

London Borough of Hammersmith & Fulham

Schedule of Technical Changes to the Affordable Workspace SPD

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 Cabinet version March 2022, therefore please refer to the Supplementary Planning Document when looking at this schedule.

APPENDIX 1 Schedule of Further Technical Changes from Cabinet Version of SPD dated 7th March 2022

The Council received representations from 13 organisations and individuals and full details of the representations and how these were addressed were appended to the 7th March Cabinet Report. You can view this here: [Affordable Workspace Supplementary Planning Document - November 2021 \(lbhf.gov.uk\)](#) Further technical changes to the SPD have subsequently been made to provide more flexibility as a result of the changing financial climate.

No.	Change location (SPD March cabinet 2022)	CHANGES MADE
1	Table of Contents	<i>Correct minor typographical errors:</i> 4 Who Needs Affordable Workspace in Hammersmith and Fulham? 8.2 Appendix B - Payments in Lieu Calculator, and End of Scheme Reviews
2	Table of Contents	<i>Add new Appendix to read</i> ' Appendix C Summary of Viability Evidence '
3	Para 1.4	<i>Change wording of first sentence:</i> The purpose of this Affordable Workspace Supplementary Planning Document (SPD) is to support the council's Local Plan policies by providing setting out requirements for, and to provide details and best practice on the implementation of affordable and flexible workspace to support meet local demand and to support local enterprise.
4	Para 1.5	<i>Change wording of last sentence:</i> This SPD will focus on meeting local needs encompassing a range of sizes and types of affordable accommodation. We anticipate this 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.
5	Para 1.6	<i>Change wording of penultimate and last sentences:</i> This can also promote innovation and fit in around family and existing employment commitments. Interventions through the local planning process are therefore necessary
6	Para 1.7	<i>Change wording of paragraph:</i> This SPD will support Local Plan Policy, and as stated in Local Plan paragraph 7.3: '..the Council is keen to provide secure a range of affordable workspaces to support existing and new businesses... ' 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.
7	Para 1.8	<i>Change wording of last sentence:</i> 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, the assessment of planning applications and assists with the drawing up of planning obligations
8	Para 1.9	<i>Change wording of paragraph:</i> This Affordable Workspace SPD provides 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 affordable and flexible workspace within this SPD.
9	Para 1.10	<i>Change wording of paragraph</i> The SPD provides the policy context, defines affordable workspace in Hammersmith and Fulham; identifies who needs affordable workspace; and provides sets out requirements and suggested 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 t This SPD will be referred to alongside the council's Employment and Skills Code, and Supply Chain Procurement.
10	Para 4.3	<i>Delete second sentence and amend wording of third sentence:</i> The aims and objectives of this document are based on the challenges facing the borough. The SPD can only help 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 T the Local Plan aims and objectives are: <ul style="list-style-type: none"> • 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
11	Para 4.6 and Image 1	<i>Change wording of first sentence, delete bulleted list and map (Image 1) -to signpost that the information is to be found in the Viability Report rather than duplicated in the SPD:</i> 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 <u>in the Viability report (November 2020).</u> Discounts to Market Rents for Subareas <ul style="list-style-type: none"> • 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). Delete image 1 Image 1: Discounts Market Rents for Subareas
12	Para 5.3	<i>Change wording in last sentence and make a minor typographical correction:</i> 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 <u>support</u> guide discussions to <u>help</u> best meet these needs.
13	Para 5.4	<i>Change wording of paragraph to clarify relocation of content</i> 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 as flexible pay-as-you go desks and as listed in <u>the Viability report and Appendix C Table 5.10</u> below will depend on a number of factors and on the circumstances of the site and development.
14	Paragraph 5.5	<i>Change wording of first and second sentences:</i> The council will <u>encourage</u> always aim for the optimal outcome for local residents and small businesses. Factors taken into account <u>may</u> would include:

		<ul style="list-style-type: none"> • 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.
15	Para 5.6	<p><i>Change wording of first sentence:</i> Active engagement with business occupiers to identify their needs, and to ensure business continuity.will need to could 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.</p>
16	Para 5.6	<p><i>Amend the final sentence to read:</i> 'Therefore any affordable workspace offer provided in accordance with Local Plan Policy E1 (and E2) will be expected to be delivered either "in perpetuity" or within the plan period until any subsequent Local Plan review no longer identifies this need.'</p>
17	Para 5.9	<p><i>Change wording within paragraph:</i> The conclusions of this exercise support a range of discounts to be applied considered in these areas. Full details of the methodology benchmarking and indicative thresholds, are set out in the accompanying Viability report and updates.</p>
18	Para 5.10	<p><i>Delete sentence and related Table 5.10:</i> Discounted Rents and Floorspace will be require on new commercial developments over 1,000 sq ms (gross) as follows: Table 5.10 APPLICATION OF DISCOUNT MARKET RENT REQUIREMENTS</p>
19	Para 5.11	<p><i>Delete paragraph 5.11.</i> 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).</p>
20	Para 5.12	<p><i>Move paragraph and amend text to new Appendix C</i></p> <p>8.19. Within the areas listed above. in the Viability report</p> <ul style="list-style-type: none"> • 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 in the table 5.19 below - to meet needs of the start-up/ SME and priority sectors may be appropriate depending on site circumstances.
21	Para 5.13	<p><i>Move paragraph to new Appendix C</i></p> <p>8.20. 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.</p>

22	Former para 5.15 New para 5.11	<i>Change wording for clarification</i> 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 to steer viability discussions .
23	Former para 5.17 New para 5.13	<i>Change wording within paragraph and indicate the relocation of Table 5.19:</i> The list in the following Appendix C Table 5.19 gives examples of alternatives to discounted market rents, as well as complementary provision to help meet the council's defined needs, applicable on schemes below the 1000 sqm gross viability threshold for market discounts.
24	Para 6.2	<i>Change wording of second sentence:</i> Pre-application discussions should include how the affordable workspace arrangements will be delivered. This may must be agreed with the council prior to the determination of a planning application.
25	Para 6.4	<i>Amend the wording of paragraph to read</i> 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 should may be demonstrated that they have the necessary skills and meet the council's criteria for accredited workspace providers. This method is not may to be unlikely to be suitable where an end-user has not been secured.
26	Para 7.1	<i>Change wording within paragraph:</i> This SPD sets out a range of requirements supplements the Local Plan to help inform discussions and proposals for secure applications that provide 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 principles of the SPD have been shown justified-viable-and-recommended by the independent evidence base reports.
27	Para 7.2	<i>Amend the second sentence to clarify link with the evidence reports:</i> 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 1,000sqms gross; The independent viability assessment has shown that Discounted market rents on a proportion of floorspace on large commercial schemes (typically above 1000 sqm gross as identified by the viability evidence) are viable. The independent viability assessment has also provided examples of and alternatives to discounted market rents which may be applicable to small schemes too – such as flexible leases; discounted desks; flexible workspace/café hubs. The SPD will also help ensure that existing affordable workspace/ SME occupiers are reprovided for in regeneration/intensification and major redevelopment schemes.
28	Para 7.3	<i>Change wording in first sentence to reflect adoption version:</i> Following public consultation and adoption, the The affordable workspace SPD provides 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.
29	Para 8.1	<i>Amend minor typographical correction in first sentence:</i> It is strongly recommended that a draft Workspace Management Plan (WMP) forms part of pre-application discussions to assist in agreeing opportunities and negotiations on a site-by-site basis.
30	Appendices	<i>Add a new appendix</i> Appendix C-Summary of Viability Evidence

List Of Technical Changes Superseding Previous Amendments

Change location	Change	Comments	
Section 4	Remove list and map of subareas	All direct references have been removed from the SPD to avoid duplication with the evidence reports.	Refer to entry no. 11 above
Section 5	Remove references to viability outputs (including summary maps and tables in and sub - areas as identified in the Viability evidence reports	All direct references have been removed from the SPD to avoid duplication with the evidence reports. It is considered that the Local Plan policies and viability reports are adequately signposted within the SPD and better reflect the inherent site specific flexibility in the Local Plan approach. This subsequent change better reflects the changes the respondents to these sections sought	Refer to entry nos. 18, 19 20 and 21 above
Para 5.6 and Appendix C: table para 8.20: 'Examples of Alternative Measures to Support Affordable and Flexible Accommodation'	Clarification of delivery timescales: 'in perpetuity' references	Additional wording has been added to clarify that delivery timescales relate to needs identified in the Local Plan. This change further clarifies that a flexible approach is taken and that the SPD is a starting for negotiations. This additional wording more closely reflects the concerns and changes sought in the consultation responses.	Refer to entry no. 16 above
Para 4.3, 5.3 and 5.11	Remove reference to using SPD as a 'guide'	Remove references and inferences to planning applications, decisions and outcomes. All direct references have been removed from the SPD to better reflect the status of an SPD and avoids duplicating the Local Plan.	Refer to entry nos. 10, 12 and 22
Paras 1.9 4.3 and 7.1	Minor wording changes in response to economic uncertainty.	Minor wording changes, to clarify that a more flexible approach could be taken in response to economic uncertainty.	Refer to entry nos. 8, 10 and 26
Appendices	Add new appendix - Appendix C 'Summary of Viability Evidence'	In response to changes to Section 5 set out above, a new appendix has been created to signpost and summarise the broad conclusions of the Viability assessment reports and to include former table 5.19 showing examples of alternative measures to support affordable and flexible accommodation.	Refer to entry nos 20 21 and 22 above

