The arches are mainly owned and managed by TfL as part of their property portfolio. TfL have indicated that they are in the process of producing a management strategy for individual groups of arches within their estate. The exception to TfL ownership are the arches in Imperial Wharf which are below the Overground and National Rail (Southern) tracks and are managed by the Arch Company. The railway arches in the borough are suitable for occupation by a variety of businesses or can provide open access allowing for the through flow of pedestrians and traffic. Although often hidden away, the arches form an attractive part of the urban landscape often dating back to the Victorian period.

1.3. Where occupied, the arches provide an important contribution to the local economy, suitable for small businesses, which can be relatively inexpensive depending on their physical condition and location. Our 2021 survey showed a high occupancy rate of 70%, with often long-standing businesses and a diverse range of service/workshop/office uses evident and in particular Shepherd's Bush Market, retail uses.

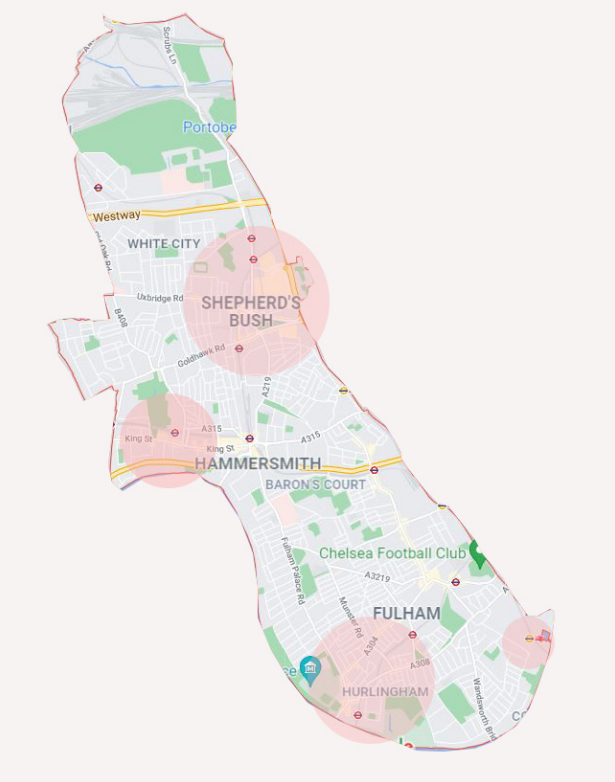


Image 1: Main location of arches within the borough

2. PURPOSE OF THE SPD

2.1. This Supplementary Planning Document (SPD) provides the first ever comprehensive survey of the railway arches in Hammersmith and Fulham. The survey contains information on the location of the arches, the uses taking place, vacancies and the character of the immediate and surrounding area. As such the SPD provides an important resource for identifying the arches and understanding their importance to the local economy and the context in which they are situated.

2.2. Like all SPD's the Railway Arches SPD cannot set out new policy. Rather, it provides guidance for applicants, planners and other stakeholders on the key principles which will be used to determine applications for new uses, other development including advertisements in the railway arches. The Key Principles and details of the relevant Local Plan (Adopted 2018) polices are contained in Section 5.

3. POLICY CONTEXT

3.1. The introduction of the new Use Class E in 2020 means that a number of uses which previously required planning permission can now change their use without permission. However, where permission is required applications will be assessed against policies summarised below.

The Hammersmith and Fulham Local Plan (Adopted 2018)

3.2. The Local Plan provides the main Policy document for the determination of planning applications and an overview of main considerations for the railway arches include the following:

3.3. The Spatial Vision for the economy seeks to build a stronger local economy to encourage inward investment, support new enterprise and start-up businesses and facilitate job growth in the local area, where all people are connected to economic opportunities and live in strong and thriving communities.

3.4. Local Plan Policy CC13 protects residents from potentially 'polluting' uses, with Policy CC11 specifically deals with noise nuisance.

3.5. Local Plan Policy E2 seeks to protect existing employment uses. Policy E1 aims to provide a range of employment uses including flexible and affordable space suitable for small and medium sized enterprises.

3.6. Local Plan Policy TLC1 seeks to enhance the vitality and viability of the borough's three town centres, five key local centres, 15 neighbourhood parades and six satellite parades. Not all arches are located in designated Town or Local Centres and some planning applications for out of centre retail uses may be subject to the sequential test within the National Planning Policy Framework (Paragraph 87).

3.7. Local Plan policies T1, T2, T3 and T4 set out details for highways and parking. With key objectives to improve public transport and accessibility whilst reducing the adverse impact of road traffic and traffic congestion. This includes ensuring that adequate and safe servicing and delivery can be provided and to ensure that traffic generated by new development is minimised so that it does not add parking pressures on local streets or congestion.

3.8. Local Plan Section 12 – Design, includes relevant policies DC1, DC2, DC4, DC5 and where in a Conservation Area or in a historic park or garden DC8 which to seeks to ensure excellence in design. Where there are associated advertisements then in accordance with Policy DC9 these

should also be of a high standard of design and in scale and keeping with the character of their location. Policy DC2 ensures that design is accessible and inclusive.

3.9. The Regeneration Area policies WCRA, WCRA1, WCRA3, HRA and SFRRA are primarily used for the large redevelopment sites in these areas. However, applications for smaller premises in these areas including the railway arches will also need to comply with the relevant parts of these policies and with the detailed residential amenity, land use, highways and design policies set out above.

Hammersmith and Fulham SPD's

3.10. The Hammersmith and Fulham Planning Guidance SPD February 2018 contains further guidance to support the Local Plan. For the railway arches of most relevance are Chapter 4 - Conservation Area Guidelines; Chapter 9 - Accessible and Inclusive Design; Chapter 10 - Noise Nuisance and Chapter 18 - Transport.

3.11. This SPD has been informed by the council's Industrial Strategy for Hammersmith and Fulham 2017.

The London Plan 2021

The London Plan was adopted in 2021 and sets out the spatial development policies for Greater London and Mayor's vision for Good Growth over the next 20-25 years. The policies in the London Plan should inform decisions on planning applications and Local Plans need to be in "general conformity" with this document. Although there is no specific policy for the railway arches, Paragraph 6.2.4 references railway arches as part of low-cost business space, which is secondary and tertiary, available on the open market and which is of a lower specification then prime space – therefore usually commands rents at or below the market average.London Plan Policy E2 -Providing suitable business space- in Part A seeks to support the provision and where appropriate protection of a range of B Use Class business space in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro and, small and medium-sized enterprises and to support firms wishing to start-up or expand. A number of the railway arches in the borough are in storage use. London Plan Policy E4 Land for Industry, Logistics and Services to Support London's Economic Function, in Part A recognises that a sufficient supply of premises to meet current and future demands for industrial and related functions should be provided and maintained.

National Planning Policy Framework (NPPF)

3.12. The NPPF 2021 sets out Central Government's economic, environmental and social planning policies for England. It includes a section on building a strong and competitive economy. Paragraph 81 states that planning policies should help create the conditions in which business can invest, expand and adapt with significant weight placed on the need to support growth and productivity. Paragraph 82 specifically notes the importance of local policies for economic development; the need to address potential barriers and the importance of allowing new and flexible approaches to changing work practices and economic circumstances. The NPPF is supported by Planning Policy Guidance (PPG).

The National Model Design Code

3.13. The National Model Design Code was published on 20 July 2021 and contains government guidance on the production of local design codes, guides and policies. The code was adopted in response to the Building Better Building Beautiful Commission "Living with Beauty" report and

is supported by Chapter 12 *Achieving well-designed places* of the NPPF and the National Design Guide. Coupled with changes to the NPPF, the code seeks to promote the importance of high-quality design and the delivery high-quality places through the planning system.

Use Class Order 2020

3.14. As part of a strategy to stimulate development Central Government made changes to the Use Classes Order in September 2020 which provides additional flexibility for businesses to change use without requiring planning permission and therefore limits planning control over this matter. The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 took effect on 1 September 2020. This amongst other changes introduced a new Use Class E which now includes business and town centre type uses. Changes of use within Class E do not constitute development and

4. ARCHES PROFILES

Image 2: Location arches within the Borough of Hammersmith and Fulham



4.1. This section provides an overview of the railway arches survey 2021 and profiles the various arch locations and their surrounding characteristics.

4.2. The survey has been broken down into four main groups, with sub-areas defined by highways, other physical boundaries or distinct characteristics. These are as follows:

A. White City to Trussley Road

- White City East
- Macfarlane Road
- Shepherd's Bush Market
- Goldhawk Road and Trussley Road

B. Cambridge Grove to Goldhawk Road

- Cambridge Grove
- Glenthorne Road, Glenthorne Mews, Albion Mews, Galena Road and Studland Street
- Dalling Road and Ravenscourt Road
- Ravenscourt Road and Ravenscourt Park
- Ravenscourt Park and Goldhawk Road

C. River Thames to Parsons Green

- Riverside and Ranelagh Gardens
- Ranelagh Gardens and Hurlingham Road
- Hurlingham Road and Grimston Road
- Grimston Road, New King's Road and Munster Road
- Parsons Green

D. Imperial Wharf

A. White City to Trussley Road

White City East

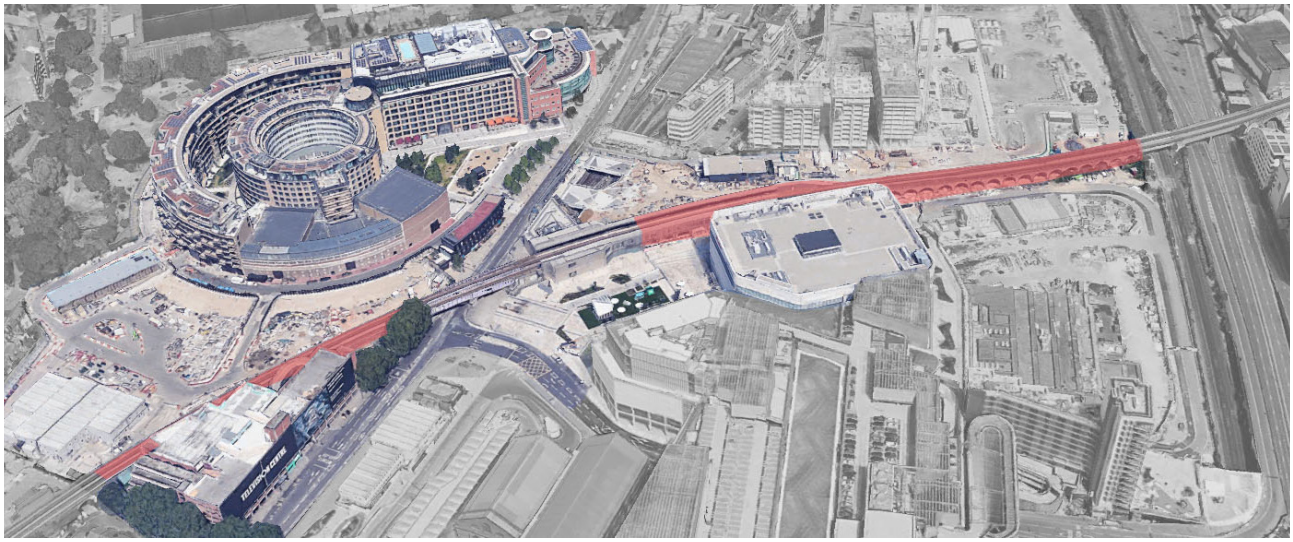


Image 3: Location of White City East arches a) Between Westfield and White city Living development; b) Part of the former BBC Tevelvision Centre and behind the multi-storey carpark

4.3. The White City East arches are located in close proximity to Shepherd's Bush Town Centre and within the White City Opportunity Area. They have a high vacancy rate (82%) and form two distinct groups as follows:

a) There are 31 arches which form the boundary between Westfield and the White City Living residential development. Ten of these (ranging from 735 to 1,750 sq. ft) have been refurbished including open arches allowing pedestrian access and improvements to the surrounding public realm. However, overall the arches remain mainly vacant with only two units, currently occupied by a restaurant. Two arches in this stretch are used for purposes ancillary to Wood Lane Tube Station.



Photo 1: Arches between Westfield and White City Living

b) There are nine arched units, part of the former BBC Television Centre, but now a mixed use residential, leisure and media development. These units are not currently accessible to the general public but appear to be occupied for storage purposes. Seven of the units (which appear to be vacant) are behind former multi-storey car park on Wood Lane. This car park is also part of the wider BBC development site (Plot H) and is currently subject to demolition and redevelopment.



Photo 2: Arches in the former BBC Television Centre

4.4. Although the strategic policies for the White City Regeneration Area can more obviously be applied to large development schemes, the arches in this area may have the potential to contribute to Shepherd's Bush Town Centre in terms of community, employment offer and public realm and permeability. All of which can complement the existing regeneration of the area and help ensure its long-term sustainability.

4.5. The ten newly refurbished arches between White City Living and the Westfield Shopping Centre have potential for a variety of uses including restaurant use, subject to no loss of general amenities enjoyed by existing surrounding residential occupiers. These arches have been refurbished to a high standard and the open arches already contribute positively to the public realm and permeability. The remaining arches as part of the wider BBC development site are currently inaccessible to the general public but they also have the potential to contribute to the aims of the White City Regeneration Area.

4.6. There are several opportunities for sustainable access to this area. It has excellent public transport facilities with Wood Lane and White City Underground Stations, Shepherd’s Bush Overground and the White City Bus Station in very close proximity to these arches.

Macfarlane Road



Image 4: Location of arches 123-152 broadly running parallel to Macfarlane Road

4.7. There are 24 arches in Macfarlane Road, mainly occupied by motorcycle, bike and motor repair businesses. There is also a gym, florist and recording/rehearsal studio accommodation, which are the more recent additions to the long-standing motor repair businesses. Shepherd's Bush rehearsal studios are in the arches closest to Uxbridge Road. There is a low vacancy rate of 8%, with only 2 of the units appearing to be vacant. There are very good public transport links with Wood Lane Underground to the North and Shepherd's Bush Underground station to the South and several bus routes running along Uxbridge Road.



Photo 3: Vacant and occupied arches on Macfarlane Road

4.8. These arches are located on the edge of the White City Regeneration Area. They are well occupied with evidence of churn and some new uses moving in. Where permission is required existing employment uses are protected in accordance with the criteria in Local Plan Policy E2. These arches are within walking distance of Shepherd's Bush Town Centre, where retail and complimentary uses are more appropriately directed. The arches are in proximity to residential properties and therefore the protection of existing amenity by way of noise (especially late at night), smells and disturbance will be an important consideration for applications involving new commercial uses.

4.9. Access to these arches is limited. There is an access road, but it is not a publicly maintained highway. Car and van access is at the north end via an arched entrance leading to a wide frontage to the arches, this area narrows closer to the Uxbridge Road end, but servicing and parking still appear to be possible.

Shepherd's Bush Market



Image 5: Location of arches 155-191 between Uxbridge Road forming part of Shepherd's Bush Market

4.10. There are 37 arches primarily used for retail purposes, which are located alongside the freestanding stalls within Shepherd's Bush Market. There is a very low vacancy rate, with only two of the arches appearing to be vacant at the time of the survey. This is a vibrant and flourishing environment, providing shopping and some associated cafes for locals and visitors alike. Shepherd's Bush Market is managed by Tandem Property Management who have an office in one of the arches. The market has excellent public transport including various busses running along Uxbridge Road and Goldhawk Road and the Shepherd's Bush Market London Underground Station.



Photo 4: Arches used for retail premises within Shepherd's Bush Market

4.11. Shepherd's Bush Market is an important and distinct part of Shepherd's Bush Town Centre's cultural and retail offer. The market and adjacent land are subject to Local Plan Strategic Site Policy WCRA3, which is part of the larger White City Regeneration Area, as set out in Strategic Policy WCRA. Development proposals for the market should promote the retention and improvement of the market and provide a vibrant mix of town centre uses. This includes assisting and working with market traders so they can remain part of the market. As the arches form an integral part of the market, this policy will apply to these premises. The market does not have a publicly maintained highway but while the market is taking place, pedestrians have priority. However, there appears to be access for servicing outside these times.

4.12. Given the proximity of residential streets to the market it is considered that new uses should not increase existing parking pressure. The arches are somewhat tucked away from these properties. However, impact on these residents by way of loss of amenity will still be considered in terms of applications for new uses. The arches are not

in a Conservation Area but those closest to Uxbridge Road are adjacent to the Shepherd's Bush Conservation Area. All premises are highly visible from street views and therefore a high-quality of deign will be required for new signage and structures.

Goldhawk Road and Trussley Road



Image 6: Location of arches 192-219(Eat) and 212-240 (west) between Goldhawk Road and Trussley Road

4.13. The Goldhawk Road and Trussley Road arches are a diverse group of 36 well used arches with a 23% vacancy rate. They are located on both sides of the railway tracks forming a long stretch of premises between Goldhawk Road to the North, Trussley Road to the South, and to the West of Wells Road and Sullivan Road. There are three distinct groupings which are occupied by a variety of uses including, motorcycle and car repair businesses, decorating suppliers, landscape gardeners and by TfL's, bus garage storage. Arch 233 provides for highway and pedestrian access under the tracks on Trussley Road.

4.14. Five of the arches in Wells Road form part of the Goldhawk Road Tube station and this stretch of arches is well connected to public transport. They are very open to the street and like other arches between Goldhawk Road and Trussley Road contain a variety of employment uses and therefore where possible have Local Plan policy protection. This group of arches are within walking distance of Shepherds Bush Town Centre where retail uses are directed.



Photo 5: Arches to the East of the railway arches on Wells Road

4.15. Of all the arched premises in this group, those between Wells Road and Trussley Road have the most mixed character with both commercial and residential premises. Proposed new uses in the arches closest to the residential premises will need to consider impact on existing amenity. These arches appear to be inside the Hammersmith Grove Conservation Area and therefore a high-quality in terms of any new structures and signage will be expected.

4.16. The arches at the Trussley Road end of this grouping have good access to the surrounding residential areas.

They are close to the local shops, services and food and drink premises on Hammersmith Grove. Two of the businesses make the most of being nearby to the Builders Merchants by selling DIY goods and paint and the other providing landscape gardening services. These have a different character from other arches in this overall group, with an attractive and open aspect. The arches are very accessible by car from Trussley Road and have a wide servicing area in front of the businesses.



Photo 6: Arches 234-240 to the West of the track in Trussley Road

B. Cambridge Grove to Goldhawk Road

Cambridge Grove

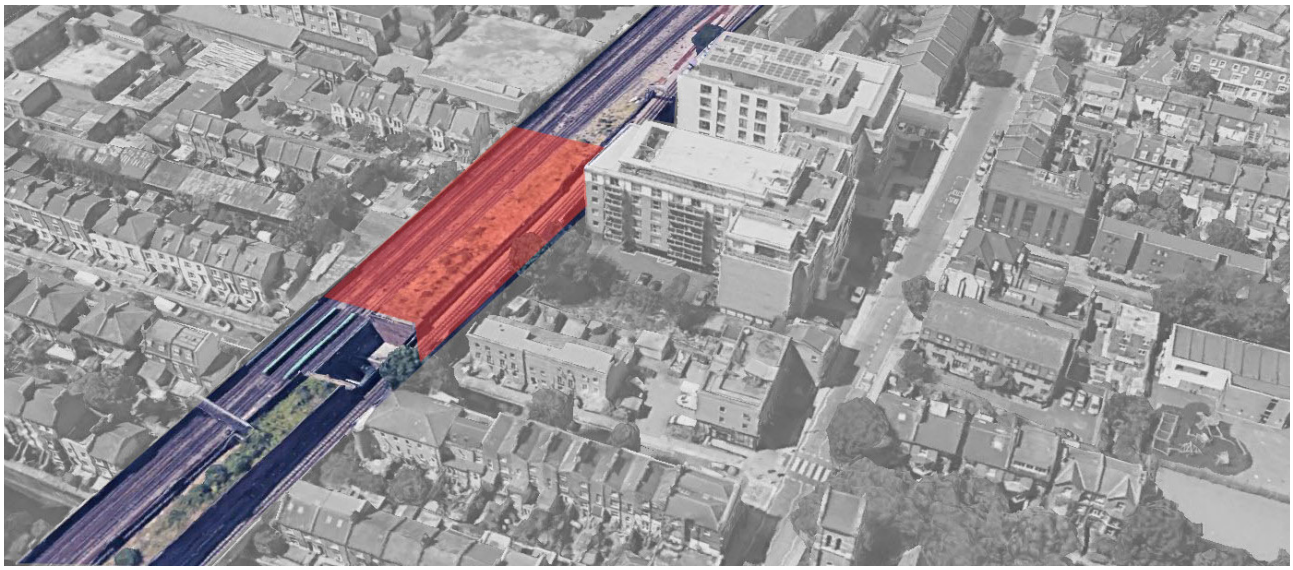


Image 7: Location of arches 57-65 Cambridge Grove

4.17. The Cambridge Grove Arches are an attractive group of nine well occupied arches. Only two of these arches are vacant and the group has a low vacancy rate of 20%. Those occupied contain workshops, (crafts, pottery, metal and woodwork) a media studio and gyms.



Photo 7: Arches in Cambridge Grove

4.18. These arches are not in the Hammersmith Regeneration Area. The vibrancy and proximity to Hammersmith Town Centre and evidence of creative uses indicates that there is demand for premises. Where possible viable existing employment uses will be protected in accordance with Local Plan Policy E2. The arches are within close walking distance to Hammersmith Town Centre, where retail and complementary uses are directed. The arches are opposite residential properties and therefore the protection of existing amenity by way of noise (especially late at night), smells and disturbance is an important policy consideration. The arches are partially inside the Bradmore Conservation Area and partly visible from surrounding streets and therefore high-quality design and new signage will be expected. The alley is not publicly maintained highway and pedestrian access is via a gated entrance off Cambridge Grove.

Glenthorne Road, Glenthorne Mews, Albion Mews, Galena Road and Studland Street



Image 8: Location of arches 75-77 Glenthorne Mews, arches 70-77 Albion Mews, arches 78-81 Galena Road and arches 83-89 Studland Street

4.19. The Glenthorne Mews, Albion Mews, Galena Road and Studland Street arches are a group of four distinct small clusters of arches located around Glenthorne Road. There are a total of 26 Arches, with 23 of these occupied at the time of the survey and therefore has a low vacancy rate. There are a variety of businesses occupying the arches consisting of car and motorcycle servicing, repair joinery company chair studio and catering suppliers.

4.20. The Albion Mews arches are located on the edge of Hammersmith Town Centre Regeneration Area. Local Plan Strategic Policy HRA includes aims to encourage the regeneration of Hammersmith Town Centre and seeks development that builds on the centre's major locational advantages for office and retail development.



Photo 8: Albion Mews arches to the North side of the track

4.21. The council is preparing an SPD for the Hammersmith Regeneration Area which sets out a high level, profiles and principles for the Town Centre.

4.22. The arches in Glenthorne Mews, Galena Road and Studland Street are well used and contain a variety of employment uses (all E class uses, and similar sui generis uses) and therefore where possible subject to the employment protection criteria in Local Plan Policy E2.



Photo 9: Glenthorne Mews arches to the South of the track

4.23. These arches are in close proximity to Hammersmith Town Centre, where town centre uses are directed to enhance the vitality and viability of this important retail location.

4.24. The surrounding area has a mixed use. However, there are a number of residential premises in close proximity to the arches in particular in Albion Mews where residential directly faces the arches and therefore it is important that new uses cause no undue detriment to residential amenity.

4.25. The arches in Galena Road and Studland Street are directly accessed off these publicly maintained highways and many make the most of this access with the arches used for motor repair and services businesses.

4.26. This group of arches are not in a Conservation Area. However, any new external construction and signage in connection with the railway arches are likely to require a high standard of design, in particular where they are visible from street views.

Dalling Road and Ravenscourt Road

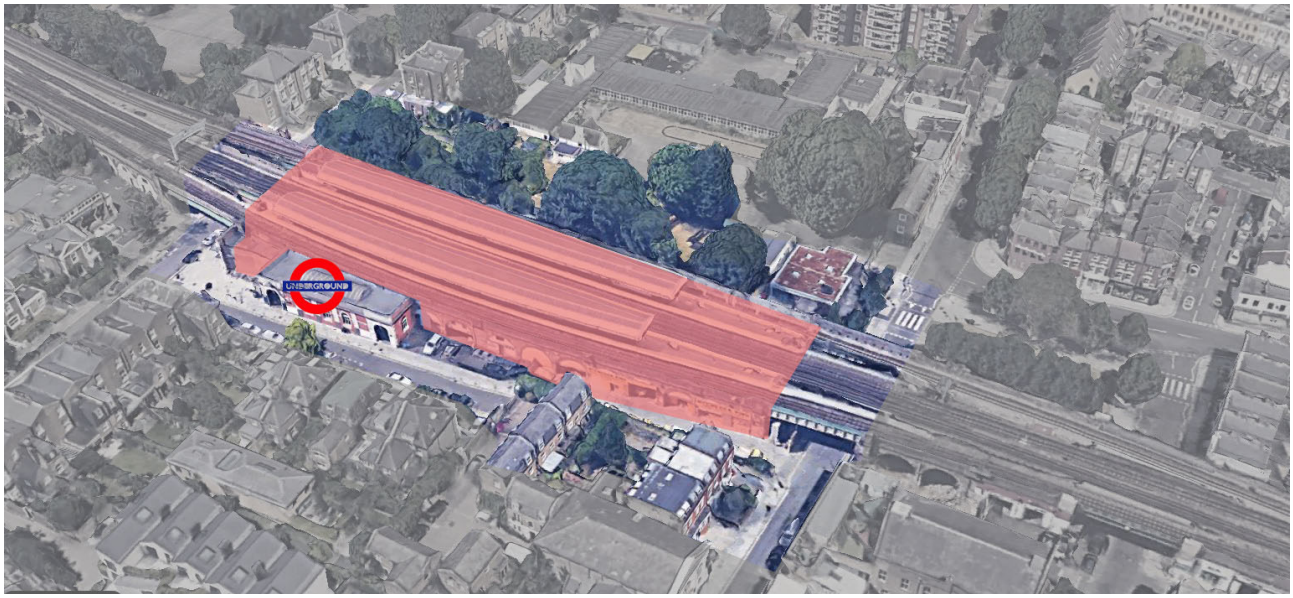


Image 9: Location of arches 92-107 between Dalling Road and Ravenscourt Park

4.27. The Dalling Road and Ravenscourt Road arches comprise ten premises which have a 100% occupancy rate at the time of survey. Existing uses include an indoor climbing centre with the main entrance in Ravenscourt Road. A longstanding timber and builder's merchants occupies a number of arches alongside a car repair business. Pedestrian and vehicle access to these arches is from Ravenscourt Road. These arches are very close to Ravenscourt Park Tube Station and therefore have excellent public transport access.



Photo 10: Arches 99-101

4.28. The arches are directly opposite and surrounded by residential properties and protection of existing amenity by way of noise (especially late at night), smells and disturbance will be an important policy consideration for new proposed uses. These arches are within close walking distance to Hammersmith Town Centre and new uses should complement and not compete with nearby town centre uses in accordance with Local Plan Policy TLC1.

4.29. There is a pedestrian alley from Dalling Road, which opens into the small residential street of Ravenscourt Place, which is bounded by Ravenscourt Road. Both of these are public highway. Any transport generated by incoming uses should to avoid congestion and ensure servicing can take place safely. The arches are visible from the street and therefore any new structures if acceptable in principle or associated signage, would need to be of high-quality design, given the location in the Ravenscourt Park and Starch Green Conservation Area.

Ravenscourt Road and Ravenscourt Park



Image 10: Location of arches between Ravescourt Road and Ravescourt Park. Arches 108-132 (North side of the track) and Arches 112-116 (South side of the track)

4.30. The Ravenscourt Road and Ravenscourt Park arches are located on both the North and South side of the railway tracks providing two distinct groups. On the North side there are 16 arches mainly located within the park itself. Twelve of these are occupied by the council's leisure and parks service for storage and ancillary purposes and therefore make an important contribution to this service. Community uses which are complimentary to the recreational use of the park may be considered as an acceptable alternative subject to planning considerations. There are also open arches within this group providing pedestrian access through the park. The vacant arches (25% of the total) are in the alleyway adjacent to Ravenscourt Road. To the south are six arches which are occupied by a garden centre and café and for purposes ancillary to the Baptist church. There are no vacancies in this group.



Photo 11: Arches in use by the Council as storage

4.31. These arches both to the North and the South of the railway line are within the Ravenscourt Park and Starch Green Conservation Area. The character profile for this Conservation Area states that this 'District Park itself forms the heart of the Conservation Area' and notes that the dominant feature of the railway arches also afford views through the park.

4.32. There are residential properties in close proximity to the railway arches in particular those near to the entrance to the park in Ravenscourt Road. This entrance, the boundary wall and the alleyway itself are within the demise of the park and publicly maintained. Servicing to these arches may be difficult.

4.33. The properties are within close walking distance to Hammersmith Town Centre and where possible new uses should complement and not compete with nearby town centre uses.

4.34. To the south the long-standing garden centre provides a destination shopping experience for locals and visitors alike. The use of the arches as a small café with outside tables and chairs within the garden centre provides a pleasant and well used environment.

Ravenscourt Park and Goldhawk Road



Image 11: Location of arches 133-178 Ravenscourt Park to Goldhawk Road (adjacent to Stamford Brook Tube Station)

4.35. The Ravenscourt Park to Goldhawk Road arches are a long stretch of 45 arched premises, which are predominantly vacant. It has an 82% vacancy rate, which is the highest vacancy level of all those surveyed in the borough. The eight that are occupied are mainly used for car services, repair and storage, with one unit used for builder's storage.

4.36. These arches are located in a non-publicly maintained alleyway which backs directly onto residential properties and therefore the protection of existing amenity by way of noise (especially late at night), smells and disturbance is an important consideration here. The arches in the middle of this space are particularly unappealing to reach by foot given the long stretch of arches without active frontages. There is evidence of car use in connection with the occupied arches. This is a narrow alleyway, with no obvious turning points.

4.37. The arches, particularly those close to Ravenscourt Park are within walking distance to Hammersmith Town Centre, this grouping forms the very most southern part of the Ravenscourt Park and Starch Green Conservation Area. However, only the arches located at each of the ends of this group are visible from the street.



Photo 12: Arches closest to Ravenscourt Park

C. River Thames to Parsons Green

Riverside and Ranelagh Gardens

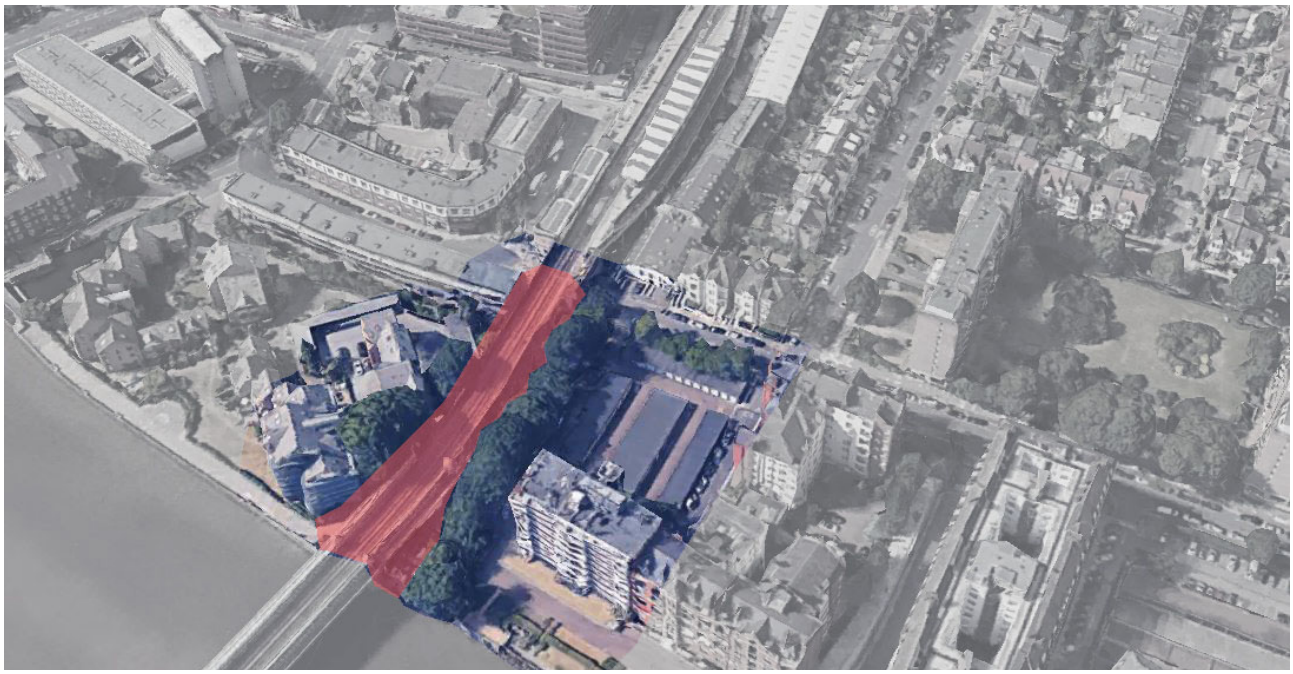


Image 12: Location of arches 72-76 Riverside Ranelagh Gardens

4.38. The riverside and Ranelagh Gardens arches are a small group of premises in an attractive gated alleyway leading to the river. An architects/construction company is the main occupier in this stretch of arches now that the car hire use previously occupying Arch 72 have vacated their premises.

4.39. These arches are in close proximity to a large number of residential properties in Hurlingham Court and therefore protection of existing residential amenity will be an important consideration for any new uses in this location.

4.40. The arches are within walking distance of Fulham High Street Neighbourhood parade, where, if possible town centre uses are most appropriate directed. The arches are visible from the public highway and are in the Hurlingham Conservation Area and therefore any new structures or advertising will be required to be of a high-quality design.

Ranelagh Gardens and Hurlingham Road

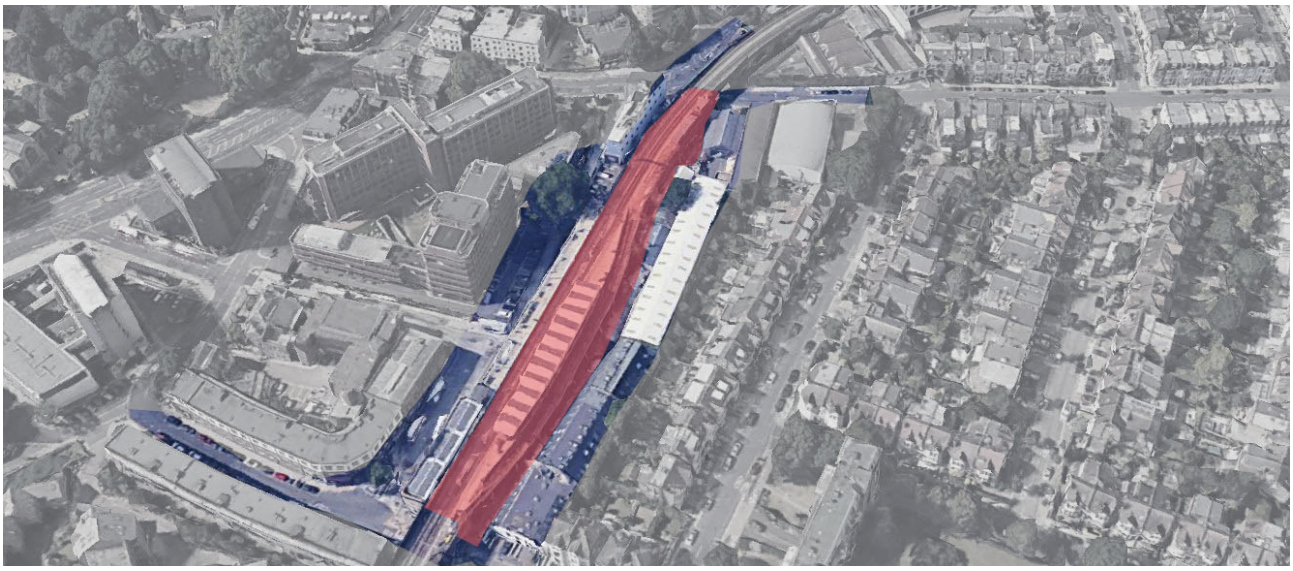


Image 13: Location of arches 55-66 between Ranelagh Gardens and Hurligham Road. Arches including 419 New King's Road and Hurlingham Road

4.41. These are a group of 15 arches (both to the West and East of the railway track) in close proximity to Putney Bridge Underground Station are located to both the West and East of the railway tracks. To the West the arches front Station Approach. A Wine shop although not within an arch itself is a dominant feature in this location and adds to the commercial character and vitality of this area. This group of arches has a high occupancy rate, with only one arch obviously vacant. Occupiers include TfL as part of the station, taxi repair and services, car repair business, an art shop, flower shop and arches used in connection with a trade building suppliers, to the East of the tracks.



Photo 13: West side of the track occupied aches including a tax repair.

4.42. These arches provide a variety of employment, service and retail uses and are very accessible both by foot and car. They do not generally front publicly maintained highway, but some have designated parking spaces in connection with the use on the forecourts. The building trade premises directly front the publicly maintained Hurlingham Road with a dropped kerb to allow access.

4.43. The arches to the West of the tracks, closest to the station are opposite commercial premises and to the East surrounded by residential accommodation and therefore the protection of existing residential amenity will be an important consideration for any new uses in this location.

4.44. The arches are within walking distance of Fulham High Street Neighbourhood parade where new town centre uses are most appropriately directed in accordance with Local Plan Policy TLC1. These arches are within Putney Bridge Conservation Area and therefore new developments should deliver high-quality design and enhance the character of the protected area.

Hurlingham Road and Grimston Road

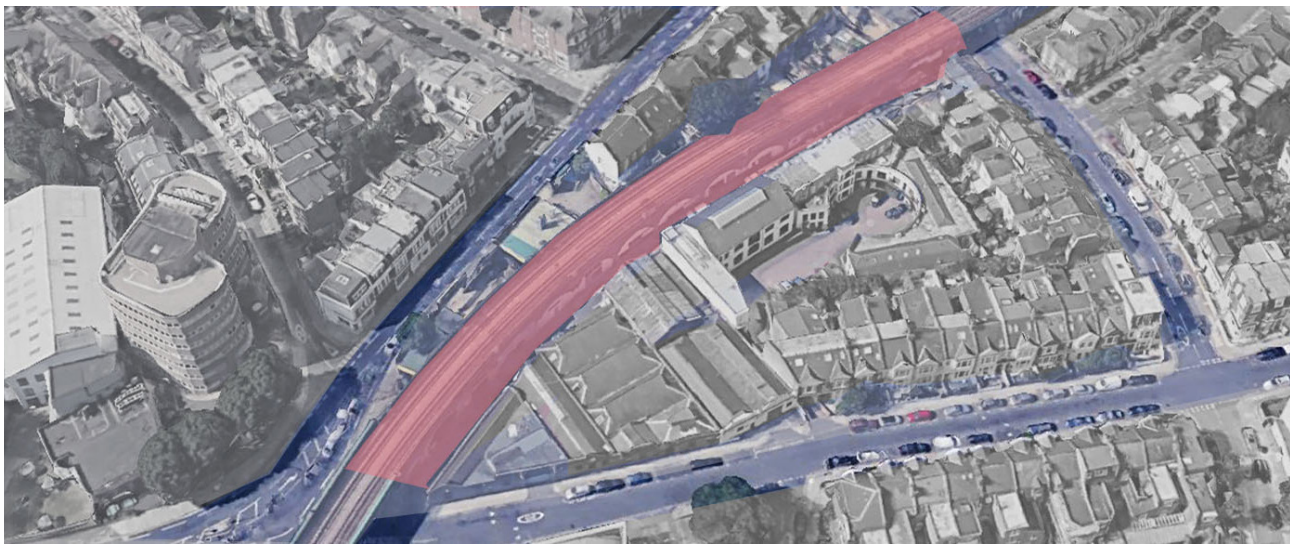


Image 14: Location of arches Hurlingham Road to Grimston Road, comprising arches 405-417 New King's Road, arch 19 Grimston

4.45. These are a group of 16 arches which have a high occupancy rate, with only one arch obviously vacant at the time of the survey. This property was granted planning permission in June 2020 for the use of the land in front to redevelop as a single-family dwelling. The arches are mainly used in connection with car repair and servicing including a car wash. The majority of arches in the rear alley are used in connection with the businesses fronting the New King's Road.



Photo 14: Arches fronting New King's Road

4.46. These arches appear to be long standing and well used, with the businesses fronting the publicly maintained New King's Road, making the most of being located on this busy road. There are residential properties next to and opposite the premises on the New King's Road frontage. The rear of these arches is flanked by the commercial Melbray Mews/ House and therefore may be less sensitive to residential amenity policies. The arches are within walking distance of Fulham High Street Neighbourhood Parade in the Local Shopping Centre and new uses, if possible, should complement and not compete with nearby town centre uses in accordance with Local Plan Policy TLC1.

4.47. The arches to the rear are not visible from any street view but are in the Fulham Park Gardens Conservation Area. Therefore, any new development and signage to those premises fronting New King's Road will require a high standard of design.



Photo 15: Arches fronting the rear of the premises on the New King's Road

Grimston Road, New King's Road and Munster Road

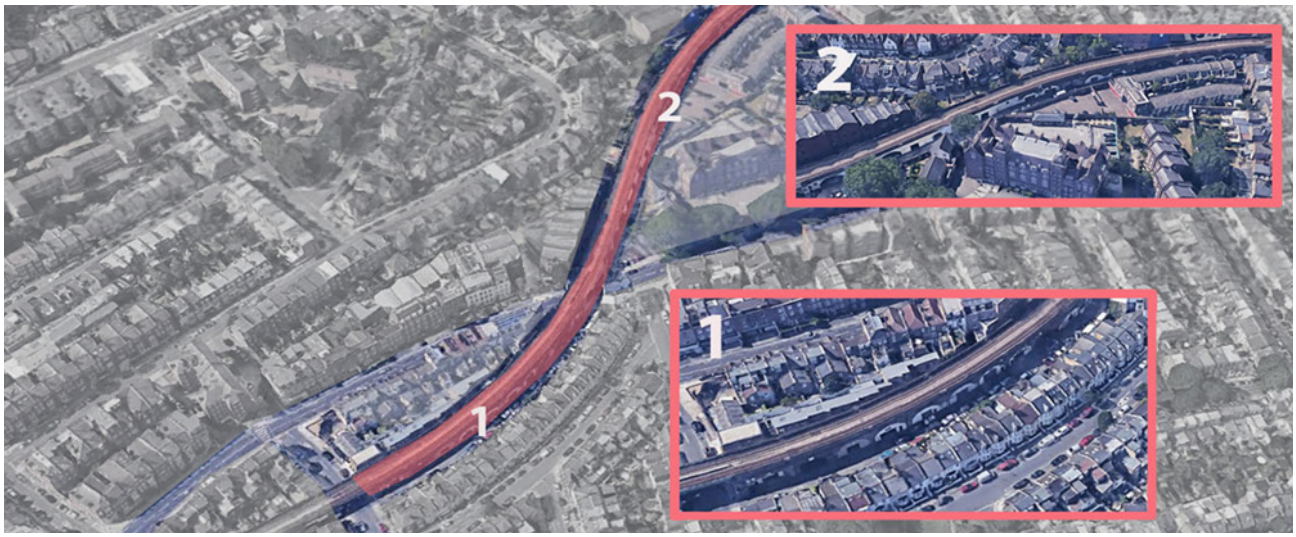


Image 15: 1) Location of arches 30-39 Grimston Road; 2) Location of arches 120 New King's Road, 9-21 and 44 Munster Road

4.48. The Grimston Road, New King's Road and Munster Road arches consist of two groups separated by the New King's Road. There are a total of 27 arches, with a very low vacancy rate of 7%. The arches between Grimston Road and New King's Road are mainly occupied by car repair and services businesses. The arches in the stretch New King's Road to Munster Road have more diverse uses and although car repair and services businesses also predominate there is more variety with arches occupied by a welder, joiner and art studio.

4.49. These arches are predominantly surrounded by residential premises and therefore it is important that new uses do not cause undue detriment to the general amenities enjoyed by these existing surrounding occupiers. The arches between New King's Road and Munster Road, especially near the junction have attracted more recent uses such as a pop-up vintage clothes shop. Although, as they are within walking distance of Fulham Road Key Local Centre and the shops on New King's Road which are part of Fulham High Street Neighbourhood Parade, new retail and other town centre uses should, where possible, be directed to these areas.



Photo 16: Arches to the West of the track

Parsons Green



Image 16: Location of arches 1-4 and Parsons Green Commercial Estate/ Depot, 33-39 Parsons Green

4.50. The Parsons Green arches are located opposite Parsons Green Underground Station on Parsons Green Lane. To the South of the tracks are arches 1-4. These are currently in use as a coffee shop/cafe. On the North side of the tracks is Parsons Green Commercial Estate/Depot, at 33-39 Parsons Green Lane. The area has both pedestrian and vehicle access from Parsons Green Lane. There are mews properties opposite the arches and structures also containing creative/ making use.



Photo 18: Parsons Green Estate/ Depot

4.51. These units are part of a successful business park, managed by TfL which provides for a range of businesses. The Parsons Green Commercial Estate/Depot is close to both the Fulham Road Key Local Centre and to the Parsons Green Neighbourhood Parade.

D. Imperial Wharf



Image 17: Location of arches in Imperial Wharf

4.52. The Imperial Wharf arches are located under the Overground and National Rail (Southern) tracks and comprise unnumbered occupied premises by office and refuse storage business, which appear to be ancillary to the surrounding premises. These are managed by the Arch Company and located between the river and Imperial Wharf Station.



Photo 19: Arches used as refuse storage (left) and office (right)

4.53. There is an open arch which provides pedestrian access next to the river on the Tames Path. Closer to Imperial Wharf Station, Townmead Road runs under the tracks within an arched structure.

4.54. These arches are inside the South Fulham Riverside Regeneration Area and therefore applications will be subject to Local Plan Strategic Policy SFRRA of the



Photo 20: Pedestrian open arch and occupied arches to the South of the track

Local Pan, including the aim to encourage appropriate small scale retail, restaurants and cafes and leisure uses which support day to day needs to provide activity adjacent to the river. In addition, this policy recognises the need for more employment uses in this area in locations close to public transport.

4.55. Unlike some other parts of the Regeneration Area, the immediate area is already well developed with new mixed-use buildings including residential accommodation.

4.56. SFRRA seeks a high-quality urban environment and the arches are inside the Sands End Conservation Area and adjacent to a Listed Building (Battersea Railway Bridge), therefore new structures

or signage will be expected to be of high-quality.

4.57. Townmead Road is publicly maintained highway. However, access to the area in front of the arches appears to be limited to authorised vehicles.

5. KEY PRINCIPLES

Key Principle AR1

- Seek the retention of existing employment uses where they are considered to still be viable in accordance with the Local Plan.
- Ensure that new uses cause no undue detriment to the general amenities enjoyed by existing surrounding occupiers, particularly where commercial and service activities will be close to residential properties.
- Ensure that traffic generated by new development is minimised so that it does not add parking pressures on local streets or congestion, that adequate servicing can be provided and sustainable methods of transportation considered.
- Direct retail and leisure use into the Town and Local Centres in the first instance, unless a sequential test and/or impact test justify its location.
- New shopfronts and signage should aim to retain the character of the arch overall. New or altered frontages should be recessed and of a lightweight, glazed style to maintain the expression of the arch and to activate the frontage.
- AC units, flues and M+E plant should be designed to be concealed within the internal environment of the arch, with external ventilation grills sensitively designed to avoid visual dominance of these features.
- Opportunity for community and educational uses and temporary/pop up uses where appropriate in accordance with the Local Plan.
- Opening hours for food and drink uses will need to accord with the Local Plan and licensing policies for the relevant area.
- Ensure that new development complements and, where appropriate, improves the public realm, encouraging new open space and permeability.
- Encourage and promote thermal energy efficiency measures, heat recovery ventilation, electric heating, and green infrastructure in development proposals for arches, where appropriate.
- Any new development (including change of use) involving the railway arches should be accessible and inclusive in terms of design.

In addition to the above, the arches in the regeneration areas will be subject to the following:

Key Principle AR2 - White City East

- Provide opportunity for creative uses, building on the historic use and legacy of the BBC Centre.

- Potential to improve the public realm in front of the BBC Arches on Wood Lane and encourage new open space and permeability.
- Promote a range of commercial facilities including small-scale retail and other town centre uses including indoor leisure use, subject to sequential and impact testing where appropriate.

Key Principle AR3 - Shepherd's Bush Market Arches

- Promote the retention and improvement of the market and provide a more vibrant mix of town centre uses.
- Work with market traders so they can continue to trade and remain part of the market.

Key Principle AR4 - South Fulham Riverside (Imperial Wharf) Arches

- Encourage appropriate small-scale retail, restaurants and cafes and leisure uses which support day to day needs to provide activity adjacent to the river.
- Encourage employment-based uses to meet local business needs and that are compatible with residential development.

Key Principle AR5 - Albion Mews - Hammersmith Regeneration Area

- New developments and changes of use will need to complement and build on the centre's major locational advantages for office and retail development.

Relevant Local Plan Polices

Protecting Residential Amenity

5.1. Local Plan Policy CC13 protects residents from potentially 'polluting' uses. Although the council wishes to encourage enterprise this will always be balanced against any adverse effects on the amenities of residents. Therefore, proposed developments involving changes of use must show that there will be no undue detriment to the general amenities enjoyed by the surrounding occupiers. This could result from fumes, light, smell or noise. It may be possible in some instances to require mitigation measures, for example using planning conditions to mitigate these impacts.

5.2. Local Plan Policy CC11 specifically deals with noise nuisance stating that noise generating development will not be permitted, if it would be liable to materially increase the noise experience by the occupiers/users of existing or proposed noise sensitive uses in the vicinity. Pubs/clubs and other entertainment venues (where they are open late at night), pavement cafes/outdoor seating and noisy building services plan and equipment can result in unacceptable noise nuisance. Where necessary, the council will expect applicants to carry out noise assessments and provide details of noise levels on site. Further details can be found in the Planning Guidance Supplementary Planning Document – Section 10 Noise and Nuisance.

Land Use

5.3. There are several strands to land use considerations and amenity and highways policies can also impact on the type of new use that is likely to be acceptable.

Looking first at the loss of existing employment use. Many of the existing arches are in some type of Class E use. Local Plan Policy E2 protects existing employment uses and requires agents to submit evidence to demonstrate that over a period of 12 months the premises have been continuously and properly marketed for employment use without any take-up.

5.4. The railway arches can provide accommodation for small business and are relatively low cost. Local Plan Policy E1 Shapeseeks to provide a range of employment uses including flexible and affordable space suitable for small and medium sized enterprises. The arches are of a size which may be suitable for small and medium sized businesses.

5.5. Local Plan Policy TLC1 - Hierarchy of Town and Local Centres seeks to enhance the vitality and viability of the borough's three town centres, five key local centres, 15 neighbourhood parades and six satellite parades. Therefore, retail should be considered in these areas first along with associated supporting uses such as health and leisure facilities and where appropriate arts, culture and entertainment uses.

Highways and Parking

5.6. New uses in the railway arches will be considered in particular regarding their impact on parking and servicing. Local Plan policies T1, T2, T3 and T4 set out these details in full. The key highways objectives are to improve public transport and accessibility in the borough whilst reducing the adverse impact of road traffic and traffic congestion. This includes supporting cycling and walking, ensuring adequate and safe servicing and delivery can be provided, to ensure that traffic generated by new development is minimised so that it does not add parking pressures on local streets or congestion or worsen air quality. Further details can be found in the Planning Guidance Supplementary Planning Document – Section 18 Transport. These policies are also supported by the council's LIP 3 (Approved February 2019) which sets out the local implementation of the Mayor of London's Transport Strategy.

Design

5.8. Local Plan Section 12 - Design includes general policies DC1, DC2 and DC4 which seek to ensure alterations and extensions are appropriate in terms of scale, form and, massing and materials and are appropriate and subservient to the existing building. In addition, where in a Conservation Area or in a historic park or garden Policy DC8 which seeks to ensure excellence in design. Further details can be found in the Planning Guidance Supplementary Planning Document – Section 4 Conservation Area Guidelines.

Accessible and Inclusive Design

5.9. Policy DC2 ensures that all development should be sited, designed and laid out to offer ease of entry, egress and the use by disabled people and for parents of small children and others with needs for an environment which is accessible and inclusive. Further details can be found in the Planning Guidance Supplementary Planning Document – Section 9 Accessible and Inclusive Design across the borough.

Shopfronts and advertisements

5.10. Where there are associated advertisements then in accordance with Policy DC9 these should also be of a high standard of design and in scale and keeping with the character of the building and location. Where the proposal includes a new shop front then Policy DC 5 will be applied. The design of the shopfront will be informed by the architectural style, character and framework of the existing building. Where possible, there is deign merit in a cohesive scheme for adjacent arches. Further details of what will normally be expected for shopfronts and signage can be found in the Planning Guidance Supplementary Planning Document – Section 7 Shopfront Design across the borough.

APPENDIX 2 - Railway Arches Supplementary Planning Document
Full Equality Impact Analysis

(Note: the Equality Impact Analysis contained herein is referred to as EQIA, and not EIA for the purposes of this report. This is to avoid confusion with Environmental Impact Assessments, which are known as EIA in planning terms.)

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2021 Q4
Name and details of policy, strategy, function, project, activity, or programme	The Railway Arches Supplementary Planning Document provides additional guidance on railway arches drawing on policies contained in the Local Plan 2018. This document provides the first ever comprehensive survey of the railway arches in the Borough of Hammersmith and Fulham, which identifies and analyses railway arches in terms of their uses, character of their surroundings and their contribution to the local economy. This SPD seeks to raise awareness of the arches recognising the value and potential these features could have in improving public realm, permeability and accessibility within the borough. The SPD sets out the development management principles the council will consider when assessing planning applications for proposed development involving railway arches. The SPD, as with all supplementary planning documents, does not introduce new policy but will guide planning applications that will come forward for arches development. As the SPD draws upon the policies in the Local Plan and principles in the Planning Guidance SPD, it should be read in conjunction with these policy documents.
Lead Officer	**Name**: Eleonora Tafuro **Position**: Planning officer, Policy & Spatial Planning Team, Economic Department **Email**: **Eleonora.Tafuro@lbhf.gov.uk** **Telephone No**: 07776672695
Date of completion of final EQIA	November 2021

Section 02	Scoping of Full EIA

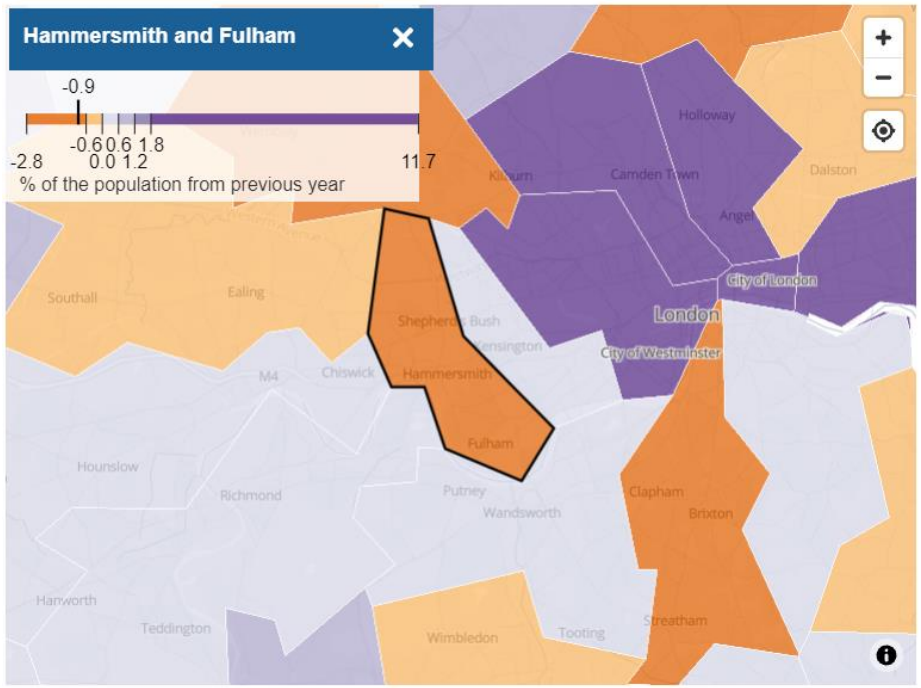
Plan for completion	**Timing:** This Equality Impact Assessment (EQIA) will support the consultation of the SPD and adoption of the document which is due to take place in winter 2021/2022. **Resources**: Officer time **Lead Officer**: David Gawthorpe, Team Leader Development Planning Team
What is the policy, strategy, function, project, activity, or programme looking to achieve?	The purpose of the Railway Arches SPD is to provide additional guidance on railway arches development to developers, planners and other stakeholders. The document sets out key principles that will apply alongside Local Plan policies to planning applications across all railway arches across the borough. However, particular attention has been given to specific key areas such as White City, Shepherds Bush Market and Imperial Wharf where there are opportunities for public realm and accessibility improvements and pedestrian permeability which would help reducing existing barriers in the borough. The document seeks to support existing employment uses and protect residential amenity from potential noise and pollutants generated by commercial activities and services in the arches and potential traffic generated by new development.

Section 03	**Analysis of relevant data and/or undertake research**
Documents and data reviewed	The following documents and data have been used to help inform this Equality Impact Analysis: **Consultation on our Draft Equalities Plan 2021-25** The Council's draft Equality Plan 2021-2025 set out the Council's vision for tackling inequality and responding to the public sector equality duty. The document draws on five objectives: 1. Everyone in our borough must feel valued when the Covid-19 pandemic ends. 2. Removing barriers to inclusion. 3. Ensuring that our services tackle the disproportionate impact on young people of the risks of street crime and exploitation by gangs. 4. Improving opportunities for all. 5. Becoming an employer of choice and fostering greater inclusion **Community Strategy**

	The Hammersmith and Fulham Business Plan 2018-2022 sets a framework of the council's main priorities which are fundamental to the Local Plan and the Draft Equality Plan. The plan combines opportunity, with social responsibility and social justice to assist the vast majority of people in the borough to help themselves while supporting the most vulnerable in the community. This is therefore considered to be consistent with the statutory codes in relation to race, gender, disability, and other equalities characteristics. **Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-2021** Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-2021 sets out an ambitious vision for improving the health and wellbeing of people in the borough and securing a sustainable system for the future. The strategy is for a people-centred health and social care system that supports communities to stay well, consistently providing the high quality care and support the most vulnerable people in the community. This includes tackling health inequalities within our communities, overcoming high levels of child poverty and child obesity and severe mental illness in the country. the strategy is therefore considered to be compliant with the statutory codes in relation to equalities characteristics. **Census 2011** The 2011 Census describes the resident population of the UK and its constituent countries, by age and sex, and provides information on how the population has changed over time. **Greater London Authority (GLA) projections 2018 and 2020** The trend-based projections 2020 is the most recent set of projections released in September 2021 by the Greater London Authority (GLA). **Office for National Statistics (ONS) population estimates 2020** The Office for National Statistics provide the annual population estimates in mid-2019 to mid-2020. These figures inform the Equality Impact Analysis on population changes and growth reflecting the impact of the first wave of coronavirus (COVID-19) pandemic and they cover the period up to 30 June 2020. **Demographics of Equality Target Groups** A summary of the demographic situation in relation to each of the equality groups is given below. This provides a starting point for the analysis of likely impacts of the Railway Arches SPD on these groups.

	Population The Population of Hammersmith and Fulham has risen by 8%% from 169,374in 2001 to 182,455 in 2011 has whilst it has had a slightly increase (0,6%) between 2011 and 2020[1]. It has been estimated that the total population will increase to 190,130[2] people in the year 2022. Currently, the total population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about half of all households having moved in the previous five years. Nearly half of the population (45%) is between the ages of 20 and 40 years old which is significantly higher than in London (32%) and the rest of the country (27%). The borough has a high proportion of single people, the fourth highest proportion (55.9%) in London. Furthermore, 3 in 10 (29%) of all households consist of one person (Source: 2011 Census). According to the 2020 GLA Population projections the borough's population is expected to increase by 20,840[3] people (11.4%) between 2018 and 2043. The projected increase in population between 2021 and 2031 is 7.2%; a similar level as the London average (7.9%). From mid-2019 and 2020 there have been changes in local populations driven by different factors (migration, births and deaths). Despite the effects of the coronavirus (COVID-19) pandemic and a slowing of national population growth in the year to mid-2020, in this period, ONS estimated the population grew in 294 out of the 374[4] local authorities of the UK. A decrease of population has been registered in the borough of Hammersmith and Fulham (negative 0.9%) according to the Office for National Statistics, as shown in figure 1 below. ***Figure 1: Population change and components of change in Hammersmith & Fulham mid-2019 and mid-2020***

[1] Source of data is the UK population estimates mid-2020, Table MYE4 - Population estimates: Summary for the UK, mid-1971 to mid-2020, ONS, 2021
[2] Source of data is the 2018-based household projections for local authorities and higher administrative areas within England (principal projection), Table 426: Projected household population, local authorities and higher administrative areas in England, mid-2001 to mid-2043.
[3] Source of data is the 2018-based household projections for local authorities and higher administrative areas within England (principal projection), Table 426: Projected household population, local authorities and higher administrative areas in England, mid-2001 to mid-2043.
[4] Source of data is Population estimates for the UK, England and Wales, Scotland and Northern Ireland: mid-2020 paragraph 3. Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)



Source: Official National Statistics, Population estimates (2021)[5]

Age

In 2011, the borough had a higher proportion of young adults aged 25-39 (35.7%) than London (28%) and England and Wales (20%). Conversely, the proportion of children and young adults (0-24) in the borough was lower than in London (26.7% compared to 32.2%) and England and Wales (30.7%). 12.7% of the population is aged 60 or over, which is slightly lower than the London (15.2%) and England and Wales (20.3%) averages.

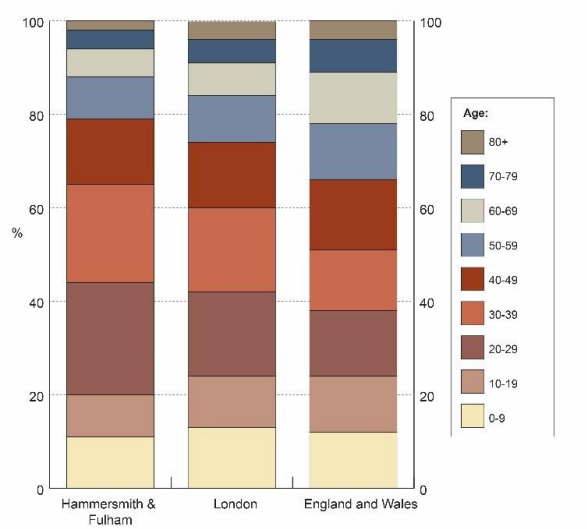
Similar trends have been reported by the GLA 2020 population projections and by the Office of National Statistics (ONS) whereby in 2020 the higher proportion of population in Hammersmith and Fulham was of young adults aged 25-34.

It has been estimated that while there will be growth in the borough's population in all age groups, the main growth will occur for people aged 84 and over. The population in that age group is expected to increase by 1,273 by 2031, equivalent to 42.8%[6]. The population aged 64-83 is expected to grow by 33.9% during the same period and population

[5] Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk) accessed 17/11/2021
[6] GLA 2020-based Demographic Projections, London Borough population projections trend model, 2020 CC central upper

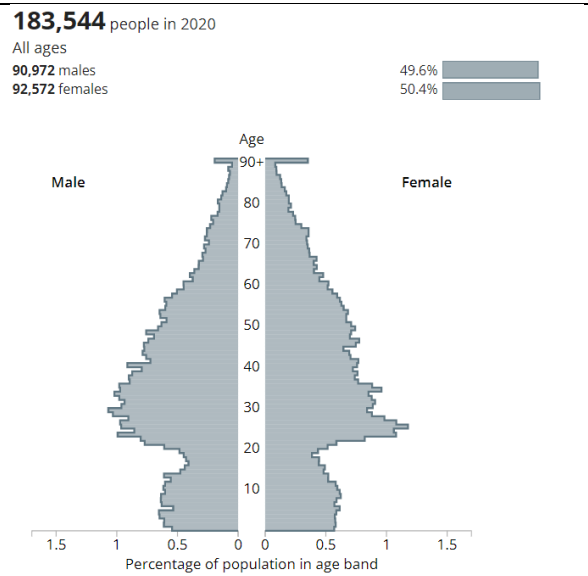
aged 50 to 63 to grow by 13.3%. This trend is reflected similarly in London with 37.7% and 33% of increase respectively for people aged 64-83 and over.

Figure 2: Age structure (% of total population, Census 2011)



Source: Office for National Statistics, Census 2011

Figure 3: Age and Sex structure in Hammersmith and Fulham



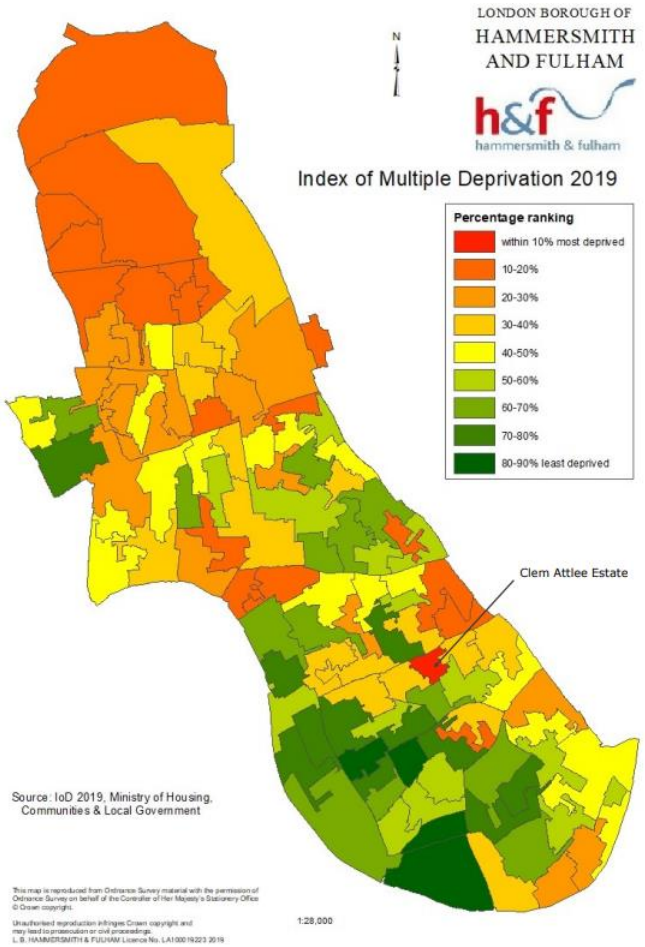
Source: Office for National Statistics, Population age and sex structure, 2020

Deprivation

The borough has high levels of deprivation. According to the 2019 Indices of Deprivation (IoD), Hammersmith and Fulham was ranked 112 out of 317 local authority area in the country (91 in 2015). Of the 113 Lower Super Output Areas (LSOAs) one (0.9%) is in the most deprived 10% nationally (Clem Attlee estate). Most of the areas in the north of the borough are in LSOAs 10-20% worst nationally[7].

Figure 4: Index of Deprivation in Hammersmith and Fulham

[7] Source of data is Deprivation in Hammersmith and Fulham 2019, Hammersmith and Fulham Council, September 2019



Source: Deprivation in Hammersmith and Fulham | LBHF, 2019

Hammersmith and Fulham not only has high levels of deprivation, it is polarised socially and economically. In the context of London this is demonstrated by the fact that the borough has some wards that have the highest and lowest rankings for the levels of income[8]. Palace Riverside appears in the rankings as having the one of the highest income ranks as well as highest Index of multiple deprivation ranks. On the contrary Wormholt and White City has statistically the one of the lowest income ranks and lowest index of multiple deprivation ranks[9]. The above image shows this

[8] https://data.london.gov.uk/download/indices-of-deprivation/5f72f768-7092-45b5-accf-dc004fa670a9/Indices%20of%20Deprivation%202019%20ward%20level%20summary%20measures%20for%20London.pdf, accessed 18/11//2021.
[9] GLA 2019, London Wards Summary Measures Document.

effectively, with the brighter range colours signifying parts of the borough which have high deprivation levels and conversely the brighter green areas showing low levels of deprivation. In the last census (2011) 41.6% of the households have classified themselves as “managers or professionals”, while more than a quarter said they were entirely dependent on benefit.

Some 23.9% of households in Hammersmith and Fulham depend on less than £20,000 per annual compared to 27% of London and 34.9% for Great Britain. Just under 40% of borough households have a household’s income between £50k and £80K per year. 16.2% of households have an income greater than £80k per annum; this is equivalent to nearly 13,000 households.

Until the 1970s, social housing and council estates tended to be occupied by households with a greater mix of incomes than is now the case. The mix under social housing tenants has come to include proportionally more people on lower incomes, some experiencing multiple deprivation. Approximately 53% of households living in social housing in Hammersmith and Fulham are currently workless and dependent on benefits and they make up the largest single group within the estimated 13,150 (2011 Census) workless households in the borough. Nearly 2,000 lone parents are dependent on out-of-work benefits and a further 2,800 are claiming Working Tax Credit and/ or Child Tax Credit benefits.

Deprivation and low household incomes also impact on health inequalities and result in high levels of child poverty. About 20% of people are in poverty in Hammersmith and Fulham compared to 32% of children in poverty. Childhood poverty in Hammersmith and Fulham does not follow the general north-south divide but is more scattered geographically across the borough. Further details of health, wellbeing and social care needs of the borough can be found in the Joint Strategic Needs Assessment 2016-2021 carried out by the Council and the NHS Hammersmith and Fulham Clinical Commissioning Group.

Disability

In 2011, 12.6% of the borough population reported long term health problem or disability that limited the day-to-day activities. This figure was lower compared to London (14.1%) and England & Wales (17.9%). In the north of the borough the percentage of residents suffering from disabilities is higher. The wards with highest rates were in College Park and Old Oak, Wormholt and White City, Shepherd’s Bush Green, Hammersmith Broadway and Askew.

We recognise that people with disabilities and those that support them may be represented in one or more of the other equality groups. The other related group that is usually referenced is age, in particular, we recognise that people with disabilities who can experience difficulty accessing services and accessing the built environment are often children and young people, older people, and those who may provide care for older and younger disabled people. As disability covers a broad spectrum, we also recognise that adaptations for people with mobility impairments may not make the

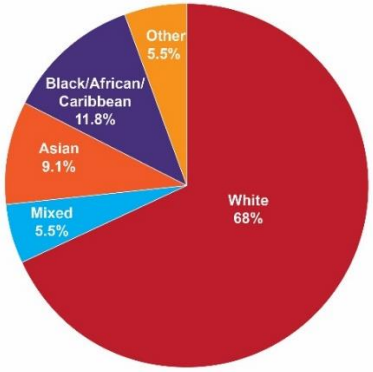
built environment accessible for people with sensory impairments, and that people with mental health or long-term limiting illnesses may have different requirements from their environment. It is for these reasons that we actively engaged with the Hammersmith and Fulham Disability Forum, the local user group representing disabled people.

Race

According to the Census 2011, 31.9% of the borough's population in 2011 belonged to ethnic groups other than White. The main ethnicity in the borough was White (68 %) followed by Black African/Caribbean origin (11.8%), Mixed (5.5%), Asian (9.1%) and the other (5.5%). In Hammersmith & Fulham, there has been a 45 % increase in the number of residents from Black and Minority ethnic groups between 2001 and 2011.

GLA population projections (2018)[10] indicates that the main ethnicity in LBHF was White (British, Irish and other White) 65.5% followed by BAME 34.5% which included Black, Asian and Minority Ethnic.

Figure 5: Ethnic groups in Hammersmith & Fulham



Source: Office for National Statistics, Census 2011

Ethnicity	Number	%
White - British	71,685	38.9
White - Irish	6,286	3.4
Other White	42,655	23.2
BAME	63,424	34.5
White and Black Caribbean	2,421	1.3
White and Black African	1,649	0.9
White and Asian	3,048	1.7
Other Mixed	3,722	2
Indian	3,305	1.8
Pakistani	1,598	0.9
Bangladeshi	936	0.5
Chinese	3,697	2
Other Asian	8,726	4.7
Black African	10,883	5.9
Black Caribbean	6,736	3.7
Other Black	4,649	2.5
Arab	6,593	3.6
Any other ethnic groups	5,461	3

Source: Greater London Authority[11], 2018

[10] GLA Population Projections (https://data.london.gov.uk/dataset/projections)
[11] Ethnic makeup of Hammersmith and Fulham (2018), London Datastore, Greater London Authority

	Religion The religious profile of the borough is less diverse than in London as a whole. In 2011, 54.1% of residents in the borough were Christians, 10% Muslim and 23.8% stated that they had no religion. This partly reflects the ethnic profile of the borough, with a higher White population who are predominantly Christian and a lower Asian population who have a more diverse religious profile. The policies in the SPD are not aimed specifically at religious groups, but it is noted that members of this population will also be represented through one or more other equality strands and that race and religion are often linked, meaning that benefits will be experienced by this group in more subtle ways. For example, through increased employment opportunities and quality of built environment. **Gender** In 2011, there were more females (51.3%) in the borough than males (48.7%). This was slightly higher that the regional and national average but still there were more females than males. The economic activity rate for females was 70.1 % and for males 78.2%. These figures are higher than the London figures of 66% for females and 77.5% for males (Source: Census 2011). Hammersmith & Fulham has a higher proportion of male residents in employment (85.7%) than the London (77.6%) and national averages (77.6%). The proportion of female residents in employment (66.9.1%) which is a bit less than the London (69.8%) and national averages (71.2%).[12] For commentary regarding transgendered or transitioning people, see 'sexual orientation (and transgender)' below. For the assessment of policies, transgendered or transitioning people are represented in the gender category (see section 05). **Sexual Orientation (and transgender)** The nature of issues facing LGB people can be similar to transgendered or transitioning people as well, hence the council often use the term LGBT (lesbian, gay, bisexual and transgender). Data published by the Office for National Statistics (ONS) revealed that in 2019 4.5% of London's population were LGBT.

[12] Source: ONS annual population survey, Employment Jul 2020-Jun 2021, Nomis

	There are no accurate statistics for the numbers of lesbian, gay and bisexual residents in the borough, the 2011 census recorded that 568 people (or 1.1% of couples), aged 16 and over, were living as same sex couples in Hammersmith and Fulham. In 2011, there were 299 same sex civil partnerships in the borough. This gives us some of the picture but within the parameters of the DTI figures, we note that these local statistics may hide single LGB people, or LGB people who have not entered into civil partnerships. We do not have specific data on transgendered or transitioning people. The policies in the SPD are not aimed specifically at LGBT people but it is noted that members of this population will also be represented through one or more other equality strands, meaning that benefits will be experienced by this group in more subtle ways. For example, through increased employment opportunities and quality of built environment. **Conclusions** The above document aims to set a context for the forth coming SPD with regards to the Councils Public Sector Equalities Duty as set out in s149 of the Equality Act 2010. The study completed here is grounded in a demographic study of the existing total population of the borough, both in the recent past and looks to demographic projections for the next few years. The document is then used to analyse impact of the Policies and strategies being proposed in the SPD on this demographic considering the Act. The document looks at what the implications are and what might be in future and sets out the steps the council will consider ensuring all are treated equally. The implementation of the SPD will be monitored on an ongoing basis as well as potential implications/impacts for/on the protected characteristics.
New research	N/A

Section 04	**Undertake and analyse consultation**
Consultation	The Railway Arches SPD consultation will take place in November 2021. The adoption of the SPD is expected in March 2022. An internal consultation took place between May and June 2021. A public consultation including various working groups, the Hammersmith Bid and amenity groups will take place between November and December 2021 in accordance with the consultation requirements of regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Analysis	**Methodology of the Analysis &Protected characteristics and the Public Sector Equality Duties PSED)** This EQIA analyses the likely impacts of the Supplementary Planning Document principles on statutorily identified protected characteristics (age, disability, gender reassignment, marriage/civil partnership), pregnancy/maternity, race, religion/belief, sex, and sexual orientation), human rights and children's rights. It also assesses the proposed Railway Arches SPD against the Public Sector Equality Duties in s149 of the Equality Act 2010 which states that in the exercise of its functions the council must have due regard to the need to: ▪ eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act; ▪ advance equality of opportunity between people who share a protected characteristic and those who do not; and ▪ foster good relations between people who share a protected characteristic and those who do not. The relevance of the policies to the protected characteristics is categorised as: • High (H) • Medium (M) • Low (L) • Not Applicable (NA) and the magnitude of the impact on the protected characteristics are categorised as: • Positive (+), • Negative (-) • Neutral (blank) The SPD touches upon the following topics (which are covered in more detail in the Local Plan): • Local Economy and Employment (Policy E2 Land and premises for employment use) • Town and Local Centres (TLC1 Hierarchy of town and local centres)

- Community Facilities, Leisure and Recreation (CF1 Supporting community facilities and services and CF2 Enhancement and retention of Community uses)
- Design and Conservation (DC1 Built environment, DC2 Design of new build, DC4 Alterations and extensions, DC5 Shopfronts)
- Environmental Sustainability -residential amenity (CC10 Air Quality, CC11 Noise)
- Transport and Accessibility (T1 Transport, T2 Transport Assessment and Travel Plans, T3 Increasing the opportunities for cycling and walking, T4 Vehicle Parking Standards)
- Regeneration Areas White City – East, White City- Shepherds Bush, South Fulham)

The section below assesses each principle against the protected characteristics as follows and sets out commentary relating to the way in which the Railway Arches SPD is likely to impact upon the protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage/ Civil Partnership
5. Pregnancy/ Maternity
6. Race
7. Religion/Belief
8. Sex
9. Sexual Orientation
10. Human/ Children's Rights Act

Section 05	**Analysis of impact and outcomes**

Analysis

Key Principle	**Age**	**Disability**	**Gender Reassignment**	**Marriage /Civil Partnership**	**Pregnancy/Maternity**	**Race**	**Religion/ Belief**	**Sex**	**Sexual Orientation**	**Human/Children's rights**	**Commentary**
AR1	M+	H+	N/A	N/A	H+	M+	N/A	N/A	N/A	M+	The principle will retain and support existing employment which would help

												decrease the levels of unemployment in the borough and therefore would have positive impact on these characteristics The principle will control noise nuisance generated by traffic and activities within the arches thereby it will provide benefits to the residents of surrounding properties, will particularly benefit pregnant women and women with young children who are more likely to suffer exposure to the adverse impact of noise. The principle will ensure that design is inclusive and accessible to disabled people. High quality design for new structures and signage will improve the aesthetic appearance of the environment as well. The principle will also improve the public realm which it is considered it will benefit residents, including those in priority groups. The principle will enable opportunities for community and educational uses within the arches. This will have relevant positive impacts on people with impairments, young people, mother with children and those with different backgrounds.
	AR2 – White City East	M+	M+	N/A	N/A	M+	N/A	N/A	N/A	N/A	N/A	The principle is of high relevance to and will positively impact on the protected characteristics of age, disability and pregnancy/maternity. The principle will enable opportunities for commercial facilities and small local businesses. This will have generally positive socio-economic impacts for all residents. The improvement of the public realm will have positive impacts on those with protected characteristics such as people with disabilities, mother and children

	AR3 – Shepherds Bush Market	H+	H+	N/A	N/A	N/A	H+	N/A	N/A	N/A	N/A	The principle is of particularly high relevance to the protected characteristics of age, disability and race. The key principle seeks to support and work with existing traders for the retention and improvement of the market which can benefit all people particularly those who have less mobility and existing employment uses as well as creating a vibrant place for younger and older generations. In addition, the market provides a variety and good range of diverse and ethnic foods which would help promoting race equality and inclusion.
	AR4 – South Fulham Riverside (Imperial Wharf)	M+	M+	N/A	N/A	M+	N/A	N/A	N/A	N/A	N/A	The principle will not generally impact on any protected characteristics.
	AR5- Albion Mews- Hammersmith Regeneration Area	M+	M	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	The principle will not generally impact on the protected characteristics. It seeks to direct retail and office uses within the town centre which will strengthen the role of the designated centre and enable opportunities for people of working age.
	<u>Human Rights and Children's Rights</u> The Principles in the SPD will not affect Human Rights as defined by the Human Rights Act 1998. The Principles in the SPD are not likely to affect Children's Rights, as defined by the UNCRC 1992.											

Section 06	Reducing any adverse impacts
Outcome of Analysis	The equalities impact analysis of the proposed SPD has found that in general, there is unlikely to be any potential unlawful discrimination against protected groups associated with the implementation of these policies. However, the council welcomes comments from the public and other stakeholders on the findings of this equalities impact analysis. The analysis has shown that not all protected characteristics will be impacted upon in a similar manner by the implementation of the SPD. The analysis has revealed that, generally, the SPD Key Principles will have a POSITIVE or NEUTRAL impact upon all protected groups and characteristics and will improve the overall quality of life among people in these groups. The protected characteristics of Age, Disability, Pregnancy and Maternity will be positively impacted upon most by the implementation of the SPD. The implementation of the SPD through consideration and determination of planning applications is unlikely to adversely impact upon Human and Children's rights. The council will take the following actions to promote its equalities duties: • it will monitor the implementation of the SPD on an ongoing basis. Potential issues that may adversely impact on the protected characteristics will be reported in the council's Monitoring Reports. The relevant SPD policies may then be amended accordingly, through a statutory review process, to help resolve these issues; • it will undertake public consultation on the SPD and associated documents, including the EQIA. The consultation will provide people with an opportunity to comment on the overall 'soundness' of the SPD policies, namely that they are 'justified', 'effective' and consistent with national and London Plan policy and meet local needs. In addition, people may comment on the EQIA and on the supporting sustainability appraisal; and • it will monitor the development of equalities legislation and associated case law to help ensure that the SPD remains legally compliant. It is not considered the SPD will adversely affect human rights as defined by the Human Rights Act 1998. It is considered that the SPD will have a positive impact on children's rights under the United Nations Convention on the Rights of the Child (UNCRC), including the following: • The right to life, survival and development;

	• Health and welfare rights, including rights for disabled children, the right to health and health care, and social security; and • The right to education, leisure, culture and the arts

Section 07	**Action Plan**
Action Plan	

Issue identified	**Action (s) to be taken**	**When**	**Lead officer**	**Expected outcome**	**Date added to business/service plan**
Ensure that the SPD remains legally compliant with respect to equalities matters	Monitoring emerging equalities related case law and any future legislative amendments.	Ongoing	To be confirmed	The SPD will continue to remain legally compliant with respect to equalities matters.	N/A
Ensuring that the plan making process promotes the Council's commitment to the involvement of people (including those with protected characteristics) in decision making.	Ensuring that adequate consultation is carried throughout the plan making process as well as through the implementation of the plan through the development management and regeneration procedures and practices.	Ongoing	To be confirmed	The Council will not only enable legal compliance, however it will be able to enable social inclusion.	N/A

Section 08	Agreement, publication and monitoring
Chief Officer sign-off	Name: Position: Email: Telephone No:
Key Decision Report	Date of report to Cabinet/Cabinet Member to adopt Railway Arches SPD : February 2022

Section 09	References
	Department for Communities and Local Government (2017), *The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017*, available at < The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 (legislation.gov.uk)> Disabled people's commission Hammersmith and Fulham (2018) *Nothing About Disabled People Without Disabled People Report*, available at https://www.lbhf.gov.uk/councillors-and-democracy/resident-led-commissions/disabled-people-s-commission Doug Pyper, House of Commons (2010), *The Public Sector Equality Duty and Equality Impact Assessments*, available at < http://www.parliament.uk/commons-library> Greater London Authority (2018), *Hammersmith and Fulham Report*, London Area Profiles, London Database, available at < London Borough Overview (windows.net)> GLA (2019), *London Wards Summary Measures Document*, available at < Indices of Deprivation - London Datastore> Hammersmith and Fulham Council (2011), *Core Strategy-Local Development Framework*, Chapter 3 Challenges - Deprivation p.7, available at Core Strategy - Local Development Framework October 2011 (lbhf.gov.uk). Hammersmith & Fulham Council (2016), *Joint Health and Wellbeing Strategy 2016-2021*, available at < Health and Wellbeing Strategy | LBHF> Hammersmith and Fulham Council (2012), *2011 Census Statistics: Hammersmith and Fulham Briefing*, <Key statistics | LBHF> Hammersmith and Fulham Council (2021), *Consultation on our Draft Equalities Plan 2021-25*, available at < http://www.lbhf.gov.uk/equality> Index of Multiple Deprivation (IMD) 2019, available at < Indices of Deprivation 2015 and 2019 (communities.gov.uk)> Milan Ognjenovic, Business Intelligence Team (PSR), Hammersmith and Fulham Council (2018), *Borough Profile 2018,* available at <https://www.lbhf.gov.uk/councillors-and-democracy/about-hammersmith-fulham-council/ward-profiles> Office for National Statistics (2011), *Census 2011*, available at < 2011 Census - Office for National Statistics (ons.gov.uk)> Office for National Statistics (2021), *Population estimates 2020*, available at Population estimates - Office for National Statistics (ons.gov.uk)>

	Office for National Statistics (2021), *Sexual Orientation UK*, available at <Sexual orientation, UK - Office for National Statistics (ons.gov.uk)> UK Parliament (2010), *Equality Act 2010*, available at < untitled (legislation.gov.uk> GLA Data (2019) available at <Indices of Deprivation - London Datastore> GLA Data (2020) available at <Trend-based population projections - London Datastore> ONS Data (2020) available at <Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)>

Appendix 3

London Borough of Hammersmith & Fulham

Schedule of Representations & Officer Responses to the Railway Arches Supplementary Planning Document Consultation

The proposed changes are expressed as ~~strikethrough~~ for deletions and underlining for additions to the text.

NB. Officer comments and amendments have been made against the draft Planning Guidance SPD, therefore please refer to the Supplementary Planning Document when looking at this schedule.

Contents – Representor Order

Andrew Pilkington…….3

Anthony Williams……..3

Natural England…….....4

TfL Commercial…….6

Friends of Ravenscourt Park……..14

Shepherds Bush Market Tenants Association…….15

Ministry of Defence……...19

Historic England ……20

St Peters Residents Association…….…...22

Roger Western……23

Hammersmith and Fulham Disability Forum Planning Group……..…..23

Nadine Grieve……..26

Richard Story……...28

Ravenscourt Action…….30

Yoo Capital……..…….33

Rep No.	Name/Org	Section /para	Comments	Officer response
1	Andrew Pilkington	Trussley Road Arches	Its important to dovetail cycling and walking with affordable units of work: I commute into Hammersmith by cycle. I read your email below with great interest. I bring to attention the Trussley Rd arch route. At Trussley Rd arch I cycle west through it every week, and back. I like the Trussley arch route and so pose this for your consideration: Could adopting arch hc25b entirely as dedicated cycleway with walking be realistic and considered please? This arch is to the south of neighbour current vehicle/cycle/footway arch called or labelled hc25a. If perhaps London Underground could be coaxed into letting go of a small amount of the nw corner of their redbrick train house by way of a small cut out of the corner of it or sliced in under cantilevered roof, then this new diagonally generated area would permit access to and full use of the arch hc25b as a cycle route. Note we all use hc25a currently and no change necessarily suggested on this arch. Incidentally Batoum Gardens losing its two way-ness for cyclists which the Council have recently imposed seems regressive to me, and not cycle useful, if indeed a little dangerous.	Comments noted. The principle of creating safer and more accessible routes is also supported by the council. We will continue to work with TfL to identify locations where such access may be appropriate, but this is not within the remit of the SPD. **No change required.**
2	Anthony Williams	General	Thank you for the invitation to comment on the draft document. I am responding as an individual but have forwarded your invitation to PRARA's planning consultant. On a general level I think the draft document is very clear and the photographs are most helpful. I am confining my comments to my local area, River Thames to Parson's Green where I have some knowledge of most of the arches under review. I agree with all of the statements in the draft document which I think are appropriate for the location of the arches and any future uses for them. I think that affordability is an important element if the arches are to serve their purpose of providing local homes for small and start-up businesses. I would hope that consideration of this could be incorporated in the SPD in some way.	Support Welcomed.

3	Natural England	General	While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues: See reps below.	Comments noted.
4	Natural England	Key Principles - Green Infrastructure	Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this. Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".	Comments noted. Further wording to promote and encourage green infrastructure will be inserted into Key Principle AR1.
5	Natural England	Key Principles - Biodiversity	Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.	Comments noted. Provision for Biodiversity enhancement is already contained in the council's Local Plan and Planning Guidance SPD. It is not considered necessary to duplicate this in the Railway Arches SPD.
6	Natural England	Key Principles - Landscape	Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for	Comments noted.

		Enhancement	the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.	Further wording to promote and encourage green infrastructure will be inserted into Key Principle AR1 as follows: • Encourage and promote thermal energy efficiency measures, heat recovery ventilation, electric heating, and green infrastructure in development proposals for arches, where appropriate.
7	Natural England	Key Principles - Design	Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).	Comments noted. Provision for this is already contained in the council's Local Plan and Planning Guidance SPD. It is not considered necessary to duplicate this in the Railway Arches SPD.
8	Natural England	SEA	Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.	Comments noted. An SEA screening assessment has been prepared - see rep 9.
9	Natural England	SEA Screening Assessment	Screening Request: Strategic Environmental Assessment It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan. Therefore Natural England does not feel a Strategic Environmental Assessment (SEA) is required	Comments Noted. We welcome the feedback on the SEA screening assessment. No SEA will be needed for the SPD.

10	TfL Commercial	General	Thank you for providing the opportunity to comment on the Draft Hammersmith and Fulham Railway Arches Supplementary Planning Document. Please note that our representations below represent the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as the most significant owner of railway arches in the borough. Our colleagues in TfL Spatial Planning may provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. TfL welcome the Council setting out planning guidance on railway arches. The guidance recognises that arch runs are unique and important spaces across the borough that often provide low-cost business space in a range of uses and that arches have the opportunity to further contribute to the local economy and local communities. However, we are concerned that the information regarding arches in TfL ownership is incorrect/out of date. The vacancy rates given in the document are incorrect. We are also concerned that TfL land which includes no arches has been included at Parsons Green Depot. We are willing to work with the borough to provide up to date information where possible and ensure that the draft SPD is accurate.	Comments and support noted. We welcome the invitation to work with TfL to obtain the most up-to-date information on vacancies. The most recent site surveys were undertaken by planning officers in August 2021. There were observational and did not include detailed survey's inside inside the premises. Further words added to Paragraph 1.1, amended text as is follows. The railway arches were originally surveyed in 2019 prior to the pandemic and more recently in August 2021. This was an observational survey and current vacancy rates may be different from those observed. Appendix 1 has been removed – It contained information from an observational survey on the railway arches. However, it is recognised that including information on individual premises at a fixed point in time may quickly become outdated. Paragraphs 4.50 – 4.51 Parsons Green have been adjusted and now only refer to Arches 1-4.
11	TfL Commercial	General	The main objective of the document is to provide guidance on the key principles which will be used to determine applications for new uses and other development in railway arches. However, TfL believe that the document may be prescriptive in its policy approach to new uses coming forward in railway arches. The London Plan encourages railway arches to be used as low-cost business space in a range of uses. Arch runs are arteries of unique spaces	Comments noted. The SPD does not contain policies rather it supplements existing policy in the borough's Local Plan. Where a prescriptive approach to land use is

			suitable for small businesses which usually connect local centres within the borough but the majority of the arches fall outside of these centres. Despite this, a number of the TfL arch runs in the borough are already successful within a range of Class E uses including retail, food and beverage and office. A prescriptive policy approach which seeks to locate and protect only certain types of uses in the arches will limit opportunities for arch runs to be successful. In line with the London Plan, these unique spaces are best utilised by providing a range of low-cost units available for smaller businesses in a range of uses to complement town and local centres. TfL is keen to work with the borough to explore the opportunity to diversify uses in arch runs while protecting successful employment uses and complementing town and local centres. This will support the local economy and ensure existing tenants are able to better recover from the impacts of the pandemic in Hammersmith and Fulham and across London. We suggest that the council should adopt a separate policy regarding railway arches in future Local Plans and that this guidance could enable this future approach. Detailed commentary on the opportunities for improvements to individual arch runs in the borough and on the principles set out in the draft SPD are set out below.	apparent in the SPD this is because the adopted Local Plan policy is prescriptive on such matters. **No change required.**
12	TfL Commercial	Introduction - para 3.6	Paragraph 3.6. identifies that Local Plan Policy TLC1 “seeks to enhance the vitality and viability of the borough’s three town centres, five key local centres, 15 neighbourhood parades and six satellite parades.” It would be useful for further information to be provided about how this policy can be interpreted in the case of uses in railway arch runs which often fall outside town, local, neighbourhood and satellite parades. The London Plan supports the provision of low-cost business space in a range of uses in railway arches across London. Paragraph 6.2.4 states that “Low-cost business space refers to secondary and tertiary space that is available at open market rents, which is of a lower specification than prime space, or found in non-prime locations such as back of-town centre and high street locations, railway arches, heritage buildings in the CAZ, and smaller scale provision in industrial locations. It usually commands rents at or below the market average.” Many of TfL’s arch runs fall outside of the town and local centres defined in the Local Plan. However, across the majority of runs, arches are already operating in a range of uses including retail, food and beverage, office and other uses within class E. For arch runs to be successful in the borough, low cost business space in a range of uses needs to be provided including town centre uses such as retail, food and beverage and office. This range of uses can best contribute to the local economy by meeting the needs of smaller businesses and serve the local	Comments noted. Some Arches fall within town and Local centres and others do not. Clarification on this will be inserted into para 3.6. Regarding E class uses and low cost business space, the council also support such uses where appropriate and where a planning application is required proposed uses will be considered on their merits. In some cases, movement between E class uses will not require a planning application and therefore this SPD will not be relevant.

			community. In line with the London Plan, this guidance can promote low-cost business space in a range of appropriate uses including Class E uses to complement existing centres to ensure an improved local economy.	
13	TfL Commercial	Introduction - para 3.16	Paragraph 3.16. states information about use Class E. While it is welcome that the document recognises that “Changes of use within Class E do not constitute development and therefore do not need planning permission” it would be helpful for the document list all of the uses falling under class E so arch tenants clearly understand which uses they can change from and to without planning permission and which changes of use would require planning permission.	Comments noted. We consider the information on class E to be sufficient. **No change required.**
14	TfL Commercial	2.0 Arch Profiles - White City to Trussley Road	A. White City to Trussley Road It is useful that the document recognises that these arches are “located in close proximity to Shepherd’s Bush Town Centre and within the White City Opportunity Area.” In line with London Plan policy, these arches are suitable for a range of uses to support the Opportunity Area and new developments including town centre uses such as retail and food and beverage but could also be utilised in a range of employment uses such as light industrial, research and technology and education. Many of the arches here form part of existing planning permissions for wider development adjacent to the run and it would be useful if the document could detail the impact of these permissions on the use of the arches, especially those required for permeability.	Comments noted. Where appropriate we will make reference to existing permissions adjacent to these arches.
15	TfL Commercial	2.0 Arch Profiles - Macfarlane Road	It is welcome that the council recognise that the arches are “located on the edge of the White City Regeneration Area” and that they are within walking distance of Shepherds Bush town centre. This arch run already supports independent retail units and there is an opportunity build on these successful businesses to diversify the uses of this arch run and provide further low-cost business space in a range of uses which complement the existing centre (including Class E uses) in line with London Plan guidance	Comments noted. Policy provision for land use is provided within the borough’s Local Plan and in the case of appropriate locations for out of centre retail the NPPF provides Policy provision as well. The SPD is not policy and does not go beyond what is already required.
16	TfL Commercial	2.0 Arch Profiles - Shepherds Bush Market	Shepherds Bush Market - The document is correct to state that Shepherds Bush Market is a is a “vibrant and flourishing environment, providing shopping and some associated cafes for locals and visitors alike.” TfL is keen to protect the retail and food and beverage uses here and will work with the Council to do that. These arches are let by TfL on a long leasehold to a third party.	Comments noted.
17	TfL Commercial	2.0 Arch Profiles - Goldhawk and Trussley Road	Goldhawk and Trussley Road - TfL owns significant land adjacent to these arch runs which may come forward for future redevelopment. In this case the character of the arch runs may change, and new Class E uses may be more appropriate than existing vehicle repair units. In the short to medium term, TfL believes that low-cost business spaces across a range of uses including Class E uses such as retail and light industrial would be suitable in this location.	Comments noted. Policy provision for land use is provided within the borough’s Local Plan and in the case of appropriate locations for out of centre retail the NPPF provides Policy provision as well. The

			There is also an opportunity to explore the rationalisation of these arch runs into storage and logistics uses, to support the wider local economy, given the strong accessibility of the arches.	SPD is not policy and does not go beyond what is already required
18	TfL Commercial	2.0 Arch Profiles - Cambridge Grove	Cambridge Grove - These arches have no accessibility by road and therefore servicing and access challenges limit the types of use that are suitable in this location. The document states that "These arches are not in the Hammersmith Regeneration Area. The vibrancy and proximity to Hammersmith Town Centre and evidence of creative uses indicates that there is demand for premises. Where possible viable existing employment uses will be protected in accordance with Local Plan Policy E2." While these arches are not within the town centre, uses such as retail, employment and educational/creative already exist in the arch run and complement the existing town centre and TfL believes such low cost business uses should not be discouraged by policy. Community led consultation on this arch run can reveal what uses that the local community find most appropriate and TfL can work with the Council and community to provide an appropriate mix of uses in this run into the future.	Comments noted. Policy provision for land use is provided within the borough's Local Plan and in the case of appropriate locations for out of centre retail the NPPF provides Policy provision as well. The SPD is not policy and does not go beyond what is already required
19	TfL Commercial	2.0 Arch Profiles - Glenthorne Road	Glenthorne Road, Glenthorne Mews, Albion Mews, Galena Road and Studland Street These arches are currently in a range of uses including motor repair, light industrial, retail and gyms. Many of the arches here have limited access (including no vehicular access) which impacts on suitable uses. The proximity of these arch runs to Hammersmith Town centre and its location within the Hammersmith Regeneration area means there is a very good opportunity to diversify uses in these arch runs to provide a sustainable run of arches which supports the local economy and complements the town centre. Many of the arches already are in Class E use and therefore can move flexibly between a number of town centre uses. However, there is also an opportunity to expand upon the employment uses in these arches including providing light industrial workspace, studio and educational spaces and potentially affordable workspace. TfL is keen to work with the borough and local community to ascertain which types of uses could come forward in these arch runs to best meet the needs of the local community.	Comments noted. Policy provision for land use is provided within the borough's Local Plan and in the case of appropriate locations for out of centre retail and leisure the NPPF provides Policy provision as well. The SPD is not policy and does not go beyond what is already required
20	TfL Commercial	2.0 Arch Profiles - Dalling Road	Dalling Road and Ravenscourt Road These arches are in a very accessible location adjacent to Ravenscourt Park station and in range of innovative uses including a builder's merchants, a climbing wall and motor repair. This arch run has been successful with many longstanding tenants. The document states "These arches are within close walking distance to Hammersmith Town Centre and new uses should complement and not compete with nearby town centre uses in accordance with Local Plan Policy TLC1." Expanding class E and other	Comments noted. Policy provision for land use is provided within the borough's Local Plan and in the case of appropriate locations for out of centre retail the NPPF provides Policy provision as well. The SPD is not policy and does not go beyond what is already required

			uses in this arch run should not be limited by planning policy. As the present use shows, independent retail and other uses within these arches complements the existing town centre and does not compete with it. Further light industrial and retail uses can also build on the existing success of this arch run. The Local community is very active in this area and will be a key stakeholder in proposals for future changes of use which require planning permission and TfL is keen to work with the Council to optimise the use of these arch runs while protecting residential amenity.	
21	TfL Commercial	2.0 Arch Profiles - Ravenscourt Road and Ravenscourt Park	Ravenscourt Road and Ravenscourt Park This arch run is in a mix of uses with a number arches linked to storage and access to Ravenscourt Park. A number of these arches are let to third parties on a long term lease. TfL would support community related uses coming forward in these arches which could be linked to the park use such as a café and education facility. There is also an opportunity to build on the very successful garden centre by providing further plant nursery uses. TfL are keen to work with the Council and Ravenscourt Park if they have proposals for any of the vacant arches that fall adjacent to the park.	Comments and support welcomed. The SPD also supports community uses in appropriate locations.
22	TfL Commercial	2.0 Arch Profiles - Ravenscourt Park and Goldhawk Road	Ravenscourt Park and Goldhawk Road Access constraints including a single track, one-way road and proximity to adjacent residential properties have resulted in many uses which require vehicular movement being unviable, especially affecting those within the middle of the run. The document rightly points out there is a high level of vacancy in this run. Given that these arches are very well connected by public transport, TfL considers that there could be a number of suitable uses which require minimum servicing and Page 6 of 9 deliveries and therefore can be appropriate despite the narrow access road. This could include workspace for small and medium sized businesses, artist studios, educational uses such as classes. There is also an opportunity to retain the established motor repair uses in this location.	Comments noted. Change of use applications will be considered on their merits, including the need to consider access and adjacent residential amenity. The SPD together with the Local Plan will be used to assess new proposals in such locations.
23	TfL Commercial	2.0 Arch Profiles - Riverside and Ranelagh Gardens	Riverside and Ranelagh Gardens These arches have traditionally been in a mix of uses including Class E office, retail and car rental use but many are now vacant. The document states that “the arches are within walking distance of Fulham High Street Neighbourhood parade, where, if possible, town centre uses are most appropriate directed.” The arch run is suitable for the provision of low-cost business space in a range of uses (including class E uses such as retail and office) which can boost the local economy and complement the existing neighbourhood parade. If in the future, there is large scale development around these arches then uses can be updated to more appropriate uses to serve the community. The arches are located within a conservation area and any new development in the arches will come forward in	Comments noted. Change of use applications will be considered on their merits. Policy provision for land use is provided within the borough’s Local Plan and in the case of appropriate locations for out of centre retail the NPPF provides Policy provision as well. The SPD together with the Local Plan will be used to assess new proposals in such locations.

			line with guidance from the forthcoming TfL arches design guide which will ensure a uniform approach to signage and advertisements.	
24	TfL Commercial	2.0 Arch Profiles - Ranelagh Gardens and Hurlingham Road	Ranelagh Gardens and Hurlingham Road These arches are characterised by a range of uses including retail and motor repair. In the short-term TfL is keen to keep the existing mix of uses and is broadly supportive of what is set out in the document. The document states that “town centre uses are most appropriately directed towards the Fulham High Street Neighbourhood Parade in line with Local plan Policy TLC1.” However, there is an opportunity for these arches to be utilised in range of low-cost business spaces (including in class E uses) to support the local economy and complement the neighbourhood parade. This can include building on the existing successful retail uses here and bringing further food and beverage uses while retaining employment and light industrial uses. TfL are keen to work with the Council to shape future uses in this arch run.	Comments noted. Change of use applications will be considered on their merits. Policy provision for land use is provided within the borough’s Local Plan and in the case of appropriate locations for out of centre retail the NPPF provides Policy provision as well. The SPD together with the Local Plan will be used to assess new proposals in such locations.
25	TfL Commercial	2.0 Arch Profiles - Hurlingham Road and Grimston Road	Hurlingham Road and Grimston Road These arches are in a range of uses including car repair, retail and light industrial. There is much new development happening in this area and there is an opportunity to diversify uses in the arches to provide low-cost business space in a range of uses, including Class E uses, to serve the local community. The arches are partially within and adjacent to the Fulham Park Gardens Conservation Area. Signage and advertisements will be in line with the forthcoming TfL arches design guide and respect the character of the conservation area.	Comments noted. Change of use applications will be considered on their merits. Policy provision for land use is provided within the borough’s Local Pan. The SPD together with the Local Plan will be used to assess new proposals in such locations.
26	TfL Commercial	2.0 Arch Profiles - Grimston Road New King's Road and Munster Road	Grimston Road, New King's Road and Munster Road These arches are currently mainly in car repair use with other light industrial and retail uses also within the run. As the document recognises, there are residential units in close proximity and any new uses would need to respect the amenity of these residents. There is a future opportunity to build on the successful retail and light industrial uses that are already in the arch run to better serve the local community. TfL is keen to work with the borough and local community to improve the arch run and find a mix of suitable uses to support the local economy.	Comments noted. Change of use applications will be considered on their merits. Policy provision for land use is provided within the borough’s Local Pan. The SPD together with the Local Plan will be used to assess new proposals in such locations.
27	TfL Commercial	2.0 Arch Profiles - Parsons Green	Parsons Green There are no arches in the Parsons Green Depot and therefore TfL questions it’s inclusion in the document. A single arch is in use adjacent to the depot as a successful café. This TfL landholdings which form the wider depot site may be suitable for future mixed-use redevelopment in the medium to long term.	Comments noted. Reference to this location has been included for thoroughness, but we will remove reference to the wider depot for clarity. See rep 10 for details.

28	TfL Commercial	Key Principle AR1	Key Principle AR1 TfL supports the idea of key principles for railway arches. However, given London Plan policy which encourages the delivery of low-cost business space in railway arches, recent changes to the Use Classes Order and the need for businesses to recover from the pandemic to aid both the local and wider London economy, principle AR1 is too prescriptive around suitable uses in the arches. Part 1 of the principle states that arches should "seek the retention of existing employment uses where they are considered to still be viable in accordance with the Local Plan." While TfL is keen for arches to retain employment uses where viable, the guidance should be clearer that arch runs are suitable locations to provide low cost business space in a range of uses, including Class E uses in line with London Plan Policy.	Comments noted. Change of use applications will be considered on their merits. The SPD does not contain policies rather it supplements existing policy in the borough's Local Plan. Where a prescriptive approach to land use is apparent in the SPD this is because the adopted Local Plan policy is prescriptive on such matters.
29	TfL Commercial	Key Principle AR1	The second part of the principle AR1 states "Ensure that new uses cause no undue detriment to the general amenities enjoyed by existing surrounding occupiers, particularly where commercial and service activities will be close to residential properties." TfL has a strong track record around working with both boroughs and local communities to protect residential amenity and successfully working through conflicts between existing tenants and the local community. We are keen to continue our good relationships with the Council, tenants and the local community. Class E uses in arches are generally suitable in areas in close proximity to residential units as impacts on residential amenity can be minimised.	Comments noted. Change of use applications will be considered on their merits, including the need to consider access and adjacent residential amenity. The SPD together with the Local Plan will be used to assess new proposals in such locations.
30	TfL Commercial	Key Principle AR1	The fourth part of principle AR1 states "Direct retail and leisure use into the Town and Local Centres in the first instance, unless a sequential test and/or impact test justify its location." TfL believe that this is prescriptive and will prevent low cost business space in a range of class E and other uses being provided in railway arches. For arch runs to have a positive impact on local communities, a mix of uses are required, including a range of Class E uses. TfL is keen to work with the Council and local communities to take a holistic approach to planning for future uses in arch runs. TfL suggest that LB Hammersmith and Fulham should create a separate policy for railway arches through the Local Plan process in the future which will enable greater flexibility for arch runs to come forward in a diverse range of appropriate low cost[1]business spaces in a range of uses to ensure that they are successfully contributing to the local economy and local communities while complementing town and local centres.	Comments noted. Change of use applications will be considered on their merits. Policy provision for land use is provided within the borough's Local Plan and in the case of appropriate locations for out of centre retail the NPPF provides Policy provision as well. The SPD together with the Local Plan will be used to assess new proposals in such locations.
31	TfL Commercial	Key Principle AR1	Part five, six, and nine of principle AR1 deals with the external appearance of railway arches. TfL has a forthcoming arches design guide which will give guidance on shopfronts, signage and plant and ensure that it is of an appropriate design which is contextual and sustainable. The guide will also provide tenants with information on when they need to seek planning	Comments noted. We welcome a design guide for arches but this must take account of or signpost existing design policies in the Local Plan to avoid confusion for tenants.

			permission for external changes to arches and will be informed that they should liaise with borough planning departments over any proposals.	
32	TfL Commercial	Key Principle AR1	Part seven of principle AR1 encourages community, educational and pop up uses in arches where these are in accordance with the local plan. TfL is supportive of these types of uses coming forward in arch runs as part of a mix of uses and is keen to work with the borough to identify opportunities for these types of uses.	Comments and support welcomed.
33	TfL Commercial	Key Principle AR1	Part eight of principle AR1 states that "opening hours for food and drink uses will need to accord with the Local Plan and licensing policies for the relevant area." TfL will work with boroughs and tenants to promote suitable management including opening hours.	Comments and support welcomed.
34	TfL Commercial	Key Principle AR2	Key Principle AR2 - White City East TfL CD broadly supports principle AR2 and agrees that the arches are suitable for a "range of commercial facilities including small-scale retail and other town centre uses including indoor leisure use." These arches are suitable for low-cost business space in a range of uses. The council should work with TfL to identify a range of appropriate uses in the arch runs which are most appropriate to the area	Comments and support welcomed.
35	TfL Commercial	Key Principle AR3	Key Principle AR3 - Shepherd's Bush Market Arches Key Principle AR3 states "Promote the retention and improvement of the market and provide a more vibrant mix of town centre uses" and "Work with market traders so they can continue to trade and remain part of the market." TfL CD is supportive of this principle. TfL has let these arches on a long leasehold.	Comments and support welcomed.
36	TfL Commercial	Key Principle AR5	Key Principle AR5 - Albion Mews - Hammersmith Regeneration Area Key Principle AR5 States "New developments and changes of use will need to complement and build on the centre's major locational advantages for office and retail development." TfL supports this principle and will work with the borough to establish appropriate uses including office and retail in these arches	Comments and support welcomed.
37	Friends of Ravenscourt Park	General	The Friends of Ravenscourt Park welcome the policies developed in this draft document. As the status of the Ravenscourt Road entrance is important, we would like to make the following comments relating to the section of the arches adjacent to Ravenscourt Road and inside Ravenscourt Park:	Comments and support welcomed.

38	Friends of Ravenscourt Park	Para 4.32	P21 para 4.32 … The alleyway access here to the park from Ravenscourt Road is not publicly maintained highway and given this alley is narrow, servicing to these arches may be difficult." The failure to register this alleyway and its entrance gates on Ravenscourt Road as public land was revealed through local objections to the 2018 Sainsbury's planning application. By contrast with the publicly maintained Dalling Road/Ravenscourt Place alleyway (referred to in para 4.29), this is clearly an anomaly and could be an unnoticed omission, possibly dating back to either the LCC or GLC handover. Maintained by the Council for decades, the Ravenscourt Road pathway is one of the two busiest entrances to the park (the other being Goldhawk Road where costly problems have also emerged due to the land's unregistered status). The left-hand wall inside the Ravenscourt entrance is a boundary wall of the park, dating from the building of the railway arches in the 19th century. Regarding access, the previous occupier of these arches was a vehicle repair business, which operated for many years using a street entrance and off-street parking. There has been a pathway into the former estate in this location for at least 400 years (see inter alia the 1754 Plan and Survey). After the estate became a public park, this entrance is shown on the large-scale 1894-96 Ordnance Survey map London Sheet VI. 95. The 1915 Survey of London, volume 6 on Hammersmith, records the eastern entrance to the park as being located on Shaftesbury Road (now Ravenscourt Road) "near Ravenscourt Park station" in chapter XLI, its detailed account of the Ravenscourt manor and park. At that time, the entrance in question had wrought iron gates similar (though smaller) to those now at the Walled Garden.	Comments noted. We will amend the errors in text.
39	Shepherds Bush Market Tenants Association	General	Although the Hammersmith & Fulham Council's planning policy may place focus on the Arches within Shepherd's Bush Market, the SBMTA encourages the Hammersmith & Fulham Council to consider the market and its tenants as a whole considering the tenancies of the Shops, Stalls, and Arches premises rather than just the Arches alone.	Comments noted. The SPD is not Planning Policy. It supplements existing policy in the Local Plan.

40	Shepherds Bush Market Tenants Association	General	If the Hammersmith & Fulham Council's planning policy is being reviewed, then, a long thorough study of Shepherd's Bush Market's history, over latter years, may offer fine examples, and reasoning as to why and how the Council's planning policy must be bettered. 7) The Shepherd's Bush Market businesses have experienced uncertainty and hardship over the past decade and prudent assessment as to why the Council's planning policy permitted such mistakes and oversights may be viewed as essential. Worryingly, the Council draft planning proposals do not extend far enough to provide the sufficient protection and safeguards which are required.	Comments noted. The SPD is not Planning Policy. It supplements existing policy in the Local Plan. It is not possible to safeguard land and premises through a supplementary Planning Document.
41	Shepherds Bush Market Tenants Association	General	Hammersmith & Fulham Council's current draft policy appears not to refer to the findings of the Quarterbridge, GVA Grimley, and Parson Brinkerhoff Reports. It is therefore asked as to why the Hammersmith & Fulham Council has not given regard to these relevant reports. 16) As no significant structural improvements have been implemented to the Viaduct or the Shepherd's Bush Market Arches since these mentioned reports, it may be fair to deduce that the condition of the Viaduct and Arches has only worsened.	Comments noted. The SPD is not intended to be a redevelopment strategy for specific arches. It provides general planning guidance. The structural condition of the viaduct and associated reports is beyond the remit of this SPD.
42	Shepherds Bush Market Tenants Association	General	Hammersmith & Fulham Council's policy could consider protecting the entire area of Shepherd's Bush Market, and subsequently, the existing market businesses by the Council exercising its statutory powers to ensure that the function/use of Shepherd's Bush Market land (and the air-rights above) are appropriated for the specific purpose of affordable market retail businesses.	Comments noted. The SPD is not Planning Policy. It supplements existing policy in the Local Plan. It is not possible to safeguard land through a Supplementary Planning Document.
43	Shepherds Bush Market Tenants Association	General	The concern that redevelopers had wished to build on Shepherd's Bush Market land (and utilise its air-rights) threatening exploitation and compromise of the traditional function of Shepherd's Bush Market's land remains an issue and should be a warning to all. 26) The Hammersmith & Fulham Council's planning policy could and should implement better and more proficient principles than the previous conservative constituency, so to prevent redevelopers from causing repeated uncertainty and interference to the Shepherd's Bush Market businesses.	Comments noted. The SPD is not intended to be a redevelopment strategy for specific arches. It provides general planning guidance.
44	Shepherds Bush Market Tenants Association	General	Shepherd's Bush Market serves a purpose to society and as such, the Hammersmith & Fulham Council's planning policy should recognise and actively protect the market and its social significance.	Comments noted. The SPD is not Planning Policy. It supplements existing policy in the Local Plan. It is not possible to safeguard land through a Supplementary Planning Document.
45	Shepherds Bush Market Tenants Association	General	Any compromise in the function or affordability of Shepherd's Bush Market's land raises the question as to why Hammersmith & Fulham Council's planning policy is not protecting the long-term future of Shepherd's Bush Market. Allowing a percentage of the market land to accommodate a housing or office development threatens Shepherd's Bush Market's size, significance, and ethnically diverse retail market offe	Comments noted. The SPD is not Planning Policy. It supplements existing policy in the Local Plan. It is not possible to safeguard land through a Supplementary Planning Document. The

				SPD does not include proposals for housing or office development.
46	Shepherds Bush Market Tenants Association	General	The Hammersmith & Fulham Council planning policy should provoke the initial question as to whether any housing or office development should be built, whatsoever, on Shepherd's Bush Market land. Such a development compromises the traditional function of the market. The question has been noticeably avoided by the redevelopers of Shepherd's Bush Market and it would be urged for the Hammersmith & Fulham Council's planning policy to take more stringent steps for these fundamental issues to be assessed and addressed with greater accountability	Comments noted. The SPD is not intended to be a redevelopment strategy for specific arches. It provides general planning guidance.
47	Shepherds Bush Market Tenants Association	General	It is concerning that the Hammersmith & Fulham Council's draft planning policy has not referred to this CPO Report, and subsequently, there appears to be little evidence that the planning policy pays sufficient regards to the concerns raised by the Government Inspector Ava Wood Dip Arch MRTPI. 40) The CPO Report raises the concern of the crumbling condition of the Shepherd's Bush Market Arches. The daunting financial burden to ensure the longevity and functionality of the retail Arch premises has escalated due to the long absence of maintenance and capital expenditure. Subsequently, if the tenants of the Arches are held accountable for bearing the substantial costs to repair the water-saturated brickwork of the Arches, then it is feared that this could lead to the unfair breaking of these businesses.	Comments noted. The SPD is not intended to be a redevelopment strategy for specific arches. It provides general planning guidance. The structural condition of the arches and the financial responsibilities are not within the remit of this SPD.
48	Shepherds Bush Market Tenants Association	General	The Hammersmith & Fulham Council draft planning policy worryingly fails to view the tenancy of Shepherd's Bush Market as a whole, but instead attempts to disregard the tenancies within the Market's Stall and Shop premises and refers only to the tenancies relating to the Arches within the Market.	The remit of the SPD is for Railway Arches only not the wider area. The SPD is not Planning Policy.
49	Shepherds Bush Market Tenants Association	Para 1.1	Para 1.1 of the Council's Supplementary Planning Document (SPD) explains that the document is heavily informed by surveys of the railway arches in 2019 (pre-pandemic) and June 2021 (mid-pandemic). However, the nature and methodology for those surveys are not discussed. No details on the time of day, or day of the week are provided, and it is vague as to who conducted the surveys and who is the author.	Comments noted. Further information regarding the Surveys will be provided.
50	Shepherds Bush Market Tenants Association	General	Nowhere within the Council's documentation is there any consideration of the length or nature of tenancies within the Arches. And the separation/disregard of the Market's Stall and Shop premises from that of the Arch premises subsequently fails to summarily the worrying reality of Shepherd's Bush Market. 50) A market might appear to be healthy on the face of it, but if the	Comments noted. The length of tenancies and private arrangements is not within the remit of the SPD.

			majority of tenants are on several short-lets, or even discounted lets, then this would not necessarily be the case. 51) Shepherd Bush Market and the tenancy within the Stalls, Shops, and Arches are all suffering. The situation is not healthy, and the uncertainty is harming the market businesses due to redevelopers wishing to landgrab and build office/housing developments on Shepherd's Bush Market land.	The SPD is not intended to be a redevelopment strategy for the market as a whole. It is guidance for the arches only.
51	Shepherds Bush Market Tenants Association	Para 4.10	Paragraph 4.10 - The Council's supplementary planning document casts an optimistic and glowing image of the tenancy of the Arches within Shepherd's Bush Market. Paragraph 4.10 suggests Shepherd's Bush Market has a "very low vacancy rate, with only two of the arches appearing to be vacant at the time of the survey". The SBMTA refutes the documentation's assertion. The assessment on the Market Arches is incorrect and there are at least 5 market Aches that are untenanted. (Arches 156, Arch 162, Arch 165, Arch 170, and Arch 175 are untenanted). 61) The Council has failed to list Arch 173 for unknown reasons. 62) The SBMTA wishes to ask as to why the Hammersmith & Fulham Council had not asked the SBMTA to provide a schedule? This would be especially logical due to the SBMTA's in-depth historical knowledge of the market and associated events. 63) It should be noted by the Council that in recent months the redeveloper - Yoo Capital Shepherd's Bush Market Ltd. (YC SBML) has sought to relocate some of the tenants occupying market Stall and Shop premises into the Arches. Stalls and Shops have fallen vacant, and, in some cases, the landlord has removed the stalls entirely. Perhaps the reason for this may be to remove the evidence of further tenancy losses.	Comments noted. Information regarding vacancy will be clarified in the introduction of the document. It was an observational survey in 2021 and actual vacancy rates may have changed or differ.
52	Shepherds Bush Market Tenants Association	Para 2.1	Paragraph 2.1 - Paragraph 2.1 explains that the supplementary planning document will provide "an important resource for identifying the arches and understanding their importance to the local economy and the context in which they are situated". With this in mind, one may expect the results of the supplementary planning document to be referenced in any future planning application. It is therefore important that the truth of the matter relating to Shepherd's Bush Market is precise and accurate.	Once adopted, the SPD will be a material consideration in future planning applications.
53	Shepherds Bush Market Tenants Association	Para 2.2	Paragraph 2.2 - It is noted that Paragraph 2.2 correctly states that supplementary planning document does not set Policy, but instead is that of 'guidance'.	Comments noted.
54	Shepherds Bush Market Tenants Association	Para 4.11	Paragraph 4.11 - Para 4.11 helpfully notes that Shepherd's Bush Market is an important and distinct part of the Town Centre's cultural and retail offer. It also notes that any development proposals on the adjacent Policy WCRA3 site should "promote the retention	Support welcomed.

			and improvement of the market an provide a vibrant mix of town centre uses". These are important principles and the SBMTA supports these values.	
55	Shepherds Bush Market Tenants Association	Key Principle AR1	Key Principle AR1 – there is no obvious clause here that seeks to limit the harm on markets from nearby development. The first bullet point talks about retaining existing employment uses, the second looks at potential harm caused by new development on the markets themselves, but nothing explicitly says that the importance of the cultural and retail offer of the markets (to use the 4.11 phraseology) should be protected when considering new development either on the site of existing markets or nearby. The Market businesses require protection, and the Hammersmith & Fulham Council should be doing their utmost to instigate sufficient safeguards to protect the existing market businesses' livelihoods for the long term.	Comments noted. The SPD is not intended to be a redevelopment strategy for specific arches. It provides general planning guidance. The protection of the market from surrounding development is beyond the remit of this SPD.
56	Shepherds Bush Market Tenants Association	Key Principle AR3	Key Principle AR3 – are both desirable objectives, however, the SBMTA wishes to ask as to who will "work with market traders". Is that the Council? And if so, how?	It would be the planning and regeneration departments at the council who would work with market traders in relation to potential development proposals. In addition, the developers themselves have a duty of engagement.
57	Shepherds Bush Market Tenants Association	General	It must be considered that the current stalls in the market are of a certain character and structure and are suited to the efficiency of those businesses. Therefore, stallholders will be comparing the existing qualities of the present stalls to that of YC SBML's proposals. YC SBML's may be holding back on revealing their proposals for as long as possible due to the objections that it may be invoked, and therefore, tactically Yoo Capital may wish to evade these contentious issues for a long as possible. It is the SBMTA's wish that The Hammersmith & Fulham Council ensure through stipulation that the design of the Market stall premises will be of a satisfactory structure, value, suitability, and permanence for the market tenants. The future of Shepherd's Bush Market is not promising and there is a genuine concern that the ambitions of the property developer known as Yoo Capital may severely limit the life of the existing market businesses and subsequently the market itself. Inter alia, the SBMTA wishes to encourage the Hammersmith & Fulham Council to implement robust planning policies to ensure that Shepherd's Bush Market's affordability, tenant retention, and ethnic diversity, are each fastidiously protected.	Comments noted. The SPD is not intended to be a redevelopment strategy for the market as a whole. It provides general planning guidance. The stalls within the market and tenant retention is beyond the remit of this SPD.

58	Shepherds Bush Market Tenants Association	General	Broadly, speaking the Council's documents aims at being helpful, however,some information is considered to be vague. It is viewed to be important that the Council holds equal regard and reference to the whole of Shepherd's Bush Market and all of the market tenants, including those in the Stall and Shop premises. Consideration only for the Arch premises may be viewed as inappropriate and may lead to inaccurate conclusions. 87) There is a disappointing absence of references to past documents and events which are considered to be significant, such as the Court of Appeal Judgement in 2016 - Horada & Ors v Secretary of State for Communities and Local Government & Ors' [2016] EWCA Civ 169, and The CPO Report to the Secretary of State for Communities and Local Government by the Government Inspector Ava Wood Dip Arch MRTPI. 88) The repercussions of the property developer's ambitions may lead to market tenants being unable to maintain their livelihoods, market businesses being abandoned, and Shepherd's Bush Market's ethnically diverse retail offer to wither and disappear within the decade. 89) The draft planning policy documentation portraits a pleasantly optimistic but incorrect view of Shepherd's Bush Market and the Arches located within. It would be favoured if Shepherd's Bush Market were referred to by the Council, in a more vigilant and mindful manner ensuring the reader is warned and made aware of the anguish and truth of the past and current situation. 90) Just as importantly, the draft planning policy documentation lacks the robust convection, provisions, and stipulations to adequately and confidently establish the safeguards which the Shepherd's Bush Market community has pleaded for this Labour constituency to implement. 91) The review on the planning policies now offers an opportunity for this Hammersmith & Fulham Council to bear the moral challenge of protecting this loved London Market	This SPD is not intended to be a redevelopment strategy for the market. It is intentionally vague on such matters because an SPD cannot set policy or protect land from redevelopment. It is intended to provide general guidance on railways arches within the borough. Should development proposals come forward for the market, then existing policy within the London Plan, the Local Plan and the National Planning Policy Framework will all be used to assess development proposals. This SPD and the council's other SPDs will be material considerations and only applicable where relevant.
59	Ministry of Defence	General	The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. This response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments. Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions	Comments noted.

			of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction. Having reviewed the supporting documentation in respect London Borough of Hammersmith and Fulham's Affordable Workspace and Railway Arches Consultation Supplementary Planning Document (SPD) Consultations, the MOD have an area of interest in RAF Northolt. Safeguarding Department Statutory & Offshore Defence Infrastructure Organisation St Georges House DIO Head Office DMS Whittington Lichfield Staffordshire WS14 9PY Tel: 07800 505824 E-mail: DIO-safeguarding-statutory@mod.gov.uk www.mod.uk/DIO 15th December 2021 The authority area of the London Borough of Hammersmith and Fulham encompasses areas within the Statutory Aerodrome Height Safeguarding Zone surrounding the aerodrome. RAF Northolt lies approximately 5.7km North of London Borough of Hammersmith and Fulham local authority area. The Aerodrome Height safeguarding zone serves to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely. In summary, the MOD has no concerns or suggested amendments to the current draft of the London Borough of Hammersmith and Fulham's Affordable Workspace and Railway Arches Supplementary Planning Documents that forms the subject of the current consultation	
60	Historic England	General	Support the production if this SPD which should help ensure the beneficial reuse for heritage structures, create employment opportunities and improve the environment around railway arches.	Support Welcomed
61	Historic England	General - Key Principle AR1	Alterations to facilitate reuse and conversion of the arches should be sympathetic. Interventions such as advert, shop fronts etc should be carefully considered to maximise the opportunities railway arches have for improving the quality and vitality of the local area. This should be recognised in any design codes that might be produced for the arches. We welcome that the SPD recognises the need to place greater emphasis upon design quality in conservation areas	Support Welcomed.

62	Historic England	Key Principle AR1 - Design	It would be helpful if the SPD could specify that good design involves having a good understanding of the surrounding historic environment and using that understanding to inform design decisions, this could be done in Key Principle AR1	Comment Noted Although Key Principle AR1 does not directly address this matter. The area profiles for arches set out the context of the area including if they are in a conservation area and/or visible from the street. Key Principle AR1 sets out design principles for new shopfronts. AC units, flues and M&E plant which are the most common applications for these arches involving design considerations. They key principles are supplemented by Relevant Local Plan Policies including for design in Paragraph 5.8. **No Change Required**
63	Historic England	SEA	Historic England concurs with the council that the production of a Strategic Environmental Assessment is not required for the plan but seek reassurance from the other statutory consultees on this matter	There have been no requests from other statutory consultees to produce an SEA. **No Change Required**
64	Historic England	Regulation 11 of the Environmental Assessment of Plans and Programmes Regulation 2004	Request that a copy is provided to Historic England	Copy sent to Historic England 6 January 2022
65	St. Peter's Residents Association	General	I write on behalf of the St Peter's Residents Association which covers some 350households to the south of King Street near to the District line arches which run from Dalling Road to the Goldhawk Road and beyond. Productive use of these arches makes a significant contribution to the quality of life of our residents and other local businesses.	Comments noted. The SPD seeks to identify the contribution the arches make to the local residential community and other businesses. **No Change Required**

66	St. Peter's Residents Association	General	We are particularly keen to see: Arches used for employment use, especially where this involves manufacturing and engineering Arches used for business which serve, participate in and supports BOTH the local residential and trade community Existing and long term tenants are to be particularly encouraged. This type of use helps to reduce commuting and encourages and supports the local identity, community and utility.	Comments noted. The SPD seeks to identify the contribution the arches make to the local residential community and other businesses. **No Change Required**
67	St. Peter's Residents Association	General	We do have some concerns but these mainly relate to the way that TfL manages its relationships with the tenants which we believe include effective loyalty penalties for long term tenants, the imposition of selective 'tenancy at will' agreements, the lack of an easily accessible dispute resolution process for tenants and TfL. In addition we are aware of instances apparent bullying of some tenants and preferential treatment for others, for example towards consumer businesses vs. trade businesses. This applies beyond the District Line arches in hammersmith and extends into Hounslow and on to Turnham Green station and we suggest you liaise with officers in that authority to help ensure a consistent approach. Although these may not all be planning issues, unless a holistic approach is taken with TfL adopting a compatible stance the aims of the council will be thwarted.	Comment Noted TfL own most of the railway arches in Hammersmith and Fulham, except for the arches in Imperial Wharf, which are located under the Overground and National Rail (Southern) tracks which are managed by the Arch Company. The council has no remit to control the business decisions of TfL. Our economic development department may have an opportunity to work with TfL on individual arch proposal or as a cohesive initiative. The Railway Arches SPD should also be used by TfL when they submit applications requiring planning permission for these arches. **No Change Required.**

68	Roger Weston	General	The borough has the good fortune to have a large number of these structures that can be relatively inexpensive. They make ideal premises for small and start-up businesses particularly for repair, warehousing, gyms and night clubs and any other activities that can be undertaken in spite of the inevitable noise and vibration from the trains above. The draft sets out the relevant policy context, and lists the arches now being used, or available for use, in a comprehensive survey. They are in four areas: Cambridge Grove to Goldhawk Road and White City to Trussley Road, in the north, and Parsons Green and Putney, and Imperial Wharf in the south. Several are in close proximity to residential areas which adds toothier attractiveness but some uses might threaten their desirability. This is a very useful survey which draws attention to the valuable asset the borough has but sets out potential problems and challenges. It should be supported.	Support Welcomed. **No Change Required**
69	Hammersmith and Fulham Disability Forum Planning Group	General/Design	Request a meeting to discuss both SPD's - Railway Arches and Affordable workspace	A meeting has been arranged.
70	Hammersmith and Fulham Disability Forum Planning Group	General/Design	We welcome council's draft Railway Arches SPD. Overall it supports London Plan and LBHF council's policies on inclusive design. It would be helpful for this SPD to mention the council's strategic aim of being the most accessible and inclusive borough in England. This is something to be proud of and it is everyone's responsibility to support Hammersmith and Fulham Council to achieve this across the borough.	Support Welcomed. **No Change Required**

71	Hammersmith and Fulham Disability Forum Planning Group	General/Design	We consider it very useful that this SPD included a review on the status of each railway arch. We wonder if this included evidence of step free access, accessible premises etc. If not, then we recommend access audits be carried out to inform the next SPD.	Most of the arches have step free access, with access at same level as the public highway. If a new application were to be submitted involving new structures to these arches, then these would be assessed against all relevant policies in the Local Plan including DC2 which ensures accessible and inclusive access. **No Change required**
72	Hammersmith and Fulham Disability Forum Planning Group	Key Principle AR1	We are surprised that Key Principle AR1 did not include access and inclusion. We recommend an additional bullet to ensure new development or change of use proposals are inclusive and accessible for disabled employees, disabled entrepreneurs and disabled customers or visitors. This will support para 5.8 on Design, Para 5.9 on Accessible and Inclusive Design and para 5.10 on Shopfront design. It will also support this para in the EQIA Section 5: "The principle will ensure that design is inclusive and accessible to disabled people. High quality design for new structures and signage will improve the aesthetic appearance of the environment as well. The principle will also improve the public realm which itis considered it will benefit residents, including those in priority groups "	Additional bullet point added to Key Principle AR1 • *Any new development (including change of use) involving the railway arches should be accessible and inclusive in terms of design.*
73	Hammersmith and Fulham Disability Forum Planning Group	General/Design	We would also like to suggest that the council finds a way of creating the expectation that developers and tenants who make changes under permitted development regulations ensure that premises are accessible and inclusive.	Comments Noted. However, this matter is outside the remit of the Railway Arches SPD as planning permission is not required for works allowed under permitted development. **No Change Required**

74	Hammersmith and Fulham Disability Forum Planning Group	Paras 5.8 - Design, Para 5.9 Accessible and Inclusive Design, Paragraph 5.10 - Shopfronts and Advertisements	We welcome para 5.8 on Design, Para 5.9 on Accessible and Inclusive Design and para 5.10 on Shopfronts and Advertisements.	Support Welcomed. **No Change Required**
75	Hammersmith and Fulham Disability Forum Planning Group	General/Design	We are not sure who owns the public realm outside Railway Arches, but it might be worth mentioning the council's policy on A-Boards to encourage a clutter free public realm.	Comments Noted. The council has produced a licencing policy (2020) for the licensing of 'A' boards on the highway. This will be considered if such advertising is applied for. The Planning Guidance SPD also notes that that signs should be designed as an integral part of the shopfront and not as a free-standing item. 'A boards' on the pavement outside a shopfront can cause clutter and be particularly hazardous for pedestrians, especially partially sighted and blind persons. However, this is somewhat detailed for inclusion in this document, but will be used in the assessment of individual applications for advertising consent if such were to be submitted. **No Change**
76	Hammersmith and Fulham Disability Forum Planning Group	General/Design	It might be helpful for the council to find a way to remind tenants of their obligations under the Equality Act 2010 to meet the access needs of disabled employees or disabled entrepreneurs.	Comment Noted However, this goes beyond the remit of the SPD as the council does not generally have control over the tenants of the arches. **No Change**

77	Hammersmith and Fulham Disability Forum Planning Group	EQIA	We consider that the EQIA is on the right lines but we are unclear why some railway arches mention inclusion and not other railway arches. We recommend that all railway arches and associated public realm should aim to be inclusive and accessible. The Council's draft Equality Plan 2021-2025 set out the Council's vision for tackling inequality and responding to the public sector equality duty. The document draws on five objectives: Everyone in our borough must feel valued when the Covid-19 pandemic ends. Removing barriers to inclusion. Ensuring that our services tackle the disproportionate impact on young people of the risks of street crime and exploitation by gangs. Improving opportunities for all. Becoming an employer of choice and fostering greater inclusion We consider that the SPD could remind railway arch tenants that they should remove any barriers to inclusion; improve opportunities for all and become employers of choice and fostering greater inclusion. We recommend the council reviews the EQIA to address these issues.	Comments Noted**.** An additional bullet point has been added to Key Principle AR1 seeking accessibility and inclusivity (See Rep 72) The Council's Draft Equalities Plan 2021-25 has informed the EQIA for the Railway Arches but has a wider remit. The request for control over the type of tenant for the railway Arches is beyond the scope of this SPD as planning does not generally have control over this matter.
78	Nadine Grieve	Section B Cambridge Gove to Goldhawk Road, particularly arches around Ravenscourt Park area and Key Principle AR1	I suggest no retail food shops at all. If you remember the controversy over a possible Sainsbury's, I think you'll agree it was nothing but problems. In a very residential area, a brightly lit, long hours food shop selling alcohol would be entirely unsuitable. Noise, light pollution, traffic of deliveries and traffic of shoppers just rule this out as an option. Food shops should be on the high street, to encourage appropriate footfall there.	Comment Noted. Where planning permission is required Key Principle AR1 addresses these matters including ensuring no loss of amenity to local residents or adverse impact from traffic generation and encouraging the location of retail and leisure uses to the Town Centres. **No Change Required**
79	Nadine Grieve	Section B Ravenscourt Road and Ravenscourt Park, Key	Small, daytime-only cafes, like the one in the garden centre, are OK, as long as they are unlicenced. The park is used very much by families and children.	Comment Noted. **No change required**

		Principle AR1		
80	Nadine Grieve	Key Principle AR1	There should be no AC units, flues etc blasting air and fumes either into people's homes nearby, nor into the park. Noise and light pollution should also be kept to a minimum during the day, and prevented at night.	Comments Noted Key Principle AR1 addresses this matter and seeks to ensure that new uses and associated plant cause no undue detriment to the general amenities enjoyed by surrounding occupiers. Although there is no specific key principle on light pollution, Local Plan Policy CC12 on Light Pollution is a detailed policy which provides information on what is required to be submitted. Planning Guidance Supplementary Planning Document Key Principle NN7 on Environmental Pollution includes consideration of light pollution with further guidance on lighting outlined in para's 5.61 to 5.65. **No change required**
81	Nadine Grieve	Relevant Local Plan Policies - Paragraph 5.9	para 5.9 Accessibility. Alleyways to access the arches should be monitored by CCTV and well-lit after dark, to ensure women, girls and vulnerable people feel a bit safer using these alleyways. If they are not public access routes from one street to another, or to a tube station, they should be gated and locked at night, with the people who rent the arches being keyholders.	Comments Noted The council takes safety and violence against women, girls and vulnerable people very seriously. Although the comments go beyond the scope of the SPD it is recognised that it may be possible to negotiate security detailing on individual arches where the applicant is amenable, but this would be difficult to insist on, given the small-scale nature of most of the arch development applied for. The comments can be more relevantly applied to the public realm in the alleyways themselves. The council works in conjunction with the metropolitan police

				and other security organisations in terms of the location of CCTV and this is funded largely by financial contributions though planning S.106 agreements throughout the borough. **No change required**
82	Richard Story	Page 20 Paragraph 4.27 Page 53 Appendix 1	My comments below relate only to the Dalling Road and Ravenscourt Road railway arches (Pages 20 and 53 in the Consultation Draft}. There are several omissions and inaccuracies in this section of the Draft, as follows: PAGE 20 Para 4.27. The entrance to the Climbing Centre is in Ravenscourt Road, not Ravenscourt Place. The door onto Ravenscourt Place is used only as an emergency exit (one of the conditions of the planning consent).	Agreed Paragraph 4.27 second sentence changed as follows: *Existing uses include an indoor climbing centre with the main ~~an~~ entrance in Ravenscourt ~~Place~~ Road.* Appendix 1 has been removed – It contained information from an observational survey on the railway arches. However, including information on individual premises at a fixed point in time may quickly become outdated.
83	Richard Story	Page 20 Paragraph 4.29	Para 4.29. Access to Hitchcock King is not via the pedestrian alleyway between Dalling Road and Ravenscourt Place. Pedestrian and vehicular access is directly from Dalling Road.	Agreed Text changed in Paragraph 4.27 as follows: ..*~~a~~ A longstanding timber and builder's merchants occupies ~~ying~~ a number of arches ~~and~~ alongside a ~~car~~ repair business. Pedestrian and vehicle access to these arches is from Ravenscourt Place.* to clarify this matter Paragraph 4.29 has also been amended as follows: *There ~~arches are accessed at one end via a~~ is a*

				pedestrian alley~~way~~ from Dalling Road, which ~~but the alley then~~ opens…..
84	Richard Story	Page 20 Paragraph 4.29.	Para 4.29. The location is within the Ravenscourt and Starch Green Conservation Area, not the Ravenscourt Park Conservation Area.	Agreed Text changed in the last sentence of Paragraph 4.29 *…given the location in the Ravenscourt Park and Starch Green Conservation Area.*
85	Richard Story	Page 53 – Appendix 1	The 2018 planning consent for the Climbing Centre was granted on appeal with an extensive list of conditions supplemented by a binding Management Plan entered by the business owners. The conditions and the Management Plan are to ensure the Centre does not have an unacceptable impact on neighbouring residents or businesses. Specific areas covered include:*?The permitted opening hours*?No food to be cooked or reheated other than by microwave or hot water*?The sale of food and drinks is to be limited to Climbing Centre customers only*?No alcohol to be sold or consumed in the premises*?All customers are to be fully registered members*?No pre-booked or walk-in groups of more than 4 adults arriving or finishing at the same time.*?No events to be held, no live music and no DJ's*?No music or amplified voices shall be audible at the boundary with any noise sensitive premises e.g. residential, educational.*?The forecourt on Ravenscourt place not to be used for smoking or sitting out with no tables and chairs permitted.*?The main entrance on Ravenscourt Road is always to be open during opening hours to allow customers immediate access rather than congregating on the street.	Appendix 1 has been removed – It contained information from an observational survey on the railway arches. However, including information on individual premises at a fixed point in time may quickly become outdated.

86	Ravenscourt Action	General	Thank you for the opportunity to comment on the draft of this long-awaited SPD. It is a very useful catalogue of the current status of occupation and use and provides a much-needed frame for future development and use, informed by the considered SPD on Affordable Workspace. We find several omissions and inaccuracies in this section of the Draft relating to the Dalling Road and Ravenscourt Road arches (Pages 20, 21 and 53 in the Consultation Draft), as follows:	Comments noted and text changes are set out in detailed below: Page 53 was contained in Appendix 1. However, this has now been removed – It contained information from an observational survey on the railway arches. However, including information on individual premises at a fixed point in time may quickly become outdated.
87	Ravenscourt Action	Page 20 - Title	There is a spelling mistake in the title of the page. Should be “Ravenscourt Road”	Agreed Title to read *Ravens**s**court Road*
88	Ravenscourt Action	Page 20 - Paragraph 4.27	The entrance to the Climbing Centre is in Ravenscourt Road, not Ravenscourt Place. The door onto Ravenscourt Place is used only as an emergency exit (one of the conditions of the planning consent).	Agreed Paragraph 4.27 second sentence changed as follows: *Existing uses include an indoor climbing centre with **the** **main** ~~an~~ entrance in Ravenscourt ~~Place~~ **Road.***
89	Ravenscourt Action	Page 20 - Paragraph 4.29	Para 4.29. Access to Hitchcock and King is not via the pedestrian alleyway between Dalling Road and Ravenscourt Place. Pedestrian and vehicular access is directly from Dalling Road.	Agreed Text changed in Paragraph 4.27 as follows: *..~~a~~ **A** longstanding timber and builder’s merchants occup**ies** ~~ying~~ a number of arches ~~and~~ **alongside a** ~~-~~car repair business. **Pedestrian and vehicle access to these arches is from Ravenscourt Place.*** to clarify this matter Paragraph 4.29 has also been amended as follows: *The**re** ~~arches are accessed at one end via a~~ is **a pedestrian** alley~~way~~ from Dalling Road, **which** ~~but the alley then~~ opens…..*

90	Ravenscourt Action	Page 20 - Paragraph 4.29	The location is within the Ravenscourt and Starch Green Conservation Area, not the Ravenscourt Park Conservation Area.	Agreed Text changed in the last sentence of Paragraph 4.29 *…given the location in the Ravenscourt Park and Starch Green Conservation Area.*
91	Ravenscourt Action	Page 21 - Title	There is a spelling mistake in the title of the page. Should be “Ravenscourt Road”	Agreed Title to read *Ravenscourt Road*
92	Ravenscourt Action	Page 21- Paragraph 4.32	The entrance to Ravenscourt Park, the boundary wall and the alleyway itself are and always have been within the demise of the Park. The alley is indeed publicly maintained. And this was established formally, including by LBHF, in relation to a development application made by Sainsburys in 2018 (2018/01867/FUL).	Agreed. Text changed to clarify ownership. *~~The alleyway access here to the park from Ravenscourt Road is not publicly maintained highway and given this alley is narrow,~~ This entrance, the boundary wall and the alleyway itself are within the demise of the park and publicly maintained. ~~s~~Servicing to these arches may be difficult.*
93	Ravenscourt Action	Page 20 - Paragraph 4.32	The alley is indeed publicly maintained. And this was established formally, including by LBHF, in relation to a development application made by Sainsburys in 2018 (2018/01867/FUL). The application was refused at planning subject to significant concerns from local residents, businesses, schools and associations on the grounds of potential noise, increased activity, visual amenity, detrimental impact on the viability of established local commerce, and transport matters. Sainsburys withdrew its subsequent appeal (APP/H5390/W/18/3218575), particularly for reason that the scheme relied on the assumed use of public land and assets, including the alley and the boundary wall and LBHF was not minded to grant any such permission.	Comments noted. However, such information is too detailed for inclusion in the SPD.

94	Ravenscourt Action		It is entirely untoward, therefore, for this document to suggest that there is any opportunity for a development or use to sequester the alley or modify the boundary wall in order to enable access to the arches. An exclusionary statement to that effect would provide helpful guidance to any potential occupiers.	Comment Noted The SPD includes an audit of the railway arches, description of the surrounding areas and Key Principles, if planning applications were to be submitted for any railway arches anywhere in the borough. Therefore, it is considered that the SPD does not suggest development in this alleyway adjacent to Ravenscourt Road. To include an exclusionary statement regarding any development would go beyond the remit of the SPD. **No Change Required**
95	Ravenscourt Action	Page 53 Appendix 1	The summary is not accurate or complete. The planning application for the Climbing Centre (2017/03835/FUL) was refused at planning subject to significant concerns from local residents on the grounds of potential noise, increased activity and transport matters, but was granted on appeal, subject to an extensive list of conditions and supplemented by a binding Management Plan entered into by the business owners. The agreed conditions and associated Management Plan ensure the Centre's operations do not cause unacceptable adverse impact on residential or business amenities. This in accordance with the Local Plan Policies enumerated in paragraphs 5.1 and 5.3 on page 33 of the SPD	Appendix 1 has been removed – It contained information from an observational survey on the railway arches. However, including information on individual premises at a fixed point in time may quickly become outdated.

96	Yoo Capital	Shepherd's Bush Market Paragraph 4.10 and Appendix 1 Page 42	As the majority owners of Shepherd's Bush Market, we welcome the London Borough of Hammersmith and Fulham's Draft Railway Arches SPD. We are supportive of the policy direction and guidance set out in the Draft SPD and our only comment is that the Market is Managed by Tandem Property Management rather than WMC Retail Partners Enterprises Ltd.	Support noted and the text in Paragraph 4.10 has been amended as follows: *Shepherd's Bush Market is managed by ~~WMC Retail Partners Enterprises Ltd~~Tandem Property Management …*

NOTICE OF CONSIDERATION OF A KEY DECISION

In accordance with paragraph 9 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the Authority hereby gives notice of Key Decisions which the Cabinet, Cabinet Members or Chief Officers intend to consider. The list may change from the date of publication as further items may be entered.

NOTICE OF THE INTENTION TO CONDUCT BUSINESS IN PRIVATE

The Authority also hereby gives notice in accordance with paragraph 5 of the above Regulations that it may meet in private to consider Key Decisions going to a Cabinet meeting which may contain confidential or exempt information.

Reports relating to Cabinet key decisions which may be considered in private are indicated in the list of Cabinet Key Decisions below, with the reasons for the decision being made in private. Any person is able to make representations to the Cabinet if he/she believes the Cabinet decision should instead be made in the public at the Cabinet meeting. If you want to make such representations, please e-mail Katia Neale on katia.neale@lbhf.gov.uk. You will then be sent a response in reply to your representations. Both your representations and the Executive's response will be published on the Council's website at least 5 working days before the Cabinet meeting.

KEY DECISIONS PROPOSED TO BE MADE BY THE AUTHORITY FROM MARCH UNTIL JULY 2022

The following is a list of Key Decisions which the Authority proposes to take from March 2022. The list may change over the next few weeks.

KEY DECISIONS are those which are likely to result in one or more of the following:

- **Any expenditure or savings which are significant (ie. in excess of £300,000) in relation to the Council's budget for the service function to which the decision relates;**
- **Anything affecting communities living or working in an area comprising two or more wards in the borough;**
- **Anything affecting the budget and policy framework set by the Council.**

The Key Decisions List will be updated and published on the Council's website at least on a monthly basis.

NB: Key Decisions will generally be taken by the Executive at the Cabinet, by a Cabinet Member or by a Chief Officer.

If you have any queries on this Key Decisions List, please contact
***Katia Neale** on 07776 672 956 or by e-mail to katia.neale@lbhf.gov.uk*

Access to Key Decision reports and other relevant documents

Key Decision reports and documents relevant to matters to be considered at the Authority by Cabinet only, will be available on the Council's website (www.lbhf.org.uk) a minimum of 5 working days before the Cabinet meeting. Further information, and other relevant documents as they become available, can be obtained from the contact officer shown in column 4 of the list below.

Decisions

All Key Decisions will be subject to a 3-day call-in before they can be implemented, unless called in by Councillors.

Making your Views Heard

You can comment on any of the items in this list by contacting the officer shown in column 4. You can also submit a deputation to the Cabinet related to Cabinet Key Decisions only. Full details of how to do this (and the date by which a deputation must be submitted) will be shown in the Cabinet agenda.

LONDON BOROUGH OF HAMMERSMITH & FULHAM CABINET

Leader:	**Councillor Stephen Cowan**
Deputy Leader:	**Councillor Sue Fennimore**
Cabinet Member for the Environment:	**Councillor Wesley Harcourt**
Cabinet Member for Housing:	**Councillor Lisa Homan**
Cabinet Member for the Economy:	**Councillor Andrew Jones**
Cabinet Member for Health and Adult Social Care:	**Councillor Ben Coleman**
Cabinet Member for Children and Education:	**Councillor Larry Culhane**
Cabinet Member for Finance and Commercial Services:	**Councillor Max Schmid**
Cabinet Member for Public Services Reform:	**Councillor Adam Connell**
Cabinet Member for Strategy:	**Councillor Sharon Holder**

Key Decisions List No. 114 (published 24 February 2022)

KEY DECISIONS LIST – FROM MARCH 2022

The list also includes decisions proposed to be made by future Cabinet meetings

Where column 3 shows a report as EXEMPT, the report for this proposed decision will be considered at the private Cabinet meeting. Anybody may make representations to the Cabinet to the effect that the report should be considered at the open Cabinet meeting (see above).

* All these decisions may be called in by Councillors; If a decision is called in, it will not be capable of implementation until a final decision is made.

Decision to be Made by	**Date of Decision-Making Meeting and Reason**	**Proposed Key Decision** **Most decisions are made in public unless indicated below, with the reasons for the decision being made in private.**	**Lead Executive Councillor(s), Wards Affected, and officer to contact for further information or relevant documents**	**Documents to be submitted to Cabinet *(other relevant documents may be submitted)***
CABINET MEMBER AND OFFICER DECISIONS				
Finance				
Cabinet Member for the Environment	March 2022 Reason: Affects 2 or more wards	**Annual Highways Maintenance Programme** This report seeks approval of the annual highway maintenance work programme for 2020-2021. A key driver for this work is improving the quality of our street scene to give residents and businesses prise in the borough. This work is planned preventative maintenance, aimed at prolonging the life of the Highway infrastructure within the borough. We aim to improve efficiency and provide maximum value for money co-ordinating as far as possible maintenance works with the implementation of LIP projects. We are coordinating footways with the need to plan more trees so use our planned maintenance on footways to increase opportunities for adding tree pits.	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Ian Hawthorn Tel: 020 8753 3058 ian.hawthorn@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for the Environment	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k	**Highways Planned Maintenance Programme 2020-21** Highways Maintenance programme to renew a number of carriageways and footways in the borough as part of the asset management of the boroughs highway network. To ensure safety requirements under the Highways	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Ian Hawthorn Tel: 020 8753 3058	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any

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	and Capital up to 1.5m	Act 1980.	ian.hawthorn@lbhf.gov.uk	supporting documentation and / or background papers to be considered.
Cabinet Member for the Environment	March 2022 Reason: Affects 2 or more wards	**Proposals for the Noise and Nuisance team's revised service hours** Review of the Hours of operation of the borough's Noise & Nuisance service	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Valerie Simpson Tel: 020 8753 3905 Valerie.Simpson@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Housing	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Replacement of Spandrel Panels (Medium and Low Risk Properties)** Replacement of Spandrel Panels at the identified properties covering the stripping out of existing panels and renewing panels including carrying out, as required, all associated works.	Cabinet Member for Housing Ward(s): All Wards Contact officer: Dominic D Souza Dominic.DSouza@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director for the Environment	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k	**Climate and Ecological Emergency – Expansion of Lamp Column Electric Vehicle Charge Points** Having successfully secured £215,175 funding from OLEV for residential lamp column EV charge points, and negotiated the necessary 25% match funding of	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Richard Hearle Richard.Hearle@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any

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	and Capital up to 1.5m	£72,000 from FM Conway, we are seeking permission to expand the network by a further 152 charge points using the existing LBHF term contract with FM Conway and CityEV.		supporting documentation and / or background papers to be considered.
Deputy Leader	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Third Sector Investment Fund** Report to agree forward plan for 3SIF.	Deputy Leader Ward(s): All Wards Contact officer: Katharina Herrmann Katharina.Herrmann@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Director Children's Services	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Climate Education** Activity to promote education, awareness and participation in climate change activities among children and young people	Cabinet Member for Children and Education Ward(s): All Wards Contact officer: Paul Triantis Paul.Triantis@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Health and Adult Social Care	March 2022 Reason: Expenditure/Income - Revenue between £500,000	**Public Health Budget Approval - Primary Care Activity** Budget approval report for public health funded services within primary care from April 2021-March 2024.	Ward(s): All Wards Contact officer: Nicola Ashton Tel: 020 8753 5359 Nicola.Ashton@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any

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	and £5m and Capital between £1.5m and £5m			supporting documentation and / or background papers to be considered.
Chief Executive	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Collaborative Delivery Agreement Variation** This workstream follows the January 2021 Cabinet report on disaggregation from LSCP and Placements. The January report contained a recommendation to delegate authority to the Chief Executive to make variations/extensions to the Collaborative Delivery Agreement from April 21 onwards - this report presents recommendations for both variation and extension.	Ward(s): All Wards Contact officer: Will Parsons Tel: 0776 848 6764 Will.Parsons@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director of the Economy Department	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Modification of construction Contract of 10 genuinely affordable new homes in Spring Vale Estate** Report on the progress of the construction of the 10 new genuinely affordable homes in Spring Vale Estate (which is near completion) and request for approval of Variation of contracts connected to the construction.	Cabinet Member for the Economy Ward(s): Avonmore and Brook Green Contact officer: Matthew Rumble matt.rumble@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director for the Environment	March 2022 Reason: Affects 2 or more wards	**Healthy School Streets- a public health approach to infrastructure on highways and air quality monitoring** This report seeks approval to start a programme of low level infrastructure improvements on the public highway around schools, undertake air quality audits for a	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Ian Hawthorn Tel: 020 8753 3058	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any

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		number of schools who are in areas of poor air quality (of which there are 28), install air quality monitors and deliver an education programme to schools about the projects with a focus on STEMs. This would be the first year of the programme, with further reports for future years to recommend and apply mitigations for all schools on the list. The programme will report back to the Cabinet member and there will be continuous monitoring. This is a joint programme working with colleagues in Public Health and Education.	ian.hawthorn@lbhf.gov.uk	supporting documentation and / or background papers to be considered.
Cabinet Member for the Environment	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Decarbonising Macbeth and Broadway Centres** Public sector decarbonisation grant funding and match funding to implement air source heat pumps and energy efficiency measures at Macbeth and Broadway Centres.	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Hinesh Mehta Hinesh.Mehta@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Chief Housing Officer	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Sale of Land next to 2 Effie Place** Sale of land next to 2 Effie Place for the construction of block of three flats.	Ward(s): Town Contact officer: Ciaran Maguire Tel: 020 8753 4500 Ciaran.Maguire@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Chief Executive	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Mass Testing Personnel Support - Global Production Squad** The current contract with Global Production Squad (GPS) and Sportgate expired on 31st March 2021. Due to the need to continue community testing, as outlined by DHSC, to ensure the Council provides as much safety as possible in line with the governments lockdown easing plan and the economy re-opening all community testing is to be extended until 30th June 2021	Cabinet Member for Health and Adult Social Care Ward(s): All Wards Contact officer: Linda Jackson, Nadia Jazaerli, Joanna Whall Tel: 07776 673085, , Linda.Jackson@lbhf.gov.uk, Nadia.Jazaerli@lbhf.gov.uk, Joanna.Whall@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director for the Environment	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Hammersmith Park - Improvements** This relates to the possible partnership between H&F and a developer to make improvements to the bowling green (and possibly the play area) within Hammersmith Park to an estimated value of £450k. There may be financial contributions from both sides covered by agreed Heads of Terms / conditions. Once the details and principles are agreed a report will be forthcoming to seek approval to proceed.	Ward(s): Shepherds Bush Green Contact officer: Silvera Williams Silvera.Williams@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director for the Environment	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Bishops Park - Improvement Programme** This relates to a range of projects to be delivered in Bishops Park. The projects are to be funded through s106 contributions and rental / revenue income received in relation to the Fulham FC stadium development. The report will outline how the monies received will be allocated to various improvement projects in the park	Ward(s): Palace Riverside Contact officer: Silvera Williams Silvera.Williams@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Strategic Director of the Economy Department	March 2022 Reason: Expenditure/Income over £5m & policies or new income, reserves use, overspend over £300K	**Variation of the Land Sale Agreement - Watermeadow Court** Variation of the terms of the land sale agreement on Watermeadow Court	Cabinet Member for the Economy Ward(s): Sands End Contact officer: Matthew Rumble, Kharon Williams Tel: 07767 78 79 36 matt.rumble@lbhf.gov.uk, kharon.williams@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Housing	April 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Stack Descale Planned Programme** To approve procurement for a 1 year planned programme to deliver soil stack descales across selected housing blocks.	Ward(s): All Wards Contact officer: Emma Lucas Tel: 07827883247 Emma.Lucas@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Resources				
Strategic Director of the Economy Department	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Procurement Strategy - Roof Repair Programme** To repair and replace roofs at 4 locations	Cabinet Member for the Economy Ward(s): College Park and Old Oak; Fulham Reach; Hammersmith Broadway; Town Contact officer: Nilesh Pankhania Nilesh.Pankhania@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be

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				considered.
Cabinet Member for Housing	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Procurement Strategy – Dry to Wet Riser Conversion Works in Six (6) Blocks** To appoint a Contractor to undertake conversion works of Dry Risers to Wet Risers in Six (6) Blocks to enhance fire safety.	Cabinet Member for Housing Ward(s): All Wards Contact officer: Richard Buckley richard.buckley@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Director Children's Services	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Call-off Contract Extensions for Semi-Independent Living Support Providers** Decision report recommending short-term extensions of up to six months from 12 April 2020 to 12 September 2020 to 16 call-off contracts to secure continuation of existing provision of semi-independent living (SIL) accommodation arrangements for Looked After Children and Young People leaving care to enable continuity of these valuable services during the current Covid-19 outbreak.	Cabinet Member for Children and Education Ward(s): All Wards Contact officer: Will Parsons Tel: 0776 848 6764 Will.Parsons@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for the Environment	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and	**Procurement Strategy for Land and Property System** The IDOX Group currently provides the Council's land and property-based IT case management system (Uniform) for multiple regulatory services across the authority. The software is highly embedded within the organisation and underpins a large number of business processes and casework	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Josh Hadley, Davina Barton Tel: 020 8753 1980, Josh.Hadley@lbhf.gov.uk, Davina.Barton@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background

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	£5m	management. Its contract has expired and needs to be reprocured.		papers to be considered.
Director Children's Services	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Approval to agree contract with Family support Service (FSS)** To enable to enter in to a contract with Family Support Service (FSS).	Cabinet Member for Children and Education Ward(s): Contact officer: Lesley Bell Lesley.Bell@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Children and Education	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Contract Extensions on Family Support (FS) Framework** To extend a series of contracts on the Family Support Service (FSS) framework and deliver savings required.	Cabinet Member for Children and Education Ward(s): All Wards Contact officer: Lesley Bell Lesley.Bell@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for the Economy, Cabinet Member for Finance and Commercial Services	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital	**Egyptian House - new housing and community facilities** A property transaction that will result in housing units including affordable housing and community facilities PART OPEN PART PRIVATE Part of this report is exempt from	Cabinet Member for the Economy, Cabinet Member for Finance and Commercial Services Ward(s): Wormholt and White City Contact officer: Nigel Brown Tel: 020 8753 2835 Nigel.Brown@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation

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	up to 1.5m	disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information		and / or background papers to be considered.
Strategic Director of the Economy Department	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Procurement Strategies for White City Central** Approval of two procurement strategies for the White City Central scheme.	Cabinet Member for the Economy Ward(s): Wormholt and White City Contact officer: Ayesha Ovaisi Tel: 020 8753 5584 Ayesha.Ovaisi@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Finance and Commercial Services	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**MFD Reprocurement** The Council has a contract for the provision of multi-functional devices (printers, scanners and copiers) so that its staff can have access to print services in its offices. The contract is due for renewal in 2021.	Cabinet Member for Finance and Commercial Services Ward(s): All Wards Contact officer: Josh Hadley Tel: 020 8753 1980 Josh.Hadley@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for the Economy	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Farm Lane Site - Contract Award for Design Team** This decision is to appoint a Design Team for the redevelopment of 11 Farm Lane. In particular, the decision seeks to appoint a Lead Designer and Architect along with specialist technical sub-consultants to allow for the completion of LBHF Development Gateway 2 (planning) and LBHF Development Gateway 3 (procurement).	Cabinet Member for the Economy Ward(s): Fulham Broadway Contact officer: Labab Lubab Tel: 020 8753 4203 Labab.Lubab@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for the Economy	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Farm Lane Site - Contract Award for Control Team** This decision is to appoint a Control Team for the redevelopment of 11 Farm Lane. In particular, the decision seeks to appoint an Employers Agent and Project Manager along with specialist technical sub-consultants to allow for the completion of LBHF Development Gateway 2 (planning) and LBHF Development Gateway 3 (procurement).	Cabinet Member for the Economy Ward(s): Fulham Broadway Contact officer: Labab Lubab Tel: 020 8753 4203 Labab.Lubab@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for the Economy	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Lillie Road Site - Design Team Award Report** This decision is to appoint a Design Team for the redevelopment of Lillie Road. In particular, the decision seeks to appoint a Lead Designer and Architect along with specialist technical sub-consultants to allow for the completion of LBHF Development Gateway 2 (planning) and LBHF Development Gateway 3 (procurement).	Cabinet Member for the Economy Ward(s): North End Contact officer: Labab Lubab Tel: 020 8753 4203 Labab.Lubab@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for the Economy	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Lillie Road Site - Control Team Award Report** This decision is to appoint a Control Team for the redevelopment of Lillie Road. In particular, the decision seeks to appoint an Employers Agent and Project Manager along with specialist technical sub-consultants to allow for the completion of LBHF Development Gateway 2 (planning) and LBHF Development Gateway 3 (procurement).	Cabinet Member for the Economy Ward(s): North End Contact officer: Labab Lubab Tel: 020 8753 4203 Labab.Lubab@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Health and Adult Social Care	March 2022 Reason: Affects 2 or more wards	**Contract extension for Floating Support Service** Agree a contract extension as permitted under the original contract award for plus 2 years to Hestia for floating support services	Cabinet Member for Health and Adult Social Care Ward(s): All Wards Contact officer: Lisa Henry Tel: 07584522952 Lisa.Henry@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director of Social Care	March 2022 Reason: Affects 2 or more wards	**Day Opportunities Contract awards** Contract awards for three day centres for older people	Cabinet Member for Health and Adult Social Care Ward(s): All Wards Contact officer: Lisa Henry Tel: 07584522952 Lisa.Henry@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Strategic Director of the Economy Department	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Procurement Strategy - Caretakers Lodges** The aim of the scheme is to generate income by redeveloping caretakers lodges into low rental, short term accommodation for teaching staff employed in H&F schools, after which they will have the option of accessing the Council wider affordable housing offer e.g. Shared Ownership or Help to Buy. The discovery work has enabled a business case for investment in repurposing four lodges as affordable key workers houses to house a first cohort of teachers from September 2021. This is expected to deliver the Council immediate revenue benefits of between £63k and £113k from the schemes launch with a breakeven point from 2025/26 considering the upfront capital invested. Works scheduled for 2021 are estimated to cost £555,481 and be paid for from Capital Planned Maintenance Budget. Due to the high pre-tender estimated costs for refurbishment to two of the lodges, a procurement strategy will be drafted for approval. This will account for £407,481 of the total pre tender estimated value. The Corporate Landlord Board, Children's Leadership Team and Cabinet Member have approved the business case for progression of the first four lodges.	Ward(s): All Wards Contact officer: Jonathan Skaife, Hannah parrott Jonathan.Skaife@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for Health and Adult Social Care	March 2022 Reason: Affects 2 or more wards	**Extension of Incumbent Homecare Contracts** This report seeks Cabinet member approval for the extension of the existing homecare contracts for 1year + 6 months + 6months.	Cabinet Member for Health and Adult Social Care Ward(s): All Wards Contact officer: Christine Williams Christine.Williams@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Children and Education	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Procurement Strategy for Young Persons and Care Leaver's Semi-independent Living** The purpose of this strategy is to set out proposed changes to in-borough commissioned supported housing services for young people at risk of becoming homeless and or at risk of entering the care system as a result of becoming homeless.	Cabinet Member for Children and Education Ward(s): Contact officer: Will Parsons Tel: 0776 848 6764 Will.Parsons@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Housing	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Contract Award, Edward Woods external wall safety works** This report seeks approval from the Cabinet Member for Housing to award a contract for the External Wall Safety Works at Edward Woods Estate	Cabinet Member for Housing Ward(s): Shepherds Bush Green Contact officer: Richard Buckley, Vince Conway Tel: 020 8753 1915 richard.buckley@lbhf.gov.uk, Vince.Conway@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for Children and Education	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Semi Independent Living Contract (SIL)** Providing the provision of SIL across Care Leavers and Young Persons at Risk Pathway	Ward(s): All Wards Contact officer: Adie Smith Tel: 07554 222 716 adie.smith@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Health and Adult Social Care	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Direct Award to Incumbent Substance Misuse Service Providers** This report seeks the approval of a direct award of one year plus six months, (1+6m) to the provision of three substance misuse contracts and two grants to be delivered by the four incumbent providers CGL, Turning Point, Outside Edge and Build on Belief	Cabinet Member for Health and Adult Social Care Ward(s): All Wards Contact officer: Rebecca Richardson Tel: 07827879659 rebecca.richardson@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director for the Environment	March 2022 Reason: Affects 2 or more wards	**Refuge Direct Award** Direct award refuge provision - 1st April 2021 - 31st March 2022.	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Felicity Charles Tel: 02087534311 Felicity.Charles@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Strategic Director of Social Care	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Extension of Healthy Hearts Contract** Extension of contract with Thrive Tribe to provide a stop smoking service and a cardio vascular disease prevention programme.	Cabinet Member for Health and Adult Social Care Ward(s): All Wards Contact officer: Lisa Henry Tel: 07584522952 Lisa.Henry@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for the Environment	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Contract Award - Revenue and Benefits** Contract for the supply of software and associated support	Ward(s): All Wards Contact officer: Graham Pottle Tel: 07733 038 882 graham.pottle@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Director Children's Services	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Child and Adolescent Mental Health Services (CAMHS) for 21/22** Exceptional circumstances related to the Covid vaccine roll-out mean that NHS partners are not sufficiently resourced at this time to enter into intended Section 75 arrangements. Therefore, in order to remain within governance requirements, this report seeks approval to directly award contracts for CAMHS services for 2021/22.	Cabinet Member for Children and Education Ward(s): All Wards Contact officer: Craig Holden Tel: 07850 541 477 Craig.Holden@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Strategic Director of the Economy Department	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Procurement Strategy for direct award of a contract for a mult-disciplinary consultant for the major refurbishment of Charecroft Estate W12** The report seeks approval of a procurement strategy proposing a direct award of a contract for multi-disciplinary consultancy services to develop, plan and manage the major refurbishment works at Charecroft estate W12	Ward(s): Addison Contact officer: Vince Conway, Richard Buckley Tel: 020 8753 1915, Vince.Conway@lbhf.gov.uk, richard.buckley@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Children and Education	March 2022 Reason: Expenditure/Income over £5m & policies or new income, reserves use, overspend over £300K	**Award to the Travel Care Taxi Services Framework** Award of providers to the Travel Care Taxi Framework	Cabinet Member for Children and Education Ward(s): All Wards Contact officer: Joe Gunning Tel: 07769672031 Joe.Gunning@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for the Economy	March 2022 Reason: Affects 2 or more wards	**CONTRACT AWARD REPORT: Responsive Capital reserve contract** On 24th March 2021 the Cabinet Member for Housing approved the award of the Responsive Capital contract to Kier Services Limited for five years from 1st May 2021 (with an option to extend for two additional years). Approval is now sought to appoint a reserve contractor to deliver the Responsive Capital contract.	Cabinet Member for the Economy Ward(s): All Wards Contact officer: William Shanks Tel: 020 8753 6007 william.shanks@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Strategic Director of the Economy Department	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**White City Central redevelopment - Contract Award** Mechanical, Electrical and Public Health Engineer (MEP) Consultant to support the White City Central redevelopment project	Cabinet Member for the Economy Ward(s): Wormholt and White City Contact officer: Tarie Chakare, Ayesha Ovaisi Tel: 020 8753 5584 tarie.chakare@lbhf.gov.uk, Ayesha.Ovaisi@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Leader of the Council	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Request for a Re-Purposing of the Stock Condition Capital Budget for the IHMS** The purpose of the report is to request approval for the re-purposing of the Capital Budget for the Stock Condition surveys to meet the cost of implementing the new Integrated Housing Management System for The Economy.	Cabinet Member for Housing Ward(s): All Wards Contact officer: Dorothy Sturzaker Dorothy.Sturzaker@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Children and Education	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Caretaker Lodges- Letting Agency Procurement** To lease the four caretaker lodges in the first phase of the Caretaker Lodge project to a letting agency to manage the tenancies & properties in partnership with H&F- details of allocations of responsibilities to be agreed. This is part of the Caretaker Lodges Project to provide local low rent teacher accommodation to increase teacher retention in LBHF and maintain outstanding education provision in the	Cabinet Member for Children and Education Ward(s): All Wards Contact officer: Lydia Sabatini Lydia.Sabatini@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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		borough.		
Deputy Leader	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Award for Violence Against Women and Girls Services** Award report for VAWG services - Integrated Support Service	Deputy Leader Ward(s): All Wards Contact officer: Felicity Charles Tel: 02087534311 Felicity.Charles@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director of the Economy Department	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Relief contractor for Housing Repairs** Procurement Strategy for procuring a contractor from a framework to address a backlog of disrepair cases, voids and major repairs.	Cabinet Member for the Economy Ward(s): All Wards Contact officer: William Shanks Tel: 020 8753 6007 william.shanks@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Housing	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Procurement Strategy for H&F Maintenance 'DLO' Roofing Subcontractor** This report seeks approval to procure a roofing subcontractor to carry out roofing repairs, on behalf of H&F Maintenance 'the DLO', via a restricted tender process to Small and Medium-sized Enterprises (SME's). This is permitted for high-value contracts under contract standing order 4.8. The DLO has responsibility for	Cabinet Member for Housing Ward(s): All Wards Contact officer: Claire Horn Tel: 07860 649 918 Claire.horn@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background

Decision to be Made by (Cabinet or Council)	Date of Decision-Making Meeting and Reason	Proposed Key Decision Most decisions are made in public unless indicated below, with the reasons for the decision being made in private.	Lead Executive Councillor(s), Wards Affected, and officer to contact for further information or relevant documents	Documents to be submitted to Cabinet *(other relevant documents may be submitted)*
		carrying out repairs to communal areas for the majority of our council housing stock and requires a subcontractor to refer roofing repairs to, due to the specialist nature of these works, in order to fulfil our duties as landlord to keep our buildings safe and in good repair.		papers to be considered.
Cabinet Member for Housing	Before 1 Mar 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Procurement strategy for DLO vehicle supplier** Hammersmith and Fulham Maintenance and the Fire Safety Works team, aka the 'DLO' has been delivering communal repairs and maintenance across the borough since April 2019. It's initial procurement approval for vehicle hire expired in June 2020. However, it has continued to lease vehicles from Northgate Vehicles on a flexi-contract since then. This paper seeks approval to note and ratify that use, and to approve procurement of a new contract going forward	Cabinet Member for Housing Ward(s): All Wards Contact officer: Claire Horn Tel: 07860 649 918 Claire.horn@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Strategy	1 Mar 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Grounds Maintenance Procurement** Grounds maintenance procurement strategy was approved by Cabinet on 1st June 2020. This procurement has 4 Lots: Lot 1 Parks, Highways and Cemeteries, Lot 2 Housing (Economy department), Lot 3 Wormwood Scrubs, Lot 4 Trees. Each lot will need approval to accept the best tendered offer.	Cabinet Member for Strategy Ward(s): All Wards Contact officer: Richard Gill Tel: 07833482119 richard.gill@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for Housing	March 2022 Reason: Affects 2 or more wards	**Variations to (Housing) Gas, Electrical and Out of Hours Call Handling contracts** A report detailing proposed variations to three contracts following Annual Review of contract performance.	Ward(s): All Wards Contact officer: Richard Buckley richard.buckley@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Public Services Reform	March 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Award report for managed service for temporary agency resources** Award report for temporary agency resources.	Cabinet Member for Public Services Reform Ward(s): All Wards Contact officer: Mary Lamont mary.lamont@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Housing	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Contract Award for Roofing Repairs and Maintenance** Contract award for a contractor to deliver roofing repairs and maintenance works across council housing properties.	Ward(s): All Wards Contact officer: Emma Lucas Tel: 07827883247 Emma.Lucas@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for the Economy	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**AWARD OF CONTRACT AND PROCUREMENT STRATEGY FOR THE COUNCIL'S LAND AND PROPERTY-BASED IT SYSTEM** AWARD OF CONTRACT AND PROCUREMENT STRATEGY FOR THE COUNCIL'S LAND AND PROPERTY-BASED IT SYSTEM	Ward(s): All Wards Contact officer: Davina Barton Davina.Barton@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Children and Education	Before 1 Mar 2022 Reason:	**Procurement Strategy to Develop Parenting Assessment Framework** Open tender exercise to regularise contract arrangements and enable best value from independent social work led parenting assessments for Children's Social Care.	Ward(s): All Wards Contact officer: Will Parsons Tel: 0776 848 6764 Will.Parsons@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Finance and Commercial Services	1 Mar 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Merchant Acquirer Services** To approve the procurement strategy for the provision of Merchant Acquirer Services	Ward(s): All Wards Contact officer: Christopher Harris Tel: 020 8753 6440 Harris.Christopher@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Deputy Leader	Before 30 Apr 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Award for Domestic Abuse Refuge Provision** To award provision for domestic abuse safe accommodation services (refuge)	Ward(s): All Wards Contact officer: Beth Morgan Tel: 020 8753 3102 beth.morgan@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Health and Adult Social Care	1 Mar 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Direct award of the contracts for mental health supported living services** Direct awards for five contracts to deliver supported living services for residents with serious mental health issues.	Ward(s): All Wards Contact officer: Michele Roberts Tel: 020 8834 4734 Michele.Roberts@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Children and Education	1 Mar 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Semi Independent Living Contract (SIL) Award** Award report for the procurement of Semi Independent Living service for Young People at Risk and Care Leavers.	Ward(s): All Wards Contact officer: Adie Smith Tel: 07554 222 716 adie.smith@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for Children and Education	8 Mar 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Approval to the financial contributions to CCG-held Speech and Language Therapy contract** This report seeks approval to continue financial contributions to the CCG held Speech and Language Therapy Services (SALT) contract.	Ward(s): All Wards Contact officer: Joe Gunning Tel: 07769672031 Joe.Gunning@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Finance and Commercial Services	Before 31 Mar 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Extension of Call Off contract for the ICT Service Desk** To extend the current ICT Service Desk contract with Agilisys Limited	Ward(s): All Wards Contact officer: Geoff Hay Tel: 0208 753 4223 geoff.hay@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Director of Resources	9 Mar 2022 Reason: Expenditure/Income above £300K - Revenue up to £500k and Capital up to 1.5m	**Digital Services future network and security infrastructure** The purchase of networking hardware to support new services and sites being set up. Equipment is required to establish secure on-site connectivity and futureproof infrastructure.	Ward(s): All Wards Contact officer: Ramanand Ladva Tel: 07493864847 Ramanand.Ladva@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for Children and Education	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**CAMHS Contracts 21/22 & 22/23** Decision to directly award contracts for provision of Children and Adolescent Mental Health Services	Ward(s): All Wards Contact officer: Paul Triantis Paul.Triantis@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Director Children's Services	29 Mar 2022 Reason: Affects 2 or more wards	**Travel Care Minibus Call off Contract Extension** The initial call off period was for five (5) years with the option to extend for a further two (2) years. This paper seeks to enact the extension for the full two-year period to enable continuity of provision and ensure the authority to continues to meet its statutory responsibilities.	Ward(s): All Wards Contact officer: Joe Gunning Tel: 07769672031 Joe.Gunning@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Strategic Director of the Economy Department	March 2022 Reason: Affects 2 or more wards	**Award Report for Green Homes Grant: Local Authority Delivery Scheme Phase 2** This report seeks approval for Warm Works to be appointed as the lead contractor to deliver works to council properties on H&F's behalf.	Ward(s): All Wards Contact officer: William Shanks Tel: 020 8753 6007 william.shanks@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet Member for Children and Education	May 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Coordination of the Holiday Activision and Food Programme offer across the London Borough of Hammersmith and Fulham** Procurement of coordination services for the local delivery of the Holiday Activity and Food Programme in 2022 with possible extensions up to 2024.	Ward(s): All Wards Contact officer: Marcus Robinson Marcus.RobinsonCHS@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for Health and Adult Social Care	Before 23 Mar 2022 Reason: Affects 2 or more wards	**Contract extension of the contract for Learning Disability Flexible Support (LDFS)** That Cabinet member for social care and health approves the contract extension for the learning disability flexible service for two years, this is to align with future commissioning intentions.	Ward(s): All Wards Contact officer: Helen Byrne Helen.Byrne@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet Member for the Environment	March 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Award Report for Refuge services** This report seeks approval to award a contract to deliver refuge services from April 2022 to March 2027. This contract will support women and children experiencing domestic abuse and other forms of violence against women and girls.	Ward(s): All Wards Contact officer: Beth Morgan Tel: 020 8753 3102 beth.morgan@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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CABINET - 7 March 2022				
Cabinet	7 Mar 2022 Reason: Expenditure/Income over £5m & policies or new income, reserves use, overspend over £300K	**CCTV Capital Investment Strategy** Report requesting approval for funding to undertake an upgrade of H&F's CCTV network over four years.	Deputy Leader Ward(s): All Wards Contact officer: Matthew Hooper Tel: 07450 964 681 Matthew.Hooper@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	7 Mar 2022 Reason: Affects 2 or more wards	**Violence Against Women and Girls (VAWG) Strategy** H&F's Violence Against Women and Girls Strategy for approval	Deputy Leader Ward(s): All Wards Contact officer: Beth Morgan Tel: 020 8753 3102 beth.morgan@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	7 Mar 2022 Reason: Expenditure/Income - Revenue between £500,000 and £5m and Capital between £1.5m and £5m	**Hammersmith Bridge – Essential Work Leading to Strengthening and Restoration Project** It is important that progress is maintained for the full re-opening of the Bridge to all motorised traffic (in line with the Strategic Transport aspirations of the Department of Transport, Transport for London and LBHF). In this regard, there are essential works on the concept design and technical ground investigations that need to be	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Bram Kainth Tel: 07917790900 bram.kainth@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be

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		completed during the year whilst the stabilisation works are progressing. This will ensure that the future project to strengthen and restore the Bridge can be undertaken with greater expediency, effectiveness and minimisation of technical risks.		considered.
Cabinet	7 Mar 2022 Reason: Budg/pol framework	**Schools Budget Shares - Dedicated Schools Grant 2022-23** Approval of the mainstream schools budget shares for Hammersmith and Fulham Schools in the financial year 2022/23 (April 2022 to March 2023). Budget proposals were developed in Autumn 2021 in consultation with schools and Schools Forum. The Council approval of the schools budget 2022/23 follows approval by Schools Forum on 18th January 2022 and submission of the Authority Proforma Tool budget sheet to the Department of Education on 21st January 2022.	Cabinet Member for Children and Education Ward(s): All Wards Contact officer: Tony Burton tony.burton@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	7 Mar 2022 Reason: Affects 2 or more wards	**Affordable Workspace Supplementary Planning Document** Planning guidance document to help deliver affordable workspace on development schemes.	Cabinet Member for the Economy Ward(s): All Wards Contact officer: David Gawthorpe David.Gawthorpe@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet	7 Mar 2022 Reason: Affects 2 or more wards	**Railway Arches Supplementary Planning Document** Development guidance document for planning applications associated with Railways Arches.	Cabinet Member for the Economy Ward(s): All Wards Contact officer: David Gawthorpe David.Gawthorpe@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	7 Mar 2022 Reason: Affects 2 or more wards	**Adopting the WLA low-carbon procurement policy** This paper seeks approval from Cabinet to adopt the West London Alliance (WLA) low carbon procurement policy. This has been developed collaboratively between eight boroughs, and is intended to present a unified, high-level expectation of suppliers for council contracts on tackling the climate emergency across the subregion. An accompanying low-carbon charter ('the charter') with suppliers has been developed for inclusion in all new tenders, and for circulation to existing suppliers to encourage them to sign up to the same principles. A low-carbon procurement toolkit ('the toolkit') has also been developed to support commissioning and procurement officers to adopt climate considerations into all procurement.	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Jim Cunningham Tel: 07468 365829 Jim.Cunningham@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet	7 Mar 2022 Reason: Affects 2 or more wards	**Flood Risk Mitigation Programme** Flood mitigation is a difficult task often with assets that contribute to flooding sitting outside of the Council's control. This report outlines what the Council can deploy across its streets and working with the public in the next 2 to 3 years to reduce the impact of flooding in the borough.	Ward(s): All Wards Contact officer: Ian Hawthorn Tel: 020 8753 3058 ian.hawthorn@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
CABINET - 19 April 2021				
Cabinet	19 Apr 2022 Reason: Affects 2 or more wards	**2021/22 Corporate Revenue Monitor - Month 9 (December 2021)** Update of 2021-22 financial forecast	Cabinet Member for Finance and Commercial Services Ward(s): All Wards Contact officer: Gary Ironmonger Tel: 020 8753 2109 Gary.Ironmonger@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
CABINET - 6 June 2022				
Cabinet	6 Jun 2022 Reason: Affects 2 or more wards	**Fixed Penalty Notices to be issued by LET team** Update to several of the existing amounts	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Mohammed Basith Mohammed.Basith@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation

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				and / or background papers to be considered.
Cabinet	June 2022 Reason: Expenditure/Income over £5m & policies or new income, reserves use, overspend over £300K	**Procurement Strategy for Mental Health Supported Housing** Procurement strategy for our mental health supported housing in borough contracts. PART OPEN PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.	Cabinet Member for Health and Adult Social Care Ward(s): All Wards Contact officer: Joanna Mccormick, Michele Roberts, Rebecca Richardson Tel: 0741207694, Tel: 020 8834 4734, Tel: 07827879659 Joanna.Mccormick@lbhf.gov.uk, Michele.Roberts@lbhf.gov.uk, rebecca.richardson@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
CABINET - 4 July 2022				
Cabinet	4 Jul 2022 Reason: Expenditure/Income over £5m & policies or new income, reserves use, overspend over £300K	**Investing in more New Affordable Homes in the Borough** development on 4 sites	Cabinet Member for the Economy Ward(s): Askew; Sands End; Town Contact officer: Labab Lubab Tel: 020 8753 4203 Labab.Lubab@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet	4 Jul 2022 Reason: Expenditure/Income over £5m & policies or new income, reserves use, overspend over £300K	**Vehicle Removal & Pound Services Contract** This report sets out the procurement strategy for a Vehicle Removal & Pound Services Contract	Cabinet Member for the Environment Ward(s): All Wards Contact officer: Oluremi Ogunleye oluremi.ogunleye@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	4 Jul 2022 Reason: Budg/pol framework	**Early Intervention 0-19 Strategy** Our ambition is to work collaboratively to support children, young people and their families at the earliest opportunity. It is imperative for this approach to develop a strategy of partnership working, early intervention and inclusion to reshape the way in which we plan, implement and deliver services in Hammersmith & Fulham in collaboration with our partners and community and third sector providers. The 0-19 Early Intervention Strategy will draw on these opportunities to transform outcomes for children, young people and families in Hammersmith & Fulham.	Cabinet Member for Children and Education Ward(s): All Wards Contact officer: Alistair Ayres alistair.ayres@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.