

## 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 ~~strike through~~ 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.**

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Rep No.	Name/Org	Section /para	Comments	Officer response
1	Andrew Pilkington	Trussley Road Arches	<p>Its important to dovetail cycling and walking with affordable units of work:</p> <p>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.</p>	<p>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.</p> <p><b>No change required.</b></p>
2	Anthony Williams	General	<p>Thank you for the invitation to comment on the draft document.</p> <p>I am responding as an individual but have forwarded your invitation to PRARA's planning consultant.</p> <p>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.</p> <p>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.</p>	<p>Support Welcomed.</p>

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 make 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: <ul style="list-style-type: none"> <li>• <a href="#">Encourage and promote thermal energy efficiency measures, heat recovery ventilation, electric heating, and green infrastructure in development proposals for arches, where appropriate.</a></li> </ul>
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	<p>Thank you for providing the opportunity to comment on the Draft Hammersmith and Fulham Railway Arches Supplementary Planning Document.</p> <p>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.</p> <p>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.</p>	<p>Comments and support noted.</p> <p>We welcome the invitation to work with TfL to obtain the most up-to-date information on vacancies.</p> <p>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.</p> <p>Further words added to Paragraph 1.1, amended text as is follows.</p> <p>The railway arches were originally surveyed in 2019 prior to the pandemic and more recently in <u>August 2021. This was an observational survey and current vacancy rates may be different from those observed.</u></p> <p>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.</p> <p>Paragraphs 4.50 – 4.51 Parsons Green have been adjusted and now only refer to Arches 1-4.</p>
11	TfL Commercial	General	<p>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</p>	<p>Comments noted.</p> <p>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</p>

			<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>apparent in the SPD this is because the adopted Local Plan policy is prescriptive on such matters.</p> <p><b>No change required.</b></p>
12	TfL Commercial	Introduction - para 3.6	<p>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</p>	<p>Comments noted. Some Arches fall within town and Local centres and others do not. Clarification on this will be inserted into para 3.6.</p> <p>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.</p>

			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.  <b>No change required.</b>
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 Plan. 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 Plan. 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	<p>P21 para 4.32</p> <p>... 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.”</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p>	Comments noted. We will amend the errors in text.
39	Shepherds Bush Market Tenants Association	General	<p>Although the Hammersmith &amp; Fulham Council’s planning policy may place focus on the Arches within Shepherd’s Bush Market, the SBMTA encourages the Hammersmith &amp; 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.</p>	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 Arches 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	<p>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 &amp; Ors v Secretary of State for Communities and Local Government &amp; 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 portrays 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 &amp; Fulham Council to bear the moral challenge of protecting this loved London Market</p>	<p>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.</p>
59	Ministry of Defence	General	<p>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</p>	<p>Comments noted.</p>

			<p>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 &amp; 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</p>	
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. <b>No Change Required</b>
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. <b>No Change Required</b>
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 350 households 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. <b>No Change Required</b>

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.  <b>No Change Required</b>
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.  <b>No Change Required.</b>

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. <b>No Change Required</b>
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. <b>No Change Required</b>

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. <b>No Change required</b>
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 it is considered it will benefit residents, including those in priority groups "	Additional bullet point added to Key Principle AR1  <ul style="list-style-type: none"> <li>• <u>Any new development (including change of use) involving the railway arches should be accessible and inclusive in terms of design.</u></li> </ul>
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.  <b>No Change Required</b>



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. <b>No Change Required</b>
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. <b>No Change</b>
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. <b>No Change</b>

77	Hammersmith and Fulham Disability Forum Planning Group	EQIA	<p>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.</p>	<p>Comments Noted.</p> <p>An additional bullet point has been added to Key Principle AR1 seeking accessibility and inclusivity (See Rep 72)</p> <p>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.</p>
78	Nadine Grieve	Section B Cambridge Gove to Goldhawk Road, particularly arches around Ravenscourt Park area and Key Principle AR1	<p>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.</p>	<p>Comment Noted.</p> <p>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.</p> <p><b>No Change Required</b></p>
79	Nadine Grieve	Section B Ravenscourt Road and Ravenscourt Park, Key	<p>Small, daytime-only cafes, like the one in the garden centre, are OK, as long as they are unlicensed. The park is used very much by families and children.</p>	<p>Comment Noted.</p> <p><b>No change required</b></p>

		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.	<p>Comments Noted</p> <p>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.</p> <p><b>No change required</b></p>
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.	<p>Comments Noted</p> <p>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</p>

				<p>and other security organisations in terms of the location of CCTV and this is funded largely by financial contributions through planning S.106 agreements throughout the borough.</p> <p><b>No change required</b></p>
82	Richard Story	<p>Page 20 Paragraph 4.27</p> <p>Page 53 Appendix 1</p>	<p>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:</p> <p>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).</p>	<p>Agreed</p> <p>Paragraph 4.27 second sentence changed as follows: <i>Existing uses include an indoor climbing centre with <u>the main entrance in Ravenscourt Place-Road.</u></i></p> <p>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.</p>
83	Richard Story	<p>Page 20 Paragraph 4.29</p>	<p>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.</p>	<p>Agreed</p> <p>Text changed in Paragraph 4.27 as follows: <i>...<del>a</del> longstanding timber and builder's merchants occupying a number of arches and <u>alongside a car repair business. Pedestrian and vehicle access to these arches is from Ravenscourt Place.</u></i></p> <p>to clarify this matter Paragraph 4.29 has also been amended as follows: <i><u>There arches are accessed at one end via a</u></i></p>

				<i>pedestrian alleyway from Dalling Road, which but the alley then opens.....</i>
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 ... <i>given the location in the Ravenscourt Park and <u>Starch Green</u> Conservation Area.</i>
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: <ul style="list-style-type: none"> <li>*?The permitted opening hours*?</li> <li>*?No food to be cooked or reheated other than by microwave or hot water*?</li> <li>*?The sale of food and drinks is to be limited to Climbing Centre customers only*?</li> <li>*?No alcohol to be sold or consumed in the premises*?</li> <li>*?All customers are to be fully registered members*?</li> <li>*?No pre-booked or walk-in groups of more than 4 adults arriving or finishing at the same time.*?</li> <li>*?No events to be held, no live music and no DJ's*?</li> <li>*?No music or amplified voices shall be audible at the boundary with any noise sensitive premises e.g. residential, educational.*?</li> <li>*?The forecourt on Ravenscourt place not to be used for smoking or sitting out with no tables and chairs permitted.*?</li> <li>*?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.</li> </ul>	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 <i>Ravenscourt Road</i>
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: <i>Existing uses include an indoor climbing centre with <u>the main</u> <del>an</del> entrance in Ravenscourt <del>Place</del> <u>Road</u>.</i>
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: <i>...<del>a</del> <u>A</u> longstanding timber and builder’s merchants occup<del>ies</del> <u>ying</u> a number of arches <del>and</del> <u>alongside a</u> car repair business. <u>Pedestrian and vehicle access to these arches is from Ravenscourt Place.</u>  to clarify this matter Paragraph 4.29 has also been amended as follows: <i><u>There</u> arches are accessed at one end via <del>a</del> <u>a</u> <u>pedestrian</u> alleyway from Dalling Road, <u>which</u> <del>but the alley then opens</del>.....</i></i>

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 ... <i>given the location in the Ravenscourt Park and <u>Starch Green</u> Conservation Area.</i>
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 <i>Ravenscourt Road</i>
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. <del>The alleyway access here to the park from Ravenscourt Road is not publicly maintained highway and given this alley is narrow,</del> <i>This entrance, the boundary wall and the alleyway itself are within the demise of the park and publicly maintained.</i> <del>s</del> <i>Servicing to these arches may be difficult.</i>
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		<p>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.</p>	<p>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.  <b>No Change Required</b></p>
95	Ravenscourt Action	Page 53 Appendix 1	<p>The summary is not accurate or complete.</p> <p>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.</p> <p>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</p>	<p>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.</p>



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: <i>Shepherd's Bush Market is managed by <del>WMC Retail Partners Enterprises Ltd</del> <u>Tandem Property Management ...</u></i>
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