

London Borough of Hammersmith & Fulham

Schedule of Representations & Officer Responses to the Hammersmith Town Centre Supplementary Planning Document Consultation including Technical Changes

The proposed changes are expressed as ~~strike through~~ for deletions and underlining for additions to the text.

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Rep No.	Consultee No.	Name/Org	Section	Representation	Response/Change
1	1	Louise Rowntree	1. General	<p>So exciting you're planning to, in partnership with TfL and the GLA, replace the flyover with a flyunder to restore the heart of Hammersmith. Reading stories by older locals describing how Hammersmith was a 'village' from the river to king street before the flyover was built, how wonderful you're going to remove the arrow in the heart of Hammersmith and let it breathe again.</p> <p>If, in upcoming communications, you could give more information on how concrete this plan is (you say it's your 'ambition') and timings that would be great.</p> <p>On a related (air pollution) note, greenery;</p> <p>-trees: please plant (even!) more, and ideally evergreen trees: deciduous trees look dead and bleak winter, which is the 'very' time we need more green! Magnolias, Rowan and mirtle trees, for example, stay green all year.</p> <p>-Also any unused public wall space, it's 'so' cheap to drill wire onto the wall, dig a small hole in the ground and plant a climbing creeper (eg star jasmine: evergreen!). Wire costs about £2, a small star jasmine £8, and it will cover even the highest of walls and create vertical green space all year round. A 'much' cheaper way to get rid of graffiti off decorate an ugly public wall than repainting etc.</p>	<p>Comments noted.</p> <p>Support for the flyunder is welcomed. However, the current cost of the project is significant and requires further discussion with key stakeholders, including central government, to help resolve. The project therefore remains as a 'long-term ambition' with no specific timetable for delivery.</p> <p>It is noted that reference is made throughout the draft SPD to 'urban greening' and 'green infrastructure' however it is appropriate to elaborate on this to clarify that this includes increased tree cover and provision of living walls, that include deciduous species to maintain greenness over the winter.</p> <p>Proposed Change:</p> <p>Page 49 Climate Change and Sustainability 7th paragraph:</p> <p><i>"... urban greening, <u>including living walls and deciduous tree cover ...</u>"</i></p>
2	2	Eugenie White	1. General	<p>It makes sense to agglomerate high rise around transport interchanges. BUT what about using the Section 106 to put the flyover underground! It would improve every aspect of Hammersmith including adding to space that can be used. And get Hammersmith Bridge reopened!</p>	<p>Comments noted, no change proposed.</p> <p>Support for the flyunder is welcomed. However, the current cost of the project is significant and could not be funded from S106 receipts alone. Further discussions are required with key stakeholders, including central government, to help</p>

					resolve the funding of the project.
3	3	Anthony Williams	1. General	<p>I have read the document and my overall impression is that it is sound and the recommendations if implemented would be of great benefit and value to the Town Centre.</p> <p>I was particularly pleased to find that the fly-under is included in the plan. The current elevated road is ugly and divides this south part of the town centre. Its removal would be transformative. I appreciate that this has to be a long term project. As well as its benefit to the area it would also remove the likelihood or even risk of further safety work being required on the existing elevated road.</p> <p>Lastly, I think that the removal of the BP service area would be detrimental to the area. It provides facilities that are not available elsewhere which are important to and necessary for motorists. All vehicles visiting the site are monitored and timed so the site cannot be used as a car park.</p>	<p>Comments noted. No change proposed.</p> <p>Support for the flyunder is welcomed. As is the acknowledgement that this is necessarily a long-term project.</p> <p>The Council is not promoting the removal of the BP service area. However, if the landowner decides to bring the BP site forward for redevelopment it is appropriate for the SPD to indicate a layout and design principles to guide any future proposal and ensure this complements and provides integration with neighbouring sites.</p>
4	4	Natural England	1. General	<p>In principle SPDs should not be subject to the Strategic Environmental Assessment Directive or the Habitats Directive because they do not normally introduce new policies or proposals or modify planning documents which have already been subject to a Sustainability Appraisal or Habitats Regulations Assessment. However a SPD may occasionally be found likely to give rise to significant effects which have not been formally assessed in the context of a higher level planning document. This may happen, for example, where the relevant high level planning document contains saved policies within a saved local plan which predates the need to carry out a SA or HRA and therefore no higher tier assessment has taken place. If there is any doubt on the need to carry out a SA or HRA a screening assessment should be carried out.</p>	<p>Comments noted. No change required.</p> <p>H&F's Local Plan was adopted in 2018 and was subject to comprehensive Sustainability Appraisal and Habitats Regulations Assessment. The Council is content that the SPD provides guidance that would not give rise to effects greater than those expected through the application of LP policies. As such, the Council does not consider further SA or HRA is required.</p>
5	5	P Houlihan	1. General	<p>To our all-powerful Council - Please please please re-open Hammersmith Bridge before you dream up any other plans?</p> <p>Or perhaps use some of the billions saved on HS 2 ? Or how about recycling the new aircraft carriers with no aircraft on them as a temporary bridge ? Best wishes In eternal hope - P. Houlihan Ps you never ever mention our lovely Bridge in your newsletter. Why?</p>	<p>Comments noted, no change required.</p> <p>Hammersmith Bridge is unfortunately outside the remit of this SPD. To keep up to date with all the latest information on the bridge visit:</p>

					Hammersmith Bridge London Borough of Hammersmith & Fulham (lbhf.gov.uk)
6	6	Jebens Design	1. General	I fully support the Hammersmith Local Plan, particularly the fly-under which would re-connect Hammersmith to the river.	Support noted and welcomed.
7	7	Nick Brooks	1. General	Can I please plead that before £811m is spent on this project Hammersmith Bridge is repaired and opened for all traffic.	Comments noted, no change required. We appreciate you taking the time to read and make comments on the SPD. Hammersmith Bridge is unfortunately outside the remit of this SPD. To keep up to date with all the latest information on the bridge visit: Hammersmith Bridge London Borough of Hammersmith & Fulham (lbhf.gov.uk)
8	9	Michael Cook	1. General	Please curtail the highest buildings. In this area, a maximum of 20 storeys should be a rule of thumb. Please put forward a road spur from the 'fly under' beneath the river to the Barnes side. Expensive and difficult, yes, but no more expensive than the misguided plans to restore our wonderful Hammersmith bridge to take heavy vehicular traffic. The bridge could become the long-lost garden bridge of London, while still taking pedestrian and bicycle traffic.	Comments noted. We appreciate you taking the time to read and make comments on the SPD. The SPD provides indicative guidance in relation to tall buildings. This suggests locations which may be suitable for large/tall buildings, indicative development parameters and key views for consideration. Planning applications for tall buildings will be assessed against the London Plan and Local Plan policies, with particular focus on townscape, heritage, and other design considerations. The comments on the flyunder are noted. No options have been ruled out, including a spur road to the Barnes side. However, the

					flyunder is a long-term ambition and will be subject to further discussion with all stakeholders, including affected communities.
9	10	Anthony Collyer	1. General	I wanted to book a place for the consultation meeting on 29Feb2024 ... but it is sold out I am unable to download a copy of the .pdf file as it is too large ... how can I obtain a hard copy? What are the plans to improve the interchange between the Piccadilly/District and the Hammersmith and City/Circle line stations ... I.e... without having to cross multiple busy lanes of motor and cycle traffic?	<p>Comments noted.</p> <p>Hard copies of the document were made available at the 3 borough reference libraries.</p> <p>Proposed change:</p> <p>Additional sentence to the future vision on page 28 to the end of the 3rd para:</p> <p><i><u>“Explore options to deliver better connections between the two stations either at grade or below ground.”</u></i></p>
10	11	Diane Fisher	1. General	<p>Keep all cars out and make more streets pedestrian and cycling.</p> <p>Keep the cars off the streets and have more paved roads.</p>	<p>Comments noted.</p> <p>We appreciate you taking the time to read and make comments on the SPD.</p> <p>The council actively promotes sustainable transport. The public realm enhancements proposed through the SPD seek to aid the transition away from cars, giving more space over to pedestrians and cyclists. Where feasible, options to pedestrianise areas will be sought as well as the creation of new pedestrian routes.</p>
11	12	Britel Fund Trustees Ltd	1. General	We are instructed by our client, Britel fund Trustees Limited, to submit representations to the consultation draft Hammersmith Town Centre Supplementary Planning Document (SPD). It is understood that the draft SPD is intended to supplement existing policies set out within the Hammersmith and Fulham Local Plan (2018) and seeks to elaborate on the Hammersmith Town Centre Masterplan (2019) to provide planning guidance for developers and residents for the Town Centre. Britel fund Trustees Limited are the owners of 26-28 Hammersmith Grove, London, W6 7HA (the ‘Site’). The Site is located within the ‘Northern Quarter’ character area of the draft SPD where the aim is to promote mixed use schemes to enable employment/housing	<p>Comments noted and support welcomed.</p> <p>We appreciate this background information on the site and buildings in question. We have addressed your detailed response your specific</p>

				<p>growth. Our client supports promoting the Site for housing growth. The Site provides existing office premises (comprising east and west wing buildings connected by a 'link' building) together with associated car parking and servicing arrangements. The east wing building comprises older, mainly vacant office stock. The west wing building, fronting Hammersmith Grove, is currently occupied by a range of tenants. The 2019 Masterplan identified the Site as part of a development opportunity site (Site F) as suitable for new residential development as part of a mixed use scheme of development incorporating retained office space. Overall Vision. Our client is supportive of the overall vision set out in the draft SPD for the regeneration of Hammersmith town centre. In particular, our client supports the diversification of uses within the town centre including encouragement given to new residential development and creating a step change in terms of the quality of the physical and built environment. The draft SPD is broadly consistent with the 2019 Masterplan, albeit we note that specific proposals for some sites (mainly those not allocated in the Local Plan for a particular planning purpose) are omitted but may be subject of future separate planning briefs. We are supportive of this approach.</p>	<p>comments further down this schedule.</p>
12	12	Britel Fund Trustees Ltd	1. General	<p>In summary, our client is broadly supportive of the vision set out in the draft SPD for Hammersmith town centre, subject to the detailed comments set out above. We trust the above comments will be taken into account by the Council in formulating the final version of the SPD.</p>	<p>Comments noted. Support welcomed.</p> <p>We have addressed your detailed response and your specific comments further down this schedule.</p>
13	14	Jesenka Oezdalga	1. General	<p>There is one point I've been wanting to raise, and draft SPD comes in a perfect time. My daughter started secondary school in Hammersmith last September and is commuting through Hammersmith Station. We are all well aware of the numerous primary and secondary schools in vicinity of Hammersmith Town Center and number of children and teenagers that are passing through town centre on daily basis. I would like to share her experience and my take on it as a parent and as a town planner.</p> <p>In 80s/90s/early 2000s most of us grew up "hanging out with their friends" for half-an-hour or so after school in local parks, small cafes or just on the benches on the street. With dominance of social media and online life-styles, as a family we strongly encourage social interaction in real life and therefore we would like our children to be able to have freedom and safe space after school to catch up with their friends. You might have picked up separately that a whole new campaign is building up nationally towards use and impact of phones and social media on young and therefore, this "time to spend with their friends" outside of any supervised environment like home with parents or in school is very important.</p> <p>On the way from school to Hammersmith station there is no space for teenagers to stop, sit, have a chat, have a sandwich together, see friends from other schools around. They come to the Broadway, buy themselves small snack in tesco and try to sit in one of the restaurants "where nobody would chase them away". They are too young to sit in Starbucks or Joe and Juice (not to mention how expensive it is and most children can't afford it). Even if they were to buy that expensive drink most restaurants generally just chase them away, as kids and teenagers are perceived as</p>	<p>Comments noted.</p> <p>We welcome your detailed example of how the centre is navigated by younger people and acknowledge that there is more to be done to address the issues raised.</p> <p>The SPD should be read alongside our Local Plan and the London plan in terms of policy provision for play space. Whilst no new play space is identified through the SPD, the SPD does promote improvements to the public realm within the town centre and is seeking to make better connections back to the river and Furnivall gardens.</p>

				<p>loud, rude, scary.</p> <p>I did word search through draft SPD and word “play” is mentioned only three times and in reference to Civic campus or in generic public realm context. Where is that space? And what would that space entail? Can anything more be done at this stage, starting with policy and hopefully taking it to realisation.</p> <p>If you go to Hammersmith station at 8am on a working day you would be surprised with the amount of secondary school children going in all directions, yet, they are nowhere to be seen in public after school. Thinking of Lyric square, it only has separate Pret-a-Manger seating area or it’s covered in market stalls. That is just one space that could be made more welcoming for children/teenagers to stop by and spend time together.</p> <p>This topic is coming up in town planning and media and I reference few quotes and links below. Whether within this SPD or if council is considering this topic separately or through other departments, I would be happy to participate and share my experiences as a parent and town planner.</p> <p>To quote:</p> <p>Writing to the Levelling Up department, the RIBA said there were ‘currently no references to young people’ in the newly revised National Planning Policy Framework (NPPF). RTPI Children and town planning: Creating places to grow. Consider younger couples and children in planning policy, government urged (architectsjournal.co.uk)</p>	
14	15	Jeremie d’Esparbes	1. General	<p>I don’t believe your proposed development of Hammersmith town center preserves the neighborhood. LBHF planning committee’s disrespect of our residents community is going from strength to strength. The idea of creating a high rise “gateway to London from the East” is simply preposterous. The high rises your consultation hints to will have severe disruptive and harmful impact on the skyline, and more generally on our residents community. We live in the Barons Court area and have already been severely and negatively impacted by the recent development led by Dominus. We would want the development of new high rises to stop. This should remain a residential single houses area.</p>	<p>Comments noted.</p> <p>We appreciate you taking the time to read and make comments on the SPD.</p> <p>The SPD provides indicative guidance in relation to tall buildings. This suggests locations which may be suitable for large/tall buildings, indicative development parameters and key views for consideration. Planning applications for tall buildings will be assessed against the London Plan and Local Plan policies, with particular focus on townscape, heritage, and other design considerations.</p>

15	16	Alice d'Esparbes	1. General	<p>Thank you for sharing the 2035 view of Hammersmith town centre and for involving residents at this stage.</p> <p>I live on St Dunstons road, near Margravine Cemetery and I don't believe the plans for the Eastern quarter preserve the residential nature of this neighbourhood, which is a conservation area. We already have in front of our windows the huge hotel development on Talgart road. The hotel is enormous and such an eye sore from Margravine gardens.</p> <p>The proposals will have disruptive and harmful impact on the skyline. Hammersmith is becoming the new Croydon with huge developments and losing its sense of residential community.</p> <p>I do like the idea to create more links between the various areas and to make more green spaces and pedestrian areas given that the borough is split in two by the M4 but this could be done with flatter brick buildings which would be far better integrated. Making a highway surrounded by high rises will not connect the areas together and will negatively impact Brook Green, Barons Court and Brackenbury Village.</p> <p>I am in favor of creating a tunnel for the flyover, but again no high rises please!</p> <p>I do hope you will listen to residents.</p>	<p>Comments noted.</p> <p>We appreciate you taking the time to read and make comments on the SPD. We welcome your support on the flyunder and the need to create better linkages through the centre.</p> <p>The SPD provides indicative guidance in relation to tall buildings. This suggests locations which may be suitable for large/tall buildings, indicative development parameters and key views for consideration. Planning applications for tall buildings will be assessed against the London Plan and Local Plan policies, with particular focus on townscape, heritage, and other design considerations.</p>
16	18	Kevin Caulfield	1. General	<p>I like the fact that our town planners are seeking to "keep developers in line" by establishing parameters they must follow when putting forward their development plans. That said, I believe LBHF needs to go even further in setting out clear guidelines in terms of:</p> <ul style="list-style-type: none"> - height of buildings - density of buildings (housing/office developments at White City adjacent to Westfield, Paddington Basin, and the Brentford stadium area) are much too dense, with poor/no sight lines making for oppressive living and working conditions - greening the environment - clear guidelines must be set out so that developers are not able to manipulate where and how much green space/park area is safeguarded - quality of materials and design 	<p>Comments noted.</p> <p>We appreciate you taking the time to read and make comments on the SPD and the support for more planning guidance.</p> <p>The SPD cannot bring forward new policy and therefore any guidance on density and height is indicative. The council's Local Plan and the London Plan contain more detailed policies on building heights, density of buildings and greening the environment.</p>
17	19	Port of London Authority (PLA)	1. General	<p>As the PLA's key interest is to improve and enable the use of the tidal Thames safely, we recognise that improving links to the River Thames is highlighted in this SPD, specifically as a key concept of the spatial framework and within the objectives for delivery. The close proximity of Hammersmith town centre to the river provides a clear benefit within the Borough, and all effort should be made to maximise opportunities to</p>	<p>Comments noted. No change required.</p> <p>Because the river does not form part of the SPD boundary it is</p>

				<p>improve the riverside alongside growth that can serve the local community, business and visitors to the area.</p> <p>In addition to improved access to the Thames, we would welcome further consideration of the river as a resource for recreation and sport, tourism and leisure, as referred within the Local Plan. Further cross-reference should also be provided to Policy RTC1 of the Local Plan in terms of promoting use of the River Thames for transport uses, including passengers and freight (incorporating construction phase).</p>	<p>not considered appropriate to add the Policy reference to the document. However, it is an ambition to better connect the river with the town centre through public realm and transport initiatives.</p>
18	21	Patrizia and Nuveen	1. General	<p>In principle, our clients are supportive of the associated improvements to infrastructure referred to in the draft SPD, however, concerned that the obligations placed on new development should not be at the expense of scheme viability.</p>	<p>Comments noted.</p> <p>Planning Obligations will only be placed on new developments where relevant and appropriate and subject to the viability of the scheme.</p>
19	21	Patrizia and Nuveen	1. General	<p>Flexibility</p> <p>Both Patrizia and Nuveen are of the view that the draft SPD should be applied with great flexibility generally. Page 26 indicates that the guidance is not intended to be formal but this should also be made explicitly clear within the document's introduction so that there is no ambiguity or misinterpretation that future development proposals must conform with the entirety of the draft SPD's content literally.</p> <p>Page 11 of the draft SPD expects landowners to work together to bring forward key opportunity sites. Nevertheless, it is supported that this does not preclude a phased approach where development proposals illustrate how they would not fetter the ability of adjacent sites to come forward for an optimum form of development. Different land ownerships and different lease profiles may well dictate that adjoining blocks such as the Nuveen and Patrizia interests may have to come forward for redevelopment at different times.</p>	<p>Comments noted. No change required.</p> <p>The SPD is a guidance document only and should be read alongside our Local Plan and the London plan in terms of policy provision. This is made clear in the SPD.</p>
20	25	Worshipful Company of Girdlers	1. General	<p>We write on behalf of the Worshipful Company of Girdlers' to comment on the draft Hammersmith Town Centre SPD. The Girdlers' own the freehold interest in a significant stretch of King Street on its southern side from the grade II listed Hop Poles public house, to Angel Walk and including 12 Blacks Road. The Girdlers' therefore has a strategic interest as the freehold owner of a number of key opportunity sites within the Town Centre. They have explored the development potential of a number of their assets and have also worked with the long- leaseholders of other sites to enable their development proposals. The Girdlers' agrees with the Council that there are sound planning reasons for the draft SPD to be ambitious about King Street and its exciting regenerative potential. In principle, our client is supportive of the associated improvements to infrastructure referred to, however, concerned that development is referred to as a major source of funding. The obligations placed on new development should not be at the expense of scheme viability.</p>	<p>Comments noted.</p> <p>Planning Obligations will only be placed on new developments where relevant and appropriate and subject to the viability and deliverability of the scheme.</p>
21	25	Worshipful Company of Girdlers	1. General	<p>The Girdler's are of the view that the draft SPD should be applied with great flexibility generally. Page 26 indicates that the guidance is not intended to be formal but this should also be made explicitly clear within the document's introduction so that there is no ambiguity or misinterpretation that future development proposals must conform</p>	<p>Comments noted. No change required.</p>

				with the entirety of the draft SPD's content literally. Page 11 of the draft SPD expects landowners to work together to bring forward key opportunity sites. Nevertheless, the document states that this does not preclude a phased approach where development proposals illustrate how they would not fetter the ability of adjacent sites to come forward for an optimum form of development. In relation to development over the M&S site which is likely to come forward first, the Girdlers' is satisfied that neighbouring sites can be optimised alongside their current proposal.	The SPD is a guidance document only and should be read alongside our Local Plan and the London plan in terms of policy provision. This is made clear in the SPD.
22	26	Romulus	1. General	<p>We have reviewed the draft SPD with our planning advisors, Gerald Eve and Montagu Evans. Therefore, this response sets out both our feedback on what we are seeing in Hammersmith as well as responding to the draft SPD consultation. We think there is an urgent need to take a step back and have a conversation about the future of the town centre as we think that previous trends have been accelerated and a new approach is required.</p> <p>Before turning to our observations, I want to reemphasize that Romulus are committed to Hammersmith town centre and we are bullish about the long-term prospects for the town centre. Hammersmith is almost unique as a truly diversified town centre that combines residential neighbourhoods, cultural landmarks and commerce. Hammersmith town centre is a key contributor to the economy of west London, and it represents one of west London's most important commercial centres and, for many of the borough's residents, it is the primary destination.</p> <p>We welcome the Council's initiatives to guide development in Hammersmith town centre, in light of the challenges to address the climate emergency, delivering fit-for purpose and sustainable buildings, providing genuinely affordable workspace and recognising flexibility in commercial developments (which has been brought about by the introduction of Class E use).</p> <p>We agree that the town centre requires a significant step change to improve the quality of the physical and built environment in Hammersmith, which can all be done through the redevelopment and refurbishment of existing buildings throughout the area, upgrading the transport network and transforming the public realm.</p> <p>On this basis, we believe this SPD is well-placed to provide the correct guidance on realising these opportunities by identifying pathways for both redevelopment and conversion. The latter would also accord with the direction of travel for policy around the retrofitting of existing buildings, before considering demolition and redevelopment as a first option.</p> <p>We support the Council's ambitions and key outcomes including the delivery of 2,800 new homes (and affordable homes), and the creation of 10,000 new jobs and the proposal to replace the existing Hammersmith flyover which currently acts as both an eyesore and a significant physical barrier amongst other key outcomes. However, there is concern that these key outcomes provided under 'vision' (page 15) have been extracted directly from the Key Masterplan Drivers set out in the Hammersmith Town Centre Masterplan ("the Masterplan) published in 2019. We note the five years that have elapsed since its publication which has coincided with a significant change in economic and social conditions. This changing picture has only served to highlight how Hammersmith town centre is currently struggling and that unfortunately the 2019 work is no longer up to date.</p>	<p>Comments noted. No change required.</p> <p>The SPD is a guidance document only and should be read alongside our Local Plan and the London plan in terms of policy provision. This is made clear in the SPD.</p> <p>Policy in the Local Plan and London Plan in particular on employment uses (Policies E1 and E2) are subject to viability considerations and therefore responsive to current trends. Intensification and alternative uses are encouraged where these are viable options for the centre and conform with policy.</p> <p>The objectives for the centre stem from the Local Plan in terms of the provision of jobs and home and not necessarily the Masterplan although there is overlap. The SPD supplements the Local Plan and cannot run contrary.</p> <p>The public consultation was carried out for 8 weeks and residents and stakeholders were invited to contribute during this period. This exceeds the duration of 4 weeks required for an SPD under the Town and Country Planning regulations. A series of workshops were also held to allow participants a</p>

				<p>We suggest a logical starting point would be to understand the progress made to date regarding these drivers/outcomes since the Masterplan was published in 2019. Therefore, a collaborative and creative approach between developers, businesses and the Council is urgently required to address these immediate headwinds. We are concerned that the current draft SPD doesn't address this in its current form and is still too based on a conventional office driven model for development. There are four key points that we would like to highlight as part of our response to LBH&F and draft SPD.</p> <p>I. We believe that short and medium-term planning needs to urgently address the oversupply of office space in Hammersmith Town Centre, which is compounded by weak demand from occupiers. The evidence shows that this is not a short term 'blip' but is more of a structural change.</p> <p>II. We welcome the focus on the town centre, which has suffered with a lack of proper investment over the last few years. However, we feel a large number of these projects such as the fly-under are not actually deliverable in the short term.</p> <p>III. Given the current office position within the Town Centre, we welcome the underlying support for the diversification of uses within the Town Centre. However, The SPD's guidance on diversifying existing office buildings to include a wider range of alternative uses also requires a more granular approach that accounts for the different types of building within the Town Centre.</p> <p>IV. We would like to highlight that we don't think that the consultation process has sufficiently engaged with local businesses in the borough with regard to these critical long-term initiatives.</p>	<p>chance to understand the SPD and ask questions.</p>
23	26	Romulus	1. General	<p>I. OVERSUPPLY OF OFFICE SPACE NEEDS TO BE URGENTLY ADDRESSED</p> <p>Romulus are the largest provider of workspace in Hammersmith town centre and we actively managed all our spaces directly. This includes large corporates, mid-sized SMEs and small start-ups. I would contend that no-one knows this office market as well as our teams and in particular, we can see the scale of change since 2019 which to a large extent we feel is irreversible.</p> <p>Hammersmith was previously a centre for high quality HQ office buildings. Many of the businesses have or are moving out of the Town Centre and there is no evidence that they are being replaced by new businesses where Hammersmith will be their HQ. Competition has emerged in new locations such as White City, Olympia and Battersea. The departure of office occupiers has undoubtedly been accelerated by the Pandemic. While transition back towards more normalised in-office working patterns albeit not at the previous intensity of a full five-day workweek; a flexible approach to working has become the norm. We have highlighted to the Council previously (in relation to proposals for Affordable Workspace) that there is an oversupply of workspace in the town centre and that rents have been falling. This trend has unfortunately continued over the last couple of years. There is currently circa 1.6 million sq ft of vacant office space in the town centre alone.</p> <p>Attached is a CoStar report provided by Frost Meadowcroft that highlights these vacancies in full detail. There are 40 buildings with significant vacancy in core Hammersmith that total almost 1.2 million sqft. Unfortunately, these numbers significantly underestimate the headwinds we face as they don't include 255 Hammersmith Road (which L'Oreal have recently vacated) or Griffin House (which Liberty Global Media have confirmed they are vacating) which add another c.200,000 sqft to this total. Additionally, demand (or take-up) for space is also at record low</p>	<p>Comments noted. No change required.</p> <p>The SPD is a guidance document only and should be read alongside our Local Plan and the London plan in terms of policy provision. This is made clear in the SPD.</p> <p>Policy in the Local Plan and London Plan in particular on employment uses (Policies E1 and E2) are subject to viability considerations and therefore responsive to current trends. Intensification and alternative uses are supported where these are viable options for the centre and conform with policy.</p>

				<p>levels in the borough. Historically, this has averaged between 400,000 and 600,000 sqft per year but last year was under 189,000 sqft (based on CoStar data). Given the oversupply and low demand, there is a structural pattern of office space vacancy in the town centre that will likely last for decades, resulting in fewer jobs, lost economic opportunities, dead frontages and a fall in activity in the town centre. These empty buildings do not provide an attractive image for the town centre. We acknowledge that some of these buildings can be successfully retrofitted but others have simply reached the end of their economic lives. Romulus has expertise in changing and retrofitting buildings but many owners do not, or are unwilling to take the longer term view required to invest and deliver this change. In our view, maintaining the current supply of office space is not sustainable. While ensuring adequate future provision is important, the promotion of new purpose-built office developments throughout the SPD might accelerate the decline in demand for existing more outdated stock and accelerate the rising vacancy rates. This assumes that the promotion of such floorspace is viable which in our opinion is very challenging at present. Given the age of the office stock in Hammersmith town centre, many of the offices which the Council would have previously assumed would remain in office use will no longer remain so. Therefore, greater flexibility is required for potential alternative uses of buildings that do not meet Grade A standards or would struggle to meet latest Energy Performance Certificate (EPC) regulations. We note the importance of differentiating the conversion of smaller buildings which possess a markedly different characteristics to purpose-built office blocks featuring larger floorplates which due to their depth are more difficult to convert.</p>	
24	26	Romulus	1. General	<p>II. THE NEED TO ENCOURAGE TANGIBLE INVESTMENT IN THE TOWN CENTRE</p> <p>Recent investment in Hammersmith & Fulham has heavily in White City with the developments around the Television Centre and Imperial Campus as well as the expansion of offices in Westfield, London. While these are of course positive, they have coincided with a lack of investment in the town centre. We are supportive of the initiatives referred to in the SPD to improve the town centre, however, are concerned that many of these are long-term aspirational goals rather than immediate areas where investment can be made or encouraged. The fly-under is a goal we support but is not realistically deliverable for the foreseeable future. We would like to encourage the council to focus on supporting tangible and short-term investment in the town centre to improve the sense of place, public realm, activity and the built environment. To achieve this, we wish to see the SPD take on a more strategic approach which promotes a diverse range of land uses.</p> <p>Hammersmith Town Centre is highly accessible and well connected by various modes of public transport and serves as an important gateway to Central London (and Heathrow Airport), but also other parts of the Borough to Shepherd's Bush and White City in the north and Fulham to the south. We feel the SPD currently undersells Hammersmith's Strategic Potential as both an office hub and a key visitor destination. Instead, the SPD should look to build upon Hammersmith's many cultural and entertainment uses that already exist centred on the ongoing success of the Lyric and the Hammersmith Apollo.</p> <p>We agree with Key Intervention 1 (page 41) that the Eastern Quarter can</p>	<p>Comments noted. No change required.</p> <p>We agree. The council is actively trying to attract investment into the centre and planning plays an important role in this, which is why the SPD has been prepared and why the ambitious long-term and short-term projects and initiatives have been identified. The SPD will play an important role alongside other policies and initiatives to help the town centre evolve and attract investment. On this basis, we consider the SPD strikes the right balance on investment.</p>

				<p>accommodate new high quality commercial and mixed-use development including offices, residential visitor accommodation, leisure and community and residential (if appropriate) through refurbishment and redevelopment. We recognise the diverse range of residents and visitors needs that regenerating this area will cater for.</p> <p>It is clear that Improvements to the functionality and attractiveness of Hammersmith as an established visitor destination will be underpinned by the provision of modern visitor accommodation which also typically includes high quality restaurant and bar spaces serving as attractions in their own right not just for residents. We would urge the Council to take grater steps in realising the wider economic benefits of Hammersmith as a visitor destination through the SPD.</p>	
25	26	Romulus	1. General	<p>III. THE NEED TO DIVERSIFY USES WITHIN THE TOWN CENTRE</p> <p>The role diversifying uses plays in securing Hammersmith as a strategic office location is critical and in our opinion is overlooked within the draft SPD. We encourage the SPD to recognise the evolving demand for office uses to be complemented by a wider range of facilities and amenities including restaurants, leisure, gyms and hotels. The SPD should go further in promoting alternative uses by recognising that Government interventions and legislation are evolving to enable increased flexibility. Notably, alterations to the Use Classes Order in 2020 have brought about more flexibility for business, commercial and service uses, especially in smaller premises, and the recent amendments to the General Permitted Development Order (“GPDO”) which presents new opportunities for the use of Class MA ‘PD rights’ to convert from commercial use (Class E) to residential (Class C3) without the need for planning permission. The draft SPD does not include any reference to permitted development rights and specifically changes to class MA of the GDPO, and it is appreciated that the rules could change numerous times over the next decade. However, PD rights provide more responsibility to building owners and developers by taking a market approach to individual buildings in considering whether residential use is more optimal for the building. We consider that some recognition of these changes could be added to the SPD, as it allows a more fluid approach to planning within Hammersmith (and wider LBHF) which could stifle development opportunities. Critical to sustaining both offices and mixed-use developments is the provision of visitor accommodation, which serves an integral role to both office space and associated amenities, as well as Hammersmith as a cultural destination and evening economy. Our experience is that hotel demand is very specific to location and building. The SPD lacks clarity regarding the precise nature of visitor accommodation being proposed, particularly whether it comprises a traditional hotel or apart-hotel model as well as the quality/ price point of this accommodation. With this in mind, generalised references to ‘hotel uses’ throughout the SPD fail to differentiate the types of visitor accommodation and account for the different needs they serve. To avoid stifling the delivery of other associated development which falls more widely within ‘Visitor accommodation’, we recommend revising references from ‘Hotel uses’ to ‘visitor accommodation’ to allow greater flexibility and reflect a broader range of accommodation like apart-hotels and serviced accommodation which offer benefits beyond those associated with traditional hotels. We note this amendment would also align with wording set out under Policy E10 (Visitor Infrastructure) of the London Plan (2021) which advocates a more inclusive approach towards visitor accommodation.</p>	<p>Comments noted.</p> <p>Agree to changing the wording from hotel uses in the SPD to visitor accommodation.</p> <p>Proposed change:</p> <p>Pages 16 and 56 multiple references – change “hotel” to “<u>visitor accommodation</u>”</p>

26	26	Romulus	1. General	<p>IV. LIMITED CONSULTATION PROCESS WITH LOCAL BUSINESSES</p> <p>We welcome the Council's preparation of the Hammersmith Town Centre SPD. We recognise the significance of the SPD as a material consideration in planning decisions and guiding future development. To maximise the effectiveness of the SPD in being responsive to the evolving dynamics of the post-pandemic world, it needs to provide an accurate snapshot in time, centring around a vision that aligns with the current challenges and opportunities facing Hammersmith Town Centre. It also needs to engage thoroughly with major long-term landowners such as Romulus. However, we would also like to highlight that we are disappointed with how this consultation has been carried out with local businesses, and would note that poor consultation is an ongoing issue with LBH&F we have frequently raised. This frustration has been shared by other local businesses who we work with. Romulus were invited to a presentation less than 24 hours before the meeting. There were no planning officers or senior members of the Council's team present at the meeting. There was then only 1 week to respond to the consultation. We are a long term investor in the borough and want to work with the Council to support local economic development and growth. In summary, we believe that a proactive and collaborative approach needs to be urgently adopted by the Council, developers, landlords and local businesses to address the headwinds faced in Hammersmith town centre today. We would like to be involved in this process which needs to consider:</p> <ul style="list-style-type: none"> - Higher prioritization for alternative uses where appropriate. - Improvements in terms of placemaking and public realm. - Closer engagement with local landowners/developers and businesses themselves. 	<p>Comments noted. No change required.</p> <p>The public consultation was carried out for 8 weeks and residents and stakeholders were invited to contribute during this period. This exceeds the duration of 4 weeks required for an SPD under the Town and Country Planning regulations.</p> <p>A series of workshops were also held to allow participants a chance to understand the SPD and ask questions. This included a session with key businesses from the Hammersmith BID attended by officers virtually.</p> <p>Ahead of the consultation, officers also held a discussion with your planning agents to discuss the SPD in detail for several of their clients.</p> <p>We have contact details for you on our database and consultation material was sent out at the beginning of the consultation. If you did not receive correspondence from us, then we will need to make sure we have up to date details for you.</p>
27	27	TfL Places for London	1. General	<p>Places for London ('Places') is pleased to provide its views on the Council's draft Hammersmith Town Centre SPD. Please note that the views expressed in this letter are those of Places in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate/ statutory response. Our colleagues in TfL Spatial Planning have provided 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>Places for London</p>	<p>Support welcomed. No change required.</p> <p>We appreciate the update on funding for TfL assets in Hammersmith Town Centre. We will continue to work with yourselves and other owners and stakeholders on the long-term aspirations within the SPD.</p>

				<p>Places is TfL's new and financially independent property company, formerly known as TTL Properties. We provide space for over 1,500 businesses in TfL stations and railway arches, as well as on London's high streets. We are working to develop TfL's surplus and under-used land to deliver new homes and jobs in highly sustainable locations, and to create excellent places to live, work and play which are sensitive to local needs and communities, and which are accessible to all.</p> <p>Draft Hammersmith Town Centre SPD</p> <p>We support the general vision for Hammersmith, the restoration of its town centre heart, and, particularly the ambition to deliver a significant number of new homes and jobs.</p> <p>Our principal interest lies in the Hammersmith Broadway Key Site on page 32. This is partly located above the underground station and the freehold is owned by London Underground Limited (LUL). I enclose a map showing TfL and related interests at and around the site. Your aspirations are for comprehensive redevelopment, including a new, enhanced public transport interchange, public realm improvements, additional retail and office space, and the introduction of housing development. We support this in principle. However, our colleagues in TfL Spatial Planning have advised that there is no funding within the TfL Business Plan to upgrade Hammersmith Broadway station, nor is this something that TfL is currently investigating. Places would be happy to engage with the Council to find out more and better understand your aspirations, and how they might be delivered. We would suggest that this should also involve other owners, including long leaseholders on the site and TfL / LUL.</p>	
28	28	Ingka Centres	1. General	<p>2.3 Section 7 of the NPPF sets out planning considerations for the vitality of town centres. In order for town centres to achieve long term vitality and viability, planning policies should allow them to grow and diversify in a way that can respond to rapid changes in the industries.</p> <p>2.4 The SPD supports the continued growth of Hammersmith Town Centre and recognises Livat Centre as a significant shopping destination where new and varied retail uses are encouraged.</p> <p>2.5 A diverse mix of uses is encouraged throughout the Regeneration Area and at Livat which in turn supports the vitality and viability of Hammersmith.</p> <p>2.6 Town centre environments are dynamic, and Ingka are constantly keeping under review investment opportunities at Livat with the aim of improving the vitality and viability of the area.</p> <p>2.7 Ingka supports the proposals to improve and enliven Lyric Square through the introduction of different uses and events which is recognised as having the potential to boost the attractiveness of the area and the strength of its evening economy.</p> <p>2.8 Overall, Ingka support the encouragement of diversification to increase the attractiveness and offer of Hammersmith. The SPD allows for Livat to respond to changes and demands in town centres.</p> <p>2.9 The key role of Livat within King Street is recognised within the SPD. Livat is in effect a functional and physical extension of King Street and is a significant shopping destination in the area.</p>	<p>Support welcomed and comments noted.</p> <p>The SPD is supportive of visitor accommodation in the town centre and the appropriateness of sites will be considered against Local Plan policies.</p> <p>We note that the internal mall at Livat provides linkages through and we acknowledge that this requires management and control for security and safety reasons, especially overnight.</p> <p>Proposed Change:</p> <p>Page 29, intervention 6 add:</p>

				<p>2.10 Ingka support the maintenance of King Street as the key retail spine within Hammersmith along with Livat and while other retail uses may be supported within the Town Centre area, they should complement the retail offer along King Street rather than compete with it.</p> <p>2.11 Pedestrianisation improvements and highway downgrading of King Street is supported to create a more attractive pedestrian environment, albeit this needs to be managed and not inhibit/undermine existing businesses who need access via King Street (See Section 3).</p> <p>2.12 The SPD recognises that engagement with key stakeholders such as Ingka and the tenants of Livat will be necessary before the works to King Street progress and any changes to operation are proposed.</p> <p>2.13 Ingka support the SPD's recognition of the importance of tourism, the visitor economy, and visitor accommodation being accelerated in Hammersmith given the benefits of a diverse range of visitors to the area. The SPD should encourage the potential to increase the capacity of this where appropriate.</p> <p>2.14 Ingka supports the SPDs work to improve the connectivity and accessibility and the proposals to improve high quality pedestrian and cycle routes across the town centre. Specifically, Ingka support improved connectivity and accessibility from Hammersmith tube station, Lyric Square and Livat Hammersmith to create a smoother journey. Although improvements must not impede or be at the expense of essential operations.</p> <p>2.15 It is recognised that Livat plays a key role in providing connectivity and permeability via publicly accessible links through large sites and between quarters. However, it should be noted that the internal mall at Livat which provides this permeability requires management and control for security and safety reasons, especially overnight.</p> <p>3.9 The SPD should recognise and offer support, to Hammersmith Town Centre being an appropriate location for hotel accommodation for both tourists and businesses.</p> <p>4.2 The SPD refers to NPPF version 2021. The NPPF was however updated in December 2023, and clarification is therefore required.</p> <p>4.3 The Map setting out the Spatial Framework is not readable due to the multiple layers provided and issues caused by separate areas of the Map not joining together correctly.</p>	<p><i>“Creating a network of links between public spaces and places of interest, to include a new enlivened pedestrian route between Lyric Square and the Apollo <u>including the Livat Centre.</u>”</i></p> <p>Agree, we will update the reference to the NPPF to the 2023 version.</p> <p>Proposed change:</p> <p>Page 11, first para amend as follows:</p> <p><i>“At the national policy level, the National Planning Policy Framework (NPPF) 2021 <u>2023</u> acts as the over-arching policy context for this SPD”</i></p> <p>Agree, we will make improvements to the readability of the Spatial Framework Map.</p>
29	29	Hammersmith BID	1. General	<p>The introduction of the SPD is a welcome formalisation of the work done some time ago by Grimshaw Architects, supported by the Hammersmith Residents Working Group, on the Hammersmith Masterplan, and subsequent work by Allies and Morrison on the King Street area. The SPD is aspirational; it cannot change or add to policies set down in the current Local Plan. However it will be a material consideration when applications are considered, so will have influence on outcomes, without specific controls. It has two main components:</p> <ol style="list-style-type: none"> 1. To inform and support the development control process 2. To set out public works proposals that are within the remit of LBHF itself, GLA TfL, etc. <p>The development control aspects of the SPD address aspects of future development that enhance the Town Centre experience of workers, residents and visitors, and include qualities such as connectivity, biodiversity, air quality, carbon neutrality, etc. The emphasis is on guidance; there are few prescriptive measures to be found in the</p>	<p>Comments noted. No change required.</p> <p>We appreciate the BID taking the time to read and comment on this SPD and the explanation and clarity in your response.</p> <p>The SPD provides indicative guidance in relation to tall buildings. This suggests locations which may be suitable for large/tall buildings, indicative development parameters and</p>

				<p>document. For example, the guidance on building heights is vague, giving ranges of 10 storeys as possible on sites. There are curiosities, such as the difference in heights suggested north and south of the Talgarth Road. Successful delivery of the LBHF vision via development is considered best dependent on cooperation by landowners/developers to enable comprehensive development of sites in multiple ownership. While clearly wise, and potentially beneficial to all, this hope may be difficult to implement. LBHF will need to engage better with large local businesses, if the hope is for them to support with capital projects. The public works aspects of the SPD will be of major interest to existing local businesses as well as potential incomers. Local businesses disagree with the claim that they were engaged in the development of the SPD. Major businesses believe that the quality of the Town Centre offer in Hammersmith falls behind that of competing centres. Thus, a profound interest in the quality and timing of the proposed public works programme.</p>	<p>key views for consideration. Planning applications for tall buildings will be assessed against the London Plan and Local Plan policies, with particular focus on townscape, heritage, and other design considerations.</p> <p>The public consultation was carried out for 8 weeks and residents and stakeholders were invited to contribute during this period. This exceeds the duration of 4 weeks required for an SPD under the Town and Country Planning regulations.</p> <p>A series of workshops were also held to allow participants a chance to understand the SPD and ask questions.</p>
30	30	Marks and Spencer and Reef Group	1. General	<p>Our clients support the preparation of this SPD which provides a strategic overview of the Council's proposals for the regeneration of Hammersmith Town Centre and their delivery objectives. At Page 4 of the SPD the Council have identified threats and weaknesses to the Town Centre which include the decline in traditional high street retail stores. Our client's proposals for the Site are specifically designed to combat this issue by creating a new and improved high quality and adaptable retail store for M+S, enabling them to commit to their long-term presence within the Town Centre in a brand defining new store. Any scheme that helps facilitate the retention of this nationally important retailer in the Town Centre should be welcomed in principle and will be a key benefit of the proposals.</p> <p>In summary, where identified above our clients are requesting changes are made to the SPD wording and content to ensure that it adequately addresses considerations relating to their proposed development of the Site and reflects wider considerations including Development Plan policies related to student housing. They would be happy to discuss their comments further with the team preparing the SPD to ensure they can be suitably addressed in the next version of the document.</p>	<p>Comments noted. No change required.</p> <p>The SPD is unable to include specific considerations for unallocated sites in the borough. Site allocations would need to be made through the Local Plan process.</p>
31	32	Inclusive Design Review Panel	1. General	<p>IDRP welcome the draft Hammersmith SPD as an opportunity to embed current council policies on accessible and inclusive design in Hammersmith town centre. The IDRP was established to ensure accessible and inclusive design is embedded in planning policy and development proposals for approval. IDRP members have lived experience of barriers faced by disabled residents in Hammersmith when using buildings, transport and the street environment.</p> <p>Hammersmith & Fulham Council's vision is to be the most accessible and inclusive</p>	<p>We welcome and your comments and really appreciate the clarity and explanation you have given on barriers facing disabled people in Hammersmith Town Centre which are understood and acknowledged.</p>

			<p>borough in the country.</p> <p>Hammersmith town centre is a key contributor to the economy of west London, representing one of west London's most important commercial centres as well as the primary retail destination for many of the borough's residents. It is also an important centre for arts, entertainment and public administration. The purpose of the SPD is to deliver a step change in achieving an accessible and inclusive physical and built environment in Hammersmith, including transforming the public realm and transport network as well as redevelopment and refurbishment of buildings throughout the area.</p> <p>The next Local Plan will be the opportunity to embed being ruthlessly inclusive as well as being the most accessible and inclusive council in the country. In summary, it will mean the council will not approve planning applications unless the applicant and their inclusive access consultant are ruthlessly inclusive in providing accessible and inclusive designs with compliant drawings. Being ruthlessly inclusive will also mean everyone has a responsibility to think, write and act inclusively without exception.</p> <p>IDRP recommend:</p> <ul style="list-style-type: none"> • a vision of an accessible and inclusive Hammersmith is embedded throughout the document. This includes not just accessible and inclusive design but also accessible and inclusive management. The outcome will be accessible and inclusive design as well as inclusive management in the DNA of everyone with responsibility for designing and managing facilities in Hammersmith town centre. • Upgrading Hammersmith Broadway transport hub and facilities to be accessible and inclusive as well as welcoming place similar to the Livat Centre. • Updating Weaknesses to include barriers faced by disabled people and Opportunities to create equitable access for everyone including disabled people. • Including information on the barriers faced by disabled people in Hammersmith town centre together with possible mitigations. • Replacing "liveable" with statements such as 'positive experience for all, including disabled people' because "liveable" means different things to different people. • language to be comprehensive as well as accessible and inclusive e.g. p 58 para E Active and Accessible Places: where we need inclusive external as well as inclusive internal environments. • PowerPoint presentations to IDRP need to be in an accessible and inclusive format for panel members. • Spatial planning policy team bring future draft SPDs to IDRP at an earlier stage to ensure documents are co-produced with disabled residents. <p>Barriers faced by disabled residents using facilities in Hammersmith town centre include:</p> <p>Hammersmith Broadway transport hub:</p> <ul style="list-style-type: none"> • passengers from White City face bottlenecks created getting beyond Hammersmith towards the 2 hospitals at Charing Cross and Chelsea & Westminster which frequently means changing buses from the lower part of the bus station then travelling 	<p>Agree to add Accessible and Inclusive design to the vision as follows:</p> <p>Proposed change:</p> <p>New entries bullet list on page 15 – Vision. See rep 56 for details and as follows:</p> <ul style="list-style-type: none"> • <u>Accessible and Inclusive town centre that provides a positive experience for all.</u> <p>Agree to add to the weaknesses the barriers facing disabled people and the opportunities – See rep 51 for details</p> <p>Acknowledge the use of liveable in the objectives section on page 17 is objective but we are content with its use in this context. Clarification on it being a positive experience for all is followed up in this paragraph already.</p> <p>Agree to make sure PowerPoint presentations are in an accessible and inclusive format.</p>
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				<p>upstairs by lift or escalator to catch the next bus to travel southwards. The same works in reverse south to north. Journeys from White City to Chelsea and Westminster hospitals can exceed an hour and a half.</p> <ul style="list-style-type: none"> • Access to the upper floor of the bus station often suffers from old broken lifts and the escalators near Tesco are frequently under repair in one direction or another. These lifts/ escalators have been like this for over 5 years. • Poor wayfinding from District and Piccadilly lines and limited access to bus station for onward travel means it does not feel accessible and inclusive or welcoming. This is an important issue for Hammersmith and Fulham Council welcoming visitors to their flagship accessible and inclusive Civic Campus. • Loud music and announcements off putting to autistic and neurodiverse people • Walking across Lyric square is scary in winter particularly if there is any ice on the slope. This is an example of aesthetics trumping accessible and inclusive design. <p>Impatient passengers pushing past Recently a disabled resident was trying to negotiate this at the bus station when an impatient person barged past, kicking the walking stick and knocking the disabled person off balance. The disabled person did not fall because another passenger grabbed the arm.</p> <p>Buses not pulling up properly along kerbs at bus stops. People have to either step over a massive gap to reach the pavement / bus stop or have to step down a large height onto the road before stepping back up onto the pavement. This happens on 90% of journeys.</p> <p>We recommend that bus drivers take pride in pulling up properly along kerbs at bus stops whatever the traffic conditions. It is too easy to think it is good enough when it has a massive impact on people particularly disabled or visually impaired people getting on or off the bus.</p> <p>The multi- storey car park at Livat Centre has free parking for blue badge holders.</p> <p>The car park does not have an easy process for free parking for blue badge holders.</p> <p>The current process for free parking requires disabled people to walk further and/or get in and out of their car more than necessary by requiring them to speak to a security person at the exit barrier. It is difficult to find and reach to press the small button on the intercom to call for attention at the exit barrier. There is no information available about the process near blue badge parking bays and by the payment machines. Simple improvements like posters and information on the website could make a huge difference.</p> <p>Dedicated cycle lane on King Street. This cycle lane created barriers for disabled and visually impaired residents without any mitigations. Some cyclists do not always use the cycle lane provided for their benefit.</p>	
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32	33	TfL Spatial Planning	1. General	<p>Thank you for consulting Transport for London (TfL) on the January 2024 draft of the above-named SPD. The following response has been prepared by officers in TfL Spatial Planning reflecting TfL's statutory role as the strategic transport authority. It is separate from any response submitted by Places for London in their capacity as a landowner and potential developer. The designation of Hammersmith as a major town centre in the London Plan is noted; alongside the high level of access to public transport. Therefore, in strategic transport terms the area is suitable for the promotion of growth of jobs and homes in line with the Good Growth objectives as set out in London Plan, specifically GG2 Making the best use of land; subject to the necessary detailed transport modelling and transport interventions needed to support the delivery homes and jobs. With the exception of the detailed matters discussed below (namely removal of the A4 flyover, reconfiguration of the gyratory, and making the A4 less of a barrier; as a cycle route with lower speeds and more surface level crossings), the general transport aspirations of the draft SPD are supported and align with strategic transport policies. The high-level vision to deliver new public realm, more space for pedestrians and enhanced active travel facilities for example, accord with the London Plan and Mayor's Transport Strategy. To further support delivery of these objectives, TfL recommends reference to Healthy Streets and Vision Zero within the SPD.</p> <p>As part of the proposed regeneration and public realm enhancements TfL recommends that the SPD makes reference to the inclusion of public cycle parking including spaces for e-cargo bikes. Alongside this, the delivery or enhancement of inclusive wayfinding to serve the Town Centre should be referenced. There is a noticeable lack of diversity, equity and inclusion aspiration within the plan an element which is mainstay within such a document. The acknowledgement that those with protected characteristics have a range of needs, which should be designed into any space as a priority, and experience spaces differently has not been noted and should be incorporated into any future iteration. Design guidance such as GLA's Safety in Public Spaces: Women, Girls and Diverse People should be adopted and promoted as best practise. In addition, a key element within the delivery of a vibrant town centre environment and successful night-time economy, as set out in the draft SPD, is the inclusion of women and girls in the design process and ensuring they feel safe when moving around at all times of day and night, in line with the Mayor's strategy to eliminate Violence Against Women and Girls (VAWG). To this end, TfL recommends that reference is made to the Mayor's VAWG strategy within the SPD and that it highlights the need for inclusion of women and girls at consultation and design stages, and use of tools such as night-time active travel zone assessments to identify where interventions are needed.</p>	<p>Support welcomed. Comments noted.</p> <p>Agree to add reference to inclusive wayfinding as follows:</p> <p>Proposed change:</p> <p>Page 49, third para add:</p> <p><i>"Renewing the public realm and streets to improve air quality and provide more comfortable, greener routes to promote walking and cycling will be a priority <u>and inclusive wayfinding</u>".</i></p> <p>Agree to add reference to the GLA's Safety in public spaces: Women, Girls and Diverse people Design guidance and reference to the Mayor's Strategy to eliminate Violence Against Women and Girls as follows:</p> <p>Page 60, 5th para add:</p> <p><i>"Development proposals should seek to contribute towards improved wayfinding and legibility across the public realm of Hammersmith town centre, <u>considering the range of needs which should be designed into spaces – see also GLA's Safety in Public Spaces: Women, Girls and Diverse People and the Mayor's strategy to eliminate Violence Against Women and Girls (VAWG)</u>".</i></p>
33	34	Royal London	1. General	Our Client welcomes the objectives of the SPD to focus on transforming the public realm and transport network as well as the redevelopment and refurbishment of	Support welcomed. No change required.

		Asset Management		buildings throughout the area.	
34	35	FORE Jersey VIII Limited	1. General	<p>On behalf of our client, 'FORE Jersey VIII Limited' we write in response to the draft 'Hammersmith Town Centre SPD (Consultation Version), 2024' which, having had the opportunity to review, would like to provide comments and observations. We set these out on their behalf, below.</p> <p>255 Hammersmith Road is approximately 0.22 ha in size and is located at the junction of Hammersmith and Butterwick, in Hammersmith Town Centre. The Site is bound to the north by Hammersmith Road (A315); to the east by an office building (plus an undercroft service yard and raised public realm); to the south by a further office building; and to the west by Butterwick Road (part of the Hammersmith Gyratory). The existing building comprises 10 storeys; ground and eight upper storeys, plus a plant enclosure. The building up until September 2023 was occupied by L'Oreal Services as their UK headquarters. L'Oreal's relocation to the White City towards the end of last year (2023) facilitated the early acquisition of the Site by my client in 2017, providing the opportunity for them to consider opportunities for the redevelopment of the Site.</p> <p>In November 2023, a planning application was submitted to LBHF for the comprehensive retrofit, refurbishment and extension of the existing building to provide a two-storey rooftop extension and retrofit of the new façade. The application - which retains the original and principal land use as office floorspace (including intensification and upgrading the quality of floorspace), plus the provision of a ground floor activating 'Urban Village Hall' - is currently pending determination (application reference 2023/03134/FUL).</p> <p>Comments and Observations Having had the opportunity to review the draft SPD, my client would like to offer their support of the preparation of the document which seeks to provide a strategic overview of the Council's proposals for the regeneration of Hammersmith Town Centre and their delivery objectives; noting the Council's recognition of the opportunities and growing interest by developers towards the heart of Hammersmith and how this can be both accommodated and supported. In terms of the document itself, page 7 of the SPD identifies a number of opportunities within the Town Centre, including "mixed use development opportunities to deliver new homes and jobs, including affordable homes". Pages 15 to 17 go further to substantiate this by indicating that the key outcomes are to provide 2,800 new homes; deliver 10,000 new jobs (including new affordable and flexible workspace); replace the Hammersmith flyover; provide a green and healthy town centre; and contribute towards the delivery</p>	<p>Comments noted. Support welcomed.</p> <p>No change required.</p>

				<p>of net zero carbon buildings. Page 8 identifies 255 Hammersmith Road (alongside buildings to the west, south and south east) as a “other key opportunity” which is then subsequently identified on page 26 as falling within the ‘Eastern Quarter’.</p> <p>Pages 39 to 42 consider the future vision of this quarter to be one which will be “transformed to realise opportunities to provide large floorplates and flexible developments to strengthen its focus as a major employment and visitor hub” and “will provide high quality office accommodation and new homes which will improve the local townscape, create a strong synergy with the town centre and strengthen identity”.</p>	
35	36	The Hammersmith Society	1. General	<p>Summary: This long awaited SDP for Hammersmith Town Centre is a welcome first draft which requires revision and refinement to achieve the objective to realise, and not repeat, the aspirations and vision of the Local Plan.</p> <p>The SDP presentation should captivate and inform both commercial and public interests: present a logical narrative, illustrated by legible, annotated purposeful diagrams, avoid repetition, avoid aspirational statements. Champion clarity and brevity.</p> <p>1 Background</p> <p>1.1 Intent: The SPD should provide guidance to support the policies of the LBHF Local Plan. To fulfil this intent, the SPD should show how the policies of the Local Plan could be implemented, effectively setting out a planning brief for the town centre.</p> <p>Existing Local Plan policies and aspirations for the town centre include:</p> <p>HRA1: setting out the initial brief for what has become the Civic Campus</p> <p>HRA2: endorsing the flyunder and associated development and replanning the traffic interchange at the Broadway.</p> <p>Identification of a wide range of opportunities including:</p> <ul style="list-style-type: none"> Optimising heritage assets Improving pedestrian and cycle infrastructure Improving links to the river Raising the quality and range of shops, services and leisure facilities Facilitating new jobs General upgrading of the urban environment with new public spaces and public 	<p>Comments noted. No change required.</p> <p>We appreciate you taking the time to read and make comments on the SPD.</p> <p>The SPD is a planning guidance document only and should be read alongside our Local Plan and the London plan in terms of policy provision. Many of the aspirations contained within the SPD are long term and subject to further work with key stakeholders and it is therefore not possible to provide a definitive practical and procedural guide for the centre.</p> <p>The SPD does contain useful guidance to help commerce and development understand the opportunities within the centre.</p>

				<p>realm renewal</p> <p>Improving and optimising St Paul's Green</p> <p>The draft SPD restates these and many other Local Plan aspirations for the future of the town centre, and fails to describe the next steps to provide the practical and procedural guidance to map out a way forward - and motivate and inspire commerce and development to advance the directives of the local Plan.</p>	
36	36	The Hammersmith Society	1. General	<p>Cover picture (repeated on p14): this is the most informative image of the document, describing the potential future town centre, but needs commentary and notation to explain the proposals shown.</p>	<p>Comments noted. The Cover page is illustrative only and is intended to provide an illustrative example as to how the guidance of the SPD when taken as a whole could be delivered.</p> <p>No change required.</p>
37	37	Matt Hedges	1. General	<p>I consider there to be some fundamental issues with the proposed Supplementary Planning Document:</p> <p>The document contains a number of headline projects that are being used to make the proposals more attractive, however:</p> <p>Flyunder (HRA2 Strategic Site A (p.30-31): this is a project that I have detailed knowledge of having been involved in the design from 2006. This project has faltered for a number of reasons, but primarily the cost of undertaking the work vs. the potential gain from the resulting developments. This has led to a shortfall in funding the project.</p> <p>Since the proposals were put forward there have been profound changes including:</p> <ul style="list-style-type: none"> · The Climate Emergency: this has led to a drive towards reducing rather than enabling traffic. Furthermore the project would contain a huge amount of embodied energy and carbon footprint due to the amount of concrete required. How would this be justified within the sustainable policies? · The type of traffic has also changed: one justification for sinking the road was to manage and reduce pollution at ground level, however with the move to predominantly electric vehicles, this benefit has significantly reduced. · Covid has reduced the amount of money TFL has available to fund such a large project. It is therefore unlikely the Flyunder project will proceed in the short to medium term. Whilst it is critical to plan for the moment when the current flyover repairs reach the end of their design life, which was estimated as about 50 years, it is also necessary to plan the centre of Hammersmith with the genuine probability the Flyunder scheme will not be realised. <p>Hammersmith Highline (King Street Key Intervention 2 (p.35)): this is another project that I was involved in the inception of. This was the subject of a public competition, however it was never the subject of a detailed scoping exercise to ascertain its feasibility.</p> <p>Furthermore, although there was some initial interest expressed by the previous</p>	<p>Comments noted.</p> <p>We appreciate you taking the time to read and make comments on the SPD.</p> <p>The detail and explanation you have provided on the flyunder is clear and understood. The current cost of the project is significant and requires further discussion with key stakeholders, including central government, to help resolve. The project therefore remains as a 'long-term ambition' with no specific timetable for delivery.</p> <p>The SPD provides indicative guidance in relation to tall buildings. This suggests locations which may be suitable for large/tall buildings, indicative development parameters and key views for consideration. Planning applications for tall buildings will be assessed against the London Plan and</p>

			<p>owners of King's Mall immediately prior to the sale, there has not been any interest expressed by either the current owners of the King's Mall (Ikea) or TFL, who own the viaduct. I can only express doubt over the likelihood this is a serious proposal. The 'Urban Boulevard' (Hammersmith Broadway Key Intervention 1 (p.29): this proposal with the image of a shared space similar to Exhibition Road has to be hugely dependant on the construction of the Flyunder to drastically reduce the volume of traffic passing through this space.</p> <p>The pedestrianisation of King Street (King Street Key Intervention 4 (p.35)): is again hugely dependent on the drastic reduction in the volume of traffic to enable it. LBHF need to be able to demonstrate where the local traffic will be routed to avoid King Street. No proposals have been submitted to justify this. It was noted in the meeting the transport schemes above were dependant on LBHF/TFL undertaking traffic modelling studies. The big question is: what happens if the traffic modelling states that either the proposals are not feasible, or are entirely dependant on the construction of the Flyunder (which in itself is not feasible in the short to medium term)?</p> <p>It was noted in the meeting LBHF are seeking funding for the more comprehensive project including the Flyunder. However it was accepted that this was less likely to secure funding in the short to medium term if at all. It was noted seeking this funding was being undertaken over that of getting funding for a scaled back scheme that attempted to achieve most of the improvements to the public realm minus the Flyunder. Not seeking funding for the scaled back project (which by its nature is more likely to receive funding) was justified by saying getting this funding would prohibit/undermine the likelihood of getting funding for the Flyunder scheme, and LBHF are aiming high. There appears to be a serious risk that developers will benefit from the green light to build the tall buildings etc., whilst the result of the traffic studies and the lack of funding for the Flyunder will mean the accompanying improvements to the public realm will not happen to balance them.</p> <p>Tall Buildings:</p> <p>The location of any tall buildings in the heart of Hammersmith is going to have a huge impact on the local character, as tall buildings appearance on the skyline is visible from a great distance. The tall buildings in the White City Regeneration Area can be seen from Barnes on the south side of the river! The size and location of the tall buildings needs to be decided with particular sensitivity. The location of several of the tallest buildings in the gradient map have already been decided. However we need to ensure that not only are the heights of new tall buildings located carefully, but their necessity is justified. The workplace has changed considerably since Covid and we need to balance the need to promote Hammersmith as a business centre, with current working practices. There also needs to be a greater emphasis on balancing the loss of amenity suffered from the imposition of tall buildings, with public/community gain from improved public amenities and housing; and by this I mean truly affordable housing. We also need to ensure that provision is included to try wherever possible (and it should be possible), to ensure their location is not on the perimeter of the Regeneration Area where they will give rise to leakage, where like 227 Wood Lane, the adjacent 30 storey building at Imperial College has been used to justify the tall building outside of the Regeneration Area. There is a necessity for there to be a buffer zone to the perimeter of the area accommodating tall buildings to prevent this. This control needs to be set out clearly objectively in policy.</p>	<p>Local Plan policies, with particular focus on townscape, heritage, and other design considerations.</p>
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38	38	Dave Hinton (former SBD officer)	1. General	<p>Sadly, looked for references to the Secured by Design standards (SPD) including the Crime Prevention through Environmental Design (CPTED), not there. To design public realm without thought to physical security, fear of crime and counter terrorism is frankly criminal.</p> <p>Remembering that Secured by Design and public space security and management are legal responsibilities it is very telling that the council, seem to have forgotten them as key themes. I would suggest that the fear of crime and crime are perhaps the biggest influencers with regard to the use of public spaces. Particularly night time economy. Full SPD compliance is and should be highlighted to developers and architects as a borough planning condition.</p>	<p>Comments noted.</p> <p>We appreciate you taking the time to read and comment on the SPD, bringing your knowledge of Secured by Design.</p> <p>Agree, reference to Secure by design will be added.</p> <p>Proposed Change:</p> <p>Page 60, 5th para add:</p> <p><i><u>“Consideration should also be given to secured by design standards – see Secured by design SBD and Crime Prevention through Environmental Design (CPTED)”</u></i></p> <p>The SPD is a planning guidance document only and should be read alongside our Local Plan and the London plan in terms of policy provision, together with other SPDs.</p> <p>Planning conditions for secure by design would be a necessary part of any relevant application in the town centre.</p>
39	38	Dave Hinton (former SBD officer)	1. General	<p>Hammersmith Borough is known as the gateway to London and is approximately 6 square miles in size: Movement around and through the borough has always been limited due to the physical impact of the river, canal, various rail lines and the A4/A40 major roads.</p> <p>Unfortunately, as result of this certain ‘choke’ points have arisen, ironically efforts by the council have removed many of the local resident ‘cut throughs’ to avoid the major through traffic hubs, causing more pollution as additional vehicles remain static within the resulting traffic at these hubs. It is quite possible in a vehicle to take more than an hour or two to move north to south in the borough.</p> <p>It should be noted that planning must reflect both local movement around the borough and none local movement through it. Access and movement obviously being critical to</p>	<p>Comments noted.</p> <p>Further references to accessibility are to be inserted into the SPD. See reps 31, 32, 51, 52 for details.</p>

				<p>both visitors, residents, and business. Increasingly movement through/into the borough has been limited by council traffic management and the closure of Hammersmith Bridge.</p> <p>It also needs to be remembered that many of the people working within the borough, have no choice but to commute. This is of particular concern for the emergency services and late-night service personnel who work unusual hours and cannot rely on public transport.</p> <p>The town centres also must be accessible for those who are less able bodied than the few 'cycle riders'. There are a large band of people who reside in the space between fit and fully abled bodied and classified disabled, who cannot walk from their homes to the town centre and the associated facilities.</p> <p>The borough is a 24/7 space, this is particularly critical regarding the town centre spaces, where often the 24hr nature of these spaces is forgotten or ignored within new development presentations. With a concentration upon day time and early evening night time economies. Also important is the transitional streets around town centres that link the centre with the more residential areas.</p> <p>Many studies have shown that crime is affected in the town centres by the frequency and the amount of movement through them. This movement of both pedestrians and vehicles increases the amount of casual surveillance by capable guardians, i.e. more eyes, and ears. This is of particular importance with regard to the current sad state of the boroughs public space CCTV systems. Limiting the amount of movement will increase fear of crime dramatically for the users.</p> <p>Finally in Hammersmith there are two main east west routes: the A4, and the King Street and Glenthorne Road to Hammersmith Road links. Accessing each other at the Hammersmith Gyratory. With a minor east west link along Brook Green and through Trustly Arches and various side streets. Otherwise, you have to go to Shepherd's Bush and make use of the Goldhawk Road. It should be noted that the A4 is of very limited use when it comes to navigating locally within the borough as it is a dual carriageway through route, with many of the side roads off it blocked and only three north south vehicle crossing points, within the borough. The west bound A4 carriageway offers no access to the northern side streets.</p> <p>Finally, King Street has already been adversely affected by the new cycle route, I wonder what figures we have to show the movement along it in cycles compared to vehicles. Bristol has removed a similar route as it simply did not get used enough and contributed to congestion, whilst adversely affecting business.</p> <p>It also needs to be remembered that because of the boroughs current accessibility many major businesses are located here.</p>	
40	39	Historic England	1. General	<p>Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into</p>	Support welcomed.

				<p>account at all stages and levels of the Local Plan process.</p> <p>We note and welcome the contents of the draft SPD in principle, which aims to deliver a clear vision for the regeneration of Hammersmith Town Centre including the enhancement of its historic environment. We particularly welcome plans to replace the Hammersmith Flyover with a tunnel (the flyunder) which should significantly enhance the setting of nearby listed buildings, in particular St Paul's Church and the Apollo (both Grade II*), as well as the character of the various conservation areas both sides of the roadway.</p>	
41	12	Britel Fund Trustees Ltd	1. General - Housing	<p>The draft SPD seeks to maximise the delivery of 'genuinely affordable homes' with a mix of tenures and unit sizes to meet the needs of residents. The draft SPD would benefit from cross referencing with relevant policies in the Local Plan. The section on Planning Obligations (S106 and CIL) recognises that planning applications will be considered on a case by case basis and developers will be expected to submit a detailed viability assessment to justify the level of affordable housing that can be achieved. We agree with this approach, recognising the circumstances pertaining to individual sites. Consistent with the indicative housing targets set by Local Plan, the SPD makes provision for 2,800 new homes however, the precise location for and composition of potential schemes is silent. We note that the majority of new homes are targeted for delivery during the period 2026 – 2035 i.e. the second half of the plan period. Many of the sites identified by the SPD within the town centre are undergoing development for new homes. Consequently, there is a need to look to other sites that may be capable of delivering additional homes to meet the requirements set out in the Local Plan. In this respect, our clients' site could assist in meeting some of this need in the future through redevelopment of vacant office space.</p>	<p>Comments noted. No change required.</p> <p>The SPD is a planning guidance document only and should be read alongside our Local Plan and the London plan in terms of policy provision for affordable housing. The SPD cannot identify sites for housing outside of the Local Plan and applications for housing provision in the centre will be assessed through the application process.</p>
42	24	Environment Agency	1. General Environmental comments	<p>In addition to the specific comments outlined above, please also consider the following general comments regarding constraints within our remit.</p> <p>Flood Risk It would be beneficial if the SPD had more emphasis on the risk of flooding in the Hammersmith Town Centre area. It would be beneficial to refer prospective developers to local plan policy CC3 (Minimising Flood Risk and Reducing Water Use) of the Hammersmith and Fulham Local Plan 2018. We recommend the SPD to include reference to flood resistance and resilience measures within the developer guidance paragraphs of the SPD. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways which can help reduce flood damage. We also recommend that the SPD explicitly refers to the relevant policies within the LBHF local plan, strategic flood risk assessment, and the climate change SPD, so that users of the Hammersmith Town Centre SPD understand where further policy and guidance on Flood Risk for can be found.</p> <p>Thames Estuary 2100 Plan Although there is no riverside frontage within the area of the SPD, the area does benefit from the presence of the tidal flood defences. Consideration should be given to the delivery of the Thames Estuary 2100 (TE2100) Plan, which requires flood defences to</p>	<p>Comment noted. No change required.</p> <p>We welcome your comment, however, it is relevant to note that the SPD is a guidance document only and should be read alongside the Local Plan, whereby this requirement is already embedded in Local Plan Policy CC4 and in the Climate Change SPD - Flooding and Sustainable Drainage section.</p> <p>With regard to Biodiversity Net Gain we note your comments. The SPD cannot introduce requirements beyond the government 10% requirement. This would need to be done via a review of the local plan. See proposed changes at rep 111.</p>

			<p>be raised in order to maintain the current level of protection from the Thames. Following the publication of the TE2100 10-year review, it is now recommended that the tidal flood defences will need initial raisings by 2050.</p> <p>Tidal Breach It is disappointing that the SPD fails to acknowledge that a large proportion of Hammersmith Town Centre is within the latest modelled breach extent. While we appreciate that the SPD is not setting out any new residential allocations, it is worth reiterating that any development proposed within the breach extent must avoid sleeping accommodation below the breach level.</p> <p>Biodiversity and Environment It is positive to see that biodiversity and the environment is given a good platform in this SPD.</p> <p>Biodiversity Net Gain Biodiversity Net Gain (BNG) came into force for major planning applications on 12 February 2024, it would be beneficial to see reference to BNG targets for developments that come forward in the Hammersmith Town Centre, and where possible, encourage a target that goes beyond 10%. For sites with no/low baseline biodiversity value, we recommend that they are referred to the Urban Greening Factor (UGF) (Policy G5, Urban Greening of the London Plan 2021) Use of UGF can help to deliver other targets within the SPD, such as green and blue infrastructure, greening Hammersmith, improving the public realm, as well as helping to deliver biodiversity uplift.</p> <p>Green and Blue Infrastructure It is positive to see that the SPD has highlighted green infrastructure prominently throughout the document. While we appreciate that the river Thames is not within the SPD area, more emphasis could be made on blue infrastructure, and how an interconnected network of green and blue infrastructure can have multifunctional benefits for town centers, such as Hammersmith.</p> <p>Sustainable Urban Drainage Systems We strongly recommend that the SPD refers to Policy CC4 (Minimising Surface Water Run-Off with Sustainable Drainage Systems) of the LBHF Local Plan, and KP19 of the Climate Change SPD, to further promote the use of SuDS in the Hammersmith Town Centre Area. The SPD misses an opportunity to further promote the use of SuDS features. Good SuDS can have multifunctional benefits including reducing the risk of surface water flooding, promoting biodiversity, and providing space for the public realm. We strongly encourage the promotion of SuDS as part of any public realm, and any new development within Hammersmith Town Centre.</p> <p>Water Resources We strongly recommend that the SPD includes reference to improved water efficiency, which will align this document with the recently adopted Climate Change</p>	<p>Blue and Green Infrastructure, BNG and Urban greening factor requirements are referenced in our recently adopted SPD on Climate Change which is signposted on page 11. See also the proposed changes at rep 111.</p>
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				<p>SPD 2023.</p> <p>This is because increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.</p> <p>We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area.</p> <p>Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments and encouraged within the SPD.</p> <p>Residential developments</p> <p>All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations &c. (Amendment) Regulations 2015. However, we recommend that in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.</p> <p>Commercial/Industrial developments</p> <p>We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>Groundwater</p> <p>Please note that much of the area of the Hammersmith Town Centre SPD is situated above a superficial aquifer, secondary A. We recommend that this is highlighted within the SPD and that any development that takes place does so in accordance with reference to our Groundwater Protection guidance: https://www.gov.uk/government/collections/groundwater-protection</p>	
43	29	Hammersmith BID	1. General Recommendations -	<p>Speedy implementation of improvements to the public realm at both large and small scale, within a five year programme.</p> <p>Formal engagement with businesses in the design and programming of public works. Coordinate into the LBHF public works programme proposals for public realm improvements in the Eastern and Broadway Quarters prepared by BID and major local businesses.</p> <p>Prioritisation of the transformation of the gyratory to reunite the Broadway with the rest of the Town Centre.</p> <p>A greater recognition that the market dictates what developments are brought forward, affecting LBHF's Local Plan aspirations. An emphasis on 'Long Life, Loose Fit' buildings to facilitate change of use would be wise.</p> <p>Engagement with BID on the Town Centre Management Plan.</p> <p>Development of protocols for seed and co-funding of smaller scale public realm improvements.</p> <p>Incorporation of the Allies and Morrison plans for the Town Centre into the SPD so that it is a material consideration</p>	<p>Comments noted. No change required.</p> <p>We acknowledge your comments and suggestions regarding the public works programme, the town centre management plan and public realm improvements which will require further discussions outside of this public consultation.</p> <p>Both the earlier Grimshaw masterplan proposals and the updated Allies and Morrison concepts have been used to inform the approach of the SPD,</p>

					including detail of key sites and developer guidance sections of the document.
44	38	Dave Hinton (former SBD officer)	1. General Entertainment -	Entertainment: Olympia, the Lyric and LAMDA; I was disappointed in the LAMDA developments lack of facility for public transport (Coaches) or even any sort of parking in its new build. Olympia will become an exhibition, business, and event hub, however for it to work, the shows all require servicing by vehicular traffic. Just for set up and take down for these events, vehicles need access. The current tube station is not sufficient for such events or this purpose.	Comments noted. No change required.
45	12	Britel Fund Trustees Ltd	1. General Affordable Workspace	<p>We note that maximizing the delivery of new affordable workspace is a key objective of the SPD. This is particularly important where existing office premises no longer meet modern business needs, including those premises that may be in the wrong location and where alternative uses better support the vision for the town centre. The draft SPD recognises that Hammersmith has a range of opportunities to meet the challenges of the postpandemic world. This is particularly important, in relation to uncertainty for office space demand.</p> <p>Where demand does exist, the SPD recognises that this is generally expressed in terms of modern accommodation that is suitable to meeting current and future business needs. In contrast, older office stock is unlikely to see take up without significant investment and such investment may be unviable given reduced demand and against a backdrop of increased construction/refurbishment costs.</p> <p>Our client considers that there is a lack of recognition within the SPD relating to redundant / vacant and older office / business premises within Hammersmith. Although it is noted that the SPD does encourage the efficient use of unused and underused areas within the town centre. Clearly, it is important that an appropriate balance is struck between competing uses and the general support given in the SPD to diversification of uses. An assessment of individual site characteristics will assist in the identification of future opportunities to better utilise existing sites and premises in accordance with the overall vision of the SPD.</p>	<p>Comments noted. No change required.</p> <p>Site identification and policy provision for alternative uses on sites will be carried out in a future of the Local Plan.</p>
46	29	Hammersmith BID	2. Introduction	<p>The document begins with an introduction describing Hammersmith, its connectivity and general character. The Town Centre is a London Plan Opportunity Area, along with White City, Earls Court and South Fulham also in the borough. Current, recent and proposed major developments are identified.</p> <p>Purpose of the SPD</p> <p>The SPD sets out a 'shared vision' for the regeneration of the Town Centre. This involves both the development control and public works aspects of planning. The SPD clarifies current National & Local Plan policies; it cannot change or add policy objectives. It aims to assist in the delivery of the following Key Strategies:</p> <p>Climate Change SPD Targeting Net Zero, etc. Industrial Strategy Enterprise, Innovation & Skills Masterplanning/Design Coding and Planning Briefs Emphasis on site-wide comprehensive development implemented by landowner cooperation. Planning Briefs and Design Codes may be used to steer development. The design Review Panel will have an important role.</p>	Comments noted. No change required.

47	36	The Hammersmith Society	2. Introduction	Where we are now (p8&9): presents random highlighting of development sites without reference or explanation to their significance to the planning policies	<p>Comments noted. No change required.</p> <p>This section is for context only and provides an overview of sites that are in the planning process or that have received planning permission, alongside other key opportunity sites. This is to illustrate the scale of change already taking place in Hammersmith town centre.</p>
48	36	The Hammersmith Society	2. Introduction	Resident led masterplan (p12): neither endorsed by the residents' group nor reviewed through public consultation, the Grimshaw report was a useful stepping stone but far from a conclusive document.	<p>Comments noted. No change required.</p> <p>The resident led masterplan does not hold any planning weight and therefore was not the subject of a public consultation. Key elements of the masterplan have informed the approach and guidance provided within the SPD.</p>
49	36	The Hammersmith Society	2. Introduction	Purpose of the SPD (p11): a lengthy account which could be consolidated into five or six single- line statements to bring clarity and engagement to the reader.	<p>Comments noted. No change required.</p> <p>The detail provided in this section is considered to be appropriate to explain the document and the policy framework for the SPD.</p>
50	38	Dave Hinton (former SBD officer)	2. Introduction	The SPD introduction: states that we have poor quality public realm and poor pedestrian environment? But we have many wide pavements and the public park spaces are excellent (Ravenscourt, Brook Green, Furnival Gardens) and there is nothing wrong with the Lyric Square or St Pauls Green. What do you define as being a quality public space?	<p>Comments noted. No change required.</p> <p>We agree that many parts of the town centre do have good public realm, but it is important to note the poor quality that does exist in the town centre.</p>
51	32	Inclusive Design Review Panel	2. Setting the Scene	<p>Setting the Scene on pages 6 and 7 is a helpful introduction. Recommendations in italics</p> <p>Weaknesses: recommend</p>	<p>Comments noted.</p> <p>Agree to change bullet points as follows:</p>

				<p><i>Barriers in public realm faced by pedestrians, dominated by vehicular traffic...</i></p> <p><i>Barriers faced by disabled people in the pedestrian environment.</i></p> <p>Opportunities: recommend</p> <p><i>Inclusive mixed used development ...</i></p> <p><i>Inclusive public realm and open space</i> <i>Stitch the town centre back together, improving inclusive connections to the river and improve air quality/urban greening.</i></p>	<p>Proposed change:</p> <p>Page 7, weaknesses box. Amend 3rd bullet:</p> <ul style="list-style-type: none"> • <i><u>and barriers faced by disabled people in the pedestrian environment.</u></i> <p>Page 7 opportunities box. Amend 1st, 3rd and last bullets:</p> <ul style="list-style-type: none"> • <i><u>Inclusive mixed use development opportunities to deliver new homes and jobs including affordable homes.</u></i> • <i><u>Improve the quality, accessibility and inclusivity of the public realm and open space.</u></i> • <i><u>Stitch the town centre back together, improving inclusive connections to the river and improve air quality/urban greening.</u></i>
52	32	Inclusive Design Review Panel	2. Purpose of the SPD	<p>P10 para 2: insert an accessible and inclusive before 'cultural hub' to celebrate the council's vision for an accessible and inclusive Civic Campus.</p> <p>P10 para 5: insert inclusive before 'arts, culture and leisure'...</p> <p>P10 para 7: Key objectives to include creating accessible and inclusive new public spaces and more inclusive legible routes; as well as redevelopment and refurbishment of inclusive buildings.</p> <p>p11: Policy context to include LBHF policy on accessible and inclusive design as well as compliance with M4(2) accessible and adaptable housing and M4(3) wheelchair housing.</p> <p><i>P 11: Masterplanning/Design Coding and Planning Briefs</i></p>	<p>Comments noted.</p> <p>Proposed change:</p> <p>Page 10. Amend as follows:</p> <p>Para 2:</p> <p><i>"Once completed, the Civic Campus will provide <u>an accessible and inclusive</u> cultural hub and important gateway development at the western edge of the town centre.</i></p>

				<p>Para 2: Use of site wide masterplanning supported by appropriate design codes to facilitate the optimisation and comprehensive inclusive development, will be encouraged as part of the Development Management process.</p> <p>P 11 last para: Our Design Review Panel and Inclusive Design Review Panel may review development proposals to ensure that they comply with council policy on providing accessible and inclusive design as well as other council policies such as climate change.</p>	<p>Para 4:</p> <p><i>The SPD builds upon Hammersmith's existing strengths as a major office and retail centre, but also seeks to diversify the town centre offer, strengthening its role as a centre for <u>inclusive</u> arts, culture and leisure, alongside encouraging....</i></p> <p>Para 5:</p> <p><i>Key objectives of the SPD focus on transforming the public realm and transport network, creating <u>accessible and inclusive</u> new public spaces and more legible routes; as well as <u>inclusive</u> redevelopment and refurbishment of buildings throughout the area".</i></p> <p>Compliance with M4(2) and (3) is already included in the Local Plan which this document refers to.</p> <p>Proposed change:</p> <p>Page 11. Amend para as follows:</p> <p><i>"Use of site wide masterplanning supported by appropriate design coding to facilitate the optimisation and comprehensive <u>inclusive</u> development, will be encouraged as part of the Development Management process."</i></p> <p>The role of a design review panel is advisory and not to replace the role of planning</p>
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					officers in determining compliance with policy. The proposed wording could be misleading.
53	30	Marks and Spencer and Reef Group	2.Masterplanning/Design Coding and Planning Briefs	Page 6 of the SPD mentions the Council will expect landowners for sites under multiple ownerships to work together to bring more comprehensive development forward. If they do not and take a phased approach to development then it says proposals should illustrate how they would not fetter the ability of adjacent sites to come forward for an optimum form of development. This text appears to acknowledge that there are times when circumstances mean that sites under individual leaseholds which are part of a wider freehold will have to come forward in isolation. This is the case for 27-39 King St. Both the Girdlers and our clients are satisfied the neighbouring sites within the freehold can be optimised in future alongside our emerging proposals.	Comments noted. No change required.
54	24	Environment Agency	3. Vision	<p>We support the inclusion of a 'sustainable green and liveable Hammersmith' as a key objective for delivery (page 17). We recommend that there is emphasis that all developments should significantly enhance the blue and green infrastructure network and restore, enhance, and increase wildlife and biodiversity.</p> <p>We also recommend that reducing flood risk is incorporated into this objective, as redesigning the public realm, particularly using green infrastructure can have multifunctional benefits including reduced flood risk.</p>	<p>Comments Noted.</p> <p>This is included and detailed in our Climate Change SPD, and links to Urban Greening Factor and Biodiversity net gain. The Climate Change SPD is referenced on page 11 as part of the relevant policy context and must be considered as a material consideration in planning decisions.</p> <p>Proposed change:</p> <p>Page 17 para 1. Amend as follows:</p> <p><i>"Flood risk reduction, green infrastructure, landscaping and sustainable construction throughout the lifetime of development will make Hammersmith a more liveable place."</i></p>
55	29	Hammersmith BID	3. Vision	<p>The SPD builds on the Hammersmith Regeneration Masterplan by Grimshaw Architects, 'shaped' through local consultation via a Residents Working Group.</p> <p><i>The SPD emphasises the prioritisation of the public realm. The Residents Group were more focussed on building heights.</i></p> <p>Key Outcomes 2,800 new homes</p>	<p>Comment noted. No change required.</p> <p>The SPD provides indicative guidance in relation to tall buildings. This suggests locations which may be suitable for large/tall buildings, indicative</p>

				<p>10,000 new jobs Replace the Flyover Green & Healthy Town Centre Delivery of net zero carbon buildings Enhanced Arts & Culture & Evening Economy Offer</p> <p>Objectives for Delivery Restoring the Heart of Hammersmith An enhanced sense of space via more diverse mix of uses, new public spaces, etc. Envisages combining the Civic Campus redevelopment with reshaping of the Broadway and Queen Caroline Street, to enable King Street to be a 'strong' spine connecting the existing centre and the Civic Campus. Improving connections to the river. This is the key major transformation of central Hammersmith, reuniting the centre. To be vigorously encouraged.</p> <p>Anchoring Creative and Entrepreneurial Hubs Exploiting connectivity to encourage new creative and entrepreneurial uses, by creating space in new and repurposed buildings. Affordability the key.</p> <p><i>In the view of the BID and many of it's members, the quality of Hammersmith's public realm and leisure offer are fundamental to this objective.</i></p> <p>Strengthening our Cultural Core/Evening Economy See <i>item above</i>.</p> <p>Delivering Genuinely Affordable Homes for Local People Increasing housing in the Town Centre is seen as a way to enhance the Town Centre's vibrancy. A focus on genuinely affordable homes.</p> <p><i>This will influence developers' approach to proposed uses, mix and, importantly, the viability of proposals, potentially leading to pressure for increased density and building height</i></p>	<p>development parameters and key views for consideration. Planning applications for tall buildings will be assessed against the London Plan and Local Plan policies, with particular focus on townscape, heritage, and other design considerations.</p> <p>We will seek to increase the amount of housing in the town centre to create a more diverse and vibrant town centre. In each case, proposals will be required to be well designed across a mix of tenures and uses and comply with London and Local Plan Policy on building height, density, mix and affordability.</p>
56	32	Inclusive Design Review Panel	3. Vision and Objectives for Delivery	<p>Moving forward, we will build upon these strengths to reaffirm the role of the town as an accessible and inclusive well connected heart of West London life.</p>	<p>Comment noted. No change required.</p> <p>The key objective for delivery in this part of the vision is to increase vibrancy and create a stronger sense of place. Accessibility and inclusivity are of course important aspects and</p>

				<p>Our vision is an accessible and inclusive Hammersmith to restore the heart of the town centre, where new commercial, residential and leisure developments create a wide variety of opportunities for employment as well as living in inclusive and affordable homes. We will also redesign the highway network to enhance accessible and inclusive movement and connections with existing open/ green spaces and key cultural destinations.</p> <p>> Replace the Hammersmith flyover with a tunnel, ‘a flyunder’ remove an eyesore and physical barrier, significantly enhancing the townscape, lessening the impact of through traffic, release valuable land for accessible and inclusive development.</p> <p>> Green and healthy town centre including delivery of a new accessible and inclusive public space and landscaping/urban greening to enhance amenity, air quality and biodiversity, creating accessible and inclusive green corridors/active travel.</p>	<p>are a thread which runs throughout the document.</p> <p>Proposed change:</p> <p>Page 15, 2nd para. Amend as follows: Proposed change:</p> <p>Page 15, para 2:</p> <p><i>“Our vision is to restore the heart of the town centre, <u>where new developments create a wide variety of opportunities for employment as well as living in inclusive and affordable homes.</u> We will also redesign redesigning the highway network to enhance accessible and inclusive movement and connections with existing open/ green spaces and key cultural destinations.”</i></p> <p>The SPD is a guidance document and should be read alongside our Local Plan which contains policies on accessibility and inclusivity in new development.</p> <p>Proposed change:</p> <p>New outcome incorporated</p> <p><i>Create an accessible and inclusive town centre which provides a positive experience for all</i></p> <p>Proposed change:</p> <p>Hammersmith – The Heart of West London, para 3</p>
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				<p>> Enhance our existing Arts and Culture offer through accessible and inclusive festivals/pop-up events and improving the evening economy.</p> <p>New developments will strengthen the identity of an accessible and inclusive town centre; focussing on creating a healthy, green and inclusive pedestrian environment. High quality accessible and inclusive buildings will complement and reveal the heritage of Hammersmith, whilst also adapting to climate change and creating a more inclusive Hammersmith that everyone including disabled people can enjoy.</p>	<p>Page 15, para 4. Amend as follows:</p> <p><i>“New developments will strengthen the identity of the an accessible and inclusive town centre; focussing on creating a healthy, green pedestrian friendly environment...”</i></p>
57	36	The Hammersmith Society	3. Vision and Objectives	<p>Vision (p15): ‘...to restore the heart of the town centre...’ is the Local Plan aspiration to which the SPD should provide shape, direction and reality.</p> <p>Objectives for delivery (p16&17): concise headings are lost in too much repetitive text which loses the reader: the overall message could be condensed into 2 or 3 paragraphs.</p>	<p>Comments noted. No change required.</p> <p>Further shape and direction is provided in the Spatial Framework, through the visions for the character areas and key sites.</p> <p>The text expands upon the overall vision which has been separated into objectives for clarity.</p>
58	12	Britel Fund Trustees Ltd	4. Spatial Framework - Key Concepts	<p>In relation to key concepts (page 20-21), it is unclear if the images are intended to be indicative to each concept. For example, the concept relating to employment and new homes, shows a range of areas with red and blue colour wash. However, this seems to exclude other areas that are in existing employment use and/or other opportunities to deliver alternative uses such as new housing which would support the diversity of the town centre without undermining the need to retain affordable workspace. It is not clear if this is intentional? As the draft SPD is not site specific, we assume this was not the intention. Indeed, setting aside strategic site allocations identified by the Local Plan, the draft SPD (page 26) confirms in relation to the identification of the various character areas that ‘the guidance is not intended to be a formal site allocation, instead providing a high-level discussion of key design principles, which could be developed in future’. It would be helpful if each of the map extracts included within the SPD could include details of the town centre regeneration area boundary.</p>	<p>Comments noted. No change required.</p> <p>The images relate to the key areas which could deliver retail, employment and housing outcomes. These are not intended to form any site allocation.</p> <p>Comments noted.</p> <p>The SPD does not contain site allocations other than those contained in the Local Plan. The intention behind the concept mapping is to highlight objectives for the centre rather than show definitive boundaries for certain land uses.</p>

					It is not considered necessary to include the town centre regeneration area boundary within the map extracts. Please note the SPD is a guidance document and these are not formal site allocations.
59	24	Environment Agency	4. Spatial Framework - Key Concepts	We support the four key concepts highlighted on pages 20 and 21. In particular, we support improving connections to the river but suggest that the document is stronger in its encouragement for using green and blue infrastructure and active travel to do this.	<p>Comments noted.</p> <p>Proposed change: Suggested change, improving connections to the river, p20:</p> <p>Page 20 2nd concept box. Amend as follows:</p> <p><i>“Restitch the town centre back together and promote access to the river. <u>Encouraging the use of green and blue infrastructure and active travel.</u> Create safe, green and animated routes.”</i></p>
60	30	Marks and Spencer and Reef Group	4. Spatial Framework - Key Concepts	<p>P11 and 12 of the SPD contain key concepts for the masterplan including:</p> <ul style="list-style-type: none"> • Promoting employment and new homes. • Providing a network of public spaces. • Enhancing the civic, cultural and evening economy. • Supporting the role of King St as the main retail centre. • Improving public realm and high-quality new buildings/shopfronts. • Improving connectivity and accessibility. <p>Our clients welcome these objectives. Their proposals for the Site will help deliver all of these aims.</p>	Comment noted, support welcomed.
61	36	The Hammersmith Society	4. Spatial Framework - Key Concepts	Key Concepts (p20-23): concise headings and one-line descriptions are confused by ineffective diagrams, some of which could be omitted. A single, larger and more informative image with clear factual annotation which refers to the headings might prove more successful.	<p>Comments noted. No change required.</p> <p>Each diagram indicates each concept on a map, which relates to the spatial framework on pages 24 and 25.</p>
62	36	The Hammersmith Society	4. Spatial Framework - What we can achieve	Spatial framework (p24-25): more empty diagrams with sweeping arrows fail to communicate: the headings announce intent but need a line or two explaining how this intent could be realised.	<p>Comments noted. No change required.</p> <p>The intent for each area is explained on pages 20 to 23.</p>

63	36	The Hammersmith Society	4. Spatial Framework - Realising Opportunities	<p>Realising opportunities (p26): ‘...This guidance...provides a high-level discussion of key design principles...’. This is the place to list the principles, even if they appear elsewhere in the report.</p> <p>Reference to Planning Briefs: for many years the Hammersmith Society has reminded LBHF of the vital role of a planning brief for major development sites, especially in moderating site sale values. The borough has fallen behind the priority that other London boroughs give to the planning brief.</p>	<p>Comments noted. No change required.</p> <p>The design principles are specific to each character area and developer guidance criteria, so there is no need to list out the principles in this section.</p> <p>The important role of the planning brief has been highlighted in this SPD. Site allocations in the Local Plan provide of detail on our strategic sites in the borough. Site allocations in the Local Plan provide a huge amount of detail on our strategic sites in the borough.</p>
64	30	Marks and Spencer and Reef Group	4. Hammersmith Broadway Character Area	<p>Page 15 of the SPD contains an image which shows an indicative new public route/link from north to south linking Lyric Square with St Paul’s Church labelled “cultural route”. This cultural route is currently proposed to be provided within our client’s development proposals for the Site, however it is shown further east beyond their Site on this particular drawing. We suggest that the graphic showing the link is moved further to the west to demonstrate that this can be facilitated and is proposed on our clients’ Site as intended and as established with Officers at pre-application stage. This will bring the image in line with the associated imagery elsewhere in the document.</p>	<p>Comments noted.</p> <p>Proposed change:</p> <p>Page 28:</p> <p>The diagram will be updated to reflect this route as a secondary pedestrian route.</p>
65	25	Worshipful Company of Girdlers	4. Hammersmith Broadway Character Area	<p>The ambition within the draft SPD to improve the public realm within this character area is supported. However, the public realm works and the network of north-south links across King Street between public spaces and places of interest shown on page 29 needs to be deliverable having regard to land ownerships and viability. Where public realm enhancement does necessitate land take, then this should be both minimized to what is absolutely necessary and compensated for through the height of development permissible.</p>	<p>Comment noted. No change required.</p> <p>The Council will work closely with developers and landowners and will take into account land ownerships, viability and density as part of planning discussions as sites are brought forward.</p>
66	25	Worshipful Company of Girdlers	4. Hammersmith Broadway Character Area	<p>The realization of the regeneration of Hammersmith Broadway character area will require the close collaboration of all stakeholders from both the public and private sector, which the Girdlers’ would be delighted to continue to be part of. We trust that the content of this letter will be taken into consideration in the final drafting of the SPD and please do not hesitate to contact us if you have any queries</p>	<p>Comments noted. No change required.</p>

67	29	Hammersmith BID	4. Hammersmith Broadway Character Area	<p>HAMMERSMITH BROADWAY Lacks townscape cohesion, but also includes quality buildings. The gyratory a strong barrier.</p> <p>Future Vision This brings forward the principles established by the Grimshaw masterplan: Enlarged St Paul's Square New public transport interchange on Broadway site New Cultural Route: Lyric to Apollo Integrate Lyric with Town Centre New development and public space on land released by gyratory changes Network of links between public spaces and places of interest.</p> <p>Key Sites HRA2 Strategic Site - Flyover, Gyratory and adjoining land A. Intention to replace Flyover with tunnel and surface road with Boulevard B. Reconfiguration of the gyratory system Public Works Proposals</p> <p><i>These are the most important public works elements of the SPD. See comments on this aspect of the SPD above. Prioritise the Gyratory.</i></p> <p>Hammersmith Broadway Total redevelopment of the Broadway Island <i>Desirable but improbable in the short/medium term. Building heights 10-20 storeys suggested.</i></p> <p>Livat Centre Redevelopment might facilitate wider renewal of the Town Centre, including diversification of uses, improved public realm, etc. <i>Guidance very loose. Any initiative will provoke much interest.</i></p>	<p>Comment noted. No change required.</p> <p>Please note, the opportunities highlighted in the SPD are not exhaustive and are not formal site allocations.</p>
68	34	Royal London Asset Management	4. Hammersmith Broadway Character Area	<p>The Site sits within the Hammersmith Broadway area of the SPD (pages 27-32) and within the HRA2 Strategic Site (Flyover, Hammersmith Gyratory and adjoining land). We welcome that part of the SPD's aim is to diversify the town centre offer increasing the amount of housing to create a more diverse and vibrant town centre, and strengthen Hammersmith's role as a centre for arts, culture and leisure.</p> <p>We also support the SPD encouraging potential highways and public realm improvements to improve the ground floor environment around 2 Queen Caroline Street including the potential to enlarge St Paul's Open Space and improving the environment on Black's Road. The ground floor and pedestrian environment around 2 Queen Caroline Street needs to be improved and any such application will seek to enhance the environment in this location.</p>	<p>Support welcomed. No change required.</p>
69	38	Dave Hinton (former SBD officer)	4. Hammersmith Broadway Character Area	<p>Hammersmith Broadway Page 27-31</p> <p>Obviously critical to this space is the tunnelling for the A4 and the removal of the flyover, creating the fly-under. This will not remove the need for Gyratory and vehicle access. One of the primary reasons for Hammersmith's desirability to commercial office, retail and entertainment development spaces is its accessibility from outside</p>	<p>Comment noted. No change required.</p> <p>The Gyratory would still exist but is proposed to be reconfigured to public realm improvements.</p>

				<p>London and to both Heathrow and Central London. Also coach and private vehicle access to the Apollo is critical for its success.</p> <p>It is a critical north south route for West London. If you remove these features then the new developments proposed will not be sustainable.</p> <p>I would strongly recommend that the examination of further traffic calming is left until after the fly-under has be completed. I also hope that at this stage Hammersmith Bridge will also become vehicle viable. Creative use of new pedestrian bridges from the Hammersmith Broadway development might also be considered. Integrating a link into St Pauls Park and to the raised deck area by the Novotel.</p> <p>The currently open space bus facility in the north eastern quarter of the Broadway could be far better integrated into the Broadway centre. I assume consideration will also be given to building above this level. Perhaps provision of entertainment and retail above the bus parking, including a cinema might be appropriate. Creation of an elevated open public space?</p> <p>A broader redesign and integration project of the Broadway shopping centre, tube station and bus stations, needs to be implemented, the existing elements are dated and feel cramped. They do not work as well together as they should. They also fail when their use is reviewed as public spaces through a 24/7 rotation. Particularly access to and from/between the transport hubs, especially for the disabled</p>	<p>Both the flyunder and the gyratory would be subject to additional transport modelling work to understand the impacts of these infrastructure projects.</p> <p>The site aspirations for Hammersmith Broadway include the creation of a new, enhanced public transport interchange. The Council will engage with landowners and the public as part of site-specific discussions for any masterplan, brief or planning application.</p>
70	21	Patrizia and Nuveen	4. Hammersmith Broadway Character Area	<p>The Hammersmith Broadway Character Area</p> <p>The Patrizia and Nuveen ownerships lie within the Hammersmith Broadway character area identified by the draft SPD. It is noted however that no specific reference is made on page 33 to either 49-63 King Street or 65-79 King Street as key sites, despite both offering significant future development potential. These properties should either be included within the “M&S/Boots/One King Street” group as presenting similar opportunities, or they could alternatively be referenced separately.</p> <p>There is no explicit reference within the description of the Hammersmith Broadway character area to suitable uses for the upper floors of any redevelopment. For 49-63 King Street and 65-79 King Street these include residential for which there is an acute need in all of its forms, including private rented accommodation.</p> <p>The reference within page 33 that “large/tall buildings varying between 5-11 storeys could be achievable” on King Street is supported. Indeed, it is considered that there could be scope for a greater maximum height than 11 storeys at 49-63 King Street and 65-79 King Street and a wider distribution of height towards the upper end of the range referred to by the “illustrative gradient map” on page 50. This is for reasons</p>	<p>Comments noted. No change required.</p> <p>The key site will be updated to include a reference to the group of site addresses.</p> <p>Proposed change:</p> <p>Page 33:</p> <p>The key site will be updated to include a reference to the group of site addresses. <u>1-79 King St/12 Blacks Rd</u></p> <p>Part of the future vision for the character area includes the delivery of homes. Discussions</p>

				<p>including the concealment and urban design context that the approved Landmark House scheme immediately to the south will provide and because of the oblique sight lines east- west along King Street. The recent feasibility study commissioned by Patrizia and Nuveen demonstrated that any impacts of greater height on the High Street and adjacent properties can be mitigated.</p> <p>The ambition within the draft SPD to improve the public realm within this character area including along Angel Walk is also supported. However, the width of it shown within the illustrative diagram on page 28 is unnecessary and would be a major constraint on viability.</p> <p>Furthermore, the aspiration on page 29 to create a network of north-south links across King Street between public spaces and places of interest, whilst also supportable in principle, needs to be deliverable having regard to land ownerships and viability, and any direct link/s should take the appropriate, direct, pedestrian desire line to St. Paul's Green which will be to east of 49-63 King Street. Where public realm enhancement does necessitate land take, then this should be both minimized to what is absolutely necessary and compensated for through the height of development permissible.</p> <p>Delivery and Implementation The realization of the regeneration of Hammersmith Broadway character area will require the close collaboration of all stakeholders from both the public and private sector, which both Patrizia and Nuveen would be delighted to continue to be part of.</p>	<p>in the development of planning briefs, masterplans and applications will address uses on specific sites and levels.</p> <p>The map is indicative only and provides a high-level concept of key design principles to be developed in the future.</p> <p>The Council will work closely with developers and landowners and will take into account land ownerships, viability and density as part of planning discussions.</p>
71	24	Environment Agency	4. Hammersmith Broadway Character Area	<p>Much of the Hammersmith Broadway area of the SPD is situated within flood zone 3, and within our latest modelled tidal breach extent. It is disappointing the SPD fails to acknowledge this and we strongly suggest that it is addressed. With particular reference to the proposed HRA2 Strategic Site.</p> <p>Whilst we appreciate that HRA2 Strategic Site 'the Flyunder' is at an early stage (page 30). It would be beneficial for the SPD to consider that the proposed Flyunder is situated within flood zone 3 and could be severely impacted by flood water should the Thames tidal walls be breached or overtopped. Therefore, the 'Enabling Delivery' paragraph on page 31 must highlight that the risk of tidal flooding and any proposals must consider this at an early phase in the design process. This approach is in line with Policies RTC1, CC2 and CC3 of the Local Plan.</p>	<p>Comments noted. No change required.</p> <p>Flood risk is acknowledged, and any work undertaken in this area would be subject to the requirements of the Local Plan relevant to mitigating flood risk.</p> <p>Flood risk is acknowledged, and any work undertaken in this area would be subject to the requirements of the Local Plan relevant to mitigating flood risk.</p>
72	36	The Hammersmith Society	4. Hammersmith Broadway Character Area	<p>Future Vision 1 and HRA2 (p28): in para 1 the diagram illustrates the attractive Grimshaw proposal for the St Paul's Green public space, but this is shown as secondary to the overlay of more planning arrows. St Paul's Green, together with the Civic Campus and the peninsularisation of the Broadway gyrator, are important ideas which need clear pictorial illustration with concise annotation.</p> <p>Flyunder and the gyratory – Future Vision 1 (p29), HRA2 (p30&31): these are major parts of the LBHF plan, and need to be better described in greater detail, referring to</p>	<p>Comments noted. No change required.</p> <p>The legend on pages 28-29 relevant to the diagram provides an explanation for each intervention.</p>

				<p>the extensive material already available, to include:</p> <p>(i) annotated plan(s) showing the scale and scope of the flyunder, including the development opportunities of the land released where the 6-lane A4 is currently sited</p> <p>(ii) the strategy proposed to prevent the commitment to the long-term uncertainties of the flyunder from blighting development proposals in the vicinity</p> <p>(iii) a clear, legible annotated illustration of the closing of Queen Caroline Street to join the Broadway to King Street; this would bring significant development benefits and has prospect of realisation in the short term.</p>	<p>The comments are acknowledged but the strategic sites and visions are indicative only and will be developed further as part of further site discussions, planning briefs and/or masterplans.</p>
73	29	Hammersmith BID	4. Strategic Sites – Flyover, Hammersmith Gyratory and adjoining land	<p>Delivering a Flyunder This is combined with proposals to transform the Town Centre road network.</p> <p><i>The Grimshaw masterplan indicates how this might work. Importantly transformation of the surface road network, in this case dualling the gyratory and pedestrianising Queen Caroline Street between King Street and the Apollo can be carried out completely independently of the potential Flyunder. The gyratory initiative realises most, if not quite all, of the benefits of the Flyunder, including: Reuniting Broadway with the rest of the Town Centre Increased potential development land Increased Green space. By contrast the Flyunder is an attractive proposition at first sight, but moves through traffic from above to below ground without any effect on surface traffic volumes, costs an enormous sum - how many council houses do you get for £800,000,000+? – will be very disruptive to construct, and will require long approach ramps, just like the Flyover.</i></p> <p><i>LBHF is urged to prioritise the changes to the surface level road network, including other projects such as the pedestrianisation of King Street, which are relatively easy wins compared with the Flyunder, and deliver many of the major public realm improvements that Hammersmith businesses seek.</i></p> <p>HRA2 Strategic Site – Flyover, Gyratory and adjoining land A. Intention to replace Flyover with tunnel and surface road with Boulevard B. Reconfiguration of the gyratory system Public Works Proposals <i>These are the most important public works elements of the SPD. See comments on this aspect of the SPD above. Prioritise the Gyratory.</i></p>	<p>Comments noted. No change required.</p> <p>The flyunder is a long-term project and requires further detailed modelling and feasibility work before being undertaken, and other projects may come forward before any work to the flyunder commences.</p> <p>Public Realm Delivery</p>
74	30	Marks and Spencer and Reef Group	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>Our clients welcome the overarching objectives of the SPD which include improving connectivity and accessibility and upgrading Hammersmith Broadway as a transport interchange. Of major significance is the proposal to re-imagine the gyratory and to transform the area through a flyunder which is detailed at page 16. This would improve accessibility and environmental quality, enhance connectivity, remove severance, improve the pedestrian and cyclist experience and would support delivery of new public realm. It would have a direct impact on the Site in existing and proposed</p>	<p>Support welcomed. No change required.</p> <p>The flyover is subject to funding being secured and discussions with the GLA and TFL.</p>

				<p>condition as the store is serviced and accessed from Black's Road, which is shown as altered in the indicative imagery in the document and potentially removed. Our clients support this proposal in principle, provided their existing and future access needs are accommodated in any design. However, for all retailers to be success on King Street they need to be able to trade and operate as efficiently as possible with adequate servicing being critical to this. Clearly further discussions will be required at the appropriate time and our clients expect to be consulted on this thoroughly as the proposals are developed. It has the potential to align neatly with our clients' own proposals for the public realm including the proposed new route and public space and this would be of great benefit to the Borough.</p> <p>It is noted that the Council intends to pay for the flyunder scheme largely via developer contributions. Noting the financial constraints already placed on development in the area through Section 106 contributions, Community Infrastructure Levy payments, and high development costs, this has the potential to affect the viability of developments coming forward. This would inevitably result in schemes needing to be larger in floorspace quantum and therefore massing terms than would otherwise be required. We therefore encourage the Council to explore alternative forms of funding, to avoid placing a further heavy financial burden on developments and to avoid the resultant pressures related to site optimisation.</p> <p>The SPD also incorporates a number of strategies to make improvements to the A4, including working alongside TfL to deliver a formalised cycle route along the A4 which would better connect Hammersmith Town Centre to Earls Court and central London. Our clients welcome these proposals.</p>	<p>Section 106 agreements are specific to individual developments and cannot be used for large infrastructure projects such as the flyunder.</p>
75	33	TfL Spatial Planning	4. Strategic Sites - Flyover, Hammersmith Gyrotory and adjoining land	<p>HRA2 part A (Flyover) of the draft SPD confirms the council's firm ambition to replace the flyover section of the A4 with a tunnel (or flyunder) with a new eastwest road to provide access for local traffic, alongside provision for a cycle route along the A4 and more surface level crossings. TfL notes that the ambition here to reduce traffic dominance, improve air quality and noise impacts and free up land for development has merit. However, it must be stressed that the scale of funding required (the draft SPD includes an estimate of £811m) means that there is currently no realistic prospect of delivery, noting that the financial situation is even more acute than in 2019 when we last commented on this proposal. Therefore, the Council, in consultation with TfL, should work to deliver more pragmatic schemes around Hammersmith Town Centre in line with Healthy Streets and Good Growth objectives. We also note that in 2016 major refurbishment/strengthening works of the Hammersmith Flyover were completed. Considering those works and the current condition of the flyover, it is unlikely that any investment or major works would be required over the next 25 years.</p> <p>In terms of a cycle route on the A4 and delivery of surface level crossings, notwithstanding the above comments on the flyover, TfL officers are working</p>	<p>Comments noted. No change required.</p> <p>Subject to further discussion with TFL, in addition to GLA and other funding sources.</p>

				with LBHF officers to investigate the feasibility of these interventions. In addition to the need for full and robust assessment before any commitments can be made, it is also worth noting that the timing and funding are significant unknowns. Regarding the cycle route, this not currently on TfL's programme of works and our current focus is on the development and delivery of the large existing cycle programme already in place, including the progress with Holland Park Roundabout/Shepherds Bush/Wood Lane.	
76	33	TfL Spatial Planning	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	HRA2 part B (Gyratory) identifies the council's ambition to reconfigure the gyratory to two-way working. As we have stated previously, TfL will continue to work with Council officers on this as part of the town centre regeneration and delivery of Healthy Streets in the borough. It should be noted that we do not currently have funding, or a programme of works associated with this. We note the Council's ambition of making King Street for buses and cycles only with wider footways. However, any such interventions will need comprehensive assessment of the impacts in a wider area to understand the displacement of traffic from King Street as well as consideration of a funding package.	Comments noted. No change required.
77	20	Richard Jackson	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>The SPD is a timely and well-considered draft document, considering the developments around Hammersmith Broadway. There are two areas I wish to comment on, the Gyratory and the Flyover/Flyunder.</p> <p>The Gyratory.</p> <p>I think it is an excellent idea to make the Gyratory two-way up Butterwick, and pedestrianise the section between the Broadway Centre and St. Paul's Green.</p> <p>The proposed road to the south of St. Paul's Green, although in disconnected sections, is already in place. This runs east-west from the junction with Fulham Palace Road, past the Apollo and Queen Charlotte Street to Hammersmith Bridge Road. This proposal could be implemented within 2/3 years, and the areas around and below the Flyover greened up.</p> <p>However, linking this road to Hammersmith Bridge Approach would make it a busy road, rather than the intended 'green boulevard' on a cultural route to the river. I would prefer St. Paul's Green not be enlarged, and the reinstated road to the south of St. Paul's Green be for local, rather than through traffic.</p> <p>In my view, it is a serious failing of the draft proposal to stop access to Hammersmith for east-bound traffic coming off the A4. This traffic (much of it local) is feeding into King Street, Shepherd's Bush Road and Hammersmith Road. Traffic is like water, it will find other routes mostly through residential areas.</p> <p>The Flyover/Flyunder</p> <p>The SPD draft document rightly describes this as a long-term project and suggests seeking funding from the government and/or GLA. The Flyunder is an elegant proposal to stitch the centre of Hammersmith back together, but it is an aesthetic project with large development potential rather than a project to improve</p>	<p>Comment noted. No change required.</p> <p>The gyratory is a long term project which will be subject to traffic modelling and feasibility work to ensure the a practical and viable solution is implemented.</p> <p>The Flyunder is a long-term ambition which is subject to further discussion with stakeholders, feasibility work and discussions on financing.</p>

				<p>infrastructure. It is reasonable to assume therefore that this will not be high on the list of priorities of either the government or the GLA.</p> <p>A further problem is that the tunnel needs to be built before the flyover can be demolished and the land released for housing. Work could start on the tunnel at an estimated cost of £800 million, but many urban tunnel projects end up costing 3x their estimates. As the scheme is to be largely paid for by residential development, subject to market pressures, how would the extra cost be funded other than by much higher and denser development than shown in the enticing visuals?</p>	
78	17	Neil Hardiman	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>Comments relate principally to the initiative for the replacement of the Hammersmith Flyover.</p> <p>It is laudable the Council is trying to right the infrastructure wrongs from the 1960's, however, my overall concern is that raising the public's hopes and expectations on the back of what must be, and will likely remain, an extremely marginal aspiration is a dangerous policy as non-delivery may generate considerable disappointment, public cynicism and negative backlash.</p> <p>Taking the document at face value, it suggests that probably a billion pounds expenditure will be required in order to achieve the removal of the existing flyover and the construction of the 'flyunder' tunnel together with any interim rearrangements of the existing gyratory system. Within the anticipated positive benefits potentially flowing from this enormous investment there is no mention of achieving any modal shift away from the use of private motor vehicles and/or a shift towards the use of alternative modes of transport. The improvements in pedestrian and cycling linkages will no doubt encourage more such movements but the vast majority of these will surely be new movements rather than diversions from motor vehicle use. For example, given the current road layouts no one would drive from say the riverside to the town centre, though better linkages may well encourage more pedestrian/cycling movements between the two.</p> <p>This omission is inexcusable.</p> <p>Conversely, there is no suggestion (thank goodness!) that the flyunder will actually provide additional highway capacity over and above the existing, nor ease traffic circulation around this key interchange.</p> <p>Following on from (2) unless there is some other means, not referred to, by which the current/anticipated traffic volume is to be reduced and/or diverted and/or deterred from the wider town centre area, or presently permitted north/south and east/west vehicle movement desire lines are to be restricted/prevented it is fanciful to assume that meaningful amounts of existing highway land will actually be entirely released for non-highway uses. In this context, what, if any, traffic modelling has been done to date that provides assurance on the highway capacity of the preferred two-way gyratory layout, and within this, what assumption has been made in respect of the future use of Hammersmith Bridge?</p> <p>Simply displacing large volumes of existing traffic, if this is what is envisaged or is the ultimate unwritten consequence, into largely residential areas adjacent to the town centre or into adjoining boroughs isn't a proper basis on which to found this policy, and would be likely to result in sustainable objections which could well scupper the proposals. This deficiency is not only an issue for the town centre but also a serious</p>	<p>Comments noted. No change required.</p> <p>We appreciate you taking the time to read and make comments on the SPD.</p> <p>We welcome your support on the flyunder and the need to create better linkages through the centre.</p> <p>The Flyunder is a long-term ambition which is subject to further discussion with stakeholders, feasibility work and discussions on financing.</p> <p>The £811m cost refers to the flyover. The gyratory is a long term project and will be subject to further modelling and feasibility work.</p>

			<p>concern for the adjoining boroughs if the tunnel portals extend beyond the borough boundary.</p> <p>In similar vein, save for a reference to some form of air filtering within the flyunder tunnel itself, there is scant suggestion that this enormous expenditure will achieve a meaningful improvement in the environmental conditions in the town centre, and clearly no reason for there to be any improvements beyond the tunnel portals themselves.</p> <p>Accepting that the stylized wish-list nature of the plans included in the SPD are simply that, even they do not highlight the creation of large entirely new development sites. Rather, most are existing sites/buildings which can be redeveloped in any event largely within the constraints of the existing highway. In which case even assuming that Sect 106 obligations relating to the highway network can be imposed these will surely not be sufficient to fund a billion pounds, even if the planners sell their souls to developers and permit multiple versions of The Shard to be built!</p> <p>As an aside, the SPD anticipates extensive highway changes irrespective of the 'flyunder' being delivered, therefore, if a significant proportion of the new developments can be delivered without the 'flyunder', isn't it more likely that any Sect 106 payments from these schemes will go towards funding the other interim highway changes rather than being ringfenced against a proposal which may never happen? On a technical point is it certain that all/any land released by closure of any highways will not simply revert to the existing frontage owners rather than becoming available for disposal by the Council?</p> <p>If the reality is that these proposals are unlikely to:- achieve significant modal shift away from private motor car use towards more environmentally friendly modes of travel, or provide additional highway capacity, or ease traffic circulation, or provide significant environmental improvements the question arises as to what credible, let alone persuasive, case might be made for any significant scale of public sector subsidy/funding? What is there to make a financially hard-pressed Council or the GLA or central government place this initiative high up in their spending priorities? The SPD offers no hints in this regard.</p> <p>As an aside there is no reference to the future of Hammersmith Bridge, the repair cost of which is a comparative drop in the ocean, but is nevertheless challenging the finances of the Council et al.</p> <p>Turning to the scale of the proposed expenditure on the highway network, it will be interesting to understand the following:- What is the cost associated with the preferred interim two way gyratory initiative? What does the £811m cost include/exclude? What outturn date has been assumed, namely is £811m a current uninflated cost, if so what outturn cost has the Council been advised to assume/expect? If not, what delivery date and inflation assumption has been adopted within the £811m? As with all public sector infrastructure projects what allowance has been made to</p>	
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				<p>counter 'optimism bias' in drawing up the £811m and the project delivery programme associated with it?</p> <p>What objective assessment of the potential sources of funding of the £811m have taken place and what proportion of the cost is likely to fall on the ratepayers of the Borough?</p> <p>If one accepts the proposition that the 'flyunder' will unlock significant new development sites which would otherwise never become available, the unlocking will presumably require the 'flyunder' first to be funded and built before the developments can be undertaken. Given the extended and routinely uncertain gestation periods of large developments e.g. Westfield, Olympia, Earls Court etc it is inconceivable that the prospective developers of any released former highway land will pay the entire site consideration and their portion of the overall Section 106 contribution without the assurance that the 'flyunder' has been all but delivered and the new sites actually created. Any other scheduling of receipts, if achievable at all, would result in a significant discount and/or imposition of significant penalties on late/non-delivery of the 'flyunder'. In these circumstances, the reality will surely be that in order to deliver the project the deliverer of the 'flyunder' will have to shoulder significant upfront/bridging finance costs and risk, indeed financial risk potentially of a scale to jeopardize the Council's overall financial well-being. Has this cost/risk been properly, (if at all?) factored into the cost, and what cashflows have been drawn up which provide the Council with adequate reassurance?</p> <p>In conclusion, whilst the Council's SPD seeks to be imaginative and is no doubt well-meant I cannot avoid the suspicion that in respect of the flyunder it is floating something that is wildly unrealistic in the hope that by presenting in parallel other less radical, though possibly equally disruptive proposals these may appear more attractive and hence more deserving of public subsidy/funding and hence more readily deliverable.</p>	
79	13	Una-Jane Winfield	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>The redevelopment of the area around the Town Hall is nearing completion, so I suppose it was not surprising that the idea of the Tunnel has been dug out again. It failed last time for 3 reasons:</p> <p>(1) cost — £800M is very optimistic</p> <p>(2) the railway lines coming into Hammersmith Tube Station are very deep and dictate the depth of the Tunnel</p> <p>(3) access roads to get into and out of the Tunnel, especially for Bridge View, Rivercourt Road and Weltje Road. Where are they going to go?</p> <p>These problems are still insurmountable with present levels of traffic. The traffic might reduce in future, but Heathrow Airport wants to expand, so who knows?</p>	<p>Comments noted. No change required.</p> <p>We appreciate you taking the time to read and make comments on the SPD.</p> <p>The Flyunder is a long-term ambition which is subject to further discussion with stakeholders and traffic modelling to determine suitable routes.</p>
80	25	Worshipful Company of Girdlers	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>The Council's aspiration for a fly-under is clearly a very long term ambition, around which there is significant uncertainty and this has been the case for a long time already. In this context, the Council should further explore in much greater detail its deliverability and the probability of funding from sources such as TfL, the GLA and from government grants, before seeking obligations from development. It should only be at the point in time that there is much greater certainty over the project that</p>	<p>Comments noted. No change required.</p> <p>Both the flyunder and the gyratory are long-term ambitions which will be subject to further</p>

				<p>development should be asked to contribute at all. Furthermore, under regulation, S106 contributions should only be sought where they are necessary to make a particular development acceptable, directly relate to that development and where they are fairly and reasonably related in scale and kind to that development. King Street is remote from the route of the fly-under and contributions from development on it, should be limited by these tests.</p> <p>Similarly, the aim to reconfigure the existing gyratory system to create greater public realm including around Blacks Road is a supportable ambition however, should firstly be the subject of detailed modelling and feasibility work and a clear pathway identified through which development is not the majority source of funding as suggested on page 65. Otherwise there is a risk that development will be stifled particularly given other aims of the draft SPD including to seek funding for the fly-under, 50% affordable housing on site and a proportion of affordable workspace both of which should be referenced as subject to viability, together with the operation of the nonnegotiable CIL which is already at a high level for this area. Extreme care should be taken that these requirements, either individually or collectively, do not overburden and that nothing happens as a consequence.</p>	discussion with stakeholders, modelling and discussions on financing.
81	29	Hammersmith BID	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>While there are proposals for relatively small, very welcome, public realm improvements, the replacement of the flyover with a tunnel and transformation of the gyratory as originally proposed in the Grimshaws Masterplan predominate. The gyratory proposal can dramatically transform the centre of Hammersmith for the better. There is considerable concern that the two proposals are coupled. Our concern is that the gyratory transformation enables almost all the benefits claimed for the combined projects at a fraction of the cost, and with a credible chance of realisation within, say, five years. The transformation of the gyratory, the creation of St Paul's Square and the Queen Caroline Street cultural route must be a priority</p>	<p>Comments noted. No change required.</p> <p>Both the flyunder and the gyratory are long-term ambitions which will be subject to further discussion with stakeholders, modelling and discussions on financing, prior to being undertaken.</p>
82	20	Richard Jackson	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>The SPD is a timely and well-considered draft document, considering the developments around Hammersmith Broadway. There are two areas I wish to comment on, the Gyratory and the Flyover/Flyunder.</p> <p>The Gyratory.</p> <p>I think it is an excellent idea to make the Gyratory two-way up Butterwick, and pedestrianise the section between the Broadway Centre and St. Paul's Green.</p> <p>The proposed road to the south of St. Paul's Green, although in disconnected sections, is already in place. This runs east-west from the junction with Fulham Palace Road, past the Apollo and Queen Charlotte Street to Hammersmith Bridge Road. This proposal could be implemented within 2/3 years, and the areas around and below the Flyover greened up.</p> <p>However, linking this road to Hammersmith Bridge Approach would make it a busy road, rather than the intended 'green boulevard' on a cultural route to the river. I would prefer St. Paul's Green not be enlarged, and the reinstated road to the south of St. Paul's Green be for local, rather than through traffic.</p>	<p>Comments noted. No change required.</p> <p>We appreciate you taking the time to read and make comments on the SPD. We welcome your support and clear explanation on the issues associated with these projects.</p> <p>The gyratory is a long term project which will be subject to traffic modelling and feasibility work to ensure the a practical and viable solution is implemented.</p> <p>The Flyunder is a long-term ambition which is subject to</p>

				<p>In my view, it is a serious failing of the draft proposal to stop access to Hammersmith for east-bound traffic coming off the A4. This traffic (much of it local) is feeding into King Street, Shepherd's Bush Road and Hammersmith Road. Traffic is like water, it will find other routes mostly through residential areas.</p> <p>The Flyover/Flyunder</p> <p>The SPD draft document rightly describes this as a long-term project and suggests seeking funding from the government and/or GLA. The Flyunder is an elegant proposal to stitch the centre of Hammersmith back together, but it is an aesthetic project with large development potential rather than a project to improve infrastructure. It is reasonable to assume therefore that this will not be high on the list of priorities of either the government or the GLA.</p> <p>A further problem is that the tunnel needs to be built before the flyover can be demolished and the land released for housing. Work could start on the tunnel at an estimated cost of £800 million, but many urban tunnel projects end up costing 3x their estimates. As the scheme is to be largely paid for by residential development, subject to market pressures, how would the extra cost be funded other than by much higher and denser development than shown in the enticing visuals?</p>	further discussion with stakeholders, feasibility work and discussions on financing.
83	38	Dave Hinton (former SBD officer)	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>Congestion issues: have often been enhanced by the councils own previous traffic enhancements and obviously the continued closure of Hammersmith Bridge does not help. I do fully support the A4 tunnel project which would also create new and enhanced public space. But the devil is in the detail as people still have to get on and off the A4 from the Gyratory. Pedestrianisation is not the answer to all issues, in fact even the answer necessarily to any. It creates more congestion and often directs traffic away from the town centre where there are few if any ground level residences. Into areas which are essentially totally occupied by street level housing or residential developments. Now making an area that is not occupied (the town centre) 'clear,' but increasing the 24/7 presence in the side streets where the residents sleep.</p>	<p>Comments noted. No change required.</p> <p>The Flyunder is a long-term ambition which is subject to further discussion with stakeholders and traffic modelling to determine suitable routes.</p>
84	39	Historic England	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>The Hammersmith Town Centre SPD currently makes no reference to archaeology and discusses heritage assets only as historic buildings. The proposed development area is covered by two Archaeological Priority Areas:</p> <ul style="list-style-type: none"> • King Street, the site of an Iron Age prehistoric earthwork, a short section of which was excavated at 120-124 King Street. This earthwork may have protected a single farmstead, but may have been a more substantial settlement. It may also have been a long linear territorial boundary • Hammersmith Creek, Queen Caroline Street and Broadway, the site of the possible original Saxon settlement of Hammersmith around Creek mouth. It also covered the medieval and post-medieval settlement of Hammersmith along the riverfront, and Roman coins and pottery from the foreshore at Queen Caroline Street and Broadway. There is also a 17th century convent and 17th century Portuguese embassy on Hammersmith Road 	<p>Comments noted. No change required.</p> <p>The SPD is a supplementary document which should be read alongside the Local Plan which identifies and includes policy on these Archaeological Priority Areas. Any proposal which would affect these areas would need to demonstrate compliance with the relevant Local Plan Policy and engage with relevant consultees.</p>

				Given these areas of known archaeological potential, and the proposed large scale below-ground works to construct in particular the 'flyunder', any plans should consider the archaeological implications of the work as part of their pre-application stage. The Greater London Archaeological Advisory Service should be consulted on any development and would be pleased to engage with applicants and contractors in the development of plans which treat any archaeological remains sensitively and enable the realisation of public benefit from any impact through engagement and outreach. This is in keeping with the recommendations of the NPPF Chapter 16.	
85	18	Kevin Caulfield	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	De-couple the Hammersmith Broadway gyratory from the the FlyUnder and get on with making improvements to Hammersmith Broadway now. There is scope to create more green open space adjacent to Apollo - St Paul's Church and to link the centre of Hammersmith to the Thames. We want to see plans that can be realised in the next 3 to 5 years. In my view, the FlyUnder will not be a priority for TFL nor any government in power. LBHF needs to recognise this and get on with what can be achieved to improve our town centre now	<p>Comments noted. No change required.</p> <p>We appreciate you taking the time to read and make comments on the SPD.</p> <p>Your comments on the two projects are valid and understood. The flyunder and gyratory whilst related are two separate projects, both of which will be subject to further consultation and feasibility work.</p>
86	21	Patrizia and Nuveen	4. Strategic Sites - Flyover, Hammersmith Gyratory and adjoining land	<p>Infrastructure</p> <p>The Council's aspiration for a fly-under is clearly a very long term ambition, around which there is significant uncertainty and this has been the case for a long time already. In this context, the Council should further explore in much greater detail its deliverability and the probability of funding from sources such as TfL, the GLA and from government grants, before seeking obligations from development. It should only be at the point in time that there is much greater certainty over the project that development should be asked to contribute at all. Furthermore, under regulation, S106 contributions should only be sought where they are necessary to make a particular development acceptable, directly relate to that development and where they are fairly and reasonably related in scale and kind to that development. King Street is remote from the route of the fly-under and contributions from development on it, should be limited by these tests.</p> <p>Similarly, the aim to reconfigure the existing gyratory system to create greater public realm including around Blacks Road is a supportable ambition however, should firstly be the subject of detailed modelling and feasibility work and a clear pathway identified through which development is not the majority source of funding as suggested on page 65. Otherwise there is a risk that development will be stifled particularly given other aims of the draft SPD including to seek funding for the fly-under, 50% affordable housing on site and a proportion of affordable workspace both of which should be referred to as subject to viability, together with the operation of the nonnegotiable CIL which is already at a high level for this area. Extreme care should be taken that these</p>	<p>Comments noted. No change required.</p> <p>Both the flyunder and the gyratory are long-term ambitions which will be subject to further discussion with stakeholders, modelling and discussions on financing.</p>

				requirements, either individually or collectively, do not overburden and that nothing happens as a consequence.	
87	36	The Hammersmith Society	4. Key Site – Hammersmith Broadway	Key sites Hammersmith Broadway (p32): identify the purpose of redeveloping - again - this substantial and complex site, including reference to H1 Sustainable Placemaking, and to the disruption to people and commerce from tearing out the heart of the town centre - which the SPD seeks to restore. Explain the strategy for a third civic square, and the measures to ensure that its prime location would not undermine the success of Lyric Square and the future Unity Square. A joint statement of LBHF/TfL policy for the Broadway site - and the Broadway - is vital to the future plan of the town centre.	Comments noted. No change required. The SPD sets out a broad vision and proposals will be further developed through planning briefs, masterplans and through planning applications.
88	28	Ingka Centres	4. Key Site - Livat Centre	3.8 The wording of the text regarding “the future development of this site” could be misinterpreted as an objective of re-development of Livat. Ingka have no specific plans for the redevelopment of the Site. It is expected, as part of the dynamics of any town centre environment that there will be future re-purposing and re-occupation of the units within the centre, and Town Centres must be able to adapt to the specific demands that may arise.	Comments noted. Proposed change: Page 32 – Key site Livat centre box. Amend as follows: Proposed change: Page 32, Livat Centre Future development of this site <i>Future use and diversification of this site’...</i>
89	25	Worshipful Company of Girdlers	4. King Street Character Area	The reference within page 33 that “large/tall buildings varying between 5-11 storeys could be achievable” on King Street is supported. Indeed, it is considered that there could be scope for a greater maximum height than 11 storeys and a wider distribution of height towards the upper end of the range than indicated by the “illustrative gradient map” on page 50. This is for reasons including the concealment and urban design context that the approved Landmark House scheme to the south of King Street will provide and because of the oblique sight lines east- west along the road. The Girdlers’ consider that any impacts of greater height on the High Street and adjacent properties can be mitigated.	Comments noted. No change required. The map is indicative only and provides a high- level concept of key design principles to be developed in the future.
90	25	Worshipful Company of Girdlers	4. King Street Character Area	The Girdlers’ freehold ownership lies within the Hammersmith Broadway character area identified by the draft SPD. It is noted that no reference is made on page 33 to 49-63 King Street (occupied by TK Maxx and Poundland), or 65-79 King Street (occupied by Barclays, Bake Haus, Starbucks, and Superdrug) or 21-25 King Street (Lloyds Bank), or to the office building at 12 Blacks Road as key sites, all of which offer future development potential. These properties should be included within the “M&S/Boots/One King Street” group as presenting similar opportunity, or could be referenced separately	Comments noted. No change required. The opportunities highlighted in the SPD are not exhaustive and are not formal site allocations. The absence of a reference to such sites on King Street would certainly not preclude them coming forward for planning consideration.

					<p>The opportunities highlighted in the SPD are not exhaustive and are not formal site allocations. However, we agree to make the references as requested.</p> <p>Proposed change:</p> <p>Page 33:</p> <p>The key site will be updated to include a reference to the group of site addresses. <u>1-79 King St/12 Blacks Rd</u></p>
91	25	Worshipful Company of Girdlers	4. King Street Character Area	<p>There is no explicit reference with the description of the Hammersmith Broadway character area on page 33 to the uses on the upper floors of any redevelopment that could support retail. These should include residential for which there is an acute need in all of its forms, and other uses such as visitor and student accommodation for which there is already an emerging proposal at the M&S site.</p>	<p>Comments noted. No change required.</p> <p>As these are not site allocations it is important that the SPD is not prescriptive about future uses. Part of the future vision for the character area is for homes to be delivered as part of any redevelopment. Discussions in the development of planning briefs, masterplans and applications will address uses on specific sites and levels.</p>
92	29	Hammersmith BID	4. King Street Character Area	<p>KING STREET Mix of small scale high street buildings. Low quality public realm Future vision Continue as main retail spine Future developments to include community buses and upper floor retail Civic Campus, an enhanced destination, encouraging diversification Enhanced public Realm - Aim to transform King Street into a 'boulevard' New and enhanced routes north and south to the river Civic Campus Under construction. 2025 completion? King Street Public Works proposals Pavement widening, restrict traffic to cycles and buses. Not full pedestrianisation Improved road crossings A4 Cycle Route</p>	<p>Comment noted. No change required.</p>

93	38	Dave Hinton (former SBD officer)	4. King Street Character Area	<p>King Street Page 33-37</p> <p>I would challenge the thought that King Street provides links to Brackenbury Village to the north? I would suggest Beadon Road is perhaps more important as is Ravenscourt tube and Studland Street.</p> <p>Similarly, Kings Street view as an accessible link to the riverside I would also query. Hopefully the new bridge across the A4 will still appear at the end of Nigel Playfair Avenue. The current subway links (Nigel Playfair Avenue and Macbeth Street) are not really integrated into Furnival Gardens Park.</p> <p>The Livat Centre or Kings Mall and the associated housing of Ashcroft Square needs to be dramatically refurbished or frankly redeveloped. I would argue that it is long past its current life span. Again, when redeveloped consideration should be given to the possibility of enclosing the tube to the north creating another open public space between Ashcroft Square and the new developments of Beaulieu & Montpellier Houses.</p> <p>Care must be taken when developing the south side of King Street to not further isolate the existing housing provision behind these buildings, between them and the A4. CIL money needs to be spent enhancing the existing hard landscaping and street environments of this residential area. Also extending the current town centre CCTV into this space. The heights of these building should be limited as King Street runs east west and high buildings would reduce the natural light at street level.</p> <p>It is important that King Street needs to remain open to private vehicles, to provide access across Hammersmith and into the residential area between the A4 and King Street; to residents, service vehicles, emergency services and visitors.</p> <p>I make mention later in the report regarding the development of more office space and to the fact that existing office space has been converted to residential use. I note that such mixed provision is mentioned here. Whilst supporting this mix, I hope appropriate roof top external communal spaces (safe spaces) will be created for these residents and their families. Due consideration must be given as to whether the residential accommodation created is appropriate for certain clients. Single parent families, families with young children, need external residential only space. Nor is it appropriate to designate an existing residential estates external space as now public residential space for the new development or a nearby park. Sometimes certain developments are not appropriate for family residential provision, but perhaps student provision or low-cost single occupant professional flats.</p> <p>Already approved is the Landmark House development, which will hopefully deliver on the expectations.</p>	<p>Comments noted. No change required.</p> <p>The SPD sets out a broad vision and proposals will be further developed through planning briefs, masterplans and through planning applications.</p>
94	24	Environment Agency	4. King Street Character Area	<p>Much of the King Street area is within Flood Zone 3 and the latest tidal breach extent. It is disappointing the SPD fails to acknowledge this. We strongly recommend that the SPD includes reference to flood risk within the 'enabling delivery' paragraph on page</p>	<p>Comments noted. No change required.</p>

				37. We emphasise that any proposed residential sleeping accommodation outlined in HRA1 Strategic Site - Civic Campus must be situated above the tidal breach level.	It should be noted that the SPD sits alongside the Local Plan and any work undertaken in this area would be subject to the requirements of the Local Plan relevant to mitigating flood risk.
95	36	The Hammersmith Society	4. King Street Character Area	Railway arches (p35): these railway arches, far from unique to the borough, bring a limited attraction of historic familiarity (and porous fabric) but are located in an urban backwater bringing only a potential diversion from the emerging benefits of King Street.	Comments noted. No change required. Activating the railway arches will promote use by SMEs and creative industries. This is something H&F actively supports, and more information can be found in our Railway Arches SPD.
96	36	The Hammersmith Society	4. King Street Character Area	Civic Campus (p37): this is a consented scheme currently under construction: the 'indicative development parameters' are perhaps irrelevant. King Street (p37): further annotated illustration is required of the 'visionary transformation of the public realm.' Transport modelling is critical to included the long spoken about 'consultation and co-production of a scheme to transform King Street.'	Comments noted. Acknowledge comment but retain text on Civic Campus. Proposed change: Page 37: Agree - A supporting image will be included.
97	24	Environment Agency	4. Eastern Quarter Character Area	We highlight that there are areas within the Eastern Quarter within Flood Zone 3 and the latest modelled tidal breach extent. It is disappointing that the SPD fails to acknowledge this.	Comments noted. No change required. It should be noted that the SPD sits alongside the Local Plan and any work undertaken in this area would be subject to the requirements of the Local Plan relevant to mitigating flood risk.
98	29	Hammersmith BID	4. Eastern Quarter Character Area	EASTERN QUARTER Major employment area, large buildings, Talgarth Road splits off Ark and associated sites. Future Vision Large floor plates, etc encouraged to strengthen employment offer Development to include housing Improved connectivity Public Works proposals Flyunder, Gyrotory, Boulevard to replace Talgarth Road	Comments noted. No change required.

99	38	Dave Hinton (former SBD officer)	4. Eastern Quarter Character Area	<p>Eastern Quarter Page 39-41</p> <p>Until the A4/ flyover is replaced with a tunnel this is not and never will be an integrated space. It is in essence three islands, the Gyrotory and then the developments south of the A4, including the Talgarth Road filling station site and the Novotel and associated developments of Shortlands. It also has LAMDA on its edge.</p> <p>I would suggest the inclusion of the new developments/refurbishments towards the northern end of Fulham Palace Road is problematic as they are not really integrated into the town centre.</p> <p>Perhaps with the Talgarth Road filling station development and when the A4 is tunnelled, strong consideration through CIL and as part of the developmental process could be given to covering/roofing the tube lines. creating a new open public space/park between; St Augustine's, Guinness Trust buildings and the new refurbished Elsinore/Horatio House development and the rear of the Ark. Thereby creating a much more accessible public link and bring much needed exterior green space to that area?</p> <p>I have concerns for the new developments already proposed south of the A4 particularly their links to the existing town centre and commuter hubs. The existing town centre CCTV system needs to be expanded to provide good coverage of the southern pavements leading to the new campus based around the old magistrate's court site . The CCTV coverage needs to be extended/integrated to cover the publicly accessible external spaces in this area.</p> <p>Again, this quarter is problematic as it could be argued that it actually extends to include new developments/ refurbishments along Hammersmith Road from Brook Green to the edge of the borough at Olympia; including Griffin House 161 Hammersmith Road, Collect court and St Pauls Hotel which have already been refurbished.</p>	<p>Comments noted. No change required.</p> <p>The SPD sets out a broad vision and proposals will be further developed through planning briefs, masterplans and through planning applications.</p>
100	29	Hammersmith BID	4. Key Sites - 3 Shortlands/Novotel/Metro Building, 161 Talgarth Road/Petrol Filling Station	<p>Key Sites Shortlands, Novotel, Metro Building If rededevolped, could include mixed use, connectivity, affordable workspace, housing. 10-12 storeys 161 Talgarth Road/Petrol Filling Site As Shortlands. 10-22 storeys Seems inconsistent to suggest 22 storeys here and only 12 on the Novotel site.</p>	<p>Comments noted. No change required.</p> <p>The SPD sets out a broad vision and proposals will be further developed through planning briefs, masterplans and through planning applications.</p>
101	12	Britel Fund Trustees Ltd	4. Northern Quarter Character Area	<p>The Northern Quarter is characterised as primarily commercial in nature, but with a mix of civic, commercial and residential uses. Indeed, we note the reference to the central area as consistent 'large scale post-war commercial buildings and recent developments have introduced taller buildings. We concur with this observation and this is particularly evident to the immediate south or of client's site. In terms of the future vision, the draft SPD notes that recent developments have brought forward high density schemes with a mix of commercial and residential uses.</p>	<p>Support noted. No change required.</p>

				Our client supports the need for future development of this area to complement the positive design features of these developments.	
102	29	Hammersmith BID	4. Northern Quarter Character Area	<p>NORTHERN QUARTER Primarily commercial, cut in two by rail tracks. Large buildings around Beadon Road. Shepherds Bush Road, lower historic buildings.</p> <p>Future Vision Looking for developments that complement positive features of recent developments, improving connectivity. Active ground floor frontages.</p> <p><i>Public Works proposals</i> <i>Traffic Management in Beadon Road, Glenthorne Road and King Street.</i> <i>Hammersmith High Line</i></p>	Comment noted. No change required.
103	38	Dave Hinton (former SBD officer)	4. Northern Quarter Character Area	<p>Northern Quarter Page 43-46</p> <p>As noted perhaps the most developed area of the town centre, with all the new development at the southern end of Hammersmith Grove, Shepherds Bush Road and along Glenthorne Road. It should be noted that generally everything north of Glenthorne Road is street level residential. With the exception of Hammersmith Road and Ravenscourt Roads. It is an important transition space from the high-density busy nighttime and daytime commuter, retail economies of King Street, the Broadway and Lyric Square.</p> <p>Again, more traffic management will not enhance this area. The councils use of the term traffic management all too often means vehicle exclusion. These roads are the remaining east-west links across Hammersmith, they are also the service routes for most of the developments, for vehicles that cannot use alternate side streets. Access to the Kings Mall must be maintained for deliveries.</p> <p>Perhaps most importantly is the sustainability of access routes for emergency services both on call and whilst patrolling. If you make non-emergency access for patrol vehicles problematic then they simply avoid the area, removing an important group of capable guardians</p>	Comment noted. No change required.
104	23	National Grid	4. Strategic Sites - general	<p>Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. 275Kv Underground Cable route: BEDDINGTON - WILLESDEN 1. A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. We propose modifications to the above site allocations and/or policies to include wording to the following effect: Relevant proposals be developed with the following site-specific criteria: a strategy for responding to the NGET Underground Cable present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the</p>	<p>Comment noted. No change required.</p> <p>Thank you for the details provided. We welcome your comments, however we think that this level of details would be best placed in a Development Plan Document rather than in this SPD. NGET assets will be captured within a review of the Local Plan. During this review process there will be the opportunity for you to make</p>

				<p>master planning stage and how the impact of the assets has been reduced through good design.” Please see attached information outlining further guidance on development close to NGET assets. NGET also provides information in relation to its assets at the website below: https://www.nationalgrid.com/electricity-transmission/network-andinfrastructure/network-route-map. Utilities Design Guidance</p> <p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET infrastructure.</p> <p>NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.</p> <p>Further Advice</p> <p>NGET is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect NGET’s assets. We would be grateful if you could check that our details as shown below are included on your consultation database</p>	<p>representations and engage with us.</p>
105	28	Ingka Centres	4. Strategic Sites - general	<p>3.4 As noted in Section 2 the proposed improvements to the public realm of King Street are supported, however it needs to be recognised in the SPD (and future phases) that existing necessary and essential servicing operations will need to be able to continue to use King Street.</p> <p>3.5 Operators on King Street such as Metro Bank require servicing access directly to the front of their business for cash collections and drop offs for example and have no access to the internal servicing areas. Other retailers inside of Livat such as Lidl and Sainsbury require daily loading and delivery and any interventions on the highway network should not cause issues to their servicing operations.</p> <p>4.4 Hammersmith Broadway Key Intervention 25 of the SPD refers to the “Comprehensive redevelopment of Hammersmith Broadway”. It is confusing whether this refers to the comprehensive redevelopment of the entire Hammersmith Broadway Area as set out in the SPD or rather the comprehensive redevelopment of the Hammersmith Broadway public transport interchange only; Quod understand it is the latter.</p> <p>4.5 Livat is incorrectly labelled as the “Kings Mall” on the map of Hammersmith Broadway6. This should be amended to “Livat” and the location made clear to the reader where the Key Site of Livat is located.</p>	<p>Comment noted.</p> <p>The SPD outlines what possible key interventions will be considered for any potential redevelopment of Hammersmith Broadway. This is not a site allocation and therefore the key interventions are not policy.</p> <p>The SPD references Livat as Key Site and does not mention Kings Mall. However, the map annotation on page 27 will be amended to remove Kings Mall.</p> <p>Proposed Change:</p>

				<p>4.6 It is unclear whether the proposed Key Intervention to downgrade the highway environment and improve the pedestrian area on King Street is proposed for King Street's entire length continuing in front of Livat or is only within the area shown within the King Street quarter. A map to support the Key Intervention proposal should be produced to clarify the area that this affects.</p>	<p>Page 27, Plan of Hammersmith Broadway map. Remove Kings Mall annotation.</p> <p>A map showing key interventions for Hammersmith Broadway can be found at page 28 of the document. However, it is noted that this map covers Hammersmith Broadway area only.</p> <p>Proposed change:</p> <p>Page 27:</p> <p>The image for the vision of this area will be adjusted to cover the entire Livat centre frontage.</p>
106	33	TfL Spatial Planning	4. Strategic Sites - general	<p>As stated above, TfL is generally supportive of the key sites contained within the draft SPD. It is expected that all sites would come forward in accordance with the relevant London Plan transport policies and where appropriate, developers will engage with TfL at an early stage through the formal preapplication process. With regards to enhancing 'public transport interchanges', there is no funding within the TfL Business Plan to upgrade Hammersmith Broadway station, nor is this something that TfL are currently investigating. As such, while the aspiration to provide good quality interchanges is supported in principle, further engagement/work will be needed to better understand what the aspirations for upgrading the station are to determine if they are feasible. If any improvements are to be taken forward, they would need to be third-party funded. Given the operational importance of the Hammersmith Broadway to TfL, any plans which would impact this location, including physical changes to the station, should be discussed with TfL at the earliest possible stage.</p>	<p>Comment welcomed. No change required.</p> <p>The redevelopment of Hammersmith Broadway will be subject to further discussion with TfL.</p>
107	38	Dave Hinton (former SBD officer)	4. Strategic Sites - general	<p>Developments: all these new high-rise developments require servicing via service vehicles, the shops require deliveries. So, the volume the flyover occupies would release valuable land, but not for development, only open space? I always worry in Hammersmith as there is little if any land left to develop, unless we start using the public open spaces. Recent town centre developments have simply increased densities through height. Creating street level spaces that exist at the bottom of canyons, this has impacts upon windage and light levels.</p> <p>Increased housing in the town centre without its own private outdoor space is unfair, to both the new and existing residents'. Public parks should not be the sole outdoor amenity space available to these residents. Single parents and families with young children cannot always be expected to go to the park.</p>	<p>Comment noted. No change required.</p> <p>The removal/replacement of the flyover with a tunnel is a long-term ambition which is subject to further discussion with stakeholders. The site that would be released by the flyover is identified as strategic site in the Council's Local Plan (2018) specifically in Policy HRA2</p>

					<p>It is relevant to note that the SPD is a guidance document only and should be read alongside the Local Plan. Whilst it will be a material consideration in determining planning applications, it does not attempt to set or go beyond existing policy.</p> <p>Policies in the Local Plan and London Plan identify appropriate locations for high-rise development and Hammersmith Regeneration Area is one of those areas. Any impacts will be carefully assessed against Local Plan policies to avoid any adverse impacts on the area.</p> <p>In terms of private amenity space provision in residential development, proposals are always subject to requirements set out in the London Plan and the Local Plan whereby a minimum of private outdoor space is generally met in residential developments.</p>
108	8	Carole Cooney-Quinn	4. Strategic Sites - general	<p>A few years ago I sent this idea to The Mayor of London explaining my vision for what is being called the High line to replace the flyover.</p> <p>I am so glad it has been drawn up for Hammersmith and Fulham and that someone has finally taken my idea on board and are looking at ways to make one of my dreams a reality. I want it to run further along by the river also. Maybe one day Hounslow council will also realise it would be amazing to do the same and join up the river, Chiswick House grounds to the rest of Chiswick. I will keep my dream alive and keep writing to those concerned.</p> <p>It will take years, much hard work and a lot of money. However the end result will make the lives of all in West London and across London so much better in so many ways.</p>	<p>Support noted. No change required.</p> <p>We appreciate you taking the time to read and make comments on the SPD.</p>
109	29	Hammersmith BID	5. Developer Guidance	<p>DEVELOPER GUIDANCE</p> <p>This section is not reviewed in detail, as developers will naturally refer directly to this and policy documents.</p>	<p>Comments noted. No change required</p>

				<p>Relevant Policies identified:</p> <p>A. Climate and Sustainability Policy H1. Sustainable Placemaking Towards Net Zero, modern methods of construction, public benefits - greening, etc.</p> <p>B Supporting Appropriate Density Policy H2. Tall Buildings Tall Buildings may be acceptable, considering context, and provision of public amenity. A general view that 10+ storeys may be acceptable on Broadway and Eastern Quarter. A 'Gradient Map' is attached indicating the desirability of tall buildings over the Town Centre. <i>The map reflects the recommendations made in the consideration of the four quarters above.</i> No surprises. Another map proposes locations for landmark/gateway (= tall) buildings. This includes the Civic Campus, the Landmark site, St Paul's, Broadway, Apollo, Shortlands, Ark, Magistrates Court. <i>Again, no surprises.</i></p> <p>C Architectural Excellence Policy H4 View Management Policy H5 High Quality Architecture <i>Again, no surprises.</i></p>	
110	38	Dave Hinton (former SBD officer)	5. Developer Guidance	<p>Developer Guidance</p> <p>No mention of Secured by Design as a planning condition</p>	<p>Comment noted. No change required.</p> <p>The SPD is a guidance document only and should be read alongside the Local Plan and the London plan in terms of policy provision, together with other SPDs.</p> <p>The requirement is already embedded in the Local Plan and the Planning Guidance SPD. We do not think that further reference in this SPD is necessary. Planning conditions for secure by design would be a necessary part of any relevant application in the town centre.</p>

111	24	Environment Agency	5. Developer Guidance H1 - Sustainable Placemaking	We strongly recommend that the SPD replaces the wording from 'as well as providing a net increase in biodiversity'. To 'as well as meeting mandatory biodiversity net gain of at least 10% and utilise the urban greening factor for to maximise increases in biodiversity'.	<p>Comment noted.</p> <p>Proposed change: Page 48 Amend Key principle H1 as follows:</p> <p><i>“New developments will need to adopt the highest possible climate standards to support the achievement of net-zero carbon emissions and be designed to be well-adapted for a changing climate, as well as providing a net increase in biodiversity <u>meeting mandatory biodiversity net gain of at least 10% and utilise the urban greening factor for to maximise increases in biodiversity.</u>”</i></p>
112	12	Britel Fund Trustees Ltd	5. Developer Guidance H1 - Sustainable Placemaking	<p>In terms of the Developer Guidance, the guiding principles should reasonably cross reference relevant policies of the Local Plan. For example, whilst H1 – ‘Sustainable Place Making’ is an admirable objective, the guidance is very general in nature. Future developments would be subject to the detailed requirements set out in the policies to the Local Plan and the London Plan.</p> <p>In relation to locations for tall building, the draft SPD broadly follows the approach developed by the 2019 Masterplan. In relation to our client’s site, we note that the colour wash on the ‘Illustrative gradient-map of location suitability for tall buildings’ (Figure 5, page 50) supports taller buildings (10+ storeys) to the south with the remainder of the site identified as “large buildings may be appropriate subject to consideration of local context (7-10 storeys”.</p>	<p>Comments noted. No change required.</p> <p>The SPD is a guidance document only and should be read alongside the Local Plan. This is made very clear in the document.</p> <p>This SPD expands upon the masterplan findings to provide planning guidance for developers and residents for Hammersmith town centre.</p> <p>The gradient map is just indicative and the suitability of tall buildings will need to be assessed against the relevant Local Plan and London Plan to determine the suitability of any proposed scheme including consideration of key townscape, and heritage issues.</p>
113	34	Royal London	5. Developer Guidance	RLAM support the principle of sustainable placemaking within Policy H1 including seeking the delivery of net zero carbon on new development sites within the Town	Support welcomed. No change required.

		Asset Management	H1 - Sustainable Placemaking	Centre, as well as the principle of maximising biodiversity, urban greening and promoting sustainable transport.	
114	35	FORE Jersey VIII Limited	5. Developer Guidance H1 - Sustainable Placemaking	My client is generally supportive of the emerging proposals and the objectives for the Town Centre and provides the following comments and observations in response to the current draft policies. Policy H1 'Sustainable Placemaking': At the heart of FORE's principles and development model is sustainability. The current application for works to 255 Hammersmith Road embodies the objectives of sustainability by seeking to utilise and retrofit the existing building. In addition to this, the proposals will introduce and increase the urban greening on the site. In doing so, the 'highest possible climate standards' are being adopted	Support welcomed. No change required.
115	24	Environment Agency	5. Developer Guidance - Climate Change and Sustainability	It is positive to see that flood risk is included within this section of the SPD, however, we recommend that it includes a specific paragraph which encourages developers to consider the risks of flooding at an early stage of the design process, with particular emphasis on sites that are within the tidal breach extent. We support the approach within 'A: Climate Change and Sustainability' as stated "as part of this approach, provision of new/enhanced enabling links into the existing London ecological network of parks, waterways the river and introduction of SUDs measures will be encouraged", however, we encourage that the wording is stronger, and suggest that "as part of this approach, provision of new/enhanced enabling links into the existing London ecological network of parks, waterways the river and introduction of SUDs measures must be considered". This will bring greater benefits to the Hammersmith Town Centre and have multifunctional benefits including reduced flood risk and enhancing biodiversity.	Comment noted. No change required. We welcome your comment, however, it is relevant to note that the SPD is a guidance document only and should be read alongside the Local Plan, whereby this requirement is already embedded in Local Plan Policy CC4 and in the Climate Change SPD - Flooding and Sustainable Drainage section.
116	31	Hammersmith Grove Residents Association	5. Developer Guidance - Climate Change and Sustainability	Commentary on page 38 Climate Change Suggestions to weave into the report. It is too generalised at the moment. Firstly, we are already feeling the impact of climate change and need to urgently respond to it. Cross reference document to SDP on Climate. Flooding an issue in this Borough, plus hot summers. Adaptation measures therefore have to be widely incorporated. Are there any plans (ask Tim Pryce) to include either parts of Kings St or the Broadway as a Local Heat Network. Civic Campus is one with a Ground Source Heat Pump already built. Needs to be mentioned. Possibly another at the Broadway? Make it clear that the Climate and Ecological Emergency Commission (CEEC) and other Commissions on AQ etc referenced, all served their fix terms and are no longer active. Current wording suggests they are ongoing! They informed the Strategy and Action Plan adopted by the Council in {date} to deliver the 2030 net zero target. This is the key document the Council is working to deliver and the most important to mention. Don't necessarily need to mention the others?. Need to talk more about ADAPTATION as well as climate change. Role of ecology is important. Survey to plant more trees and planting in general.	Comments noted. It is relevant to note that the SPD is a guidance document only. This is made clear in the document. The council have recently adopted a dedicated Climate Change SPD and this document should be read alongside it for more detail measures on adaptation. Proposed change: Page 49, amend as follows: <i>Resident-led commissions on air quality and biodiversity have been established, alongside a Climate and Ecological Emergency Commission to</i>

				<p>Green and blue roofs please. Introduction of solar panels and use of Air Source Heat Pumps. introduce Sustainable Urban Drainage Systems (SUDS) to reduce the impact of surface water flooding on our streets and homes. To be normally considered in planning applications. In redesign of streets and public realm will be “greening the grey”. Use of permeable paving, water butts on buildings, planning for water storage tanks to alleviate flood risk in the area etc. Note street scape will change significantly to accommodate these measures.</p> <p>Look at mitigating the impact of Heat Islands particularly around the Broadway. Identification of “shaded/cooler” areas in summer for office workers and residents to shelter from extreme heat eg on Lyric Square and along Kings Street. Or wind tunnel at top of HG!</p> <p>EV chargers need to be rolled out. More bicycle safe storage units for commuters and office workers..</p>	<p><i>assist with recommendations to achieve significant improvements. The Council has adopted a Climate and Ecological Strategy (2021) and Climate Change SPD (2023) the themes of which underpin this SPD.</i></p> <p>The Climate Change SPD covers climate change and adaptation topic in more detail.</p> <p>Overheating is a challenge for the borough and London wide. It is something that we are committed to understanding and where we aim to reduce the impact. All major planning applications in the borough and across London are required to mitigate overheating in line with the London Plan cooling hierarchy and reduce the urban heat island effect. This is also something that is reflected in our Local Plan and Climate Change SPD.</p> <p>Electric vehicle charging is something that we actively support. Where car parking is provided as part of new development, we expect EV charging points to be provided. Across Hammersmith and Fulham, there are almost 3000 EV charging points. You can suggest a location for a lamppost charging point and look at the work that H&F are carrying out in support of EV charging by accessing the following link:</p> <p>https://www.lbhf.gov.uk/transport-and-roads/electric-vehicles</p>
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117	38	Dave Hinton (former SBD officer)	5. Developer Guidance - Climate Change and Sustainability	Greenhouse gases, most of those are generated by the A4 not King Street. The decline in the High Street has more to do with the after effects of covid, the arrival of Westfield and the lack of investment in the Kings Mall.	Comment noted. No change required.
118	38	Dave Hinton (former SBD officer)	5. Developer Guidance - Climate Change and Sustainability	<p>Page 49 A Climate Change and sustainability.</p> <p>Please do not, assume the removal of all vehicles (cars) is the best way to achieve this aim. I would fully support the removal of the flyover and the introduction of a new tunnel to replace it. But access will be needed by new developments to support vehicles which will not all be electric, similarly residents will also require access to private transport alternatives, suitable for all ages and weather conditions. If there is no car parking provision available now in new residential developments , how in 5 – 10 years' time, will you facilitate the electric vehicles which may be the majority unit at that time.</p> <p>Obviously, use of solar power etc should be a matter of course as well as sustainable low carbon developments and long-term development management.</p>	<p>Comment noted. No change required.</p> <p>The SPD supplements policies in the Local Plan. Transport and accessibility are addressed in Policies T1-T7 of the Local Plan. Given the high level of public transport accessibility the council's approach to new residential developments is car parking free measures unless evidence is provided to show that there is a significant lack of public transport available.</p> <p>Detailed guidance on renewable energy, low carbon development are themes explored in the Council's Climate Change SPD.</p>
119	29	Hammersmith BID	5. Developer Guidance - Climate Change and Sustainability	A Sustainable, Green and Liveable Hammersmith Prioritisation of Carbon Reduction in Construction projects, improvement of cycle routes, new and improved public spaces. The requirements for construction projects are in line with developing national and GLA policy. They stop short of specifically requiring the prioritisation of reuse over demolition. As this would be a policy change it cannot be introduced via the SPD. Note that this is encouraged by GLA policy and is being introduced by Westminster	Comment noted. No change required.

120	38	Dave Hinton (former SBD officer)	5. Developer Guidance - Supporting Appropriate Density	Page 50-51 B. Supporting Appropriate Density. I have made mention of this elsewhere: whilst this section concentrates on density of mass and height and obvious impacts upon existing buildings and fields of view. I would also raise density of type of use: i.e. how much residential, hotel, retail, night time economy etc is sustainable. The developments use throughout the day and at weekends. I.e. avoid concentrations of night time and week end only use dead spaces.	Comment noted. No change required. The Council's Local Plan policies relating to town centres development encourage uses that can contribute to the night time economy. The vision for Hammersmith town centre is to increase the diversity in the range of uses being provided (activities such as restaurants, bars and pubs, cinemas and theatres) to add vitality to the centre. This variety will automatically contribute to enhancing night life economy for local community and visitors.
121	27	TFL Places for London	5. Developer Guidance H2 - Tall Buildings	We note your suggested indicative development parameters that building heights of between 10- 20 storeys might be achievable. We consider that this could inhibit the development of this site, given the Council's aspirations, including enhanced public transport interchange which would need to be delivered via the development. Therefore, we suggest that the upper height limit is deleted and that reference is made to height being determined via a design-led approach and as part of a development which delivers significant public benefits. We hope that these representations are helpful and, as we say above, we would be happy to meet officers, with other owners, to discuss your aspirations and delivery of Hammersmith Broadway.	Comment noted. No change required. The SPD intends to provide indicative guidance only and should be read alongside the Local Plan. The SPD suggests indicative development parameters for tall buildings that may be considered appropriate for the regeneration area. However, detailed consideration of these matters will be required through the development management process. As per Local Plan Policy DC3, the general character of any particular area will always be an important consideration in assessing the acceptability of tall buildings and a full design appraisal of the impact of a tall building will always be required.
122	31	Hammersmit h Grove	5. Developer Guidance H2- Tall buildigs (p.50	The London Borough of Hammersmith and Fulham published a new supplementary planning document to help guide the development of Hammersmith Town Centre.	Comment noted.

		Residents Association		<p>As part of the consultation process the planning department met committee members of the Hammersmith Grove Residents Association to discuss issues in relation to Hammersmith Broadway and the Northern Quarter of the Town Centre plan being areas within or adjacent to Hammersmith Grove.</p> <p>HGRA were concerned as to how proposals in the Plan might impact on the Hammersmith Grove Conservation Area and have proposed amendments to the description of the area to include reference to the Conservation Area (see attached). 'Primarily commercial in nature but including mix of civic, commercial and residential uses. In the northern part the railway tracks separate the area into two, creating a significant barrier to movement, between Hammersmith Grove and Shepherds Bush Road. The central area around Beadon Road/and the southern end of Hammersmith Grove, consists of large scale post-war commercial buildings contrasting with the Victorian tree lined terraces to the north forming the Hammersmith Conservation Area.' Future vision amendments: 'Consideration of traffic management within Beadon Road, Glenthorne Rd and King Street together with their effect on adjoining neighbourhoods will enable active travel.'</p> <p>Various sites and buildings were discussed and comments relating to those sites are made as follows:</p> <p>26-28 Hammersmith Grove at rear of Hammersmith Grove residential properties</p> <p>The site presently comprising a ramp and carpark and office block consisting of six storeys. (See attached).</p> <p>Two planning applications for a hotel comprising of six storeys were submitted by Developers and both refused by LBHF on a number of grounds to include, significantly, grounds that the development was considered unacceptable in terms of impact on residential amenity and unacceptable in terms of neighbouring properties privacy.</p> <p>In the circumstances HGRA made clear their view that any Development should be no higher than the existing office building or the Hotel Development being 6 storeys. It was therefore felt that in respect of the land immediately behind Hammersmith Grove, residential buildings, and access way, it was inappropriate for this to be shown coloured dark blue (Appropriate Density page 50) indicating this was land suitable for tall buildings (i.e. 7-10 storeys).</p> <p>After some discussion it was agreed that turquoise colouring would be more appropriate for this particular area but leaving the dark blue colouring for the remainder of the 26-28 site.</p> <p>Hammersmith and City Over-Rail Development</p> <p>HGRA received confirmation the Over-Rail development for the metropolitan and city line proposed in the Grimshaw report was not viable and these proposals have now been dropped.</p>	<p>We appreciate you taking the time to read and make comments on the SPD.</p> <p>The tall buildings gradient map will be updated to exclude the north-western extent of 26-28 Hammersmith Grove as not being suitable for tall buildings; to reflect the interface with the scale of adjacent terraces and the need for a transition in height along this boundary.</p>
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				<p>Glen House Grove House and Wimpey building</p> <p>The dark blue colouring in relation to tall buildings should also be removed from the forecourt to Grove and Glen house as being inappropriate for this site.</p> <p>HGRA also believe the Glen House Grove House and the Wimpey buildings should be designated as local Buildings of Merit.</p> <p>The three buildings form a uniform style and homogenous cluster of buildings built in the post war 20th century providing a natural transition from the very modern buildings of the 21st century in the centre of Hammersmith in the south to the more historic 19th century residential buildings to the north.</p> <p>The Triangle</p> <p>As was made clear from our discussion the frustrations of the Residents are matched by those of the Council.</p> <p>HGRA with others have always felt that 14 storey permission was too high a building for this site in that there should have been a lowering of height transition between the centre of Hammersmith and the residential areas to the north.</p> <p>HGRA also feels that Hammersmith has been able to maintain its unique commercial character by incorporating existing historic buildings or facades into development schemes.</p> <p>HGRA also challenges any attempts to remove green landscaping and replacing them with hard landscaping.</p> <p>Accordingly, HGRA will with the council follow any developments or amendments to the existing scheme on this site closely and make the appropriate representations where appropriate.</p> <p>Hammersmith High Line</p> <p>The proposed Planning Document refers to the proposed 'Hammersmith High -line' using an elevated gantry between Sovereign Court and the railway behind the Livat building. This was a proposal made several years ago and two committee members had understood that with the building of Sovereign Court access was compromised. HGRA would ask for confirmation that the proposals are still viable and if necessary, commissioning a report: if not it should be dropped as was the City line Over-rail development. It was pointed out the picture used to illustrate the High line was the one originally used for the over-rail development. It is felt that the Development plan should only set out proposals which have a viable realistic chance of proceeding.</p>	
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				<p>Marks and Spencer and Lyric Square</p> <p>The Planning Document refers to Lyric Square being the heart of Hammersmith. This cannot be overstated not only providing a market and various cultural and sporting events over the summer but also throughout the year outdoor seating to the various cafes and restaurants. The square is relatively small and overshadowed by taller building on many sides. HGRA will press to ensure that light and particularly sunlight is not curtailed by any developments to the south or west of the square.</p> <p>A committee member has taken pictures to record the current existing sunlight throughout the year.</p> <p>There is therefore particular concern as to a proposal by Marks and Spencer to build a high-rise tower(s) for student accommodation at the rear of their property. The HGRA view is that this should only be consented to if it is shown that the tower will not affect the light /sunlight to Lyric Square at any time during the year.</p> <p>If the planning proposal proceeds, HGRA will press for the council to have a fully independent report in relation to light/sunlight.</p> <p>One further point is that the map showing the location of proposed Landmark buildings shows a Landmark/Gateway building at the southwestern corner of Lyric Square. Is this misplaced?</p> <p>Editing of extract relating to Northern Quarter</p> <p>We have as requested included some editing by way of amendments and addition to the wording in relation to the norther quarter for your consideration.</p> <p>Developers Guidance /Climate Change and Sustainability</p> <p>The points made are all very important but seem to flow into each other. Could consideration be given to set out the various issues as bullet points or boxes in order to make each issue important in its own right?</p>	
123	30	Marks and Spencer and Reef Group	5. Developer Guidance H2- Tall buildigs (p.50) and Key Site M&S	<p>The SPD includes suggested appropriate heights and massing for new development within the Town Centre, including on our Site. Policy H2 at page 26 sets out indicative heights and massing for the Town Centre and identifies where tall buildings may be appropriate. Our clients welcome the acknowledgement in the policy wording that tall buildings of 10+ storeys (+30m) may be achievable within the Hammersmith Broadway and Eastern Fringe Areas. Their Site is located within the identified Hammersmith Broadway sub area. At Policy H2 on page 26 there is also an</p>	<p>Commented noted. No change required.</p> <p>The SPD is a guidance document only and should be read alongside the Local Plan. The SPD suggests indicative</p>

				illustrative gradient-map of suitable locations for tall buildings which identifies that the King Street frontage of our clients' Site could contain a building up to 6 storeys and that the remainder of their Site is suitable for a tall building of 10+ storeys. There is also mention of the M+S Site under a heading labelled "Key Site" on page 17 where an appropriate height is mentioned as 11 storeys (subject to consideration of townscape context and historic assets). For consistency and to ensure this description of appropriate heights accords with the diagram on page 26, we suggest the text under the Key Site subheading on page 17 is altered to say "10+ storeys".	development parameters for tall buildings that may be considered appropriate for the regeneration area. Based upon option testing, we think that the indicative height range 5-11 storeys is an appropriate range for this site. As per Local Plan Policy DC3, the general character of any particular area will always be an important consideration in assessing the acceptability of tall buildings and a full design appraisal of the impact of a tall building will always be required as part of the development management process.
124	34	Royal London Asset Management	5. Developer Guidance H2 - Tall Buildings	<p>We support the principles of Policy H2, which identifies suitable locations for tall buildings of 10+ storeys including locating 2 Queen Caroline Street within such an area. This is in line with the adopted Local Plan (2018) which supports the principle of tall buildings in the town centre.</p> <p>We do not consider it necessary that each tall building should provide new public spaces as currently outlined in Policy H2, but instead new tall buildings should deliver improvements to the environment at ground floor level and help facilitate public realm improvements around the Site to enhance the pedestrian environment. We agree that tall buildings should provide active uses and highest architectural quality as identified in Policy H2 and this is the intention with the emerging 2 Queen Caroline Street proposals.</p> <p>The RLAM team has undertaken significant analysis required under the policy tests of Policy D9 of the London Plan and Policy DC3 of the Local Plan. This includes a review of the surrounding context that includes a number of existing and emerging tall buildings (including Landmark House to the west of the Site), detailed view assessment assessing the impact of the proposals on heritage assets and from a townscape perspective, daylight and sunlight impacts etc.</p> <p>There is clear opportunity to improve the architectural quality of the Site through the emerging proposals and to optimise the development potential of the Site with the inclusion of a tall building that would sit comfortably within townscape views and safeguarding heritage assets.</p>	Comment noted and support welcomed. No change required.
125	35	FORE Jersey Limited VIII	5. Developer Guidance H2 - Tall Buildings	Policy H2 'Tall Buildings': The identification of 255 Hammersmith Road within the illustrative gradient map of suitable locations for "taller buildings (10+ storeys)", is supported. We note that the Shortlands / Novotel / Metro Building have been identified as a 'key site' which considers (indicative) heights of 10-23 "may be achievable". 255 Hammersmith completes the 'urban block' of buildings along Hammersmith Road and	Comment noted. No change required.

				Butterwick Road (part of the Hammersmith Gyration). My client is encouraged by the identification of a range of building heights in this location	
126	36	The Hammersmith Society	5. Developer Guidance H2 - Tall Buildings	Tall buildings (p50): the illustrative gradient map includes the site at 26-28 Hammersmith Grove, alongside the rear of the existing residential terrace, where it suggests 'tall buildings may be acceptable'. This planning guidance is contrary to the discussions about this site which have been taking place between residents, LBHF and developers for some years, and this SDP diagram would sabotage the emerging consensus.	<p>Comment noted. No change required.</p> <p>The SPD provides an indicative guide to tall buildings only.</p> <p>Proposals are always assessed against relevant policies in the Local Plan and supported only if policies' requirements are met.</p> <p>Proposed change:</p> <p>Page 50:</p> <p>The tall buildings gradient map will be updated to exclude the north-western extent of 26-28 Hammersmith Grove as not being suitable for tall buildings; to reflect the interface with the scale of adjacent terraces and the need for a transition in height along this boundary.</p>
127	39	Historic England	5. Developer Guidance H2 - Tall Buildings	The document contains guidance for developers regarding proposals for tall buildings in Hammersmith Town Centre (Developer Guidance Section B, p49), and indicative building parameters for specific sites. Historic England recognises that well-designed tall building in the right location can make a positive contribution to urban life. However, such development should be based on a thorough assessment and understanding of the heritage significance of the area and seek to have a positive relationship with the surrounding townscape context in terms of scale, massing and streetscape. For the avoidance of doubt, the advice in the draft SPD regarding tall building development for specific sites should be cross-referenced with existing policies set out in the Local Plan, and should not constitute new allocations. We recommend that your Council refers to Historic England's Tall Buildings Advice Note (2022) when considering tall building development at both strategic and application stages. This document can be accessed via: https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/ .	<p>Comment noted. No change required.</p> <p>Existing policies in the Local Plan and in the London Plan have been referenced in the supporting text of H2 key principle.</p> <p>The SPD seeks to supplement Policies in the Local Plan and London Plan providing additional guidance to development considerable acceptable in the identified areas. Development proposals for tall buildings will be assessed against Local Plan and London Plan criteria.</p>

128	12	Britel Fund Trustees Ltd	5. Developer Guidance H2 - Tall Buildings	The text included within H2 recognises that 'within the northern fringe areas, new buildings should generally be designed to respect the existing townscape context and key heritage assets. The scale of any large/tall building should be carefully considered within this fine-grain context.' Reference to 'large' buildings should be replaced with 'tall' buildings to ensure consistency otherwise reference to 'large buildings' be better defined. Our client supports the flexible approach to tall buildings site out in the SPD, with the acceptability of individual proposals needing to be assessed on their merits in the local contexts consistent with Local Plan policy.	Comment noted and welcomed. Proposed change: Page 50 The tall buildings gradient map will be updated to exclude the north-western extent of 26-28 Hammersmith Grove as not being suitable for tall buildings; to reflect the interface with the scale of adjacent terraces and the need for a transition in height along this boundary.
129	34	Royal London Asset Management	5. Developer Guidance H3 – Landmarks and Gateways	The Queen Caroline Street site is within a prominent location from the gyratory and provides an opportunity to deliver a high quality landmark building on a currently underdeveloped brownfield site, especially as you look south from the gyratory. We consider that the site has the potential to be identified as a landmark/gateway location within this policy.	Comment noted. No change required.
130	35	FORE Jersey VIII Limited	5. Developer Guidance H3 – Landmarks and Gateways	Policy H3 'Landmarks and Gateways': Identifying both 'landmark' buildings and 'gateway' buildings, the document considers the 'transport hub' in the centre of Hammersmith Gyratory to have the potential to become a landmark building. Whilst this is recognised, we are surprised that 255 Hammersmith Road – and its position on the corner of Hammersmith Road / Butterwick Road (part of the Hammersmith Gyratory) – has not been identified as at least a gateway building, particularly given its prominence on the corner and in the context of the live application which seeks to improve and enhance the existing façade to make it of a higher quality and celebrated. We would encourage this to be reviewed	Comment noted. No change required.
131	35	FORE Jersey VIII Limited	5. Developer Guidance H4 - View Management	Policy H5 'High-Quality Architecture': Our client welcomes the continued requirements for development to be of high architectural quality.	Comment noted. No change required.
132	38	Dave Hinton (former SBD officer)	5. Developer Guidance H4 - View Management	H4 View management: I fully support new development, but I am aware of unintended impacts of new developments upon sight lines and existing development, emergency services radio transmission and the BID town centre radio network. It should be a planning condition that any such transmission impacts noted upon the completion of a development will need to be rectified at the developer's expense. I.e. the creation of new transmission dead/black spots must be mitigated and designated by a planning condition. View management is also critical to tree planting, signage, and canopy/table umbrella use. With regards to the borough use of CCTV. Planting trees without having additional funding to mitigate the impact by placing additional town centre CCTV cameras will be an issue. Remembering that currently we try to co-locate new cameras upon street lighting columns. Similar issues need to be addressed in the	Comments noted. This level of detail is something we cannot introduce to an SPD without policy provision in the Local Plan. View management polices do not cover transmission impacts as currently drafted. Community Infrastructure Levy and S106 obligations can be used to fund CCTV systems, but

				creation of new public spaces/pedestrianised areas. CCTV provision and the integration links to new development CCTV systems, particularly with large scale public attendance, was a stream under the CIL process and this needs to be ensured in the planning process.	again this level of detail cannot be introduced to this SPD and for such mitigation measures we would look to secure these through the planning application process and capture, where appropriate, in future iterations of the Local Plan.
133	36	The Hammersmith Society	5. Developer Guidance - Architectural Excellence	Architectural excellence (p53): illustrations which are restricted to major development projects overlook the particular importance of architectural excellence in smaller projects, which make up the greater part of the streetscape in the borough and the town centre.	Comment noted. No change required. It is important to note that the illustrations at page 53 are only intended to be as example of high-quality architecture and successful landmark buildings.
134	38	Dave Hinton (former SBD officer)	5. Developer Guidance - Architectural Excellence	<p>Page 52-53 C Architectural Excellence:</p> <p>Sadly, lacking from the new residential development on the A4 by the Civic Campus and as mentioned in some of the other recent developments. I fully support the insistence on good architecture including Secured by Design as a basic requirement for not only the inner space but also the external spaces. Blast mitigation (i.e. laminated glass as standard in all town centre development and refits) is increasingly important for where building heights increase, creating enclosed street scape's and new town centre focal points. Glazing is often used on ground level facades to create the feeling of inclusion into the buildings. Care needs to be taken to ensure that existing focal points do not become dwarfed, by new development mass.</p> <p>The design of the street scape including furniture and planting, needs to be sustainable at minimum cost. It also has to adhere to both security and counter terrorist needs. Vehicles have been used as weapons and I.E.D devices hidden amongst cluttered street furniture. CCTV needs to be able to see to manage an area. Therefore any planting must take into account site lines or pay to mitigate impacts</p> <p>The removal of the Hammersmith Flyover would perhaps be the most critical element of enhancing the existing environment and focal points of the Apollo, St Pauls and Bradmore House.</p> <p>Remember that the buildings whilst award winning also need to have long term sustainability of use. Often a bespoke award-winning building (e.g. the Ark) may be problematic to reuse once the original tenant has moved on. So, architecture that has sustainability and flexibility of use is also critical. Also, the architecture in a town centre must have a 24/7 spatial relationship. Despite the project drawings, the spaces must be appropriately lit and have use outside summer daylight hours. How will the external space feel at 4am on a wet winters' day?</p>	Comment noted. We agree that design measures such as those you describe are important considerations for development proposals coming through the planning process. Our detailed policies in the Local Plan, London Plan and Planning Guidance SPD seek to address these impacts and the need for mitigation measures in certain schemes. The Hammersmith SPD must be read alongside these documents as these will be used to determine planning applications.

135	12	Britel Fund Trustees Ltd	5. Developer Guidance -H5 - High Quality Architecture	Our client supports H5 which recognises that new development can assist in transforming and replacing less successful buildings with high quality, sustainable developments.	Support noted. No suggested changes
136	29	Hammersmith BID	5. Developer Guidance - Diversifying and Promoting New Uses	<p>Diversifying and promoting New Uses Policy H6 Mix of Uses Office/Workspace Uses <i>LBHF aim is for 10,000 new jobs by 2035. In view of current vacancy rates this intention of the Industrial Policy may require review. In any case the market will dictate the demand for office space.</i> <i>It would be wise to encourage developments that are inherently convertible - 'Long Life, Loose Fit'. Aspects such as escape provision, floor plate widths, daylight/sunlight.</i></p> <p>Supporting the Evening Economy Restaurant and Cafe Uses Cultural/Arts/Leisure and Community Uses Residential Uses Defend Council Homes Hotel Uses Social and Community Infrastructure Betting Shops, Pawnbrokers, Payday Loan Shops, and Hot Food Takeaway Use <i>Generally, no surprises in this section.</i></p> <p>Active and Accessible Places Legible streetscapes, low level activity, wayfinding, accessibility, etc. all encouraged. <i>Public Works Proposals</i> <i>An enhanced programme of markets and public events working with local communities and Hammersmith BID</i> <i>Consultation on functional requirements for public space.</i></p>	<p>Comment noted. No changes required.</p> <p>The Local Plan policies for the economy and jobs are written flexibility to respond to changing demand and supply and viability evidence is sought to establish the need for continued uses. See Local Plan policies E1 and E2.</p> <p>The detail design measures mentioned such as escape provision etc would be assessed by way of Building regulations and other relevant policy provision. This SPD is not a stand-alone document that can include that level of detail or replicate existing requirements and policies.</p>
137	38	Dave Hinton (former SBD officer)	5. Developer Guidance - Diversifying and Promoting New Uses	<p>H6 Mix of uses: I have concerns about the type of housing being provided within town centre spaces and the densities involved. There will be limited public space and I have concerns about the amount or private communal space provided for residents, as already mentioned.</p> <p>Retail uses: Multiple small retail outlets are fine, but they need to be supported by footfall and Hammersmith is not really a tourist destination.</p> <p>Office and workspaces: In the new world of working from home, currently embraced by the LBHF council. I wonder on the need or viability of new major office redevelopment. Especially as we already have offices converted to residences at the Gyratory end of King Street. But offices again will be fed by commuters. Our existing public transport is already reaching capacity levels during 'rush hours' I wonder how the increased demand will be facilitated.</p> <p>Supporting the evening economy: Much of the evening economy is supported by vehicular traffic. As many of the locations, Lamda, Apollo, the lyric and Olympia require non local patronage to survive. Particularly vehicle (coach, car) traffic for</p>	<p>Comment noted. No change required.</p> <p>Our vision is to restore the heart of the town centre promoting jobs and a wider mix of uses, including arts and culture offer, new homes, and new affordable workspace for SME start-ups enabling businesses, our communities and visitors to thrive. The regeneration of Hammersmith Town Centre with a wider range of uses aims to promote tourism and support businesses.</p>

				<p>Olympia and the Apollo. Also, much of the night time economy is serviced by taxis, again requiring access.</p> <p>Having worked on the Shepherds Bush Green area for just over 30 years, I noted the dramatic decline of the night time economy, clubs, and pubs, through council/ non local resident harassment, and a total lack of TFL support (through a lack of additional and appropriate buses). A vibrant nighttime economy which had at its peak a capacity exceeding over 10,000 is now reduced to the O2 and a couple of pubs. So, my concern is what type of additional night time economy are you expecting within this new residential hybrid town centre and how will it be sustained. Many of the previous Gyrary based nighttime locations failed to thrive and could not have been more accessible using public transport.</p> <p>Restaurant and café uses: As above for night time economy without office user support or the event spaces there is limited footfall to support extensive restaurant development.</p> <p>Residential uses : I have already commented on the concerns of increased residential density within the town centre spaces without access to external residential only spaces. Nighttime economy centres and residents do not mix.</p> <p>Defend Council Homes: Yes, however I would argue that Ashcroft Square is now end of life and the development needs to be reviewed on how to redevelop, upgrade the location and the housing stock. With particular attention to the access control of the residential deck and its long overdue and dramatic enhancement as an external residential only communal space.</p> <p>Hotels: I am not sure if the provision of new hotels is needed, over and above all the new hotels currently in the pipeline. We have various Hotel facilities already proposed in and around Olympia. New hotels or expansion to existing hotels on Shepherds Bush Green. I suspect that there will be additional such facilities within the new Wood Lane Hyper developments at the end of South Africa Road.</p> <p>Social and Community infrastructure: CIL monies will be used for infrastructure and not holding down council tax? Where will these schools be located? The existing provision is at capacity and again schools need external spaces and access.</p> <p>Betting Shops, Pawnbrokers, Payday Loan Shops and Hot Food Takeaway use: and I would include Charity shops. There are very limited numbers of take aways within the town centre space already, as the area does not encourage vehicle access or stopping. As for the rest they appear on the high street as normal retail dies.</p>	<p>The SPD builds upon policies in the Local Plan. Hammersmith town centre is identified as strategic office location which target is to deliver 10,000 jobs by 2035. The recently adopted Affordable Workspace SPD would play this role in supporting and adapting office demand to current and future trends whilst providing opportunities for small local business and start-ups and securing and promoting employment.</p> <p>Visitor accommodation will be considered subject to relevant Local Plan Policies and reference to it in the SPD is only as a potential land use.</p> <p>Betting shops, pawnbrokers, payday loan shops and takeaway uses will be considered against Local Plan policies.</p> <p>Community Infrastructure Levy is required in the borough on development in accordance with the councils CIL charging schedule. This can be used for community infrastructure projects. The types of infrastructure funded by the CIL and S106 obligations are detailed in the council's Infrastructure Delivery Plan (IDP).</p>
138	30	Marks and Spencer and Reef Group	5. Developer Guidance of Uses H6- Mix	<p>At page 28, Policy H6 states that throughout the Regeneration Area, increased diversity in the range of uses being provided is encouraged to maximise opportunities for businesses and communities to thrive and grow. This is welcomed. The supporting text lists a wide range of new uses which are supported within the Town Centre. These include new residential homes including affordable homes and new and improved retail. However, student accommodation is not mentioned. London Plan's</p>	<p>Comment noted. No change required.</p> <p>We disagree with this proposed change. There is no need to be</p>

				<p>Policy H15 outlines the overarching requirements for purpose-built student accommodation (PBSA) throughout London. A strategic requirement for 3,500 PBSA bedrooms is established as an annual requirement over the plan period, informed by the work of the Mayor's Academic Forum. It is also noted that the housing needs of students in London is an element of the overall housing need for London whether in purpose-built student accommodation or shared conventional housing. Para. 4.1.9 identifies that student accommodation helps to meet normal residential housing delivery targets at a ratio of 1.8 to 1. London Plan Policy H15 and LBHF Local Plan Policy H09 both identify that student use can be suitable in areas of high public transport accessibility as part of mixed-use regeneration and redevelopment schemes, provided that they meet a range of criteria as outlined in the policies. This includes provision of affordable student housing and securing a nominations agreement with a higher educational provider for the majority of the bedrooms. We note student uses also help to deliver key benefits for Town Centres including improved footfall for local businesses such as shops, pubs and restaurants and can help to enhance the nighttime economy. According to Imperial College London, an average student in London is likely to spend £19,580 for the year 2023 to 2024 and much of this is spent on food, drink and entertainment in their local area. There are also potential synergies between students and established institutions within the Town Centre including the Lyric Theatre, for example. Our clients' development proposals for the Site are a student housing development above new retail. As discussed with LBHF Officers they have secured Heads of Terms for a nominations agreement with Imperial College London and are proposing to provide the policy compliant level of affordable housing. Throughout our pre-application discussions with the Council, our clients have been advised that a student development on their Site is supported. We therefore request that the wording in the SPD at page 28 is updated to acknowledge that student use is also an acceptable use in the Town Centre.</p>	<p>exhaustive in our list of land uses.</p> <p>The SPD builds upon policies in the Local Plan, and it is a guidance document only. This is made clear in the document. Local Plan Policy H09 focuses on PBSA. The policy identifies and directs this type of development to White City and Earls Court and West Kensington Opportunity Areas which are considered the most effective for addressing student accommodation shortage. This use is supported outside these areas subject to adverse local impacts.</p>
139	34	Royal London Asset Management	5. Developer Guidance H6- Mix of Uses	<p>We support the principle of a range and mix of uses being encouraged within the town centre, although have the following comments in relation the provision of office space. We understand Hammersmith is seen as an important office location and that the Council wishes this to be strengthened. However, the analysis CBRE Leasing has undertaken shows that at the end of 2023 there is just under 1 million sq ft of available office space for 10,000 sq ft and above. There is also a further approximately 620,000 sq ft office space consented in the pipeline that is not yet been delivered (e.g. Landmark House</p> <p>In comparison the take-up of commercial space for 10,000 sq ft or more is just 485,944 sq ft over the last 5 years (under 100,000 sq ft per annum). Therefore, there is a significant amount of available and unlet office space within Hammersmith which is sufficient to meet the demand for the next 10 years of the average take-up (over 16 years worth of stock is available if you include the pipeline).</p> <p>In support of this, RLAM also own 200 Hammersmith Road which is a largely vacant office building that underwent significant refurbishment in 2019. This building currently has one office tenant occupying a small part of the office floorspace and with a Starbucks Cafe also occupying part of the ground floor. This building has not let successfully since the refurbishment in 2019 and the building will be fully vacant in September 2024, aside from the Starbucks café, when the remaining office tenant</p>	<p>Comment noted. No change required.</p> <p>The SPD is a guidance document only and should be read alongside our Local Plan and the London Plan in terms of policy provision. This is made clear in the SPD.</p> <p>Local Plan Policies E1 and E2 relating to employment uses are subject to viability considerations and therefore responsive to current trends. Intensification and alternative uses are supported where these are viable options for the centre and conform with policy.</p>

				<p>vacates the premises.</p> <p>There is a significant amount of office space which is struggling to let (including 2 Queen Caroline Street and 200 Hammersmith Road) and we question the emphasis and need for office space within the town centre in this current climate where availability is clearly very high and demand very low in comparison.</p> <p>We support a range of flexible uses being encouraged in the town centre including cultural, arts, leisure and community use. The community use at ground floor will help meet this aspiration especially as 2 Queen Caroline Street is on a route identified to enhance civic, cultural and evening economy.</p> <p>There is no reference to PBSA in the SPD. We believe the inclusion of PBSA helps the SPD achieve the aim of diversification of uses within the town centre. This is a use that should be supported within the town centre on a case-by-case basis if developments meets London Plan Policy H15 and Local Plan Policy HO9. PBSA will count towards housing targets in the Borough (at a rate of 2.5 students beds to 1 unit), will deliver affordable student accommodation, ease the pressure on private rented stock/HMOs where students currently stay, and will help support the evening economy and vitality and viability of the town centre through increased expenditure in the town centre. This should be recognised as a type of residential accommodation that can come forward on a case-by-case basis subject to meeting London Plan Policy H15 and Local Plan Policy HO9. It is worthwhile noting that residential use is already situated on the island site with Guinness Partnership owning apartments above the neighbouring Irish Cultural Centre.</p>	<p>We do not think that there is need to be exhaustive in our list of land uses.</p> <p>The SPD builds upon policies in the Local Plan. In Policy H09 focuses on PBSA. The policy identifies and directs this type of development to White City and Earls Court and West Kensington Opportunity Areas which are considered the most effective for addressing student accommodation shortage. This use is supported outside these areas subject to adverse local impacts.</p>
140	35	FORE Jersey VIII Limited	5. Developer Guidance of Uses H6- Mix	<p>Policy H6 'Mix of Uses': Notwithstanding the current application which is currently pending determination for the refurbishment and increase in office floorspace, my client is encouraged by – and supportive of – references to a mix of uses being considered acceptable in the Town Centre, particularly those references elsewhere in the document which refer to the “intensification of residential uses on appropriate sites within the Town Centre.</p>	Comment noted. No changes suggested
141	12	Britel Fund Trustees Ltd	5. Developer Guidance of Uses H6- Mix	<p>Similarly, H6 is strongly supported which promotes increased diversity in the range of uses within the town centre regeneration area, including an increase in the amount of housing. The SPD should specifically recognise, as part of H6 that certain commercial premises within the town centre may no longer meet the current/future needs of business. As such, sites such as those owned by our client present potential opportunities for redevelopment with benefits in terms diversification of the uses within the town centre, including new homes, and improvements to townscape character. This is important if the Council's target of 2,800 new homes, is to be met within the town centre.</p>	Comment noted. No changes suggested
142	38	Dave Hinton (former SBD officer)	5. Developer Guidance -Active and Accessible Spaces	<p>Page 59 E Active and Accessible Places</p> <p>Activity at Ground Floor: With regard to the comment of developments creating access to the ground floors to enable general access. Remember there does need to be the ability to secure against access when required and to prevent unrestricted access on into a building/ development for those who should not be there.</p> <p>Again, with residential developments accessible communal spaces for residents, not the public.</p>	<p>Comment noted.</p> <p>The SPD is a guidance document only and should be read alongside our Local Plan.</p> <p>In response to the comment on 'Activity at ground floor' page 58:</p>

				<p>Maximising activity within the public realm: Fully support a coordinated approach to the public realm. I have some confusion about the reference Civic Campus, which is the closest of the proposed linked spaces 600 metres away, as it is almost outside the town centre space. I would respectfully say that there are currently three town centre focal points: King Street & Kings Mall (Sorry, Livat Centre), which requires dramatically more than a name change, then the Gyrotory and Novotel blocks (including the Apollo), The Riverside studios and general new riverside developments. The Civic campus (or town hall) has never been a focus.</p> <p>Submitted for your consideration.</p>	<p>Key principle H7 seeks to ensure that new developments create accessible and inclusive environments to remove any barriers to access from all residents, visitors and users of the town centre. There will be circumstances where general access will be restricted such as in residential buildings where access will be for residents only. However, the aim is to make places publicly accessible to activate the public realm and increase pedestrian links between key cultural, art and entertainment venues.</p>
143	34	Royal London Asset Management	5. Developer Guidance H7 Active and Accessible Hammersmith	<p>We support the principles of this policy to encourage active uses on ground floor to achieve a positive relationship at to the public realm as well as providing inclusive access.</p>	<p>Support welcomed. No change required.</p>
144	35	FORE Jersey VIII Limited	5. Developer Guidance H7 Active and Accessible Hammersmith	<p>Policy H7 'Active and Accessible Hammersmith': Requiring developments to provide well defined, legible streetscapes as well as inclusive and accessible design is supported by my client. These principles form a key part of their proposals at 255 Hammersmith Road which will readily improve accessibility to the building.</p>	<p>Support welcomed. No change required.</p>
145	38	Dave Hinton (former SBD officer)	5. Developer Guidance H7 Active and Accessible Hammersmith	<p>Cycling: The SPD talks about more legible routes but routes for whom? Accessibility needs to include vehicular traffic. Let us suggest all vehicles are now electric, so why is access now blocked?</p> <p>There are a lot of outstanding issues about some of the new cycle routes already introduced with no wholistic view of the infrastructure. The practice of having the cycle route in the opposite direction to vehicle road traffic causes accidents. Particularly when electrical 'powered' bikes and scooters use the same pedal bicycle lanes. They can travel at high speeds or at least the same speed as the traffic 15 – 25 mph, with those tweaked by owners exceeding this.</p> <p>Cycle routes should terminate at a clearly defined destination that facilitates secure cycle parking, regardless of the end of the routes destination purpose, or a hub to other transport links. Routes should integrate into adjacent borough ongoing cycle routes. Cycle routes should be fit for purpose, placing street furniture within them is problematic, critical is how other users pass across them or how they pass through other users' spaces. Especially pedestrians, concentrate on the interaction of disabled</p>	<p>Comment noted. No change required.</p> <p>The SPD is a guidance document only and should be read alongside our Local Plan. This is made clear in the document.</p> <p>The SPD does not specifically reference electric vehicles and does not preclude the transit of these vehicles through Hammersmith town centre. However, public realm, dominated by vehicular traffic will cause congestion and create</p>

				<p>and less able bodied individuals or the blind.</p> <p>It should be made very clear that the planners or architects' images of cyclists as being gentle ambling entities is not the reality. Commuting cyclists are moving at high speed. Averaging 20mph, with the advent of the electrical bicycles and scooters they can be exceeding 30 mph. These modes of travel are becoming increasingly popular with the criminal fraternity, who use them to cruise areas looking for opportunities or to enable the snatching of valuables from pedestrians. Most of our subways were designed for foot traffic not groups of teenagers on electric bikes. Spend some money on modernising this infrastructure to make these now shared spaces safe for all users.</p> <p>Secure cycle parking includes appropriate cycle hoops that deter access to locks, are illuminated, have good CCTV fixed camera coverage, are managed (do not become a bits of bike storage area). Do not block pavements, do not encourage cyclists to walk into traffic when unlocking their bikes. These points were all agreed with both TFL and the mayor's office, but did not stop them or the council sticking bike racks with none of these elements everywhere, creating long term crime hot spots.</p> <p>The council also needs to consider how the disabled public space user (particularly the blind and less agile users) navigates when confronted by pedal cycles that can move through the large open spaces/squares from any direction. Remember despite appearances to the contrary it is still illegal to ride on pavements.</p>	<p>barriers for pedestrians and impaired people. The section focuses mainly on the permeability and legibility of routes in order to improve the public realm making it more accessible, attractive, enjoyable and inclusive. Renewing the public realm and streets to improve air quality and provide more comfortable, greener routes to promote walking and cycling will be a priority. This will help overcome future challenges across Hammersmith Town Centre relating to Climate Change and will ensure that our communities and visitors will be able to fully enjoy and use the town centre.</p> <p>Prioritising sustainable modes of transport is one of key objectives of our Local Plan (2018) which is strengthened in the Climate Change SPD (2023).</p> <p>Local Plan Policy T3 encourages cycling and walking by ensuring that bicycle lanes are safe for all. The policy also promotes active travel by requiring secure and safe cycle parking in all developments which should follow designing out crime principles/approach.</p>
146	29	Hammersmith BID	6. Delivery and Implementation	<p>DELIVERY & IMPLEMENTATION Cooperation the Key. Key Players: Delivery Partners Led by the Council, a wide range of stakeholders. <i>But mostly developers will be prime movers.</i> Landowners Expectation that landowners will have proactive role. Delivery Bodies Public bodies - central government, GLA etc.</p>	<p>Comments noted.</p> <p>The SPD mentions at page 63 that the council will need support from a from a range of other stakeholders, delivery bodies and agencies (both public and private) who will also have a role in funding,</p>

				<p>Stakeholders Includes Hammersmith BID, businesses, local residents. <i>To be engaged to 'support, enable, co-produce' vision.</i> <i>Formalised Engagement must be implemented.</i></p> <p>Funding Combined private/public funding will be needed. <i>Matches Hammersmith BID approach.</i> <i>Can be implemented best if:</i> 1. <i>Formal Engagement introduced, businesses involved in design and programming decisions.</i> 2. <i>Seed funding identified to demonstrate engagement and commitment.</i> <i>Planning Obligations - S106 & CIL</i> List of obligations that may generate funding follows; includes: Requirement that 50% affordable residential is provided on-site. Co-Production and Engagement <i>"With Residents not to them". So expectation of co-production and early engagement by developers with local groups and other stakeholders.</i> <i>Structured approach required to ensure balance. The loudest voice isn't necessarily the most representative. Business voices also need to be heard.</i></p> <p>Next Steps- 0-5 Years (Short Term) 1. Publish draft SPD and engage 2. Engage with TFL and GLA to put together Flyunder business case 3. Proactively seek external funding for Flyunder 4. Engage with TFL on highway network improvements including Gyrotory and King Street 5. Engage with TFL on Broadway site redevelopment 6. Work with all to bring forward successful planning applications 7. An effective Town Centre Management Plan 8. Detailed delivery and infrastructure plan 9. Shopfront and signage design guidance <i>PRIORITISE THE GYRATORY</i> <i>ENGAGE WITH BID ON TOWN CENTRE MANAGEMENT PLAN</i></p>	<p>enabling and delivery. This includes the engagement with Hammersmith BID.</p> <p>Agree, minor wording can improve clarification Change to Next Steps 0-5 years</p> <p>Proposed change:</p> <p>Delivery and Implementation page 63.</p> <ul style="list-style-type: none"> • <i>Develop an effective town centre management plan, including engagement with the Hammersmith BID</i> • <i>Develop a detailed delivery and infrastructure plan for the town centre, identifying key projects, funding and phasing</i>
147	33	TfL Spatial Planning	6. Delivery and Implementation	<p>Delivery and implementation We welcome that TfL is listed one of the many bodies integral to successful delivery of the SPD and we are happy to work with you. However, the Council should note that TfL does not have any funding allocated to the interventions in the SPD in our current Business Plan. Planning obligations S106 and CIL TfL recommends that the list of potential planning obligations for development sites is expanded to include active travel/Healthy Streets measures, public transport capacity and accessibility as set out in London Plan policy T9(C) Funding transport infrastructure through planning. Planning obligations are key to support the delivery of future transport and active travel improvements. We will be happy to work with you to progress this draft SPD and engage in detailed discussions where needed and appropriate. Please feel free to reach out if you have any questions or clarifications.</p>	<p>Comment welcomed. Agree.</p> <p>Proposed change:</p> <p><i>Planning obligations are likely to include the items set out below but this is not an exhaustive list and other matters may also need to be covered on consideration of each planning application:</i></p> <ul style="list-style-type: none"> • <i>Direct delivery by the developer- add/amend</i>

					<ul style="list-style-type: none"> • <i>Public realm improvements</i> • <i>Heritage</i> • <i>Education contributions (for any residential development)</i> • <i>S278 for offsite works/contributions</i> • <i><u>TfL Active travel/healthy Streets measures</u></i>
148	28	Ingka Centres	6. Planning Obligations - p.57, 63 and 64	<p>3.6 The SPD makes reference to planning obligations (S106) and CIL being used to fund projects and interventions set out within the SPD. It needs to be made explicit within the SPD that any planning obligations will need to meet the tests as set out in regulation 122 of The Community Infrastructure Levy Regulations 2010. This requires that planning obligations are used to mitigate the impact of development in order to make it acceptable in planning terms. Planning obligations must be:</p> <ul style="list-style-type: none"> ▪ necessary to make the development acceptable in planning terms; ▪ directly related to the development; and ▪ fairly and reasonably related in scale and kind to the development. <p>3.7 Therefore, any obligations must be directly relevant to the proposed development and will only be able to contribute to projects and interventions as set out in the SPD if they meet this criteria.</p>	<p>Comment noted.</p> <p>The SPD is a guidance document only and should be read alongside our Local Plan and the London Plan in terms of planning obligations S106.</p> <p>Policy INFRA1 in the Local Plan addresses planning contributions and specifies at paragraphs 15.9 and 15.10 that the council will negotiate for planning obligations that are considered to meet the necessary tests in Reg 122 CIL Regulations:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development.
149	29	Hammersmith BID	6. Conclusions	<p>TRANSFORMING OUR TOWN CENTRE Conclusion to the SPD Document Key Aims Community Capacity Building Engagement with stakeholders Future-Proofing the Economy Capture Opportunities from business moving from central London</p>	<p>Comments noted. No change required.</p>

				<p>Support high-growth sectors Support cheap space for startups Recovery via new employment and skills Programming events etc to drive footfall Prove links between Lyric Theatre, Civic Campus and Apollo These aims all reinforce BID and its members' emphasis that public realm improvement is key to the attractiveness of Hammersmith to existing businesses considering their future and potential incoming businesses. Delivering new/enhanced public realm and green spaces. Meantime and Interim Projects: A. Civic Campus - completion 2025? B. Lyric Square: Potential review and enhancement - 1-3 years C. King Street: improved cycle access, pedestrian use of public realm, pocket parks D. Hammersmith Gyrotory: improved cycle connectivity implemented, working with TFL on permanent concept E. A4/Flyover: short term improvements - speed reduction, at grade crossings, new cycle routes, greening and improvements to areas below flyover All good. Reinforces need for engagement with businesses</p>	
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Schedule of Minor Technical Changes

No.	Section	CHANGE (MINOR WORDING CHANGES UNLESS INDICATED)
1	Page 24-25 – Spatial Framework	Spatial framework diagram updated to reflect opportunity for additional improvements to pedestrian connections between King Street, Civic Campus and Ravenscourt Park Station.
2	Page 34 – King Street Vision	Diagram updated to reflect opportunity for additional improvements to pedestrian connections between King Street, Civic Campus and Ravenscourt Park Station.
3	Page 67	Minor changes to wording of public realm ambitions for King Street and update to diagram to reflect opportunity for additional improvements to pedestrian connections between King Street, Civic Campus and Ravenscourt Park Station.