

Appendix 2: Consultation Response Schedule (Planning Guidance SPD) - April 2013

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Explanatory Note

This schedule includes the representations received on the draft planning Guidance SPD during consultation in June and July 2012, together with the council's response to the comments made.

This schedule is organised in SPD chapter order and identifies the organisations, groups or individuals who made comments. The responses include changes to relevant SPD policies or paragraphs where these have been considered appropriate. The policy and paragraph numbers refer to those included in the June 2012 draft SPD, however it should be noted that the numbering has changed in the finalised SPD that is proposed for adoption.

The major change to the June 2012 SPD involves the deletion of the section on residential moorings. Other changes are predominantly concerned with clarification, including referring to the Development Management Local Plan (DM LP) rather than Development Management Development Plan Document (DM DPD).

The adopted SPD will also include some minor and technical amendments that do not relate directly to the representations received in June and July 2012.

General Comments

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Natural England	General	Planning Guidance Supplementary Planning Document	Support	The conclusion of the Council that a Strategic Environmental Statement or Sustainability Appraisal for this document is not required can be agreed by Natural England. This document clarifies and expands on policies within the Local Plan which were screened as part of the overall assessment and consultation process.	Comments noted.
Ptarmigan Riverside AW LLP	General	Planning Guidance Supplementary Planning Document	Object	<p>As a general comment we would question whether it is necessary to introduce further planning policy that is supplementary to the Council's currently adopted Core Strategy and emerging Development Management Development Plan Documents ("DM DPD"). Some of the policies repeat policy which is already contained within the emerging DM DPD or within the Mayor's draft Housing SPG, indeed a significant proportion of the policies proposed repeat detailed design guidance contained within the Mayor's London Housing Guide. We also consider that some policies, such as SPD Housing Policies 1, 5, 6 and 9 amongst others for example, are policies which go beyond what should reasonably be contained in an SPD, and should form part of a DPD subject to independent Examination.</p> <p>The Core Strategy and the emerging DM DPD are scheduled to go through independent Examination to provide a comprehensive policy framework for the borough. It is identified within the 'context' section of the emerging DM DPD that when read alongside the Core Strategy the document will allow '... a complete understanding of Local Development Framework policies that are applicable to the borough.' It is therefore questionable whether further planning policy at the detail level proposed is required.</p> <p>Paragraph 173 of the National Planning Policy Framework identifies that '... sites and the scale of development identified in</p>	<p>Comments noted. The purpose of the SPD is to provide supplementary detail to policies in the Core Strategy and DM LP, rather than to duplicate policies.</p> <p>The SPD will be a material consideration in planning decisions, but will not be part of the development plan.</p>

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				<p>the plan should not be subject to such a scale of obligations and policy burdens that their ability to be development viably is threatened.' The NPPF continues that the cumulative impact of local standards and policies '...should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle.'</p> <p>We are also concerned that the SPD contains policies which provide generic statements which are too simplistic if applied literally. For example, SPD Design Policy 47 states that 'Any new development should respect the dominant building line on the street frontage' and SPD Design Policy 48 states 'any new development should respect the general townscape in each area'. Such broad statements should not form part of the SPD.</p> <p>In summary, we are concerned that the SPD either duplicates existing policy, provides policy which should be considered as part of a DPD, places unnecessary burdens on developers which could prevent economic development coming forward contrary to the NPPF or provides policies which are too generic and simplistic. We consider that the SPD should be fundamentally reviewed, and stripped back in order that it only provides supplemental policies which are absolutely necessary to control development in the Borough, and do not result in policies which could prevent acceptable development from coming forward.</p>	
Hammersmith & Fulham Historic Buildings Group	General	Planning Guidance Supplementary Planning Document	Observations	<p>Markets</p> <p>The Borough had three historic markets: at Shepherd's Bush, King Street/Lyric Square and North End Road. The UDP 2003 included specific support for these markets. We have not been able to identify similar support in the LDF documents. We hope that</p>	The Core Strategy includes policies that are relevant to the markets at Shepherds Bush and Fulham. In addition the London Plan sets out support for the range of London markets in policy 4.8 and notes that

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				specific recognition of their value and support for them could be added to this SPD.	further guidance on market provision will be provided in the Town Centres SPG. It is considered unnecessary to refer to markets in the council's SPD.
Hammersmith & Fulham Historic Buildings Group	General	Planning Guidance Supplementary Planning Document	Observations	Open Space We are concerned that the private open space of the Borough's sports clubs should be protected from development. There has been public reports of clubs considering moving elsewhere. We are not clear that Policy E1 of the DPD does protect them sufficiently. This is especially important in relation to the pressure for use of sports field from the Borough's schools. We should like to discuss this with officers.	Comments noted. DM LP Policy DM E1 covers this issue, together with Policy OS1 of the Core Strategy. The Planning Guidance SPD does not include supplementary policy related to open space.
Hammersmith & Fulham Historic Buildings Group	General	Planning Guidance Supplementary Planning Document	Observations	2. CLARITY AND USABILITY OF THE NEW HIERARCHY OF LDF DOCUMENTS. As we understand it, the hierarchy of policy which will replace the UDP is as follows: • Legislation • The National Planning Policy Framework (NPPF) – published March 2012 • The London Plan (July 2011 but being amended) • The Core Strategy with the Proposals Map (adopted by LBH&F Oct 2011)	Comments noted. Amendments have been made to the DM LP to improve its usability and to signpost relevant policies. The glossaries have also been enhanced.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<ul style="list-style-type: none"> • The Development Management DPD (going to EIP this Oct 2012) • Planning Guidance SPD (June 2012 on which we are commenting herewith) • Other design guidance (such as Street Smart, River Walk Enhancement Report, and Thames Strategy Kew to Chelsea). <p>We are concerned at the 'difficulty of identifying relevant policies on specific subjects' in what we might term a 'loose leaf' series of planning documents.</p> <p>We are aware of guidance that there should not be unnecessary repletion of policies but we think it is essential if voluntary groups - as distinct from professional planners and developers – are not to be handicapped in their contribution to planning consultations that there is appropriate 'cross references and sign posting' within and between each document.</p> <p>Since the Core Strategy has been adopted the NPPF has been published replacing it states: 'over a thousand pages of policy with around fifty, written simply and clearly. We are allowing people and communities back into planning'. Unfortunately, at the moment we consider the opposite is happening. We would argue that the changed Government guidance in NPPF justifies appropriate sign posting in the LDF documents.</p> <p>We note that there is more signposting and cross references particularly to policy in this document than in previous ones and welcome that as very helpful. For example the section on</p>	

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				<p>'Buildings of Merit' page 41 is well signposted and includes and updates the UDP policy. However the existing Core Strategy Policy and DPD do not sign post as clearly and we shall be referring to this again in our submission to the EIP on the DPD. We fully support the HamSoc's suggestion of an 'Index' which could cross reference across the documents.</p> <p>In addition we suggest that there is a more comprehensive 'Glossary' – perhaps combining the ones in the Core Strategy, the DPD and the SPG? For example, since the loss of PPS5 there is not to our knowledge an easily accessible 'definition of an 'heritage asset''. We understand it includes CAs as well as nationally and locally listed buildings, ancient monuments, archaeological areas and historic parks and gardens? We note reference to views as historic assets – see note on Views below. We should like to discuss with you whether the Thames in our Borough with its historical and artistic associations and its views should not itself be recognised as an heritage asset?</p> <p>We suggest that it is clearly stated in the Glossary that our 'Buildings of Merit' are our locally listed buildings. This could save a great deal of explanation in representations made on planning applications and at possible arguments at Inquiries.</p> <p>We should also welcome a full definition of 'Metropolitan Open Land' (MOL), as mentioned at a recent briefing meeting. We note that it is referred to in the Core Strategy Glossary but the entry is not informative about the constraints on development on MOL.</p>	
Hammersmith & Fulham Historic Buildings	General	Planning Guidance Supplementary	Observations	<p>Views</p> <p>We note that DPD page 96 re EN31 refers to views as heritage</p>	The SPD refers to views in Design Policy 51. More detail is provided in DM LP policy G6 which identifies

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Group		Planning Document		<p>assets. We welcome this but cannot identify the reference. We suggest the policy/page numbers are added to such references in the final document and that views are added to the definition of heritage assets in the glossary.</p> <p>We note the list of views in the DPD (policy G6 page 55). We suggest that the possibility of adding other views in future is mentioned. Whilst we fully support the riverside views as very important, we also think other more 'inland 'views should be considered as additions to the list.</p>	views and landmarks of local importance. Heritage assets are included within these views.
Greater London Authority	General	Planning Guidance Supplementary Planning Document	Support with conditions	Many of the issues addressed in the SPD are of a local nature; however, others are relevant to the implementation of strategic policies set out in the London Plan. Of these, the majority are consistent with the London Plan and are supported.	Support welcome.
Land Securities	General	Planning Guidance Supplementary Planning Document	Support with conditions	In general we welcome the Planning Guidance SPD which assists in clarifying the position of London Borough of Hammersmith (LBHF) with regard to design criteria for proposed developments, material considerations in relation to planning application as well as the documents required as part of planning application submissions. However, we would also note that this document will not be subject to the same level of scrutiny as most planning policy documents, in terms of an independent examination by the Planning Inspectorate. As such, although it is a material consideration in the planning applications process, it is not part of the statutory development plan for LBHF and as such, should only carry minimal weight.	<p>Comments noted. The purpose of the SPD is to provide supplementary detail to policies in the Core Strategy and DM LP, rather than to duplicate policies.</p> <p>The SPD will be a material consideration in planning decisions, but will not be part of the development plan.</p>
Hammersmith Society	General	Planning Guidance Supplementary	Object	<p>Open Space</p> <p>13. Some good provisions contained in the UDP appear to have</p>	Comments noted. DM LP Policy DM E1 covers this issue, together with Policy OS1 of the Core

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
		Planning Document		<p>been watered down, and a problematic loophole appears between the DM DPD and the PG SPD. The following comments relate to both the DM DPD and the PG SPD.</p> <p>14. Policy E1: Whereas UDP EN22x stipulated as a condition for building on open space that the proposed development should “provide for relocation of open space to a site in the locality which is at least equivalent in size, quality, accessibility, usefulness and attractiveness to that being lost”, Policy E1 stipulates “replacement of open space of equal or greater value elsewhere”. This is a deplorable weakening of the conditions and we strongly recommend adoption of the previous wording. As one can only hope the occasions will be rare for building on open space, the previous wording would not be an onerous commitment.</p> <p>15. DM 4.87 states that in some cases contributions to improvements in existing open space rather than provision of new open space, will be appropriate and then offers by way of example “new or upgraded play areas, refurbished pathways, better signing or additional seating...” (Submission Amendments June 2012 version). That “better signing or additional seating” should be regarded as an acceptable substitute for correct and proper provision of open space beggars belief. This is relevant to the next comment.</p> <p>[See comments on Housing and Amenity Space]</p>	Strategy. The Planning Guidance SPD does not include supplementary policy related to open space.
Hammersmith Society	General	Planning Guidance Supplementary Planning Document	Observations	4. Ease of use is a basic essential for documentation of this kind, and the PG SPD needs to be read with the CS and DM DPD open at the same time in order to ensure all relevant policies are noted and understood. A real priority for the final documents will be a detailed index with full cross-referencing across all three	Comments noted. Amendments have been made to the DM LP to improve its useability and to signpost relevant policies. The glossaries have also been

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				documents and references to further relevant documents where necessary (for example, under Advertising, to the Mall Area of Special Advertisement Control). We understand there is a presumption against repeating in one document what is said in another , but where the PG SPD is silent (eg on design in new developments outside Conservation Areas) the user could assume there are no policies, whereas it is discussed in Policy DM G1. More references in the PG SPD to its senior document would therefore support effective use of the entire range of documents.	enhanced.
A2 Dominion Group	General	Planning Guidance Supplementary Planning Document	Object	Overall we consider the Planning Guidance SPD to contain an excessive level of detail that will confuse rather than help applicants. Reference is made throughout to legislation, standards and guidance that already apply to developments. The inclusion of these within an SPD leads to unnecessary repetition and an overwhelming level of information likely to deter rather than encourage development. Given the size of the document and level of information, including reference to specific legislation, standards and guidance, it would not be easy to update and could date quickly. Furthermore, we question the usability of a document of this scale and suggest that it would be more effective to split the document by chapter to create six smaller, accessible SPDs.	Comments noted. The purpose of the SPD is to provide supplementary detail to policies in the Core Strategy and DM LP, rather than to duplicate policies. The SPD will be a material consideration in planning decisions, but will not be part of the development plan.
Capital and Counties on Behalf of Earls Court and Olympia Group	General	Planning Guidance Supplementary Planning Document	Object	As a general comment we would question whether it is necessary to introduce further planning guidance that is supplementary to the Council's currently adopted Core Strategy and emerging Development Management Development Plan Documents ("DM DPD"). In a number of places the proposed SPD repeats policy which is already contained within the emerging DM DPD or within the Mayor's draft Housing SPG. Indeed a significant amount of the SPD simply repeats detailed design guidance contained within the Mayor's London Housing Guide. We also consider that the guidance, such as SPD Housing Policies 1, 5, 6 and 9 amongst	Comments noted. Repetition in the SPD will be reviewed prior to adoption. The purpose of the SPD is to provide supplementary detail to policies in the Core Strategy and DM LP, rather than to duplicate policies.

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				<p>others for example, are policies which go beyond what should reasonably be contained in an SPD, and should form part of a DPD subject to independent Examination.</p> <p>The Core Strategy and the emerging DM DPD are scheduled to go through independent Examination to provide a comprehensive policy framework for the borough. It is identified within the 'context' section of the emerging DM DPD that when read alongside the Core Strategy the document will allow '...a complete understanding of Local Development framework policies that are applicable to the borough. ' It is therefore questionable whether further planning guidance at the detail level proposed is required.</p> <p>Paragraph 173 of the National Planning Policy Framework (NPPF) identifies that '...sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be development viably is threatened. ' The NPPF continues that the cumulative impact of local standards and policies '...should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. ' We are also concerned that the SPD contains policies which provide generic statements which are too simplistic if applied literally. For example, SPD Design Policy 4'7 states that 'Any new development should respect the dominant building line on the street frontage' and SPD Design Policy 48 states 'any new development should respect the general townscape in each area'.</p> <p>Such broad statements are ineffective and subjective and should not, therefore, form part of the SPD.</p> <p>In summary, we are concerned that the SPD either duplicates</p>	<p>The SPD will be a material consideration in planning decisions, but will not be part of the development plan.</p>

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				<p>existing policy, provides policy which should be considered as part of a DPD, places unnecessary burdens on developers which could prevent economic development coming forward contrary to the NPPF or provides policies which are too generic and simplistic. We consider that the SPD should be fundamentally reviewed, and stripped back in order that it only provides supplemental guidance which is absolutely necessary to control development in the Borough, and does not result in policies which could prevent acceptable development from coming forward.</p>	
<p>St James Group Ltd and St George Plc</p>	<p>General</p>	<p>Planning Guidance Supplementary Planning Document</p>	<p>Object</p>	<p>1. Consistency with NPPF approach to streamlining the planning system</p> <p>In publishing the NPPF in March 2012, the Government made clear that its intention is to streamline the planning system to deliver sustainable development. In this regard, the NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so (Para 1).</p> <p>The NPPF also makes clear that each local planning authority should produce a Local Plan for its area but that any additional development plan documents should only be used where clearly justified. It states that supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development (Para 153).</p> <p>In this instance, we do not believe that the requirement for the SPD to be prepared has been clearly justified and rather than assisting developers in making successful planning applications it</p>	<p>The purpose of the SPD is to provide supplementary detail to policies in the Core Strategy and DM LP, rather than to duplicate policies.</p> <p>The SPD will provide further guidance on issues such as design. It will be a material consideration in planning decisions, but will not be part of the development plan.</p>

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				<p>is likely to add to the burdens associated with development by introducing an unnecessary further layer of local planning guidance.</p> <p>It is acknowledged that there are specific areas of planning in Hammersmith and Fulham where it is appropriate to provide additional guidance to help guide development, for instance, in relation to matters such as shop front design or hot food takeaways. However, the requirement for an additional layer of guidance in relation to matters such as housing quality, access, sustainability, and transport is questioned.</p> <p>In this regard, the SPD repeats to a large extent planning policies and guidance that are already appropriately set out elsewhere, including in the Mayor's London Plan and its accompanying supplementary planning guidance and in the borough's Core Strategy and emerging Development Management DPD, amongst other sources. The accompanying schedule highlights the areas of the SPD where it is considered that the guidance unnecessarily repeats planning policies already set out elsewhere in the adopted development plan and/or provides guidance that is not consistent with the adopted development plan.</p> <p>We therefore conclude that there is no requirement for an overarching Planning Guidance SPD to be produced for the borough. Where there are specific areas of concern, such as the examples identified above, these areas should be addressed through discrete supplementary planning guidance.</p> <p>Notwithstanding this, and where the borough is minded to progress with the preparation and adoption of an overarching Planning Guidance SPD, the accompanying schedule sets out our detailed consideration of the document and highlights those areas</p>	

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				where we consider it necessary to either amend or delete the guidance contained in the document.	
St James Group Ltd and St George Plc	General	Planning Guidance Supplementary Planning Document	Object	<p>2. Purpose and status of the document</p> <p>Having reviewed the document, we also consider there to be some confusion arising as to its purpose and status.</p> <p>Para 1.3 of the document states:</p> <p>“The SPD provides SUPPLEMENTARY DETAIL TO POLICIES concerned with a variety of topics within LBHF’s Core Strategy 2011 and proposed Development Management Development Plan Document(DMDPD).”</p> <p>(Our emphasis added)</p> <p>Para 3.2 states:</p> <p>“The overall objectives of the SPD, once it is finalised, will be to:</p> <ul style="list-style-type: none"> • establish MORE DETAILED GUIDANCE ON THE APPLICATION OF POLICIES within the Core Strategy and Development Management DPD (DMDPD) that are concerned with managing development proposals within the borough; and • help applicants make successful applications and to aid infrastructure delivery.” <p>(Our emphasis added)</p> <p>Para 3.3 states:</p>	<p>Comments noted. Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that “policies in a supplementary planning document must not conflict with the adopted development plan”. The council therefore thinks it appropriate to refer to policies in the Planning Guidance SPD.</p>

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				<p>“The document provides policy guidance covering a number of different topics.”</p> <p>Finally, Para 3.4 states:</p> <p>“The key elements of the SPD, however, are THE POLICIES that the council will apply when considering development proposals.”</p> <p>(Our emphasis added)</p> <p>Our concern principally relates to the identification of the guidance contained within the SPD as ‘policy’ in a number of areas throughout the document. Para’s 1.3, 3.2 and 3.3 as set out above accurately describe the document as providing guidance to further inform adopted and emerging development plan policies. However, Para 3.4 and the referencing throughout each of the detailed sections of the document then appear to indicate that the SPD contains policies rather than supporting guidance. As such, this creates some uncertainty for the reader as to the status of the guidance set out in the document.</p> <p>The NPPF defines supplementary planning documents as follows:</p> <p>“Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.”</p> <p>Para 3.5 of the SPD does state that:</p>	

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				<p>“The SPD will be a material consideration in planning decisions although it is not part of the development plan.”</p> <p>It is considered necessary, therefore, to amend the referencing in the document to make it clear that its purpose is to provide further guidance to existing and emerging development plan policies only and cannot therefore introduce new policy. Within each of the detailed topic areas, the reference to policies should be amended to guidance e.g. SPD Housing [STRIKETHROUGH]< Policy> [STRIKETHROUGH] Guidance 1.</p>	
White City Residents Association	Section 1	Explanatory Note	Observations	<p>Reference is made to a number of policy and other documents that will be used for guidance. It is recommended that Neighbourhood plans be included as relevant documents to which reference should be made and from which guidance should be sought, as and when they are developed within the borough.</p> <p>It is recommended that development within the borough should lead to an increase in the amount of public amenity, facility and service per head of population. It is vital that this is a core principal, particularly where developments will lead to any increased demand for those amenities, facilities and services.</p>	It is agreed that reference should be made to neighbourhood plans within the SPD. In particular, in the Explanatory Note in para 1.3 or its successor in the adopted SPD and in the section that discusses the Purpose of the Document.
A2 Dominion Group	Section	Purpose of the Document	Object	<p>PURPOSE OF THE DOCUMENT</p> <p>3.2 The purpose of the SPD is identified as providing ‘detailed guidance on the application of policies within the Core Strategy and Development Management DPD’. Whilst the Core Strategy is adopted (October 2011), the Development Management DPD is in draft, is the subject of extant representations and as such should be afforded limited weight at present. In our view, the SPD is premature as it provides guidance on policies that have not yet</p>	The SPD will be finalised and adopted at the same time as the DM LP. The result of the DM LP Examination has been taken into account in the finalisation of the SPD.

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				<p>been found to be legally compliant, sound or in line with national planning policy and could be subject to change at Examination. To be effective, the SPD should be delayed pending the Examination of the DM DPD and reviewed and consulted on following receipt of the Inspector's report on the DM DPD.</p>	

Housing

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Mr Anthony Williams	Section 4	Housing	Support	All policies seem sensible. I particularly support the control of extensions especially basement additions	Support welcome.
H&F Disability Forum	Section 4	Housing	Observations	<p>Section 4: housing P 9</p> <p>We are unclear why DM DPD policies A3 Housing Mix and A4 Accessible Housing were not listed.</p>	<p>DM LP policy A3 is not referred to because there is no additional supplementary guidance relating to housing mix. Policy A4 is not referred to in this section because supplementary guidance in relation to access issues is in Section 5 Access para.5.9. DM LP policy A4 is not specifically referred to in para.5.9 because there are a number of relevant policies in the DM LP for the Planning Guidance SPD Design policies 1 to 13.</p> <p>No amendment necessary.</p>
Hammersmith Society	Section 4	Housing	Object	<p>Housing and amenity space</p> <p>16. The PG SPD's guidance on amenity space is weaker than previous provision.</p> <p>17. Whereas the UDP required new family dwellings with accommodation at ground level to have one area of private open space of at least 36 sqm, Housing Policy 1 calls simply for an area of private open space, dropping the size requirement. There is merely a requirement for "access" to a space of not less than 36 sqm – i.e. possibly a communal space. We oppose this watering down of previous provision.</p> <p>18. Meanwhile, whereas Housing Policy 1 begins "All new dwellings should have access to an area of amenity space, appropriate to the type of housing being provided", DM E2 is more</p>	<p>The policies in the Planning Guidance SPD have been written to provide more flexibility in the provision of amenity space and children's playspace, whilst seeking to ensure that new family housing at ground floor level will have access to private open space.</p> <p>No amendment necessary.</p>

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				<p>conditional and explicitly envisages contributions to provide offsite playspace if on site cannot be provided or is not considered appropriate, and calls for the contributions to enhanced facilities mentioned above. Under that proviso (DM 4.87) it becomes possible to meet the residential playspace requirements (or, more accurately, avoid them) by providing “Better signing or additional seating” in an existing open space. It is simply not acceptable that playspace/ open space/amenity space should be provided off site other than in wholly exceptional circumstances – which is not the precondition envisaged in these documents. (Note: Where communal open space is provided, the term embraces playspace (see Housing Policy 1)). Developers already routinely point to a park in the locality and reduce open/amenity/playspace in their proposals. The wording must be tightened up to close this loophole and stop this practice becoming a matter of routine, and stop the new and additional potential for fulfilling conditions by trivial improvements to existing spaces.</p>	
<p>A2 Dominion Group</p>	<p>Section 4</p>	<p>Housing</p>	<p>Object</p>	<p>4 HOUSING</p> <p>Housing Quality</p> <p>OBJECTION</p> <p>4.2 This paragraph states that LBHF will rely on the Mayor of London’s draft Housing SPG when assessing planning applications. The Mayor’s Housing SPG is in draft, is the subject of extant representations and as such should be afforded limited weight at present. The extant representations to the draft Housing SPG may result in changes to the standards which could make them inappropriate for use within the London Borough of Hammersmith and Fulham. For the document to be sound it should refer to adopted planning policy and supplementary guidance that has been subject to full consultation and testing.</p>	<p>The Mayor’s Housing SPG has been finalised and references to this SPG have been updated in the Planning Guidance SPD.</p>

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Nhs Hammersmith & Fulham	Section 4	Housing	Support with conditions	<p>Housing</p> <p>We are pleased that the SPD refers to lifetime homes. The broader concept of lifetime neighbourhoods which offer everyone the best possible chance of health, wellbeing and social economic and civic engagement regardless of age as set out in the GLAs London Plan should also be considered.</p>	<p>Paras.4.1 and 4.2 make clear that the Mayor's Housing SPG will be used to assess planning applications except where the H&F Planning Guidance SPD specifies other or more detailed guidance.</p> <p>No amendment necessary.</p>
Helical Bar and Aviva	SPD Housing Policy 1	Amenity space in new dwellings	Support with conditions	<p>Whilst the principle of dwellings having access to an area of amenity space is supported, the draft policy is too prescriptive in two respects.</p> <p>1. First, the requirement that dwellings with ground floor accommodation must have private open space, with direct access to it, is too onerous. In many urban areas, particularly in mixed-use locations, it is neither appropriate nor often possible to provide private open space for each ground floor dwelling, with the direct access that is required by the policy. In common with the policy requirement for all other types of dwellings, it should be acceptable for space to be provided communally where appropriate.</p> <p>To overcome the objection, the second sentence in the second paragraph, should be deleted and combined with the third sentence and amended to read "For family dwellings this space may be provided either as an adjoining garden, as a balcony or terrace and/or communally in close proximity to the proposed home."</p> <p>2. Second, we object to the requirement in the first draft bullet point for all communal space to include a children's play area. Children's play areas are not always required by all developments and furthermore some may already have open space in close proximity.</p>	<p>1. SPD Housing Policy 1 only requires ground level family dwellings to have access to private amenity space. The council consider that is important that families can have access to private open space.</p> <p>2. The first bullet does provide flexibility but it is important to ensure that there is a well designed area that meets the need for children's play.</p> <p>No amendment necessary.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>The first bullet should therefore be amended to read “has a well-designed area to meet the appropriate needs of the development;”.</p>	
<p>Ptarmigan Riverside AW LLP</p>	<p>SPD Housing Policy 1</p>	<p>Amenity space in new dwellings</p>	<p>Support with conditions</p>	<p>Ptarmigan support the requirement for a suitable level of amenity space to be provided with all new dwellings; however it is considered that the requirement for 36 square metres of space to be provided with each new family dwelling is overly prescriptive. Both the London Housing Design Guide and the Mayor’s Draft Housing SPG (2011) requires a minimum of 5 square metres for all 2 person dwellings and an extra 1 square metre for each additional occupant to be provided. Based on a typical 4 person family, this results in a requirement for approximately 7 sq m of private open space.</p> <p>It is therefore considered that Housing Policy 1 is currently too prescriptive regarding the level of amenity space that is required to be provided with family dwellings. Depending on site constraints it may not be possible for such a high level of amenity space to be provided within developments, and as currently worded Housing Policy 1 could prevent new housing coming forward which is otherwise capable of meeting the standards set out in the London Housing Design Guide.</p> <p>It is suggested the following changes are made to the wording:</p> <p>Suggested wording: (Additional text in bold and deletion with strikethrough)</p> <p>‘Every new family dwelling should have access to an appropriate level of amenity or garden space which is provided in line with the requirements as set out in the Mayor’s Housing SPG and London Housing Design Guide...’</p>	<p>H&F Core Strategy Policy H3 Housing Quality and Density makes clear that new housing will be expected to be low to medium rise with gardens and shared amenity space. Para.4.6 of the SPD makes clear the council expects to see a more generous provision of outdoor amenity space than the minimum standards in the London Plan.</p> <p>36 sqm of amenity or garden space is based on an estimate of the minimum area that is needed for a range of outdoor activities, such as children’s play, gardening and clothes drying. This standard has been successfully implemented over the last 25 years.</p> <p>No amendment necessary</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
A2 Dominion Group	SPD Housing Policy 1	Amenity space in new dwellings	Object	<p>Housing Policy 1: Amenity Space in New Dwellings</p> <p>OBJECTION</p> <p>A provision of this policy is that family dwellings should have access to a minimum of 36 square metres of amenity or garden space. There is no evidence to suggest how the figure of 36 square metres has been arrived at and why this is appropriate. The assessment of amenity space should be on a site by site basis taking account of the character of the area, market demand and the constraints/ opportunities presented by the particular site and should not be based on an arbitrary space requirement.</p> <p>Further to the above, the policy states that communal open space should demonstrate various provisions. The requirements repeat the provisions of standard 1.2.3 of the Mayor's draft Housing SPG 2011. Paragraph 4.2 states that Hammersmith and Fulham will assess applications against the Mayor's draft Housing SPG. In our view, there is no need to repeat the provisions of the draft Housing SPG within the policy wording as once adopted they will be applicable to developments within the Borough.</p> <p>The NPPF states that local plans should be succinct (paragraph 17; page 5). Whilst we understand that this SPD will not form part of the Development Plan, once adopted, it will be a material consideration in determining planning applications and in line with the aspirations of the NPPF, should be succinct. Housing Policy 1 unnecessarily repeats the requirements of the Mayor's draft Housing SPG and in our view this does not result in a succinct document as envisaged by the NPPF. This element of the policy should be deleted.</p>	<p>36 sqm of amenity or garden space is based on an estimate of the minimum area that is needed for a range of outdoor activities, such as children's play, gardening and clothes drying. This standard has been successfully implemented over the last 25 years.</p> <p>For clarity Housing policy 1 repeats the 4 bullet points from the Mayor's Housing SPG</p> <p>No amendment necessary.</p>
Capital and Counties on Behalf of Earls	SPD Housing Policy 1	Amenity space in new	Support with conditions	Capital & Counties support the requirement for a suitable level of amenity space to be provided with all new dwellings. However, it is considered that the requirement for 36 square metres of space to	H&F Core Strategy Policy H3 Housing Quality and Density makes clear that new housing will be

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Court and Olympia Group		dwellings		<p>be provided with each new family dwelling is overly prescriptive and has no basis or supporting evidence. Both the London Housing Design Guide and the Mayor's Draft Housing SPG (2011) requires a minimum of 5 square metres for all 2 person dwellings and an extra 1 square metre for each additional occupant to be provided. Based on a typical 4 person family, this results in a requirement for approximately 7 sq m of private open space. It is, therefore, considered that Housing Policy 1 is currently too prescriptive regarding the level of amenity space that is required to be provided with family dwellings. Depending on site constraints it may not be possible for such a high level of amenity space to be provided within developments, and as currently worded, Housing Policy 1 could prevent new housing coming forward which is otherwise capable of meeting the standards set out in the London Housing Design Guide. It is suggested the following changes are made to the wording:</p> <p>Suggested wording:</p> <p>'Every new family dwelling should have access to an appropriate level of amenity or garden space which is provided in line with the requirements as set out in the Mayor's Housing SPG and London Housing Design Guide.. . '</p>	<p>expected to be low to medium rise with gardens and shared amenity space. Para.4.6 of the SPD makes clear the council expects to see a more generous provision of outdoor amenity space than the minimum standards in the London Plan.</p> <p>36 sq.m of amenity or garden space is based on an estimate of the minimum area that is needed for a range of outdoor activities, such as children's play, gardening and clothes drying. This standard has been successfully implemented over the last 25 years.</p> <p>No amendment necessary</p>
St James Group Ltd and St George Plc	SPD Housing Policy 1	Amenity space in new dwellings	Support with conditions	<p>Housing Quality</p> <p>Reason/Justification</p> <p>The importance of providing outdoor amenity space for children and young people is acknowledged. Given the different circumstances of each site, however, the policy should be amended to allow flexibility in terms of the mechanisms by which outdoor amenity space is delivered. The provision of outdoor amenity space should be assessed on a site by site basis and should be informed by the individual characteristics of a site and</p>	<p>As section 3 of the Planning Guidance SPD makes clear, the policies in this document do not form part of the development plan but they are a material consideration in determining planning applications. Therefore there will be flexibility in the way that they are applied and all material considerations will be taken into account.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>its surrounding context.</p> <p>Action</p> <p>Amend by adding the following opening sentence:</p> <p>Subject to a detailed assessment of individual site and development circumstances, all new residential developments should aim to meet the following amenity space requirements:.....</p>	No amendment necessary
Royal Borough of Kensington & Chelsea	SPD Housing Policy 1	Amenity space in new dwellings	Observations	Housing Policy 1 – This makes a requirement for amenity space; it will need to be able to meet the recommended noise levels for outdoor amenity space 50-55dBAeq; see BS 8233 and WHO.	Comments noted
Miss Linda Moll	SPD Housing Policy 2	Amenity space and conversions	Object	This is discriminatory against non family residents. People who do not have families are also entitled to gardens, low level dwellings, etc. not just those with a family. Totally out of order.	<p>Family dwellings are larger dwellings with 3 or more bedrooms and where children are more likely to live. Children particularly need outdoor playspace. The SPD guidance is seeking that all dwellings have access to garden or amenity space.</p> <p>No amendment necessary</p>
A2 Dominion Group	SPD Housing Policy 3	Amenity space and balconies	Object	<p>Housing Policy 3: Amenity Space and Balconies</p> <p>OBJECTION</p> <p>This policy states that balconies should have a minimum depth and width of 1500mm. This is a requirement of the Mayor's draft Housing SPG 2011 (standard 4.10.3). Paragraph 4.2 states that Hammersmith and Fulham will assess applications against the</p>	As most of the policies relating to the provision of amenity and garden space are different from the Mayor's Housing SPG it is considered that it provides greater clarity to repeat those parts of the SPG for those issues that are the same as the H&F Planning

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>Mayor's draft Housing SPG. In our view, there is no need to repeat the provisions of the draft Housing SPG within the policy wording as once adopted they will be applicable to developments within the Borough. The NPPF states that local plans should be succinct (paragraph 17; page 5). Whilst we understand that this SPD will not form part of the Development Plan, once adopted, it will be a material consideration in determining planning applications and in line with the aspirations of the NPPF, should be succinct. Housing Policy 1 unnecessarily repeats the requirements of the Mayor's draft Housing SPG and in our view this does not result in a succinct document as envisaged by the NPPF. This element of the policy should be deleted.</p>	<p>Guidance SPD. No amendment necessary</p>
<p>St James Group Ltd and St George Plc</p>	<p>SPD Housing Policy 3</p>	<p>Amenity space and balconies</p>	<p>Object</p>	<p>Housing Quality</p> <p>Reason/Justification:</p> <p>It is not considered necessary for the proposed guidance on balconies to be included for the following reasons.</p> <p>In relation to the first bullet point, the provisions of emerging Development Management Policy G1 are considered to provide an appropriate policy basis to protect the residential amenity of neighbours and the character of a site's surroundings.</p> <p>In relation to the second bullet point, the Mayor's draft Housing SPG Standard 4.10.3 already provides the minimum space requirements for balconies and there is therefore no requirement to repeat this policy at the local level.</p> <p>We would therefore recommend that the policy should be removed.</p> <p>Where the borough is minded to retain the policy, then it should be amended to remove the requirement for all balconies to be</p>	<p>As most of the policies relating to the provision of amenity and garden space are different from the Mayor's Housing SPG it is considered that it provides greater clarity to repeat those parts of the SPG for those issues that are the same as the H&F Planning Guidance SPD.</p> <p>Agree to delete "and should be wheelchair accessible" from 2nd sentence of SPD Housing Policy 3.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>wheelchair accessible. In this regard, Policy 3.8 of the London Plan states that ten per cent of new housing should be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. It is therefore unreasonable to expect that balconies in all residential homes should be wheelchair accessible.</p> <p>Action: Delete or amend the second bullet point as follows:</p> <p>Balconies provided to meet amenity space requirements should have a minimum depth and width of 1500 mm.</p>	
Royal Borough of Kensington & Chelsea	SPD Housing Policy 3	Amenity space and balconies	Observations	<p>Housing Policy 3 - as with Housing Policy 1 (below) re noise levels privacy</p> <p>Housing Policy 1 – This makes a requirement for amenity space; it will need to be able to meet the recommended noise levels for outdoor amenity space 50-55dBLAeq; see BS 8233 and WHO.</p>	Comments noted
Royal Borough of Kensington & Chelsea	SPD Housing Policy 3	Amenity space and balconies	Observations	4.10 amenity space of terrace or balcony can be noisy and affect neighbours if large enough for tables and chairs; will you be relying on s80 for any noise nuisance?	<p>Same BS8233 standard should apply.</p> <p>No amendment necessary</p>
Greater London Authority	SPD Housing Policy 4	Minimum Sizes	Support with conditions	<p>The references in paragraphs 4.1 and 4.2 to the London Plan draft Housing SPG, and in paragraph 4.4 to London Plan policies 3.5 and 7.6, are welcomed. However, it is noted that SPD Housing Policy 4 Minimum Sizes, which is specifically concerned with converted flats, specifies a minimum internal area of 32.5 square metres where a separate bedroom is provided and 25 square metres where a bedsitting room is provided. These standards are significantly lower than those prescribed in table 3.3 of the London Plan, which are 50 square metres for a one-bed, two-person flat and 37 square metres for a one-person studio unit. London Plan policy 3.5C states that "LDFs should incorporate minimum space</p>	<p>The minimum internal floor areas for converted flats are based on the size of dwellings in H&F. If these minimum sizes for residential are increased to meet the Housing SPG standards there are likely to be very few new conversions in H&F. This would significantly impact on the achievement of the London Plan housing targets for H&F as in the last 2 years over 80 additional</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>standards that generally conform with Table 3.3" and paragraph 2.1.14 of the draft Housing SPG states that the Mayor's design standards, including the minimum space standards, apply to all new housing in London including new-build dwellings, conversions and change of use schemes where new dwellings are created.</p> <p>By virtue of the space standards set out in SPD Housing Policy 4 being significantly lower than those prescribed in table 3.3 of the London Plan, they are not in general conformity with the London Plan and are not supported.</p> <p>The GLA commented on the Proposed Submission Development Management DPD (November 2011) by way of letter and report dated 14 December 2011. This concluded that the document was in general conformity with the London Plan, but that there were areas of the document that would benefit from clarification. These included a recommendation that draft policy A2 should be amended to include reference to London Plan policy 3.5 Quality and Design of New Housing Developments. It is noted that in the Submission version dated June 2012, the reference in the policy to the Mayor of London Housing Design Guide has been deleted, to be replaced by a reference in paragraph 4.8 of the reasoned justification to the Mayor's new Housing SPG and London Plan policy 3.5. Officers are of the view that this weakens the policy position and could compromise the Council's ability to secure the highest standards of residential quality as required by the London Plan. Reference to London Plan policy 3.5 and the space standards set out in table 3.3 should therefore be incorporated into policy DM A2. Discussion on this issue would be welcome prior to the forthcoming examination into the Development Management DPD.</p>	<p>dwellings pa have been completed as a result of conversions.</p> <p>No amendment necessary</p> <p>The changes to DM LP policy A2 and the supporting text were agreed in Oct 2012 when the Inspector for the H&F DM LP Examination received a Statement of Common Ground from the GLA.</p> <p>No amendment necessary</p>
Miss Linda Moll	SPD Housing Policy 6	Rear Extensions	Object	Everyone will be on top of one another, more people in a high density area leads to anti-social and criminal issues.	The aim of this policy is to make sure rear extensions are not too close together and that rear garden

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					space is not built on. This policy is the same as has been implemented over many years. No amendment necessary
Miss Linda Moll	SPD Housing Policy 7	Rear Extensions - Standards	Object	Everyone will be on top of one another, more people in a high density area leads to anti-social and criminal issues.	The aim of this policy is to make sure rear extensions are not too close together and that rear garden space is not built on. This policy is the same as has been implemented over many years. No amendment necessary
Land Securities	SPD Housing Policy 8	Protection of amenities	Support	SPD Housing Policy 8 - Protection of amenities Guidance (ii) contained within SPD Housing Policy 8, we acknowledge that new windows should 'normally' be positioned so that the distance to any adjacent residential windows is not less than 18 metres. In this regard, we welcome the exception allowing new windows within 18 metres of residential windows, where they are designed to ensure that no loss of privacy will occur.	Support welcome
A2 Dominion Group	SPD Housing Policy 8	Protection of amenities	Object	Housing Policy 8: Protection of Amenities OBJECTION It is unclear whether the provisions of this policy relate to new developments or extensions with part (i) referring to both developments and extensions. Greater clarity is needed as to what types of development this policy applies to. Further to the above, part (ii) states that directly facing windows should not be closer than 18 metres. There is no evidence to	Amend first sentence of Housing Policy 8 to read: "In order to protect the amenity of neighbouring occupiers new development <u>and extensions to existing buildings</u> should accord with the following guidance:"

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>suggest how the figure of 18 metres has been arrived at and why this is appropriate. The assessment of separation distances should be based on a review of local character and the need to reinforce established building lines. Many historic streets within Hammersmith and Fulham have dwellings with directly facing windows that fall short of the 18 metre provision. To require new development to meet the 18 metre separation could undermine established building lines and historic street patterns to the detriment of local character. If the 18 metre guide distance is to be retained a provision should be included to clarify that a lesser distance may be appropriate in the context of local character.</p>	
<p>St James Group Ltd and St George Plc</p>	<p>SPD Housing Policy 8</p>	<p>Protection of amenities</p>	<p>Object</p>	<p>Housing Quality</p> <p>Reason/Justification:</p> <p>The Mayor's Draft Housing SPG already sets out appropriate guidance in relation to the definition of north facing dwellings and bullet point (iv) should therefore be amended to ensure it is consistent with this or else deleted as being unnecessary.</p> <p>Action:</p> <p>Delete bullet point (iv) or where considered appropriate to retain, amend as follows:</p> <p>"North facing (i.e. where the orientation is less than 50 degrees either side of north) should be avoided wherever possible."</p>	<p>Agree the amendment</p> <p>Amend point (iv) as follows: No dwelling should have all its habitable room windows facing exclusively in any northerly direction (i.e. between north east and north west). Only where very special circumstances can be shown to exist which would outweigh the benefits to the amenity of the dwelling, will this requirement be relaxed.</p> <p><u>"North facing (i.e. where the orientation is less than 50 degrees either side of north) should be avoided wherever possible."</u></p>
<p>Thames Water Property Services</p>	<p>SPD Housing Policy 9</p>	<p>Basements</p>	<p>Support with conditions</p>	<p>We support the content of the policy which should be considered alongside the requirements of Policy A8 of the submission Development Management Policies DPD. This policy requires active drainage devices to be used to minimise the risk of sewer</p>	<p>Add a further bullet point in SPD Housing policy 9 to say:</p> <p><u>"Provide active drainage devices to</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				flooding to basement accommodation.	<u>minimise the risk of sewer flooding"</u>
Royal Borough of Kensington & Chelsea	SPD Housing Policy 9	Basements	Observations	Housing Policy 9 – Basements: nothing mentioned about the construction impacts; it could say the Council will seek a DCMP by condition. (Just for info, RBKC will have a revised Subterranean SPD in due course).	<p>Reword the last bullet point in Policy 9 to clarify that the survey is a Subterranean Construction Method Statement.</p> <p>Amend final bullet point (vi) as follows:</p> <p>“ Include a <u>Subterranean Construction Method Statement structural survey</u> (carried out by a qualified structural <u>surveyor civil engineer</u>) has been carried out and submitted <u>with the planning application and made available</u> to neighbouring owners”</p>

Design

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
H&F Disability Forum	Section 5	Design	Object	<p>5.171 local register of buildings of merit</p> <p>H&F DF is surprised that these policies are not consistent with DM DPD G7 policy para j such as “applications for proposals affecting buildings of merit or listed buildings should achieve accessible and inclusive design wherever possible and practicable”. Currently the EQIA reports a negative impact of this policy on disabled people without a mitigating action.</p> <p>We recommend that PG SPD confirms that DM DPD G7 takes priority.</p> <p>5.171 local register of buildings of merit</p> <p>We recommend that this para is consistent with the above policies and includes a sentence “planning applications affecting new or replacement shop fronts or any other alteration . . . in buildings of merit should achieve accessible and inclusive design wherever possible and practicable”.</p>	<p>Section 3 of the SPD sets out the hierarchy of planning documents. The SPD is not part of the development plan for the borough and consequently the DM LP will always take priority over the SPD. Any development proposal will need to comply with Core Strategy and DM LP policy, otherwise it would not be acceptable.</p> <p>Regarding, para 5.171, shop front policy is set out elsewhere in the SPD – see, for example, SPD Design Policy 27.</p> <p>No amendment required.</p>
H&F Disability Forum	Section 5	Design	Observations	<p>Appendix 1: Equality Act 2010 and relevance to the Local Planning Authority and Building Control</p> <p>We notice that the section on contaminated land has a glossary and a list of resources. The Hammersmith and Fulham Access Officer is retiring in late 2012 so recommend that the section on accessible and inclusive design should also include a glossary and a list of resources and links to on line resources to assist both applicants and case officers. We think this may be an oversight as para 5.61 mentions [See Best Practice Guidance list in Appendix]</p> <p>The relationship between planning and building regulations is a grey area and our concern is to ensure that nothing is approved at planning application stage that will make it difficult or impossible to achieve accessible and inclusive design at subsequent detailed</p>	<p>Comments noted.</p> <p>It is agreed that a glossary of terms should be included within the SPD.</p> <p>Proposals that may be acceptable in planning can fall foul of building control and vice-versa. From the planning perspective, however, all of the safeguards are in place in compliance with national and regional policy and guidance to ensure that a development proposal must provide the criteria noted here to be acceptable in planning terms.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>drawing stage or building regulation stage. We have in mind</p> <ul style="list-style-type: none"> • Mayor of London minimum space standards • allocation of internal and external space for different purposes; • appropriate location of affordable housing within the development; • appropriate location of wheelchair accessible housing within the development • appropriate locations for blue badge parking • accessible and inclusive pedestrian routes to and through the development <p>Should para 5.40 remind developers to use the latest versions of Approved Document Part M? We understand the latest version is 2004 with 2010 amendments.</p>	<p>This would be addressed on an application by application basis.</p> <p>The Council will add a cross reference under SPD DP 1, para 4.16:</p> <p><u>“National advice is that it is not necessary for a planning application, or the Design and Access Statement attached to a planning application, to state that Building Regulations requirements under Building Acts will be met. Nor need they show detail that would fall to be approved under Building Regulations requirements, or submit information about service access arrangements that might satisfy an Equality Act 2010 requirement on service providers to remove physical barriers confronting disabled people. See Appendix 1, below.”</u></p> <p>The Council will add a cross reference under SPD DP 2 (Entry Into a Building), SPD DP 3 (Access to facilities inside a building), SPD DP 5 (ATM developments), and under SPD DP 10 (Major Regeneration Projects) that reads:</p> <p><u>“For further information about</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>Equality Act 2010 and Building Regulations access requirements see Appendix 1 below.</u></p> <p>Whilst it is possible for the Supplementary Planning Document to point planning applicants to particular documents currently approved under different legislation, it is possible that future amendments to Building Regulations may amalgamate or re-title some current Building Regulation “Approved Documents”.</p> <p>To clarify the references made in SPD DP 3, the Council will add the following further explanations:</p> <p>Under SPD DP3:</p> <p><u>” The guidance above does not take the place of Building Regulations that require new construction to provide accessibility to disabled people and the features in new buildings and extensions that will prevent anyone being excluded from using them.</u></p> <p><u>In LBHF there are many older buildings, so existing buildings can be made more sustainable for future use by being updated with</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>the accessibility features, and facilities that are recommended in BS 8300:2009 and the other best practice codes that the London Plan considers should be applied when planning applications are submitted.</u></p> <p><u>An accessible and inclusive local environment enables disabled and older people in particular, with family or neighbourhood support, to remain mobile and to live fully independent everyday lives.</u></p> <p><u>In practice the most efficient arrangements for inclusive access are usually those where rooms, acoustics, facilities and entrances are designed for all people to use: options that separate people with different needs can be far more costly to manage and maintain.</u></p> <p><u>For further information about Equality Act 2010 and Building Regulations access requirements see Appendix 1, below.”</u></p> <p>Under SPD DP4:</p> <p><u>” The guidance above does not take the place of Building Regulations that require new construction to provide accessibility to disabled</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>people, and key features in new buildings and extensions that will prevent anyone being excluded from using them.</u></p> <p><u>Larger buildings when first built or converted to new use can provide important new facilities for people to use, if comprehensively re-designed for inclusion.</u></p> <p><u>In LBHF itself, larger public buildings make an essential contribution to the social infrastructure of the Borough. These range from older church buildings converted or extended for learning and public use, to new complexes that bring new business and entertainment or leisure opportunity into town centres, or that create hubs of new activity in neighbourhoods.</u></p> <p><u>For further information about Equality Act 2010 and Building Regulations access requirements see Appendix 1below.”</u></p>
H&F Disability Forum	Section 5	Design	Observations	<p>Section 5: Design</p> <p>We are unclear why London Plan policies 3.5 Housing Design and 7.1. Lifetime Neighbourhoods are not listed.</p>	The SPD does not provide an exhaustive list of London Plan policies.
H&F Disability	Section 5	Design	Support with	Para 5.45: Evacuation lifts etc. we are pleased to see this para.	Support welcome. It is not

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Forum			conditions	We regularly advise that applications have a condition to ensure developers have a management plan for 24/7 enhanced maintenance cover for lifts to ensure rapid response so wheelchair users are not trapped on upper floors. We are unsure whether this point should be addressed here or in DM DPD.	<p>considered appropriate to amend the DM LP with this level of detail.</p> <p>It is important to note that the Building Regulations do not require the inclusion of an Evacuation Lift. It will only apply to a limited number of cases, so it is better dealt with in supplementary guidance and this is why it has been included here.</p> <p>The Council will re-word the reference in paragraph 4.63 (formerly para 5.45) to say:</p> <p>” A <u>well-maintained</u> evacuation lift gives people the choice....”</p>
English Heritage-London Region	Section 5	Design	Observations	We recommend that the section on Local Context on pages 56 and 57 include more information about the Borough’s green spaces	Paragraphs 4.209 and 4.210 (formerly paras 5.193 and 5.194) refer to open spaces. Further mention of green spaces is considered unnecessary in this section. See also various policies in the SPD and DM LP that relate to open spaces, landscaping, trees, etc.
English Heritage-London Region	Section 5	Design	Observations	English Heritage considers that a reference to English Heritage guidance on conservation areas and conservation values may be useful in the section on National Policy – for example Conservation Principles (April, 2008) and Understanding Place (2010)	The section on national planning policy refers to NPPF. However, English Heritage guidance is useful accompanying material and a further sentence will be added to paragraph 4.196 (formerly para 5.180):

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>“In addition to this, English Heritage provide and regularly update guidance on conservation areas and conservation values – such as Heritage Works : The Use of Historic Buildings in Regeneration” (2006), Conservation Principles (2008) and Understanding Place (2010) – that are instrumental in the management of the historic environment.”</u></p>
<p>H&F Disability Forum</p>	<p>Section 5</p>	<p>Design</p>	<p>Observations</p>	<p>Section on Access</p> <p>Throughout the London Plan; Core Strategy 2011; submission DM DPD and the PG SPD there are references to accessible and inclusive design. We wonder if it would help developers understand accessible and inclusive design if this section was renamed Accessible and Inclusive Design. We believe it would also be helpful to remind applicants and case officers that additional detail on accessible and inclusive design may be included under specific headings elsewhere e.g. shopfront design.</p>	<p>Comments noted.</p> <p>This section will be renamed <u>Accessible and Inclusive Design</u>, as each policy deals with this.</p>
<p>H&F Disability Forum</p>	<p>Section 5</p>	<p>Design</p>	<p>Observations</p>	<p>Design and Access Statements (DAS)</p> <p>We are unsure of the status of Design and Access Statements in the Core Strategy 2011; Submission Development Management DPD or the Planning Guidance SPD. The DAS may vary in quality but they are very useful in focusing on accessible and inclusive design issues that need to be resolved.</p> <p>If applications are required to include a DAS H&F DF recommend that the DM DPD or the PG SPG retains the requirement that</p>	<p>The SPD will not change the requirements for submission of design and access statements.</p> <p>A DAS is a requirement of the 2004 Act, although there are some exceptions. The requirements of a DAS are also set out in government guidance, broadly that they should be proportionate to the complexity</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>planning applications should include design and access statements. We also suggest that applicants will find it helpful to understand the reasons for a DAS and what accessible and inclusive design issues applicants should think about and include in the DAS.</p>	<p>of the scheme but need not be long. In terms of which kinds of developments they apply, again broadly it is to Householder development in World Heritage sites, Conservation Areas or requiring Listed Building consent as well as certain non-residential development in World Heritage sites, Conservation Areas or requiring Listed Building consent. In addition to this there are some more minor categories where a DAS is required. As this is set centrally – and updated centrally – the council considers it best not to include these categories, as they will be subject to change, but to rely on central guidance for DAS requirements.</p> <p>“ The Council will refer to “<u>Design and Access Statements</u>” in place of “access statements” in paragraph 4.13 (formerly para 5.12) to highlight that this is what the guidance refers to.</p>
<p>Hammersmith & Fulham Historic Buildings Group</p>	<p>Section 5</p>	<p>Design</p>	<p>Support with conditions</p>	<p>Conservation Areas</p> <p>It is very helpful to include the generic Conservation Area (CA) guidelines in the SPG particularly as all CAs do not yet have a CA Profile. We look forward to hearing when work can start on the</p>	<p>Comments noted. Work on profiles is to commence soon.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>CAP reviews.</p> <p>Para 5.178 We suggest that ‘appearance’ is added to read ‘retain their character, appearance and quality’</p> <p>Para 5.183 We suggest that the word “and” replaces “or” to read restore and enhance the quality, character appearance and setting...’</p> <p>Para 5.187 We suggest that it should read ‘preserve and enhance’ instead of ‘or enhance’.</p> <p>In the UDP (2007) EN2, 4.58 (page 93) discourages outline planning permission in conservation areas. We have not identified a similar note in the SPD. Despite Policy G7 page 57 of DPD would not such a note be useful guidance to applicants?</p>	<p>Agreed. Insert word – “appearance” in last sentence of para 4.194 (formerly para 5.178):</p> <p>“... which retain their character, <u>appearance</u> and quality”</p> <p>The word “or” is used in the DM LP – it is not appropriate for the SPD to have different text.</p> <p>No change. Current wording follows national legislation and guidance</p> <p>Agreed. After para 4.259 (formerly para 5.243) insert first three sentences and penultimate sentence of para 4.5 of the UDP, namely:</p> <p><u>“The council will require applications for planning permission, whether outline or full, to be in sufficient detail for a judgment to be made in relation to the impact of the proposal on the character and appearance of the adjoining buildings and street scene and the conservation area as a</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>whole. It is important, therefore, to be able to assess any proposal not just as a separate entity but as part of that area. For this reason an outline application without any details is unlikely to provide sufficient information. The council has statutory powers to ask for additional details within one month of the lodging of a planning application, if these are necessary to enable it to make a decision”.</u></p>
Hammersmith & Fulham Historic Buildings Group	Section 5	Design	Support	Shopfronts. We welcome the inclusion of the more detailed guidance on shop fronts (page 45)	Support welcome.
Hammersmith & Fulham Historic Buildings Group	Section 5	Design	Support with conditions	Listed Buildings. We are pleased at the detailed guidance on BOM (page 41ff) but surprised that there is not similar guidance on listed buildings.	Guidance on listed buildings is generally provided in national guidance. However, within the SPD there is reference to listed buildings where this is particularly relevant. See also SPD Design Policy 64 and the DM LP.
Hammersmith & Fulham Historic Buildings Group	Section 5	Design	Observations	<p>Archaeology. Para 4.71.of the UDP (amended Sept 07) includes the section on involving and informing local societies. We should like this wording included in this SPD</p> <p>We support the GLAAS proposal that there should be an APA designation along the whole riverside. As we understood that one of the reasons for this new LDF format was greater flexibility, it</p>	Similar wording to para 4.71 of the 2007 UDP (para 4.17 of the UDP as amended in 2007 and 2011) is included in SPD para 4.350 (formerly para 5.331).

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>seems a great pity a way cannot be found to designate it now particularly as so much development is expected along the riverside.</p> <p>(An editing note: 5.330 repeats part of 5.329.)</p>	<p>Para 5.328 of the SPD explains why it is not appropriate to consider designating a new APA in the DM LP.</p> <p>Repetition noted; the paragraph 4.349 (formerly para 5.330) will be deleted.</p>
<p>Hammersmith Society</p>	<p>Section 5</p>	<p>Design</p>	<p>Observations</p>	<p>10. Para 5.103 says “The document includes a list of existing buildings and artefacts and provides a list of policies that the Council will apply when considering development proposals.” What policies are referred to here?</p>	<p>This paragraph requires amendment because a) the list of buildings and artefacts will be published separately to the SPD and b) because of the ambiguous reference to “a list of policies”. In addition SPD Design Policy 23 requires amendment to make clear that the list of buildings and artefacts is published separately.</p> <p>Amend para 4.123 (formerly para 5.103) to read:</p> <p>“The document includes a list of existing buildings and artefacts and provides a list of policies that the Council will apply when considering development proposals.”</p> <p>Amend first para of SPD Design policy 23 by deleting the words:</p> <p>“contained within this</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					Supplementary Planning Document”
Hammersmith Society	Section 5	Design	Observations	<p>Chapter 5 Design</p> <p>5. The layout of this chapter is challenging, as it contains a huge range of material, covering Access, Lightwells, Buildings of Merit, Shop Front Design, Conservation Area Guidelines, and Archaeology. We suggest there should be a sub-index at the head of the chapter to summarise what it contains. In addition it would help to print the subheadings (currently in pale mauve) in a bolder type and colour. This would help considerably in ease of use.</p>	The council has made editorial changes to improve layout and usefulness of the SPD. An index has also been created.
Hammersmith Society	Section 5	Design	Observations	<p>6. NPPF Design requirement and new build: The PG SPD contains good policies and guidance for new build in CAs. But because this is in the Conservation Areas Guidelines section, there is nothing in the PG SPD about guidance for Design of New Build generally across the borough. The guidance formerly included in UDP EN8 is not covered in the PG SPD.</p> <p>7. The general policy is addressed in DM G1. DM G1 itself is a satisfactory policy but we would have hoped to see either in the DM DPD or the PG SPD a reference to the NPPF’s requirement for planning to “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”.</p> <p>8. Chapter 4 para 4.4 has a useful reference to this requirement, but in the context of housing. The requirement should be helpful grounds to include in arguments against poor-quality development and it seems a missed opportunity not to include a reference to it in either the DM DPD or the PG SPD in the context of new build across the borough. Can a way be found to include a reference similar to that in the housing chapter?</p>	<p>DM LP design and conservation policies, together with the SPD, replace the UDP policies.</p> <p>The NPPF is a material consideration in determining planning applications and it is not necessary to refer to the document in detail throughout the SPD. However, para 3.4 (formerly para 4.4) includes the text requested by this representation.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Hammersmith Society	Section 5	Design	Observations	Buildings of Merit 9. Para 5.104 This paragraph, by contrast, does have a relevant reference to a different section of the NPPF but it might also be helpful, again, to add a reference to the NPPF Core Planning Principle 17 that planning “should always seek to secure high quality design,” because Buildings of Merit may be subject to proposals which will affect them, as per Design Policy 23.	The NPPF is a material consideration in determining planning applications and it is not necessary to refer to the document in detail throughout the SPD.
Mr Anthony Williams	SPD Design Policy 1	Inclusive design	Support		Support welcome.
Land Securities	SPD Design Policy 1	Inclusive design	Object	SPD Design Policy 1 - Inclusive Design Within the 'key inclusive design issues' that support this policy, it is acknowledged that in certain circumstances an applicant may believe that a particular design feature cannot be achieved. In reality this can quite often be the case, when for example, physical or monetary constraints mean that the introduction of disabled access facilities are simply not viable. As such, this sentence cannot be considered to be a 'key inclusive design issues' and we would argue that it should either be removed or changed to 'instances when a particular inclusive design feature cannot be achieved'.	Agree that the 3 rd bullet point re this issue should be deleted.
Land Securities	SPD Design Policy 1	Inclusive design	Support	SPD Design Policy 1 - Inclusive design In paragraph 5.14, it is acknowledged that 'for some conversions and changes of use it may not be possible to incorporate fully accessible and inclusive facilities'. This acknowledgment is welcomed.	Support welcome.
Mr Anthony Williams	SPD Design Policy 2	Entry into a building	Support with conditions	There should be a test of reasonableness and practicality.	Reasonableness and practicality are part of every planning decision and integral to the negotiation process for development proposals.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					There is no need to write this explicitly into supplementary guidance.
St James Group Ltd and St George Plc	SPD Design Policy 2	Entry into a building	Object	<p>Access</p> <p>Reason/Justification:</p> <p>The Mayor's Draft Housing SPG already sets out appropriate standards at Section 3.1 in relation to the entrance and approach to residential buildings.</p> <p>Action: Amend the opening line as follows:</p> <p>Guidance in relation to entrance arrangements for residential buildings is set out in the Mayor's Draft Housing SPG (2011). For all other buildings, entrances should be level</p>	<p>Comments noted.</p> <p>Additional text will be provided by way of reasoned justification to outline why the council prefers this approach to signposting the Mayor's SPG as well as to outline the type of buildings this supplementary guidance applies to.</p> <p>The Council will amend SPD DP 2 (Entry into a Building) and add new explanation text as below:</p> <p>SPD DP 2</p> <p>"Entrances to a building, <u>and to residential block entrances which are above or below street level, should be level, or positioned to be level.....</u>"</p> <p>Add text below SPD DP 2</p> <p>" <u>Planning guidance aims to ensure that all the entrances to buildings are practically accessible from the public realm, usually the street.</u></p> <p><u>The guidance will normally apply to non-residential and mixed use sites.</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>new shopfronts and to new and altered public or visitor entrances.</u></p> <p><u>However in LBHF there are also some residential sites entered above or below street level. For example there are some that are on back land sites below street level; other sites may be over railway tracks. In these cases, the guidance above should apply outside the entrances to residential sites and buildings, on any sites where there are not to be unstepped street entrances with level access to internal lifts that meet London Plan Supplementary Planning Guidance for circulation in residential buildings.</u></p> <p><u>In neighbourhoods where flooding is a concern, the March 2012 National Planning Framework Technical Guidance on flood risk states that where the lowest floor level of a new development or a conversion to create a new dwelling is raised above predicted flood level, consideration must be given to providing access for those with restricted mobility.</u></p> <p><u>For existing non-residential development, the guidance reflects</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>the reality that many business and service premises in LB Hammersmith and Fulham have been built with floor slabs slightly above street level. This is the case even with modern blocks constructed before Building Regulation level access requirements first came into force.</u></p> <p><u>The SPD DP 2 guidance aims to help businesses and other service providers of all sizes to consider how to remove access barriers from existing premises as required by the Equality Act 2010.</u></p> <p><u>For further information about Equality Act 2010 and Building Act requirements, see Appendix 1 below.</u> “</p>
Mr Anthony Williams	SPD Design Policy 3	Access to facilities inside a building	Support		Support welcome.
Land Securities	SPD Design Policy 3	Access to facilities inside a building	Object	<p>SPD Design Policy 3 - Access to facilities inside a building</p> <p>As with the remarks on SPD Design Policy 1 above, there should be some differentiation in this policy between new development and conversions/changes of use. As acknowledged in Paragraph 5.14, 'it may not be possible to incorporate fully accessible and inclusive facilities' into some conversions and changes of use and SPD Design Policy 3 should reflect this.</p>	<p>Under SPD DP3:</p> <p>” <u>The guidance above does not take the place of Building Regulations that require new construction to provide accessibility to disabled people and the features in new buildings and extensions that will</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>prevent anyone being excluded from using them.</u></p> <p><u>In LBHF there are many older buildings, so existing buildings can be made more sustainable for future use by being updated with the accessibility features, and facilities that are recommended in BS 8300:2009 and the other best practice codes that the London Plan considers should be applied when planning applications are submitted.</u></p> <p><u>An accessible and inclusive local environment enables disabled and older people in particular, with family or neighbourhood support, to remain mobile and to live fully independent everyday lives.</u></p> <p><u>In practice the most efficient arrangements for inclusive access are usually those where rooms, acoustics, facilities and entrances are designed for all people to use: options that separate people with different needs can be far more costly to manage and maintain.</u></p> <p><u>For further information about Equality Act 2010 and Building Regulations access requirements see Appendix 1 below."</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
St James Group Ltd and St George Plc	SPD Design Policy 3	Access to facilities inside a building	Object	<p>Access</p> <p>Reason/Justification:</p> <p>The Mayor's Draft Housing SPG already sets out appropriate standards at Section 3.2 in relation to shared circulation space within residential buildings.</p> <p>Action: Amend the opening line as follows:</p> <p>Guidance in relation to circulation space in residential buildings is set out in the Mayor's Draft Housing SPG (2011). For all other buildings, facilities that are essential to disabled people.....</p>	<p>Comments noted.</p> <p>Additional text has been provided by way of reasoned justification to outline why the council prefers this approach to signposting the Mayor's draft SPD as well as to outline the type of buildings this supplementary guidance applies to. See above.</p>
Mr Anthony Williams	SPD Design Policy 5	Automatic Teller Machines (ATMs)	Object	<p>Altering a shop floor level is an unreasonable requirement.</p>	<p>Comments noted.</p> <p>The second sentence of Design Policy 5, will be removed as it would prejudice the provision of such facilities that are a local service. The first sentence of the policy adequately covers what is being sought in this guidance.:</p> <p>"If this cannot be achieved the floor level of the shop or host premises should be adjusted to achieve this".</p>
H&F Disability Forum	SPD Design Policy 5	Automatic Teller Machines (ATMs)	Observations	<p>PG SPD DP 5 ATMs</p> <p>Para 5.16 which national guidance and para 5.17 good practice</p>	<p>Comments noted.</p> <p>Policy references will be made</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				guidance is relevant? We suggest these are included in the list of resources.	where appropriate. There is no public web access to the document, and the Council will alter the text on which it has based the guidance given to read : "....but good practice guidance (Access to ATM's: UK design guidelines, Centre For Accessible Environments, 2002) has been prepared..... "
H&F Disability Forum	SPD Design Policy 6	Changes of level in public spaces	Support with conditions	SPD DP 6: changes in level in public spaces: PG SPD should also confirm that applications with gradients in excess of 1: 12 will generally be resisted unless alternative and acceptable step free routes are provided.	Comments noted. Include additional final sentence of the policy to state: <u>"Gradients in excess of 1:12 will be resisted unless alternative and acceptable step-free routes are provided."</u>
Mr Anthony Williams	SPD Design Policy 8	Public and Open spaces	Support		Support welcome.
H&F Disability Forum	SPD Design Policy 8	Public and Open spaces	Observations	PG SPD DP 8: Public and Open Spaces While we welcome this para reminding applicants and case officers to ensure public and open spaces should be accessible to disabled children, older people and disabled adults we were not sure why this policy is in PG SPD and not incorporated in DM DPD Policy E1 Access to Parks and Open Spaces.	DM LP policies seek accessible and inclusive open space. This supplementary guidance sets out how accessible and inclusive spaces can be delivered and this is the appropriate place for this level of supplementary detail.
St James Group Ltd and St George Plc	SPD Design Policy 8	Public and Open spaces	Object	Access Reason/Justification:	Disagree. The level of detail in the policy is considered appropriate for the SPD. It is important to set out

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>The remainder of the policy is considered to be unnecessary and over prescriptive. The appropriate design of public and open space in a manner that protects the interests of disabled people will be secured by the requirement of all new development to fully compliant with applicable DDA standards.</p> <p>Action: Amend opening line as follows and delete the remainder of the policy:</p> <ul style="list-style-type: none"> • Where new public and open spaces/areas are created or enhanced planning applications should indicate how the interests of disable people are to be protected. 	<p>the means by which open spaces catering for all can be delivered, which is in line with DDA standard requirements. The borough has some best practice examples of delivery of such open spaces and wants to continue on this good work.</p>
Mr Anthony Williams	SPD Design Policy 10	Major regeneration projects	Observations	<p>How will this be implemented? How will the disabled people be selected? How will conflicting needs of different disabilities be resolved?</p>	<p>The supporting text gives some clear examples of how the policy can be achieved.</p>
Ptarmigan Riverside AW LLP	SPD Design Policy 11	Lifetime homes	Object	<p>It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over and above existing and emerging policy. Both London Plan Policy 3.8 and emerging DM Policy A4 'Accessible Housing' require all new housing to be built to Lifetime Homes standards. DM Policy A4 also requires residential conversions and changes of use to also achieve these standards where possible.</p> <p>It is therefore suggested that this policy is deleted.</p>	<p>It is agreed that this lifetime homes policy could be deleted because there is adequate policy coverage in DM LP policy A4.</p> <p>Delete SPD Design Policy 11 and supporting text.</p> <p>Regarding conversions, paragraph 3.12 (formerly para 4.11) of the SPD has been amended to read:</p> <p>"....should allow for satisfactory layout, taking account where possible of Lifetime Homes standards and of BS 9266 for design of accessible and adaptable</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					homes when published; and for an adequate range of furniture.....”
H&F Disability Forum	SPD Design Policy 11	Lifetime homes	Object	<p>SPD DP 11: lifetime homes</p> <ul style="list-style-type: none"> It is settled policy that all new build housing should be built to lifetime homes standard but we understand that over time these will be overtaken by the Mayor of London Housing SPG or the BS 9266. <p>In any event we consider policy 11 itself should be re-worded to allow for evolving design standards.</p> <ul style="list-style-type: none"> para 5.28 we wonder if there is an error in this para. We understand that where conversions cannot meet LTH standards that applicants should explain the reasons. We are unclear why this dispensation also applies to new housing. 	<p>Comments noted.</p> <p>The principle of achieving Lifetime Homes standards is already set out and any updates to these standards can be interpreted in the principle of DM LP policy DM A4. There is no need to retain this guidance and it will be deleted.</p> <p>Delete SPD Design Policy 11 and supporting text.</p> <p>Regarding conversions, paragraph 3.12 (formerly para 4.11) of the SPD has been amended to read:</p> <p>”.....should allow for satisfactory layout, taking account where possible of Lifetime Homes standards and of BS 9266 for design of accessible and adaptable homes when published; and for an adequate range of furniture.....”</p>
Capital and Counties on Behalf of Earls Court and Olympia Group	SPD Design Policy 11	Lifetime homes	Object	<p>It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over and above existing and emerging policy. Both London Plan Policy 3.8 and emerging DM Policy A4 'Accessible Housing' require all new housing to be built to Lifetime Homes standards. DM Policy A4 also requires residential conversions and changes of use to also achieve these</p>	<p>Comments noted. The principle of achieving Lifetime Homes standards is already set out and any updates to these standards can be interpreted in the principle of Policy DMA4. There is no need to</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				standards where possible. It is therefore requested that this policy is deleted.	<p>retain this guidance and it will be deleted.</p> <p>Delete SPD Design Policy 11 and supporting text.</p> <p>In connection with DM Policy DM A4 for conversions etc, it is considered helpful to retain reference to Lifetime Homes standards and to the upcoming BS 9266 code of practice for accessible and adaptable housing, as Lifetime Homes is about internal space and BS 9266 is now in the final stage of preparation.</p> <p>Regarding conversions, paragraph 3.12 (formerly para 4.11) of the SPD has been amended to read:</p> <p>”.....should allow for satisfactory layout, <u>taking account where possible of Lifetime Homes standards and of BS 9266 for design of accessible and adaptable homes when published</u>; and for an adequate range of furniture.....”</p>
Ptarmigan Riverside AW LLP	SPD Design Policy 12	Wheelchair accessible homes	Object	It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over and above existing and emerging policy. Both London Plan Policy 3.8 and emerging DM Policy A4 ‘Accessible Housing’ require 10% of new housing to be wheelchair accessible.	<p>Agree, this wheelchair accessible homes policy could be deleted because there is adequate policy coverage in DM LP policy A4.</p> <p>Delete SPD Design Policy 12 and</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				It is therefore suggested that this policy is deleted.	see amendment to Design Policy 13 in response to representations below.
Capital and Counties on Behalf of Earls Court and Olympia Group	SPD Design Policy 12	Wheelchair accessible homes	Object	It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over and above existing and emerging policy. Both London Plan Policy 3.8 and emerging DM Policy A4 'Accessible Housing' require 10% of new housing to be wheelchair accessible. It is therefore requested that this policy is deleted.	Agree, this wheelchair accessible homes policy could be deleted because there is adequate policy coverage in DM LP policy A4. Delete SPD Design Policy 12 and see amendment to Design Policy 13 in response to representations below .
St James Group Ltd and St George Plc	SPD Design Policy 12	Wheelchair accessible homes	Object	Access Reason/Justification: The supporting text at para's 5.31 – 5.32 sets out the following: "5.31 The Mayor of London's draft Housing SPG includes Best Practice Guidance for Wheelchair Accessible Housing that includes the key design considerations that need to be met and an illustrative layout of "Key Features of a Home for a Wheelchair User. 5.32 Development Management policy A4 expects wheelchair accessible homes to be provided in proportion to the tenure mix of the development and therefore the planning application must make clear which of the new dwellings will meet wheelchair accessible standards.	Agree, this wheelchair accessible homes policy could be deleted because there is adequate policy coverage in DM LP policy A4. Delete SPD Design Policy 12 and see amendment to Design Policy 13.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>On this basis, it is considered that appropriate policy guidance exists elsewhere in relation the provision of wheelchair accessible homes. It is therefore recommended that this guidance be deleted.</p> <p>Action: Delete</p>	
<p>H&F Disability Forum</p>	<p>SPD Design Policy 13</p>	<p>Market tenure wheelchair user homes</p>	<p>Support with conditions</p>	<p>PG SPD DP13: market tenure wheelchair accessible homes</p> <p>We welcome this policy but unfortunately we have not seen evidence of the 6 month pre-marketing period achieving sales of market housing or low cost home ownership to wheelchair users within this timeframe.</p> <p>Our concern is to ensure wheelchair accessible market housing and low cost homeownership wheelchair accessible housing is available for future generations of wheelchair users. We consider that such housing should be identified in perpetuity as wheelchair accessible housing but we are unsure whether this point should be addressed here or in DM DPD.</p>	<p>The 10% of units to be wheelchair accessible or adaptable in DMA4 are in perpetuity. SPD Design Policy 13 is more concerned with ensuring that these units are brought to the awareness of those residents in the borough who need them and that they are not simply considered as market housing.</p> <p>Amend Design Policy 13 as follows:</p> <p>Where wheelchair accessible homes for market sale are included in a development they should be first marketed to households who require such a home.</p> <p><u>Where wheelchair accessible homes are included in a development the application should clearly identify the location and tenure of the units. Wheelchair accessible homes for market sale should be first marketed to households who require such a</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<u>home.</u>
St James Group Ltd and St George Plc	SPD Design Policy 13	Market tenure wheelchair user homes	Object	<p>Access</p> <p>Reason/Justification:</p> <p>The requirement to provide a variety of homes suitable for a range of different users is accepted. However, it is not considered reasonable or practical for measures requiring private market sale homes to be marketed in the first instance to wheelchair users. This would place an unnecessary restriction on the ability of developers to market new homes and to provide for the housing needs of a wide range of users.</p> <p>Within new housing developments, planning policy requires that ten percent of all new homes are built to wheelchair accessible standards. It is estimated that wheelchair users represent c. two percent of the UK population only, and therefore, it is reasonable to assume that where a wheelchair user is interested in purchasing a market sale home within a development, then they will be capable of being accommodated in a wheelchair accessible home.</p> <p>Requiring developers to reserve wheelchair accessible homes for wheelchair users would potentially result in homes remaining empty where demand has not been forthcoming from this small sector of the wider population. The guidance as currently drafted therefore would be contrary to the requirements of all levels of planning policy in failing to enable development to address a range of housing needs and by potentially frustrating demand for new homes which may arise from other sectors of the population. This element of the guidance should therefore be deleted.</p>	<p>The council is seeking targeted marketing for at least 6 months. The council wants to be sure that new residential is meeting the needs of all residents of the borough and will retain this requirement, as it considers it fit and reasonable to ensure that wheelchair users are made aware of units coming forward in the borough. This is not considered to be an onerous obligation and will not impact on marketing the majority of units.</p> <p>Amend Design Policy 13 as follows:</p> <p>Where wheelchair accessible homes for market sale are included in a development they should be first marketed to households who require such a home.</p> <p><u>Where wheelchair accessible homes are included in a development the application should clearly identify the location and tenure of the units. Wheelchair accessible homes for market sale should be first marketed to</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				Action: Delete	<u>households who require such a home.</u>
Mr Anthony Williams	SPD Design Policy 14	Assessment of Proposals for Lightwells and Basement Excavation	Support		Support welcome.
St James Group Ltd and St George Plc	SPD Design Policy 15	Proposals for basements	Object	<p>Guidelines for lightwells</p> <p>Reason/Justification:</p> <p>As currently drafted, it is not clear as to whether or not the guidance applies to all basement development or whether it applies to the provision of new basement accommodation in existing dwellings only.</p> <p>Action:</p> <p>Amend as follows:</p> <p>The creation of basement accommodation in existing dwellings beyond the footprint of the dwelling will generally be resisted.</p>	<p>Agreed. Amend SPD Policy 15 as suggested</p> <p>“The creation of basement accommodation <u>in existing dwellings</u> beyond the footprint of the dwelling will generally be resisted.”</p>
Mr Anthony Williams	SPD Design Policy 16	Model Lightwells	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 17	Inserting stairs	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 18	Listed buildings	Support		Support welcome
English Heritage-	SPD Design Policy 18	Listed buildings	Support with conditions	Paragraph 5.79 on page 36 concerning the need to be sure of archaeological value is welcome but we request that consideration	Agreed. Insert para 4.99 (formerly para 5.79) after para 4.92.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
London Region				is given to the location of this content as it will apply to land without listed buildings on as well as to land with listed buildings. Consequently, we have a concern that people might overlook it in this section. It might be better as a new 5.74, or even better as part of Policy 14 concerning the Assessment of proposals for lightwells and basement excavation	<p>Reword Policy SPD Design Policy 18 to read</p> <p><u>“Listed Buildings and Conservation Areas”</u></p> <p>Insert new paragraph after Design Policy 18 as follows:</p> <p><u>“Some heritage assets will be extremely sensitive to changes in level at the threshold of a building especially where the forecourt or front garden space provides the setting for the building or terrace and contributes to the significance of the heritage asset.”</u></p>
Mr Anthony Williams	SPD Design Policy 19	Model Design	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 20	Front lightwells	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 21	Means of escape	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 22	Designation of Buildings of Merit	Support		Support welcome
Hammersmith & Fulham Historic Buildings Group	SPD Design Policy 22	Designation of Buildings of Merit	Support with conditions	<p>Buildings of Merit</p> <p>We welcome the commitment to review the Register of BOMs from time to time in consultation with the relevant amenity societies. (DP22 page 42).</p>	<p>Agreed. Amend bullet point 6 as follows:</p> <p>“Historic association – would include association with important</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				We suggest that association with events should be included in 5.111 bullet point 6, criteria for inclusion on the Register.	local persons <u>and events</u> .”
Mr Anthony Williams	SPD Design Policy 23	Proposals affecting buildings of merit	Support with conditions	This policy should not be used as a purely commercial justification for any demolition or substantial alteration.	Comments noted.
H&F Disability Forum	SPD Design Policy 23	Proposals affecting buildings of merit	Object	<p>PG SPD DP23: proposals affecting buildings of merit.</p> <p>H&F DF is surprised that these policies are not consistent with DM DPD G7 policy para j such as “applications for proposals affecting buildings of merit or listed buildings should achieve accessible and inclusive design wherever possible and practicable”. Currently the EQIA reports a negative impact of this policy on disabled people without a mitigating action.</p> <p>We recommend that PG SPD confirms that DM DPD G7 takes priority.</p> <p>This policy to be re-worded to be consistent with DM DPD G7 policy para j such as “proposals affecting buildings of merit should achieve accessible and inclusive design wherever possible and practicable”.</p>	<p>The DM LP is part of the development plan for the borough and as such will take precedence over the Planning Guidance SPD. It is proposed to amend the SPD to explain in more detail the hierarchy of planning documents.</p> <p>It is not appropriate to refer to accessibility and inclusivity throughout the SPD.</p>
Mr Anthony Williams	SPD Design Policy 24	Shop fronts in context	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 25	Pilasters, console brackets, etc	Support		Support welcome
H&F Disability Forum	SPD Design Policy 26	Listed buildings and buildings of merit	Object	<p>PG SPD DP 26: Listed buildings and buildings of merit</p> <p>H&F DF is surprised that these policies are not consistent with DM DPD G7 policy para j such as “applications for proposals affecting buildings of merit or listed buildings should achieve accessible and</p>	The DM LP is part of the development plan for the borough and as such will take precedence over the Planning Guidance SPD. It is proposed to amend the SPD to

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>inclusive design wherever possible and practicable". Currently the EQIA reports a negative impact of this policy on disabled people without a mitigating action.</p> <p>We recommend that PG SPD confirms that DM DPD G7 takes priority.</p>	<p>explain in more detail the hierarchy of planning documents.</p> <p>It is not appropriate to refer to accessibility and inclusivity throughout the SPD.</p>
H&F Disability Forum	SPD Design Policy 26	Listed buildings and buildings of merit	Support with conditions	<p>PG SPD DP 26: Listed buildings and buildings of merit</p> <p>We support sensitive restoration of listed buildings and buildings of merit with period character. However, this policy should be reworded to be consistent with DM DPD G7 and not rule out achieving "accessible and inclusive design wherever possible and practicable" in buildings open to the public.</p>	<p>Support welcome.</p> <p>It is not appropriate to refer to accessibility and inclusivity throughout the SPD.</p>
Mr Anthony Williams	SPD Design Policy 27	Access	Support		Support welcome.
H&F Disability Forum	SPD Design Policy 27	Access	Support	<p>PG SPD DP 27 Access [shop front design]</p> <p>We welcome this policy.</p>	Support welcome.
Mr Anthony Williams	SPD Design Policy 28	Canopies & blinds	Support		Support welcome.
Mr Anthony Williams	SPD Design Policy 29	Burglar alarms & fire alarms	Support		Support welcome.
Mr Anthony Williams	SPD Design Policy 30	Roller shutters	Support		Support welcome.
Mr Anthony Williams	SPD Design Policy 31	Advertisements	Support		Support welcome.
English Heritage-London Region	SPD Design Policy 31	Advertisements	Object	<p>English Heritage requests a cross-reference to SPD Policy 60 concerning advertising in conservation areas either in SPD Policy 31 or its justification paragraphs on page 50</p>	<p>No amendment necessary.</p> <p>SPD Policy 60 concerns itself</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					primarily with advertisement hoardings, poster panels and shrouds, and is not directly related to shopfront design.
Mr Anthony Williams	SPD Design Policy 32	Land Uses	Support		Support welcome.
A2 Dominion Group	SPD Design Policy 32	Land Uses	Object	<p>This policy does not read as a policy or set out a test for applicants to meet, rather it states that changes in land uses will be 'carefully considered' and would be more appropriate as supporting text than as a policy. As worded this does not provide guidance for applicants and should be deleted.</p> <p>We acknowledge that the mixture of uses within a conservation area can be one component of character. However, to ensure their long-term prosperity and that areas do not become blighted, conservations areas must evolve in response to changing market demands. The NPPF states that heritage assets should be put to viable uses consistent with their conservation. Should this policy be retained it should be amended to reflect the provisions of the NPPF.</p>	<p>Agreed. Add the following sentence to SPD Policy 32:</p> <p><u>"Where a change of use is proposed, it should be consistent with the conservation of the asset."</u></p>
Mr Anthony Williams	SPD Design Policy 33	Alterations to Buildings	Support		Support welcome.
Ptarmigan Riverside AW LLP	SPD Design Policy 33	Alterations to Buildings	Object	<p>It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over and above emerging DM Policy G3 'Alterations and extensions', which requires alterations and extensions to buildings to be compatible with the scale and character of existing development, their neighbours and their setting.</p> <p>The only additional guidance provided within Policy 33 is the requirement for alterations to buildings not to have a significant</p>	<p>No amendment necessary.</p> <p>SPD Design Policy 33 relates to both DM LP policies DM G3 and DM G7, but has more detailed requirements in relation to conservation areas.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>effect on the character of conservation areas. This requirement is however handled within other existing and emerging policies including London Plan Policy 7.8 and DM Policy G7 'Heritage and Conservation'.</p> <p>It is therefore suggested that this policy is deleted.</p>	
H&F Disability Forum	SPD Design Policy 33	Alterations to Buildings	Object	<p>PG SPD DP 33 alterations to buildings:</p> <p>This policy to be re-worded to be consistent with DM DPD G7 policy para j such as "applications for alterations to buildings should achieve accessible and inclusive design wherever possible and practicable".</p>	It is not appropriate to refer to accessibility and inclusivity throughout the SPD.
English Heritage-London Region	SPD Design Policy 33	Alterations to Buildings	Object	Heritage requests that paragraph 5.197 include reference to the importance of setting to a conservation area (page 57)	No change. The importance of setting of a conservation area is covered by SPD Design Policy 50
Mr Anthony Williams	SPD Design Policy 34	Roof Extensions and Materials	Support		Support welcome.
Mr Anthony Williams	SPD Design Policy 35	Hip to Gable Roof Extensions	Support		Support welcome.
Mr Anthony Williams	SPD Design Policy 36	Extensions	Support		Support welcome.
English Heritage-London Region	SPD Design Policy 36	Extensions	Object	<p>English Heritage does consider that there may be opportunities for contemporary design that conserves and enhances a conservation area and we recommend that allowance is made for this in the justification paragraphs for SPD Design Policy 36</p>	<p>No change to policy necessary, although in para 4.223 "would" will be changed to "will".</p> <p>The importance of setting of a conservation area is covered by SPD Design Policy 50.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Mr Anthony Williams	SPD Design Policy 37	Lightwells	Support		Support welcome.
Mr Anthony Williams	SPD Design Policy 38	Brickwork and Stonework, Painting, Render and Cladding	Support		Support welcome.
English Heritage-London Region	SPD Design Policy 38	Brickwork and Stonework, Painting, Render and Cladding	Object	Again in paragraph 5.210 on page 59, English Heritage would not support the approach outlined in the final sentence as less satisfactory and we would prefer to see this sentence removed	Agreed. Remove last sentence which reads: “ A less satisfactory ... to match the original brick ”.
English Heritage-London Region	SPD Design Policy 38	Brickwork and Stonework, Painting, Render and Cladding	Object	English Heritage requests that paragraph 5.210 on page 59 indicate that planning permission may be needed for changes to brickwork and stonework and that consultation with the Borough’s conservation officer should be sought	Agreed. Add as new last sentence to para 4.226 (formerly para 5.210): “ <u>Planning permission may be needed for changes to brickwork and stonework and that consultation with the Borough’s conservation officer should be sought.</u> ”
English Heritage-London Region	SPD Design Policy 39	Windows and Original Features	Object	English Heritage requests that paragraph 5.213 indicate that planning permission may be required if an Article 4 Direction has been placed on a conservation area	Agreed. Add as new last sentence to para 4.229 (formerly para 5.213): “ <u>Planning permission may be needed for replacement windows and that consultation with the Borough’s conservation officer should be sought.</u> ”
Mr Anthony Williams	SPD Design Policy 40	Adapting for Climate change	Support		Support welcome

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Mr Anthony Williams	SPD Design Policy 41	Other Additions	Support		Support welcome
English Heritage-London Region	SPD Design Policy 41	Other Additions	Object	English Heritage advises, in respect of paragraph 5.220 on page 61 that some alternatives such as powder coated aluminium may also be acceptable and we recommend that the justification paragraphs include scope for these	Agreed. In para 4.236 (formerly para 5.220) insert at start of second sentence: “ <u>Some alternatives such as powder coated aluminium may be acceptable but the use of PVCu.....</u> ”
Mr Anthony Williams	SPD Design Policy 42	Shop Surrounds	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 43	Shopfronts	Support		Support welcome
H&F Disability Forum	SPD Design Policy 43	Shopfronts	Observations	Shopfronts Para 5.229: is LDF draft SPD shop front design guidance available? We have not seen this.	Shopfront guidance is included in the Planning Guidance SPD – see SPD Design Policy 24 and others. Para 4.245 (formerly para 5.229) will be amended to avoid ambiguity to read: “More detailed guidance can be found in the Development Management DPD policy G4 and in SPD Design Policies 24 to 31 council’s Local Development Framework, Draft Supplementary Planning Document, Shopfront Design Guidance 2012”.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Mr Anthony Williams	SPD Design Policy 44	Shop Fascias, Signage and Lighting	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 45	Shop Security Shutters and Canopies	Support		Support welcome
English Heritage-London Region	SPD Design Policy 45	Shop Security Shutters and Canopies	Object	Similarly, we recommend that the option of reinforced glass or toughened glass be included in the justification paragraphs for SPD Design Policy 45 concern Shop Security Shutters and Canopies on page 63	SPD Policy 45 deals with preferred options for the design and location of roller shutters.
Mr Anthony Williams	SPD Design Policy 46	Opportunity Sites	Support		Support welcome
A2 Dominion Group	SPD Design Policy 46	Opportunity Sites	Object	<p>Paragraph 5.239 identifies opportunity sites as those where 'improvements are desirable'. It appears that the identification of opportunity sites will be at officers discretion. For clarity and to provide certainty to land owners/ developers, it would be helpful for opportunity sites to be clearly defined and ideally set out in an easily updatable, published list.</p> <p>This policy aims for new buildings to achieve a 'harmonious relationship with their neighbours'. 'Harmonious' is a subjective word, capable of interpretation in any number of ways. Furthermore, this policy assumes that neighbouring sites set an appropriate precedent for future development. On many sites this is not the case and the redevelopment of an opportunity site provides the catalyst to improve an area, setting a new precedent of high quality development going forward. It would be more appropriate for the policy to aspire for new buildings to achieve an appropriate relationship with the surrounding townscape.</p>	<p>See para 4.256 (formerly para 5.240) which states that Opportunity Sites are identified in the Conservation Area Character Profiles.</p> <p>"Neighbouring buildings" refers to the surrounding context of conservation area buildings. It is suggested in para 4.258 (formerly para 5.242) that proper consideration of elements of scale proportion massing height alignment and use of materials will result in buildings that have a harmonious relationship with their context. This follows national guidance.</p>
St James Group	SPD Design	Opportunity Sites	Object	Conservation Area Guidelines	SPD Design Policy 46 relates

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Ltd and St George Plc	Policy 46			<p>Reason/Justification:</p> <p>This guidance is not required as it repeats guidance that is already appropriately set out within the Core Strategy and emerging Development Management DPD.</p> <p>For instance, Borough Wide Strategic Policy - BE1 Built</p> <p>Environment states:</p> <p>“all development within the borough, including in the regeneration areas should create a high quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that considers how good design, quality public realm, landscaping and land use can be integrated to help regenerate places.”</p> <p>We therefore do not believe there is a requirement for this SPD to repeat adopted policy. We therefore seek for this policy guidance to be removed.</p> <p>Action: Delete</p>	<p>specifically to Opportunity sites as identified in the Conservation Area character profiles where enhancement of the conservation area is sought.</p> <p>Policies on new build elsewhere in the Core Strategy and DM Local Plan relate to new development more generally. This policy relates specifically to opportunity sites</p>
Mr Anthony Williams	SPD Design Policy 47	Building Line	Support		Support welcome
Ptarmigan Riverside AW LLP	SPD Design Policy 47	Building Line	Object	<p>We are concerned that this policy provides a generic statement which is too simplistic when applied literally. The aim of the policy appears to be the protection of the relationship between existing buildings, and in turn the local character of areas. On this basis, it is considered that this is adequately controlled through existing planning policy, such as London Plan Policy 7.4 and emerging DM Policy G1 ‘Design of new build’ which requires new development to respect ‘local design context, including the prevailing rhythm</p>	<p>SPD Design Policy 47 is an expansion of the policy issue included in both DM Policy G1 and G7. It relates specifically to building alignment in streets with a consistent frontage which is often the case in many of our conservation areas, and requires</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>and articulation of frontages...'</p> <p>It is therefore suggested that this policy is deleted.</p>	<p>new infill development to follow this alignment thereby preserving the character of the area. It follows long-standing Central Government guidance and English Heritage good practice advice and is included here for completeness.</p> <p>No amendment necessary</p>
H&F Disability Forum	SPD Design Policy 47	Building Line	Support with conditions	PG SPD DP 47 building line: it would be helpful to mention that the building line is useful guide for blind people who use canes to navigate the space.	Such a comment would be out of context in a policy concerned with appearance.
A2 Dominion Group	SPD Design Policy 47	Building Line	Object	<p>This policy requires new buildings to respect the dominant building line on a street frontage. However, the dominant street frontage may not be the most appropriate in the context of wider redevelopment aspirations or the historic street pattern. Additional flexibility should be incorporated in to this provision by including 'where appropriate' at the end of the sentence.</p>	<p>The underlying objective for development in conservation is the preservation or enhancement of character or appearance of the conservation area. If, in a rare instance, by respecting the building line, this underlying objective was not achieved, the policy would be secondary, and would be overridden by the main policy consideration. This would be the case with most of the policies in this document.</p> <p>No amendment necessary</p>
Capital and Counties on Behalf of Earls Court and Olympia Group	SPD Design Policy 47	Building Line	Object	<p>We are concerned that this policy provides a generic statement which is too simplistic when applied literally. The aim of the policy appears to be the protection of the relationship between existing buildings, and in turn. the local character of areas. On this basis, it is considered that this is adequately controlled through existing</p>	<p>SPD Design Policy 47 is an expansion of the policy issue included in both DM Policy G1 and G7. It relates specifically to building alignment in streets with a</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>planning policy, such as London Plan Policy 7.4 and emerging DM Policy G1 'Design of new build' which requires new development to respect 'local design context, including the prevailing rhythm and articulation of frontages ... ' It is therefore requested that this policy is deleted.</p>	<p>consistent frontage which is often the case in many of our conservation areas, and requires new infill development to follow this alignment thereby preserving the character of the area. It follows long-standing Central Government guidance and English Heritage good practice advice and is included here for completeness.</p> <p>No amendment necessary.</p>
<p>Helical Bar and Aviva</p>	<p>SPD Design Policy 48</p>	<p>Building Height</p>	<p>Object</p>	<p>The blanket approach to building height being proposed is in the draft policy of requiring that any new development should respect the general townscape of each area is too broad in its approach and cannot be appropriate in all cases. The statutory requirement in a Conservation Areas is that any proposal must either preserve or enhance the character of that area.</p> <p>Draft Policy 48 as currently worded adds nothing to the adopted Core Strategy and does not reflect the statutory requirement. Planning guidance is already provided by the proposed Design Policy 50. Clear guidance is already provided by the proposed Design Policy 50. Draft Policy 48 should therefore be deleted.</p>	<p>SPD Policy 48 lies within the parent policies in the Core Strategy and DM Policy G1 and G7. It relates specifically to building height in streets with a consistent frontage height which is often the case in many of our conservation areas, and requires new infill development to follow the prevailing height and scale thereby preserving the character of the area. It follows long-standing Central Government guidance and English Heritage good practice advice and is included here for completeness. SPD Design Policy 50 deals with a separate issue of setting. The policy is applicable to new development outside of a conservation area but affecting its setting.</p> <p>Delete paragraph 4.264 (formerly</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p>para 5.247). Add new supporting paragraphs as follows:</p> <p><u>“In many parts of the Boroughs conservation areas where there is a consistency of scale and height, any new development should respect the generally prevailing height, thereby preserving the character of the area.”</u></p> <p><u>“It is acknowledged that across some of the conservation areas, there is a mix of building heights and the judgement to be made will be one aided by an analysis of both the immediate and surrounding townscape context.”</u></p>
<p>Ptarmigan Riverside AW LLP</p>	<p>SPD Design Policy 48</p>	<p>Building Height</p>	<p>Object</p>	<p>The principle of Design Policy 48 which seeks to ensure new development respects surrounding townscape is supported. However, it is considered that the principle of this policy is already addressed within emerging DM Policy G1 ‘Design of new build’, which requires new development to respect historical context, townscape setting and sense of place.</p> <p>As a result it is considered that this policy is unnecessary and does not provide any additional clarity or guidance over and above existing and emerging policy. On this basis the policy should be deleted.</p>	<p>SPD Policy 48 lies within the parent policies in the Core Strategy and DM Policy G1 and G7. It relates specifically to building height in streets with a consistent frontage height which is often the case in many of our conservation areas, and requires new infill development to follow the prevailing height and scale thereby preserving the character of the area. It follows long-standing Central Government guidance and English Heritage good practice advice and is included here for completeness.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p>Add new supporting paragraphs as follows:</p> <p><u>“In many parts of the Boroughs conservation areas where there is a consistency of scale and height, any new development should respect the generally prevailing height, thereby preserving the character of the area.”</u></p> <p><u>“It is acknowledged that across some of the conservation areas, there is a mix of building heights and the judgement to be made will be one aided by an analysis of both the immediate and surrounding townscape context.”</u></p>
English Heritage-London Region	SPD Design Policy 48	Building Height	Object	English Heritage requests a reference to our joint publication with CABE Guidance on Tall Buildings (July, 2007) in the supporting text to SPD Design Policy 48	SPD Policy 48 relates to building height generally and not tall buildings specifically.
Hammersmith Society	SPD Design Policy 48	Building Height	Observations	Design Policy 48 Building Height .Para 5.247 could usefully include a cross-reference to Policy GM2 (Submission Amendments June 2012 version) on Tall Buildings.	As above. SPD Policy 48 relates to building height generally and not tall buildings specifically.
A2 Dominion Group	SPD Design Policy 48	Building Height	Object	In requiring new development to respect the general townscape of each area, no provision is made for future redevelopment aspirations that may aim for tall buildings in specific circumstances that will change the prevailing character of the townscape. Each site should be assessed on its merits and in light of existing character and context and the future aspirations for an area.	SPD Policy 48 lies within the parent policies in the Core Strategy and DM Policy G1 and G7. It relates specifically to building height in streets with a consistent frontage height which is often the case in many of our conservation areas,

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					<p>and requires new infill development to follow the prevailing height and scale thereby preserving the character of the area. It follows long-standing Central Government guidance and English Heritage good practice advice and is included here for completeness.</p> <p>Add new supporting paragraphs as follows:</p> <p><u>“In many parts of the Borough’s conservation areas where there is a consistency of scale and height, any new development should respect the generally prevailing height, thereby preserving the character of the area.”</u></p> <p><u>“It is acknowledged that across some of the conservation areas, there is a mix of building heights and the judgement to be made will be one aided by an analysis of both the immediate and surrounding townscape context.”</u></p>
<p>Capital and Counties on Behalf of Earls Court and Olympia Group</p>	<p>SPD Design Policy 48</p>	<p>Building Height</p>	<p>Object</p>	<p>The principle of Design Policy 48 which seeks to ensure new development respects surrounding townscape is supported. However, it is considered that the principle of this policy is already addressed within emerging DM Policy G1 'Design of new build', which requires new development to respect historical context, townscape setting and sense of place. As a result it is considered</p>	<p>SPD Policy 48 lies within the parent policies in the Core Strategy and DM Policy G1 and G7. It relates specifically to building height in streets with a consistent frontage height which is often the case in</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>that this policy is unnecessary and does not provide any additional clarity or guidance over and above existing and emerging policy. On this basis the policy should be deleted.</p>	<p>many of our conservation areas, and requires new infill development to follow the prevailing height and scale thereby preserving the character of the area. It follows long-standing Central Government guidance and English Heritage good practice advice and is included here for completeness.</p> <p>Add new supporting paragraphs as follows:</p> <p><u>“In many parts of the Borough’s conservation areas where there is a consistency of scale and height, any new development should respect the generally prevailing height, thereby preserving the character of the area.”</u></p> <p><u>“It is acknowledged that across some of the conservation areas, there is a mix of building heights and the judgement to be made will be one aided by an analysis of both the immediate and surrounding townscape context.”</u></p>
<p>St James Group Ltd and St George Plc</p>	<p>SPD Design Policy 48</p>	<p>Building Height</p>	<p>Object</p>	<p>Conservation Area Guidelines</p> <p>Reason/Justification:</p> <p>This guidance is not required as it repeats guidance that is already appropriately set out within the Core Strategy and emerging</p>	<p>SPD Policy 48 lies within the parent policies in the Core Strategy and DM Policy G1 and G7. It relates specifically to building height in streets with a consistent frontage height which is often the case in</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>Development Management DPD.</p> <p>For example, Borough Wide Strategic Policy – BE1 Built Environment states:</p> <p>“all development within the borough, including in the regeneration areas should create a high quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that considers how good design, quality public realm, landscaping and land use can be integrated to help regenerate places.” The guidance should therefore be deleted.</p> <p>Action: Delete</p>	<p>many of our conservation areas, and requires new infill development to follow the prevailing height and scale thereby preserving the character of the area. It follows long-standing Central Government guidance and English Heritage good practice advice and is included here for completeness.</p> <p>Add new supporting paragraphs as follows:</p> <p><u>“In many parts of the Borough’s conservation areas where there is a consistency of scale and height, any new development should respect the generally prevailing height, thereby preserving the character of the area.”</u></p> <p><u>“It is acknowledged that across some of the conservation areas, there is a mix of building heights and the judgement to be made will be one aided by an analysis of both the immediate and surrounding townscape context.”</u></p>
Mr Anthony Williams	SPD Design Policy 49	Landmarks	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 50	Setting of the Conservation Area	Support		Support welcome

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Ptarmigan Riverside AW LLP	SPD Design Policy 50	Setting of the Conservation Area	Object	<p>It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over and above existing and emerging policies including London Plan Policy 7.8 and DM Policy G7 'Heritage and Conservation'.</p> <p>It is therefore suggested that this policy is deleted.</p>	SPD Policy 50 adds detail to the broad policy statement on setting found in the Core Strategy and DM policy G7 and is therefore considered to be both justified and necessary.
English Heritage-London Region	SPD Design Policy 50	Setting of the Conservation Area	Support with conditions	English Heritage welcomes the reference to the English Heritage guidance document The Setting of Heritage Assets (October, 2011) in paragraph 5.253 but would recommend inclusion of the definition of setting from page 4 of this document in paragraph 5.249	Para. 4.268 (formerly para 5.249) includes a definition. The definition quoted in " The Setting of Heritage Assets" publication is from PPS5 which has been superseded by the NPPF.
Land Securities	SPD Design Policy 50	Setting of the Conservation Area	Object	<p>The wording of this policy is confusing, the following is suggested as an alternative:</p> <p>'When new buildings are proposed, they must be carefully designed to maintain or enhance the setting of a conservation area. The significance of the contribution to the setting of the conservation area should be proportionate to the importance of the asset.'</p> <p>This amendment would bring SPD Design Policy 50 in line with Chapter 12 of the National Planning Policy Framework (NPPF) - 'Conserving and enhancing the historic environment'.</p>	<p>No amendment necessary</p> <p>SPD Policy 50 correctly refers to the key assessment which is the contribution of the setting to the significance of the conservation area.</p>
A2 Dominion Group	SPD Design Policy 50	Setting of the Conservation Area	Object	This policy repeats the provisions of the NPPF (section 12; pages 30-32) and does not provide new policy or guidance. The NPPF requires the production of succinct local plans (paragraph 17; page 5). Whilst this policy is within an SPD which will not form part of the Development Plan, once adopted, it will be a material consideration in determining planning applications and, in line with the aspirations of the NPPF, should be succinct. In our view, this	SPD Policy 50 adds detail to the broad policy statement on setting found in the Core Strategy and DM LP policy G7 and is therefore considered to be both justified and necessary.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				policy does not add anything that is not already covered by the NPPF and should be deleted.	
Capital and Counties on Behalf of Earls Court and Olympia Group	SPD Design Policy 50	Setting of the Conservation Area	Object	It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over and above existing and emerging policies including London Plan Policy 7.8 and DM Policy G7 'Heritage and Conservation'. It is therefore requested that this policy is deleted.	SPD Policy 50 adds detail to the broad policy statement on setting found in the Core Strategy and DM LP policy G7and is therefore considered to be both justified and necessary.
St James Group Ltd and St George Plc	SPD Design Policy 50	Setting of the Conservation Area	Object	<p>Conservation Area Guidelines</p> <p>Reason/Justification:</p> <p>This guidance is not required as it repeats guidance that is already appropriately set out within the Core Strategy and emerging Development Management DPD.</p> <p>Core Strategy Borough Wide Strategic Policy - BE1 Built Environment identifies that development throughout the borough should “protect and enhance the character, appearance and setting of the borough’s conservation areas”. The guidance should therefore be deleted.</p> <p>Action: Delete</p>	SPD Policy 50 adds detail to the broad policy statement on setting found in the Core Strategy and DM LP policy G7and is therefore considered to be both justified and necessary.
Mr Anthony Williams	SPD Design Policy 51	Views	Support		Support welcome
Ptarmigan Riverside AW LLP	SPD Design Policy 51	Views	Object	It is considered that the wording of this policy is too generic and does not provide any useful policy guidance over and above existing planning policy. Emerging DM Policy G6 'Views and landmarks of local importance' provides more detailed guidance in respect of views, whilst London Plan Policy 7.9 requires regeneration schemes to reinforce the qualities that make heritage assets significant, including views. It is therefore suggested that	SPD Design Policy 51 relates specifically to views within and affecting conservation areas. It would therefore include more local views in addition to those identified in DM LP Policy G6, and would include the views identified in the

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				this policy is deleted.	conservation area character profiles. Amend policy wording to read: "New development should not adversely affect key views <u>within</u> , into or out of Conservation Areas."
Land Securities	SPD Design Policy 51	Views	Support	It is acknowledged within this policy that 'New development should not ADVERSELY affect key views into or out of Conservation Areas' [C&P emphasis]. This approach has been established over many years and is supported by the provisions of the NPPF. As such, Chase & Partners consider it to be appropriate.	Support welcome
Capital and Counties on Behalf of Earls Court and Olympia Group	SPD Design Policy 51	Views	Object	It is considered that the wording of this policy is too generic and does not provide any useful policy guidance over and above existing planning policy. Emerging DM Policy G6 'Views and landmarks of local importance' provides more detailed guidance in respect of views, whilst London Plan Policy 7.9 requires regeneration schemes to reinforce the qualities that make heritage assets significant, including views. It is therefore suggested that this policy is deleted.	SPD Design Policy 51 relates specifically to views within and affecting conservation areas. It would therefore include more local views in addition to those identified in DM Policy G6, and would include the views identified in the conservation area character profiles. Amend policy wording to read: "New development should not adversely affect key views <u>within</u> , into or out of Conservation Areas."
St James Group Ltd and St George Plc	SPD Design Policy 51	Views	Object	Conservation Area Guidelines Reason/Justification:	SPD Design Policy 51 relates specifically to views within and affecting conservation areas. It

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>This guidance is not required as it repeats guidance that is already appropriately set out within the Core Strategy and emerging Development Management DPD.</p> <p>Core Strategy Borough Wide Strategic Policy - BE1 Built Environment identifies that development throughout the borough should “protect and enhance the character, appearance and setting of the borough’s conservation areas”. The guidance should therefore be deleted.</p>	<p>would therefore include more local views in addition to those identified in DM Policy G6, and would include the views identified in the conservation area character profiles.</p> <p>Amend policy wording to read:</p> <p>“New development should not adversely affect key views <u>within</u>, into or out of Conservation Areas.”</p>
Mr Anthony Williams	SPD Design Policy 52	Boundary Treatment	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 53	Forecourt Parking & Vehicular Crossovers	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 54	Disabled Access	Support		Support welcome
H&F Disability Forum	SPD Design Policy 54	Disabled Access	Object	<p>PG SPD DP 54 Historic buildings: disabled access</p> <p>This policy to be re-worded to be consistent with DM DPD G7 policy para j such as “applications for development affecting historic buildings should achieve accessible and inclusive design wherever possible and practicable”.</p> <p>Need to send consistent message through buildings of merit; historic buildings, heritage assets and conservation issues generally. We also recommend that the EQIA be amended to reflect this change.</p>	<p>Agreed. Amend policy to read:</p> <p><u>“Applications for development affecting heritage assets should achieve accessible and inclusive design wherever possible and practicable. Provision for suitable access for disabled people to historic buildings is encouraged.”</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
English Heritage-London Region	SPD Design Policy 54	Disabled Access	Observations	English Heritage recommends including a reference our guidance document Easy Access to Historic Buildings in paragraph 5.267 concerning SPD Design Policy 54	Agreed. Add new sentence at end of paragraph 4.286 (formerly para 5.267): “ <u>The English Heritage publication – Easy Access to Historic buildings provides useful guidance.</u> ”
H&F Disability Forum	SPD Design Policy 55	Landscape and Floorscape	Observations	PG SPD DP 55 landscape Para 5.272 and 273 who verifies that dropped kerbs and tactile paving and pedestrian crossings are installed correctly?	If it's public highway then the council would verify this.
English Heritage-London Region	SPD Design Policy 55	Landscape and Floorscape	Observations	English Heritage recommends a reference to our guidance document Streets for All in the justification paragraphs for SPD Design Policy 55 on page 68	Agreed. Add at end of para 4.287 (formerly para 5.268): “ <u>Guidance on streetscape design and the appropriate use of materials in historic settings can be found in the English Heritage publication – Streets for All</u> ”
Mr Anthony Williams	SPD Design Policy 56	Street Furniture	Support		Support welcome
Mr Anthony Williams	SPD Design Policy 57	Open Spaces	Support		Support welcome
H&F Disability Forum	SPD Design Policy 57	Open Spaces	Observations	DP 57 Open space [in conservation areas] : We are unsure how this links with DM DPD Policy E1 Access to Parks and Open Spaces and the Mayor of London SPG Providing for Children and Young People's Play and recreation. In any event this policy should ensure everyone including disabled children, older people and disabled adults are able to use public and private open spaces within conservation areas.	SPD Policy 57 relates to the townscape qualities of a proposal affecting open spaces in a conservation area. Delete Design Policy 57 and reword as follows:

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>“Development in a conservation area which is also within or adjacent to open space should respect and Where development satisfies policies in the LDF then it should be carefully integrated into the layout and designed to complement the character of the open space and conservation area.”</u></p>
<p>Mr Anthony Williams</p>	<p>SPD Design Policy 58</p>	<p>Trees</p>	<p>Support</p>		<p>Support welcome</p>
<p>H&F Disability Forum</p>	<p>SPD Design Policy 58</p>	<p>Trees</p>	<p>Support with conditions</p>	<p>PG SPD DP 58 Trees: We suggest an additional para that trees should not impede space for wheelchair users or people with scooters or buggies on pavement</p>	<p>Agreed. Add new wording to para 4.302 (formerly para 5.283):</p> <p><u>“... positive contribution to the street scene and where the width of the footway and underground services allow.....”</u></p>
<p>A2 Dominion Group</p>	<p>SPD Design Policy 58</p>	<p>Trees</p>	<p>Object</p>	<p>The policy and paragraph 5.281 state that all trees in conservation areas are protected. It is not our understanding that this is correct. The Town and Country Planning (Trees) Regulations 2012 state the following:</p> <p>15 (1) Section 211(1) (preservation of trees in conservation areas) shall not apply to–</p> <p>(d) the cutting down or uprooting–</p> <p>(i) of a tree whose diameter does not exceed 75 millimetres; or</p> <p>(ii) where carried out for the sole purpose of improving the growth of other trees, of as tree whose diameter does not exceed 100</p>	<p>Reword Design Policy 58 as follows:</p> <p>“All trees in conservation areas are protected. To protect trees in conservation areas. Additional tree planting is encouraged in appropriate locations.”</p> <p>Replace first two sentences of paragraph 4.300 (formerly para 5.281) with the following:</p> <p><u>“Most trees in a conservation area,</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>millimetres; or</p> <p>(e) the topping or lopping of a tree whose diameter does not exceed 75 millimetres.</p> <p>(2) For the purpose of this regulation–</p> <p>(a) where a tree has more than one stem at a point 1.5 metres above the natural ground level its diameter shall be treated for the purposes of paragraph (1)(d)(i) and (e) or paragraph (1)(d)(ii) as exceeding 75 millimetres or 100 millimetres respectively, if any stem when measured over its bark at that point exceeds 75 millimetres or 100 millimetres respectively;</p> <p>(b) in any other case, the diameter of a tree shall be ascertained by measurement, over the bark of the tree, at a point 1.5 metres above the natural ground level</p> <p>The policy should be amended to reflect the provisions of the Town and Country Planning (Trees) Regulations 2012. It would also be helpful to direct users to the relevant legislation.</p> <p>Further to the above, the assessment of whether trees should be planted should be based on a review of the character of an area. For example, in certain locations it may be appropriate in character terms to provide a strong urban edge that reinforces buildings lines and historic street patterns. Whether trees should be planted should be assessed on a site by site basis.</p>	<p><u>including those in rear gardens, are protected [see the Town and Country Planning [Trees] Regulations 2012]. “</u></p>
<p>Hammersmith & Fulham Historic Buildings Group</p>	<p>SPD Design Policy 59</p>	<p>Continuity and Historic Names</p>	<p>Support</p>	<p>Continuity and Historic Names</p> <p>We welcome this support for the retention of historic names, and addition of date plaques and historic information plaques. (DP59 page 70</p>	<p>Support welcome</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Mr Anthony Williams	SPD Design Policy 60	Advertisement Hoardings, Poster Panels and Shrouds	Support		Support welcome
Capital and Counties on Behalf of Earls Court and Olympia Group	SPD Design Policy 60	Advertisement Hoardings, Poster Panels and Shrouds	Object	<p>This policy proposes a blanket approach and does not clarify the circumstances in which advertisement hoardings, poster panels and shrouds will be found unacceptable and refused. The supporting text refers to two key factors in the assessment of such proposals (impact on visual amenity and public safety). The policy wording should incorporate these key factors and it is therefore considered that Design Policy 60 should be amended to accurately reflect planning considerations.</p> <p>Suggested wording:</p> <p>"The Council will refuse consent for advertisement hoardings, poster panels and high level signs that are harmful to visual amenity or public safety. Shrouds will only be permitted in tightly defined circumstances."</p>	<p>Agreed. Amend wording to Policy SPD Policy 60:</p> <p>"The Council will refuse consent for advertisement hoardings, poster panels and high level signs <u>that are harmful to visual amenity or public safety</u>. Shrouds will only be permitted in tightly defined circumstances."</p>
Mr Anthony Williams	SPD Design Policy 61	Estate Agents Boards	Support		Support welcome
A2 Dominion Group	SPD Design Policy 62	Information requirements for applications for consent affecting heritage assets	Object	<p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.</p>	<p>No amendment necessary.</p> <p>Applicants for development affecting heritage assets are required to submit a heritage statement which describes the significance if the heritage asset affected. A Validation Checklist has been prepared in accordance with the requirements of the NPPF. The list will be available on the Council</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					website.
A2 Dominion Group	SPD Design Policy 63	Policies guiding the determination of applications for consent relating to all heritage assets	Object	<p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document.</p> <p>Further to the above, this policy repeats the provisions of the NPPF (section 12; pages 30-32) and does not provide new policy or guidance. The NPPF requires the production of succinct local plans (paragraph 17; page 5). Whilst this policy is within an SPD which will not form part of the Development Plan, once adopted, it will be a material consideration in determining planning applications and, in line with the aspirations of the NPPF, should be succinct. In our view, this policy does not add anything that is not already covered by the NPPF or could be included within an easily updatable local validation list and should be deleted.</p>	<p>No amendment necessary.</p> <p>Applicants for development affecting heritage assets are required to submit a heritage statement which describes the significance if the heritage asset affected. A Validation Checklist has been prepared in accordance with the requirements of the NPPF. The list will be available on the Council website.</p>
Ptarmigan Riverside AW LLP	SPD Design Policy 64	Policies guiding the consideration of applications for consent relating to designated heritage assets	Object	It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over emerging DM Policy G7 'Heritage and Conservation' which already identifies a presumption in the favour of conservation and restoration of heritage assets, as well as the more significant the asset, the greater the presumption in favour of its conservation will be. It is therefore suggested that this policy is deleted.	Disagree on the basis that the real value of this policy is the supporting text which provides detail not in the DM LP.
A2 Dominion Group	SPD Design Policy 64	Policies guiding the consideration of applications for consent relating to	Object	This policy repeats the provisions of the NPPF (paragraph 133) and does not provide new policy or guidance. The NPPF requires the production of succinct local plans (paragraph 17; page 5). Whilst this policy is within an SPD which will not form part of the Development Plan, once adopted, it will be a material	Disagree on the basis that the real value of this policy is the supporting text which provides detail not in the DM LP

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
		designated heritage assets		consideration in determining planning applications and, in line with the aspirations of the NPPF, should be succinct. In our view, this policy does not add anything that is not already covered by the NPPF and should be deleted.	
Capital and Counties on Behalf of Earls Court and Olympia Group	SPD Design Policy 64	Policies guiding the consideration of applications for consent relating to designated heritage assets	Object	It is considered that this policy is unnecessary and does not provide any additional clarity or guidance over emerging DM Policy G7 'Heritage and Conservation' which already identifies a presumption in the favour of conservation and restoration of heritage assets, as well as the more significant the asset, the greater the presumption in favour of its conservation will be. It is therefore requested that this policy is deleted.	Disagree on the basis that the real value of this policy is the supporting text which provides detail not in the DM LP
A2 Dominion Group	SPD Design Policy 65	Policy policies guiding the recording of information related to heritage assets	Object	This policy does not read as a policy or set out a test for applicants to meet, rather it is a statement of intent in the determination of application. This would be more appropriate as supporting text than as a policy. As worded this does not provide guidance for applicants or a test to be met in preparing development proposals and should be deleted.	<p>Agree to reword Design Policy 65 by replacing existing text with first sentence of para 4.366 (formerly para 5.347) as follows:</p> <p><u>“Where the loss of the whole or a material part of a heritage asset’s significance is justified, the council will require the developer to record and advance understanding of the significance of the heritage asset before it is lost, using planning conditions or obligations as appropriate”.</u></p> <p>Amend para 4.366 (formerly para 5.347) by deleting first sentence and replacing with a new sentence, Also amend second sentence as follows:</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>"Where the loss of the whole or a material part of a heritage asset's significance is justified, the council will require the developer to record and advance understanding of the significance of the heritage asset before it is lost, using planning conditions or obligations as appropriate. A documentary record of the past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the past will not be a factor in deciding whether a proposal that would result in a heritage asset's destruction should be given consent. The extent of the requirement to record the past should be proportionate to the nature and level of the asset's significance"</u>.</p>

Amenity

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
A2 Dominion Group	Section 6	Amenity	Object	<p>Contaminated Land</p> <p>Amenity Policies 2 to 17</p> <p>OBJECTION</p> <p>These policies provide an excessive level detail that is repetitive and unnecessary. The detailed requirements in relation to contamination are covered by relevant legislation. An SPD should focus on the key planning considerations and advise on the information required to make a successful application (NPPF paragraph 153). For example, it may be necessary to understand the nature and extent of contamination and that it is capable of remediation before a decision can be made and suitable conditions imposed.</p> <p>Given the complexities associated with contaminated land, the SPD recommends that a suitably qualified consultant be appointed. We agree with this recommendation. However, any suitably qualified professional would have an understanding of the relevant legislation and process and would not require such detailed guidance. This recommendation appears at odds with the level of detail provided which could encourage the lay person to tackle the requirements in respect of contaminated land.</p> <p>The approach and legislation in respect of contamination is constantly evolving. The inclusion of such detailed provisions could date easily and if included within an SPD it cannot be updated without further consultation.</p> <p>Should contaminated land be included within the SPD it would benefit from being condensed and streamlined to focus on the key</p>	<p>The assessment and remediation of contaminated land is a very specialised and technical undertaking. In contrast, the information outlined in this SPD is not technical and refers only to the LBHF specific planning requirements in line with and as required by relevant Council and London policies and the NPPF (including paragraphs 120, 121 and 153).</p> <p>Whilst it is correct that the approach and legislation in respect to contaminated land is constantly evolving, the information required through the planning process to enable planning decisions does not. For example, although the advances in research may show that acceptable levels of Lead in soil should be lowered, that an assessment of the soil in relation to acceptable levels needs to be submitted and agreed does not.</p> <p>The objection states that detailed requirements regarding contaminated land is already contained in relevant legislation. This is not correct. Current</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>considerations. At present this section is unnecessary repetitive and could easily be consolidated to create a more user friendly document. For example, Policies 8 and 16 both make mention of preliminary risk assessments, site investigations and remediation strategies.</p>	<p>legislation addresses the determination of land as contaminated and not what details are required through planning to satisfy individual authorities that the land being developed is suitable for proposed or permitted use.</p> <p>As laid out in the SPD, it is agreed that a suitably qualified professional would have an understanding of the above referenced legislation. However, as stated above, the exact requirements through planning are not established in this legislation or elsewhere. To the contrary, it is stated in both the NPPF and the London Plan that local authority development plans and policies should provide for example, the level of detail required at the application or pre-application stage is not identified elsewhere nor what information may be suitably required via condition. Whilst it is expected that a suitably qualified person would be a specialist with detailed technical knowledge of how contaminated land is assessed and remediated, it is not expected that they would know the detailed planning requirements (i.e. what</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p>information is to be submitted when and to what level of detail).</p> <p>For example, this objection states that Policies 8 and 16 repeat requirements and that this should be consolidated. Policy 8 lays out what information is required at the application stage and the details given in the following paragraph define the scope of the information necessary to enable to council to determine an application. Policy 16 lays out what may be required by condition once permission is granted with the following paragraphs providing details on the particular scope required to satisfy conditions. They are distinctly different policies.</p> <p>No amendment necessary.</p>
<p>Nhs Hammersmith & Fulham</p>	<p>Section 6</p>	<p>Amenity</p>	<p>Observations</p>	<p>Gambling</p> <p>As Section 6 states, health and health inequalities form a key part in the London Plan and the density of hot food takeaways is linked to childhood obesity. There are potentially similar issues around the density of gambling outlets and problem gambling. Research suggests a link between problem gambling and socio-economic disadvantage, with low income as a consistent factor associated with problem gambling. Furthermore, spatial analysis studies are</p>	<p>The SPD does not include guidance on betting shops and similar establishments such as amusement arcades.</p> <p>The DM LP includes shopping policies that provide some control over the distribution of betting shops, but this is limited, partly</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>indicating that there is a heavier density of gambling outlets (including gambling machines) in deprived neighbourhoods.</p> <p>The inverse relationship between problem gambling and deprivation suggests that the prevalence of people exhibiting a range of gambling problems (from low level problems to problem gambling) will increase as more people face shortfalls in their personal or household income. Research has found that problem or pathological gambling can significantly affect a person's health and social wellbeing. Whilst the latest British Gaming Survey confirms that most British adults participate in at least one form of gambling each year (excluding the national Lottery, 56% of adults participated in at least one form of gambling); the survey also found that attitudes toward gambling are somewhat negative with most people feeling that there are "too many gambling opportunities nowadays".</p> <p>While we recognise that the current legislation affords little opportunity for Local Authorities to reject licensing applications for betting shops on the grounds of density, we encourage the LBHF to flag the issue in the SPD and explore options to ensure that the approval of future gambling licenses both reflects community norms and does not contribute to increasing health inequalities.</p>	<p>because of the terms of the use classes order.</p> <p>In respect of gambling licensing, this falls outside of the terms of planning control. However, the comments by NHS Hammersmith & Fulham have been forwarded to the council's licensing officers for information.</p>
<p>Nhs Hammersmith & Fulham</p>	<p>Section 6</p>	<p>Amenity</p>	<p>Observations</p>	<p>Alcohol</p> <p>Statistics show that there were over 1 million hospital related admission in 2009/2010. Studies indicate that there is an association between high alcohol outlet density and increased alcohol related hospital admissions. We would therefore like the SPD to limit the concentration of alcohol outlets.</p>	<p>The DM LP includes shopping policies that provide some control over the distribution of pubs and bars, together with criteria concerning hours of operation. However planning has no control over retail shops selling alcohol. This is a licensing issue.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Contaminated land</p> <p>1. Para 6.33:</p> <p>Establish detailed guidance on the application of policies within the Core Strategy and DM DPD that are concerned with addressing the potential risks from CONTAMINATED land affected by contamination during development, namely Core Strategy borough wide strategic policy CC4 and DM DPD policy H7 Contaminated land;</p> <p>Would suggest re-moving first highlighted word (in caps).</p>	<p>Amendment agreed. Amend first bullet point of paragraph 5.32 (formerly para 6.33) as follows:</p> <p>“Establish detailed guidance on the application of policies within the Core Strategy and DM <u>LPDPD</u> that are concerned with addressing the potential risks from contaminated land affected by contamination during development, namely Core Strategy borough wide strategic policy CC4 and DM <u>LPDPD</u> policy <u>DM H7 Contaminated land</u>; and”</p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Contaminated Land</p> <p>3. Para 6.43</p> <p>Could add a sentence referring to paragraph 121 of the NPPF which states that ‘after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990’;</p>	<p>Amendment agreed. Add the following sentence before penultimate sentence of paragraph 5.42 (formerly para 6.43):</p> <p><u>“Paragraph 121 of the NPPF states that ‘after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990’”</u></p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	Contaminated Land	Amendment agreed. Amend last sentence of paragraph 5.54

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Chelsea				<p>4. Para 6.55</p> <p>Paragraphs ends with (See the Planning Conditions Policy); it would be helpful if there was a signpost as to where this can be found.</p>	<p>(formerly para 6.55) as follows:</p> <p>“(See the <u>Amenity Policy 16 on Planning Conditions Policy</u>”.</p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Contaminated Land</p> <p>6. Para 6.70</p> <p>Regardless of whether land at the site is considered affected by contamination, the importation or exportation of soil at the development site will need to be detailed and reported to the council as part of the verification works. In regards to soil removal, the appropriate duty of care must be shown including analytical reports demonstrating the waste class of the material as well as the conveyance notes for the material should be provided. Soil imported to the site, whether for levelling, soft landscaping or other purposes will require the material to be tested and compared to site specific guideline values and included in the verification report.</p> <p>Could further information be included about the testing of imported material? Where should testing take place, at source prior to being brought onto site or once in situ or both? If the material is imported but deemed unsuitable by the LPA once reviewed as part of the validation report, it might be worth stating that it will have to be removed or further remediated.</p> <p>What is meant by ‘validated’? Does this material need to be tested if the source of the material has been confirmed and it is only going to be beneath the footprint of buildings? Unless SSAC have already been derived we’d suggest that site specific guidelines</p>	<p>Comments noted.</p> <p>Amend Paragraph 5.69 (formerly para 6.70) as follows:</p> <p>Soil imported to the site, whether for levelling, soft landscaping or other purposes will require the material to be tested (<u>as a minimum following placement at the receiving site</u>), and compared to site specific guideline values and included in the verification report.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				aren't necessary if the samples meet SGVs. If demolition arisings are to be re-used elsewhere on site will these have to be tested prior to re-use?	
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	Contaminated land 7. Para 6.83 Refers to principles 8 and 9, should this now be policies?	Amendment agreed. Amend last sentence of paragraph 5.82 (formerly para 6.83) as follows: "This may be achieved by adhering to principles Policies 8 and 9 of this document in preparation of the relevant ES chapter. "
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	Air Quality 2. Para 6.132 (maps) We would suggest marking the objective levels on the legend and the units of measurement i.e. concentrations or number of days. The legend values and number of exceedences should also be rounded to the nearest whole number to make the values clearer. The title of the PM10 map does not make it clear what information is being presented – whilst the text refers to levels the title refers to 'exceedences' it should be clear that the map shows the number of days exceeding the objective level rather than concentrations.	Comment noted. The maps are produced by the GLA and the legend values are incorporated into the map images. Therefore amending this part of the maps is not straightforward. However, <u>the titles of Maps 1 and 2 will be amended to make it clearer that for Map 1, the concentrations are shown in µg/m³ and that Map 2 shows the number of days when 50 µg/m³ is exceeded.</u>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	Air Quality 3. Para 6.150 Define what is considered significant (third bullet point, could have	Comment noted. No amendment proposed other than the inclusion of reference to the London Councils' guidance which includes a section on determining significance of

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				significant impacts on air quality). In terms of concentrations, most developments, regardless of their size, seem to show no significant adverse impact on air quality, due to the way the modelling is carried out and significance criteria applied. We would suggest it might be better to refer to increases in emissions.	impacts. Amend paragraph 5.148 (formerly para 6.151) as follows: "Guidance on appropriate models to use to assess air quality impacts can be found in <u>London Councils 'Planning and Air Quality'</u> and <u>Environmental Protections UK guidance Document 'Development Control: Planning for Air Quality'</u> which can be found online here"
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	Air Quality 4. Para 6.151 Please add a reference to the London Council's guidance on planning and air quality issues as this is more appropriate for London boroughs within an air quality management area.	Comment noted. Amendment agreed as proposed. Reference to the London Councils' guidance to be included in paragraph 5.148 (formerly para 6.151) (See above).
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	Air Quality 5. Para 6.153 After the second sentence, could add that the locations of these sensitive receptors should be agreed with the local authority in advance.	Comment noted. No amendment proposed other than the inclusion of reference to the London Councils' guidance, which includes a section on this issue. Reference to the London Councils' guidance to be included in paragraph 5.148 (formerly para 6.151) (See above).

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Air Quality</p> <p>6. Para 6.154</p> <p>There is no mention of how cumulative impacts should be assessed. In RBKC, we have had instances where developers have incorporated the impact of other developments taking place in the vicinity within the baseline. It could be helpful to state that this is not acceptable.</p>	<p>Comment noted. No amendment proposed other than the inclusion of reference to the London Councils' guidance, which includes a section on this issue.</p> <p>Reference to the London Councils' guidance to be included in paragraph 5.148 (formerly para 6.151) (See above)..</p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Contaminated Land</p> <p>2. Para 6.42</p> <p>There are a number of legislative and guidance documents which control the development of potentially contaminated land or the development of land for a sensitive use as well as other relevant pollution matters. < A list of current guidance and legislation may be found in the Reference section. > As these documents are often updated and changed, it is essential that the most relevant guidance is acquired and used at the time of development works. < A list of current guidance and legislation may be found in the Reference section. ></p> <p>Text repeated.</p>	<p>Amendments agreed</p> <p>Delete the last sentence of paragraph 5.42 (formerly para 6.42):</p> <p>"A list of current guidance and legislation may be found in the Reference section"</p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>11. Appendix 1: suggested amendments [NEW TEXT PROPOSED]:</p> <p>Where a noise and or vibration survey and assessment report is required at pre-application stage or by condition, this must be carried out by a qualified and competent acoustic consultant such</p>	<p>Amendment agreed.</p> <p>The first paragraph in Appendix 1 will be amended as follows:</p> <p>"Where a noise <u>and or vibration</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>as a member of the Institute of Acoustics (IOA).</p> <p>The applicant should provide the chosen consultant with the details of the Council's requirements contained within this SPD so that they can respond accordingly with appropriate noise and/or vibration assessments and report.</p> <p>(7th bullet point)</p> <p>Architects drawings of the proposed external plant or equipment, to include details of any required acoustic enclosures and acoustic screens showing the location, size and visual impact of such installations on the host building; this is especially important at historical buildings or buildings situated in conservation areas.</p>	<p><u>survey and assessment report</u> is required at pre-application stage or by condition, this should <u>must</u> be carried out by a qualified and competent acoustic consultant such as a member of the Institute of Acoustics (IOA). The applicant should provide the chosen consultant with the details of the Council's requirements <u>contained within this SPD</u> so that they can respond accordingly with appropriate noise and/or vibration assessments and report."</p> <p>Amend the first sentence in bullet point 7 of Appendix 1 as follows:</p> <p><u>"Architects drawings of the proposed external plant installations of machinery or equipment including, to include details of any required acoustic enclosures and acoustic screens demonstrating showing the location, size, distance from and visual impact of such installations on at the host building."</u></p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>13. Appendix 3</p> <p>Do you not feel that sound insulation performance between 'good' and 'reasonable' standard is acceptable standard; amenity areas</p>	<p>Applicants are usually able to achieve the Good standard and this standard is particularly important in</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>range from 50-55dBLeqday outdoors?</p> <p>The difference between 'good' and 'reasonable' standard for living rooms in BS8233 is a range between 30dBLeqday and 40dBLeqday respectively and for bedrooms 30dBLeqnight and 35dBLeqnight. Would not a level between these limits still be acceptable?</p> <p>'Applicants and developers should aim for an enhancement of the minimum levels stated in the Building Regulations by 10-15dB.'</p> <p>This is a very substantial uplift in requirement for normal domestic noise between say a bedroom and living room. What evidence is this 10-15dB based on and does it refer to both airborne and impact noise?</p> <p>What is the uplift required for commercial to residential separating floors and walls? For B1 office and retail with daytime use only, 5dB uplift in the minimum requirements of ADE has been used on Earls Court Development?</p>	<p>noisy areas to give a decent standard of living.</p> <p>Where, in individual applications, there is a difficulty in achieving the Good standard, we would be flexible with the requirement and make allowances for a slightly lower standard.</p> <p>Agreed. Amend the title and 2nd and 3rd sentences of the paragraph entitled 'Enhanced sound insulation' in Appendix 3, as follows:</p> <p><u>"Enhanced sound insulation between different residential uses:</u> "Therefore, especially where the arrangement of rooms in separate adjoining dwellings is shown to be unsuitable in terms of preventing transmission of household noise and consequently is likely to give rise to neighbour noise complaints, the council will require better enhanced sound insulation of relevant walls, floors and ceilings than compared to the minimum specifications of the Building Regulations. Applicants and developers should aim for an enhancement of the minimum</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p>levels stated in the Building Regulations by <u>at least 10-15</u> 5-10dB.”</p> <p>The following paragraph titled Residential / non-residential separation will also be amended, as follows:</p> <p>“Building Regulation minimum values of $D_{nT,w}+C_{tr}$ for walls and glazing, floors and ceilings, as appropriate, should be significantly enhanced <u>by at least 10-15dB</u> where commercial/ sports/ entertainment and similar non-residential development is intended in the same or attached building or in close proximity to noise sensitive premises. <u>Applications for developments where residential and commercial units adjoin each other should be accompanied by a sound insulation assessment and details of the sound reduction achieved by the proposed separating structures.</u>”</p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	Contaminated Land 9. Para 6.84	Specific reference is not considered necessary. No amendment necessary.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				State what legislation the claim for compensation could be awarded under.	
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Air Quality</p> <p>9. Para 6.158 and 9</p> <p>This lists the possible mitigation measures that can be taken during the construction and demolition phase. However, we could not see any reference to on site monitoring for major sites during the demolition and construction phase. This should discuss the type of monitoring expected, trigger values and the notification system should these be exceeded. Could also refer to this in 7.297.</p> <p>For the operational phase, the text refers to the London Councils and Low Emission Strategies guidance. It would be helpful also include a similar list here (as provided for the construction phase) for the mitigation measures for the operational phase too, such as: no parking, cycle parking, electric charging, renewable non-combustion energy plant, increased solid wall insulation to reduce energy demand etc.</p> <p>Within the section it also caveats mitigation measures by stating 'where identified as necessary', this should be based on emissions rather than the application of significance criteria to predicted concentrations which allow for significant increases in emissions, contrary to the AQ action plan objective.</p> <p>Emission standards for boilers and plant could also be promoted.</p>	<p>Comment noted. Amendment agreed.</p> <p>There is a formatting error in this section. Correct this by turning the 1st line of paragraph 6.159 into a bullet point and also amend to read: "Ensuring the control of air quality impacts during the construction/demolition phase (See Sustainable Construction SPD), <u>including monitoring of air quality impacts where identified as a requirement</u>".</p> <p>The remaining bullet points in this section relate to mitigation measures during the operational phase.</p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	Noise and environmental pollution	Agreed, reference to the Noise Policy Statement for England will be

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Chelsea				<p>1. Para 6.109</p> <p>We would like to suggest that this national policy section should also make reference to the Noise Policy Statement for England.</p>	<p>included after paragraph 6.109 as follows:</p> <p><u>“The Noise Policy Statement for England by DEFRA advises further on considerations that should be had for working to secure a healthy environment.”</u></p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Noise and Environmental Pollution</p> <p>6. Para 6.135</p> <p>Noise and vibration monitoring reports will be required for substantial demolition and construction works, especially those close to noise sensitive premises.</p> <p>Just for information, in RBKC, on site monitoring and the reports would normally be secured through adding a condition to the s61 for the site. It might be worth stating this, or any other method this could be achieved through e.g. planning condition. It might also be worth setting out what on site monitoring you require and frequency of the reports and how you would expect to be informed if levels exceed those agreed.</p>	<p>Agreed. Add the following sentence to the end of paragraph 5.133(formerly para 6.136 not 6.135) as follows:</p> <p><u>“Alternatively, applicants may chose to apply for a Section 61 consent which may be granted with relevant conditions.”</u></p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Noise and environmental pollution</p> <p>Noise and environmental pollution</p> <p>2. Para 6.134</p> <p>This paragraphs appears to require reports for all development</p>	<p>Agreed. Para 5.131 (formerly para 6.134) will be amended as follows:</p> <p><u>“Noise and/or vibration surveys and reports will generally be required for most types of developments including. These should consider</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>proposals. We would recommend making is more specific, for example [NEW TEXT PROPOSED AS FOLLOWS]:</p> <p>Noise and/or vibration surveys and reports will generally be required for most types of developments. These should consider and assess:</p> <ul style="list-style-type: none"> • Internally and externally located building services plant and equipment • Sound Insulation • of the building envelope, • of separating structures between different noise sensitive and noise generating rooms in adjoining dwellings, between commercial/ communal/ non-residential and noise sensitive uses; • Residential and other noise sensitive developments proposed in areas that would be exposed to existing noise from sources including transport, commercial and industrial uses and vibration from surface railways, including heavy freight trains and trains of the underground network. • The construction phase of subterranean developments; • Places of entertainment, including proposed pubs and clubs, sports facilities, religious centres, cultural sites, educational establishments, outdoor or indoor recreational, leisure centres, retail parks and other commercial uses. 	<p><u>and assess:</u></p> <ul style="list-style-type: none"> • <u>Internally and externally located building services, and other plant or and equipment, internal and external;</u> • Sound insulation <ul style="list-style-type: none"> ○ Of the building envelope; ○ Of separating structures between different noise sensitive and noise generating rooms in adjoining dwellings, between commercial/communal/ non-residential and noise sensitive uses; • <u>Residential and other noise sensitive developments near transport or commercial/industrial sources proposed in areas that would be exposed to existing noise from sources including transport, commercial and industrial uses and vibration from surface railways, including heavy freight trains and trains of the underground network.</u> • <u>Significant demolition and construction phases including those</u>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>of</u> subterranean developments;</p> <ul style="list-style-type: none"> • Places of entertainment, <u>including proposed pubs and clubs</u>, sports <u>facilities</u>, religious <u>centres</u>, cultural <u>sites</u>, educational <u>establishments</u>, <u>outdoor or indoor recreational or leisure centres</u>, retail <u>outlets</u> and other commercial uses. • Vibration from railways, including heavy freight trains
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Noise and Environmental Pollution</p> <p>4. Para 6.136</p> <p>A CMS, we understand, is usually a Chartered Engineer's report with a proposed construction and engineering method; it is not intended to address issues of noise or vibration. In RBKC, we usually require, by condition, a Demolition and Construction Management Plan for mitigation of environmental impacts for sub major sites and a Construction Environmental Management Plan for major sites.</p>	<p>Comments noted. No amendment necessary as similar wording is already suggested.</p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Noise and Environmental Pollution</p> <p>5. Para 6.137</p> <p>Suggest slight re-wording.</p> <p>If you do not submit the required noise survey and report with the application, or do not obtain or follow pre-application advice of Council Officers....</p>	<p>No amendment necessary.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>One further observation; this suggests that if the correct noise surveys are submitted, conditions will not be attached to any permission. Even with a report, would conditions imposing limits still not be set?</p> <p>Second half of paragraph talks about the discharge of conditions, without introducing how this would work. E.g if conditions are set, that require external noise attenuation (etc), these must not have an unacceptable visual impact on the host building etc etc. If this does occur, then it will not be possible to discharge this condition....</p>	<p>No amendment necessary.</p> <p>No conditions are usually required if a satisfactory report is submitted with the application as permission will be based on the acceptability of the information provided.</p> <p>Agreed. Amend second sentence of Para 5.134 (formerly para 6.137) as follows:</p> <p>"However, conditions may not be discharged where compliance requires external noise attenuation such as acoustic enclosures, acoustic screens or plant equipment, <u>permission may be refused where these which</u> have an unacceptable visual impact on the host building or where the requirements of a condition are not otherwise shown to be achieved. (Please see Appendix 1 and 2 for more details and criteria)."</p>
Royal Borough of Kensington &	Section 6	Amenity	Observations	Noise and Environmental Pollution	No amendment necessary

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Chelsea				<p>7. Para 6.170.</p> <p>We do not tend to class offices as noise sensitive as they are usually air-conditioned with fixed acoustic glazing.</p>	
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Noise and Environmental Pollution</p> <p>9. Para 6.177</p> <p>'It is essential that conversions and new dwellings are designed with the appropriate room arrangement in separate adjoining dwellings...'</p> <p>We would not see this as essential but something that needs to be considered. Noise on its own cannot dictate the layout of an Architect's scheme purely from the point of normal domestic noise; there are other criteria to consider as well. If we have concerns regarding the arrangements of the accommodation then we could ask for uplift in the pass requirements for SI testing by condition or an improvement in the minimum requirements of ADE, by condition. Where concrete floors with plaster and resilient coverings or plastered solid block walls are the norm between dwellings the SI value is usually significantly in excess of minimum ADE requirements in any event.</p>	<p>No amendment necessary.</p> <p>We do consider good room design as essential, however, it is strongly advised and where this cannot be achieved, we set a condition requiring better sound insulation between rooms for different types of uses, eg. Living room above bedroom of separate dwelling.</p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Air Quality</p> <p>7. Para 6.155</p> <p>This paragraph states that new point sources such as energy centres should be assessed but the chapter does not provide any detailed guidance on how this should be done. Could more detail be provided on the proposed method. Also, whilst this refers to</p>	<p>Comment noted. Amendment agreed.</p> <p>The GLA is in the process of developing guidance on assessing and managing emissions from energy centre installations such as CHP units. A reference to this</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>biomass, there is no mention of CHP and generators; such plant can also significantly add to local emissions. The LBHF AQ action plan has an objective to reduce emissions from buildings yet there is no acknowledgement of the significantly higher emissions that CHP and generators produce compared to readily available low NOx boilers and other renewable technologies. It would also be useful to request that advice is sought to ensure that appropriate chimney heights are determined and that ventilation /fresh air intakes are taken into account.</p> <p>Whilst energy is covered elsewhere in the document (para 7.330 etc), it would be worthwhile including a few sentences regarding the conflict between CHP, carbon and air quality pollutants and seeking alternative renewable where possible.</p>	<p>guidance will be inserted into this section.</p> <p>Amend Para 5.152 (formerly para 6.155) to read: "As well as assessing traffic emission impacts, new 'point' sources such as energy centres should also be assessed if they form part of a development's proposals, <u>with reference to the GLA's guidance on emissions standards for Biomass and CHP plant</u>". This is particularly the case if there are plans to include any form of biomass.</p>
<p>Royal Borough of Kensington & Chelsea</p>	<p>Section 6</p>	<p>Amenity</p>	<p>Observations</p>	<p>Noise and Environmental Pollution</p> <p>8. Para 6.171</p> <p>Separation of noise sensitive developments from significant existing noise sources can be achieved, for example, by good design layout of the development and location of habitable rooms on quieter facades. In addition, adequate sound insulation will be required. Where mechanical ventilation is required in areas of high noise levels and poor air quality, this should be silenced and the air intake should be from the cleanest aspect of the building.</p> <p>There are criteria other than noise exposure that will influence a building layout scheme, such as modern taste for large open plan kitchen/dining rooms. Adequate impact and airborne sound insulation should be a priority.</p>	<p>Amend last sentence of para 5.167 (formerly 6.171) from 'silenced' with '<u>noise attenuated</u>'</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>Would like to suggest that 'silenced' in the last sentence, should be replaced with 'noise attenuated'.</p>	
<p>Royal Borough of Kensington & Chelsea</p>	<p>Section 6</p>	<p>Amenity</p>	<p>Observations</p>	<p>Noise and Environmental Pollution</p> <p>14. Appendix 4</p> <p>Here is a typical condition for plant noise that we use in RBKC, in case you find this helpful to include:</p> <p>'Noise emitted by all building services plant and equipment shall be -10dBA below the existing measured lowest LA90(15min) background noise level at any time when all plant is in use, where the plant noise source has a tonal spectrum it shall be -15dBA. The noise emitted shall be measured or predicted at 1.0m from the façade of the nearest residential window or at 1.2m above any adjacent residential garden, terrace, balcony or patio. The plant and equipment shall be serviced regularly in accordance with manufacturer's instructions and as necessary to ensure that the requirements of the condition are maintained.</p> <p>The use shall not commence until full details, to include a noise survey and report, have been submitted to and approved in writing by the Local Planning Authority in consultation with the Director of Environmental Health.'</p>	<p>No amendment necessary.</p>
<p>Royal Borough of Kensington & Chelsea</p>	<p>Section 6</p>	<p>Amenity</p>	<p>Observations</p>	<p>Noise and Environmental Pollution</p> <p>15. Appendix 6</p> <p>As mentioned previously, for major sites we would require a Construction Environmental Management Plan. Just for</p>	<p>Comments noted.</p> <p>Similar wording is already suggested.</p>

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				information, in RBKC we will be revising our Subterranean SPD in due course and possibly extending it into other areas of construction. We are guided by our Planners on the scope of SPD's.	
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Air Quality</p> <p>8. Para 6.157</p> <p>As a second bullet point, could you request:</p> <p>Details of the emissions from the development and a comparison of how this compares with the existing development.</p>	<p>Comment noted. Amendment agreed.</p> <p>Insert new bullet point (after bullet point 1) in Paragraph 5.154 (formerly para 6.157) as follows:</p> <p><u>“Details of the emissions from the development and a comparison of how this compares with the existing development.”</u></p>
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>12. Appendix 2</p> <p>In Table 1 it appears that noise levels above that on the boundary between the old PPG24 NEC's of B and C need only be considered in terms of the required façade sound insulation, i.e. for road traffic 63dB day and 57dB night; where does this come from?</p> <p>Page 142; VDV (m/s1.75) is VDV (m/s1.75)</p>	No amendment necessary.
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Air Quality</p> <p>Air quality</p> <p>1. Would like to see 'air quality' specifically listed within the contents page. Could it also be mentioned in Amenity Policy 7 and</p>	<p>Comment noted. Amendments partially agreed.</p> <p>Air quality is currently considered under the “Noise and Environmental Pollution” heading</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				para 6.75 just before dust.	<p>which seems adequate already rather than providing a full breakdown of all issues such as air quality, dust, odour etc.</p> <p>However, the text in Amenity Policy 7 and paragraph 5.74 (formerly para 6.75) will be amended to refer to air quality as follows:</p> <p>Amenity Policy 7:</p> <p>“They need also to take into account issues of sustainability, disturbance to existing occupiers and the cumulative negative environmental impact of issues (<u>air quality</u>, dust, noise, odours, traffic movements etc) which might arise from the contamination or its remediation.”</p> <p>Paragraph 5.74 (formerly 6.75):</p> <p>“Reference should be made to guidance in the Noise and Environmental Pollution <u>sections of this SPD</u> in regards to <u>air quality</u>, dust, noise, odour, and wider environmental impact as well as the <u>section on Sustainable construction SPD</u> for minimising other relative</p>

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					cumulative environmental impacts”
Royal Borough of Kensington & Chelsea	Section 6	Amenity	Observations	<p>Air quality</p> <p>1. Would like to see ‘air quality’ specifically listed within the contents page. Could it also be mentioned in Amenity Policy 7 and para 6.75 just before dust.</p>	<p>Comment noted. Amendments partially agreed.</p> <p>Air quality is currently considered under the “Noise and Environmental Pollution” heading which seems adequate already rather than providing a full breakdown of all issues such as air quality, dust, odour etc.</p> <p>However, the text in Amenity Policy 7 and paragraph 5.74 (formerly para 6.75) can be amended to refer to air quality. Amenity Policy 7:</p> <p>“They need also to take into account issues of sustainability, disturbance to existing occupiers and the cumulative negative environmental impact of issues (<u>air quality</u>, dust, noise, odours, traffic movements etc) which might arise from the contamination or its remediation.”</p> <p>Paragraph 5.74 (formerly 6.75):</p> <p>“Reference should be made to guidance in the Noise and</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					Environmental Pollution <u>sections of this SPD</u> in regards to <u>air quality</u> , dust, noise, odour, and wider environmental impact as well as the <u>section on Sustainable construction SPD</u> for minimising other relative cumulative environmental impacts”
Mr Anthony Williams	SPD Amenity Policy 1	Location and concentration of hot food takeaways	Support		Support welcome.
Land Securities	SPD Amenity Policy 1	Location and concentration of hot food takeaways	Observations	SPD Amenity policy 1 - Location and concentration of hot food takeaways It is noted that this policy deals purely with proposals for new hot food takeaways (class A5) OUTSIDE of town centres and therefore has no relevance to the West 12 Shopping Centre which is located within Shepherds Bush Metropolitan Centre.	Comment noted..
Nhs Hammersmith & Fulham	SPD Amenity Policy 1	Location and concentration of hot food takeaways	Support with conditions	Hot Food Takeaways We welcome restrictions of new hot food takeaways in H&F. We strongly support the 400m exclusion zone for new hot food takeaways around areas where children congregate. However, we believe this exclusion zone must include primary schools as local research suggests that parents with primary school age children visit fast food outlets on their way home from school.	Support welcome. Regarding the issue of primary schools, the council considers that development management can only do so much and that making the right food choices for primary school children must primarily lie with parents. Nevertheless, a significant number of primary

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				<p>In addition, we recommend the council considers an exclusion zone for hot food takeaways around new developments.</p> <p>The council's environmental health team and local dieticians have undertaken innovative work on "healthier catering" and "tips on chips". These initiatives support local businesses to make small changes in their practices to make the food they serve healthier. Such initiatives with existing hot takeaways can help reduce their negative impact on people's health. We would encourage the council to continue supporting such initiatives. An evaluation of this work is due shortly and we will send you a copy of this when it has been completed.</p> <p>We would like the council to develop a policy which aims to reduce the overall number of hot food takeaways in H&F in the longer term. It is known that access to healthy nutritious food can improve health and we would therefore welcome practice that promotes the variety of food available locally particularly to those on a limited income to support them to afford a healthy diet.</p>	<p>schools in the borough are either located close to a secondary school or a park and therefore would indirectly benefit from the proposed policy.</p> <p>Concerning an exclusion zone around new developments, the council considers that this would be neither appropriate nor justifiable.</p> <p>The council would be pleased to receive further detail on the initiatives referred to in the representation.</p> <p>Comments noted.</p>
<p>Royal Borough of Kensington & Chelsea</p>	<p>SPD Amenity Policy 5</p>	<p>Key Contamination Considerations</p>	<p>Observations</p>	<p>Contaminated Land</p> <p>5. SPD Amenity Policy 5</p> <p>Liaise with the council's specialist officer dealing with contamination as early in the process as possible</p> <p>Might be worth referring to the section in the SPD on pre-app.</p>	<p>The policy makes reference to guidance and requirements outlined in the technical details and submission details sections. Further cross referencing in the policy is not considered necessary.</p> <p>The 'phased' approach is clarified in more detail in the subtext of</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>Ensure that land potentially affected by contamination is addressed in a phased approach seeking agreement with the council at each phase;</p> <p>Refer to section 6.67 or provide definition of 'phased'.</p> <p>Ensure that the conveyance of ground materials on and off site are in line with guidance and legislation and that the relevant paperwork is collated;</p> <p>Would be good if this referred to section 6.35 on guidance.</p>	Amenity Policy 5.
Royal Borough of Kensington & Chelsea	SPD Amenity Policy 10	Outline Applications	Observations	<p>Contaminated Land</p> <p>8. SPD Amenity Policy 10</p> <p>If an outline application is not accompanied by a site investigation, how will these be dealt with? This policy suggests the application will be refused rather than a condition will be attached to any permission the LPA is minded to grant.</p>	<p>Agreed that clarification and reference to the placement of planning conditions where relevant should be included here.</p> <p>Add additional text to the end of Amenity policy 10 as follows:</p> <p><u>"Consideration will be given by the council to the placement of planning conditions on a case by case basis"</u></p>
Royal Borough of Kensington & Chelsea	SPD Amenity Policy 16	Planning Conditions	Observations	<p>Contaminated Land</p> <p>10. SPD Amenity Policy 16</p> <p>This appears to be very similar to policy 15.</p>	<p>Agreed, disambiguation of these two policies is necessary.</p> <p>Amend first paragraph of Amenity Policy 16 as follows:</p> <p>"In some cases, the information available when a planning application is being considered will</p>

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					<p>be sufficient to resolve the main issues regarding contamination from a planning point of view but insufficient to resolve all the details. If the council is satisfied that the proposal will deliver an appropriate development and that the risks are sufficiently well known that there is a viable remediation option, it may be appropriate to grant permission subject to conditions relating to the condition of the land. Where planning conditions in relation to the assessment and, where necessary, the remediation of contaminated land are placed, further submission requirements may be necessary. A summary of common submission requirements are as follows."</p>
Mr Anthony Williams	SPD Amenity Policy 18		Support		Support welcome.
Thames Water Property Services	SPD Amenity Policy 18		Support with conditions	<p>The principle of the above policies is supported. However, it is considered that the wording of the policies and supporting text could be strengthened.</p> <p>Where piling is required for construction there is potential for the vibration to lead to burst water mains or the collapsing of sewers. Works that result in the collapse or partial collapse of sewers could</p>	<p>Comments noted.</p> <p>Requirement to protect services etc. are included in paragraph 5.133 (formerly para 6.136)</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>result in sewer flooding to existing properties.</p> <p>It is considered that the supporting text for the policies should be amended to ensure that the method statements required for construction consider the protection of below ground infrastructure including water mains and sewers.</p>	
<p>A2 Dominion Group</p>	<p>SPD Amenity Policy 18</p>		<p>Object</p>	<p>Amenity Policy 18: Noise and Vibration – Survey and Report</p> <p>OBJECTION</p> <p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.</p>	<p>Comment noted.</p> <p>Associated para 5.131 (formerly para 6.134) has been amended (See text below) and requirements will be made as relevant, necessary and material to the application. This is the case where new dwellings are proposed near existing noise sources and where new developments have the potential to increase existing noise.</p> <p>Amendment to para 5.131 (formerly para 6.134):</p> <p>“Noise and/or vibration surveys and reports will generally be required for <u>most types of developments including. These should consider and assess:</u></p> <ul style="list-style-type: none"> Internally and externally located building services, and <u>other plant or equipment,</u>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p>internal and external;</p> <ul style="list-style-type: none"> • Sound insulation <ul style="list-style-type: none"> ○ Of the building envelope; ○ Of separating structures between different noise sensitive and noise generating rooms in adjoining dwellings, between commercial/communal/ non-residential and noise sensitive uses; • Residential and other noise sensitive developments near transport or commercial/industrial sources proposed in areas that would be exposed to existing noise from sources including transport, commercial and industrial uses and vibration from surface railways, including heavy freight trains and trains of the underground network. • <u>Significant demolition and construction phases including those of subterranean developments;</u> • <u>Places of entertainment, including proposed pubs and clubs, sports facilities, religious centres, cultural</u>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>sites, educational establishments, outdoor or indoor recreational or leisure centres, retail outlets</u> and other commercial uses. Vibration from railways, including heavy freight trains</p>
<p>Mr Anthony Williams</p>	<p>SPD Amenity Policy 19</p>	<p>Dust, smell, smoke, fumes, gases, steam, lighting, etc.</p>	<p>Support</p>		<p>Support welcome.</p>
<p>Hammersmith Society</p>	<p>SPD Amenity Policy 19</p>	<p>Dust, smell, smoke, fumes, gases, steam, lighting, etc.</p>	<p>Object</p>	<p>12. Amenity Policy 19 and Amenity chapter appendix 8 p154 – Lighting. The references in the UDP EN20C to “effect of light on local residents” and “the potential to harm wildlife” are not taken up in the PG SPD. These are important points which will not be mentioned elsewhere, and should be included.</p>	<p>DM LP policy DM H10 clearly refers in the supporting text to the impact of lighting on residents and wildlife. However, it would be appropriate to add reference in the second sentence of paragraph 5.140 (formerly para 6.143) in the SPD. Add “...<u>and impact on residents quality of life and wildlife</u>”.</p> <p>Requirements for prevention of light pollution are covered in Appendix 8</p>
<p>Mr Anthony Williams</p>	<p>SPD Amenity Policy 20</p>	<p>Assessment of Air Quality Impacts of new Development</p>	<p>Support</p>		<p>Support welcome</p>
<p>A2 Dominion Group</p>	<p>SPD Amenity Policy 20</p>	<p>Assessment of Air Quality Impacts of</p>	<p>Object</p>	<p>Amenity Policy 20: Assessment of Air Quality Impacts of New Development</p>	<p>Comment noted. No amendment proposed.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
		new Development		<p>OBJECTION</p> <p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.</p>	<p>The guidance provided is far more detailed than can be included in validation list and also contains additional advice compared to that outlined in the NPPF. Whilst there is some reference to national guidance, this is not considered to be in conflict with the NPPF requirements.</p>
Mr Anthony Williams	SPD Amenity Policy 21	Assess and Minimise Exposure to Poor Air Quality	Support		Support noted
Mr Anthony Williams	SPD Amenity Policy 22	Noise Sensitive Development - Noise and Vibration	Support		Support welcome
Ptarmigan Riverside AW LLP	SPD Amenity Policy 22	Noise Sensitive Development - Noise and Vibration	Object	<p>Ptarmigan support the requirement for new noise sensitive development to be protected from existing external noise sources; however the current wording of Amenity Policy 22 indicates that in order to achieve this development needs to be 'separated' from significant noise sources. This creates the impression that a significant distance needs to exist between noise sensitive development and noise sources.</p> <p>Ptarmigan have been working up plans for the redevelopment of the Swedish and Comleys safeguarded wharf sites for a number of</p>	<p>Comment noted. Do not agree that the policy creates the impression that a significant distance needs to exist between noise sensitive development and noise sources. However, the council do agree with the suggested wording here and in the next representation, ie. using the word 'protected' instead of 'separated'.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>years, the detail of which has been discussed with the Council. As part of the work Ptarmigan have done, it has been established that noise sensitive development, such as residential, does not need to be located significant distances from noise generating development in order to ensure an appropriate amenity can be provided.</p> <p>The additional text which supports the policy in paragraph 6.171 recognises that separation of noise sensitive developments can be achieved for example via good design layout, and this should also be recognised within the policy wording itself.</p> <p>It is suggested the following changes are made to the wording:</p> <p>Suggested wording:</p> <p>'Wherever possible and practicable, residential and other noise sensitive development including hospitals, sheltered and nursing homes, offices, schools and similar establishments proposed in area where they would be exposed to existing external noise shall be designed so as to be protected from significant transport, industrial and/or commercial and other non-residential noise sources.'</p>	<p>Amend the first paragraph of Amenity Policy 22 as follows:</p> <p>"Wherever possible and practicable, residential and other noise sensitive development including hospitals, sheltered and nursing homes, offices, schools and similar establishments proposed in areas where they would be exposed to existing external noise shall be <u>designed so as to be located away and protected</u> separated from significant transport, industrial and/or commercial and other non-residential noise sources."</p>
<p>Capital and Counties on Behalf of Earls Court and Olympia Group</p>	<p>SPD Amenity Policy 22</p>	<p>Noise Sensitive Development - Noise and Vibration</p>	<p>Support with conditions</p>	<p>Capital & Counties support the requirement for new noise sensitive development to be protected from existing external noise sources. However, the current wording of Amenity Policy 22 indicates that in order to achieve this development needs to be 'separated' from significant noise sources. This creates the impression that a significant distance needs to exist between noise sensitive development and noise sources. The additional text which supports the policy in paragraph 6.171 recognises that</p>	<p>Comment noted. Do not agree that the policy creates the impression that a significant distance needs to exist between noise sensitive development and noise sources. However, the council do agree with the suggested wording here and in</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>separation of noise sensitive developments can be achieved for example via good design layout, and this should also be recognised within the policy wording itself.</p> <p>It is requested that the following changes are made to the wording:</p> <p>Suggested wording:</p> <p>'Wherever possible and practicable, residential and other noise sensitive development including hospitals, sheltered and nursing homes, offices schools and sirmilar establishments proposed in area where they would be exposed to existing external noise shall be designed so as to be protected from significant transport, industrial and/or commercial and other non-residential noise sources. '</p>	<p>the next representation, ie. using the word 'protected' instead of 'separated'.</p> <p>Amend the first paragraph of Amenity Policy 22 as follows:</p> <p>"Wherever possible and practicable, residential and other noise sensitive development including hospitals, sheltered and nursing homes, offices, schools and similar establishments proposed in areas where they would be exposed to existing external noise shall be <u>designed so as to be located away and protected</u> separated from significant transport, industrial and/or commercial and other non-residential noise sources."</p>
<p>Royal Borough of Kensington & Chelsea</p>	<p>SPD Amenity Policy 22</p>	<p>Noise Sensitive Development - Noise and Vibration</p>	<p>Support with conditions</p>	<p>6. SPD Amenity Policy 22</p> <p>We would like to suggest the following amendments [NEW TEXT PROPOSED]:</p> <p>Noise Sensitive Development - Noise and Vibration</p> <p>Wherever possible and practicable, proposed residential and other noise sensitive development including hospitals, sheltered and nursing homes, offices, schools and similar establishments shall</p>	<p>Comment noted. Do not agree that the policy creates the impression that a significant distance needs to exist between noise sensitive development and noise sources. However, the council do agree with the suggested wording here and in the next representation, ie. using the word 'protected' instead of 'separated'.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>be separated and located away from significant transport, industrial and/or commercial and other non-residential noise sources.</p> <p>Where this is not possible, locations for new dwellings including conversions or other noise sensitive developments that would be exposed to noise from transport and/or other non-residential sources should be assessed in accordance with relevant guidance and criteria. Planning applications for proposed residential development near substantial transport and/or other noise sources should be accompanied by an acoustic survey detailing the existing ambient and background noise levels for night and daytime periods. The required façade sound insulation performance shall be determined along with noise mitigation measures, as applicable.</p>	<p>Amend the first paragraph of Amenity Policy 22 as follows:</p> <p>“Wherever possible and practicable, residential and other noise sensitive development including hospitals, sheltered and nursing homes, offices, schools and similar establishments proposed in areas where they would be exposed to existing external noise shall be <u>designed so as to be located away and protected</u> separated from significant transport, industrial and/or commercial and other non-residential noise sources.”</p>
Mr Anthony Williams	SPD Amenity Policy 23	Sound Insulation between dwellings and between commercial and residential premises	Support		Support welcome
A2 Dominion Group	SPD Amenity Policy 23	Sound Insulation between dwellings and between commercial and residential	Object	<p>Amenity Policy 23: Sound Insulation between Dwellings and between Commercial and Residential Premises</p> <p>OBJECTION</p> <p>As detailed in paragraph 6.175 adequate sound insulation</p>	Comment noted. Reasons for this policy are explained in Paragraphs 5.171 and 5.172 (formerly 6.175 and 6.176).

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
		premises		between floors and walls is a matter for Building Regulations. This is not a matter to be controlled through planning and should not be included as a policy within an SPD. Inclusion could cause confusion for applicants and place unnecessary financial burden on developments in direct conflict with the aims of the NPPF in respect of supplementary planning documents (paragraph 153). This policy should be removed.	
Mr Anthony Williams	SPD Amenity Policy 24	Noise Generating Development	Support		Support welcome
A2 Dominion Group	SPD Amenity Policy 24	Noise Generating Development	Object	<p>Amenity Policy 24: Noise Generating Development</p> <p>OBJECTION</p> <p>Standards and guidance in respect of noise are constantly evolving. The inclusion of such detailed provisions will date quickly and if included within an SPD, cannot be easily updated. Furthermore, noise is covered by the provisions referred to in Appendices 2-6 and as such it is not necessary to include this within an SPD as it causes unnecessary repetition and cannot be considered to result in a succinct document as envisaged by the NPPF (paragraph 17).</p>	Comments noted. No amendment necessary.
Mr Anthony Williams	SPD Amenity Policy 25	Outdoor uses incl. recreational and sporting activities, deliveries, etc.	Support		Support welcome
Mr Anthony Williams	SPD Amenity Policy 26	Construction and Demolition Works	Support with conditions		Support welcome
Thames Water	SPD Amenity	Construction and	Support	The principle of the above policies is supported. However, it is	Comment noted. Requirements

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Property Services	Policy 26	Demolition Works		<p>considered that the wording of the policies and supporting text could be strengthened.</p> <p>Where piling is required for construction there is potential for the vibration to lead to burst water mains or the collapsing of sewers. Works that result in the collapse or partial collapse of sewers could result in sewer flooding to existing properties.</p> <p>It is considered that the supporting text for the policies should be amended to ensure that the method statements required for construction consider the protection of below ground infrastructure including water mains and sewers.</p>	<p>included in para 5.133 (formerly 6.136). Add supporting paragraph after amenity policy 26 to read:</p> <p><u>“The method statement and plan should consider issues such as structural stability of adjacent properties, including party walls and foundations, as well as impact on underground services, such as water mains and sewers(See also SPD Amenity Policy 18).”</u></p>
A2 Dominion Group	SPD Amenity Policy 26	Construction and Demolition Works	Object	<p>Amenity Policy 26: Construction and Demolition Works</p> <p>OBJECTION</p> <p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.</p>	Comments noted. No amendment necessary
Royal Borough of Kensington & Chelsea	SPD Amenity Policy 26	Construction and Demolition Works	Observations	<p>10. SPD Amenity Policy 26</p> <p>Construction and Demolition Works</p> <p>'A Demolition Method Statement and Construction Management</p>	Comment noted.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>Plan will be required for substantial developments and where the site is close to other premises.'</p> <p>In RBKC, for sites that require an EIA or are classed as a Major application we usually require a Construction Environmental Management Plan (by condition). For smaller sites or those with a lesser environmental impact we usually require a Demolition and Construction Management Plan often by condition. If possible, it would be helpful to align our terminology and agree criteria for which sites require which Plan.</p>	

Sustainability

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Thames Water Property Services	Section 7	Sustainability	Support	Section 7.13 We support the references to sewer and surface water flooding and the need for basement developments to be carried out with appropriate flood mitigation measures.	Support welcome
Natural England	Section 7	Sustainability	Support	Natural England welcomes the Biodiversity consideration and policies proposed by the Borough in the Supplementary Planning Document, Chapter 7: Sustainability, paragraphs 7.172 to 7.270 refer. This section covers the areas and issues of interest to Natural England, and we acknowledge the amendments to reflect our earlier comments and advice.	Support welcome
Environment Agency	Section 7	Sustainability	Object	Paragraph 7.11 As noted in our previous response, the SPD should state on what evidence and in what context the whole borough is considered to be a Critical Drainage Area (CDA). In response to our original comment, the Statement of Consultation states that “the borough has been identified as a CDA in the Council’s Surface Water Management Plan”, but no change has been made to the SPD text. We therefore recommend that this section is revised accordingly to ensure it is clear.	Comment noted. Text in Para 6.10 (formerly para 7.11) to be amended to read: “H&F benefits from 7km of riverside frontage along the Thames which helps to enhance the environmental quality and character of the borough. However, it also means that the borough is potentially more at risk of flooding than some other parts of London. The whole borough has been <u>identified in the council’s Surface Water Management Plan</u> is regarded as a Critical Drainage Area, indicating that there are multiple and inter-linked sources of flood risk, with much of the borough at risk from surface water flooding”.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Environment Agency	Section 7	Sustainability	Object	<p>Glossary</p> <p>As noted in our previous response, the definition of greenfield runoff rates included in the SPD is inconsistent with the London Plan, the Supplementary Planning Guidance on Sustainable Construction, and the Council's own Core Strategy. While we accept that it is a standard definition as noted in the Statement of Consultation, we reiterate that we do not agree with it. Simply retaining the definition because it is a standard one does not in any way address the resultant inconsistencies with established policy. The retention of the definition in the SPD also risks undoing much of the hard work of Council Officer's and the Environment Agency in trying to ensure development makes a meaningful contribution to reducing surface water flood risk. If the Council wishes to retain the definition, it needs to fully consider the implications that will have for surface water flood risk in the Borough.</p>	<p>Comment noted.</p> <p>The current definition of 'greenfield run-off' in the SPD will be amended to read:</p> <p>"The surface water run-off from a site before development. or the existing site conditions for a brownfield redevelopment site. A typical greenfield run-off rate is considered to be 5l/s/ha".</p> <p>This will bring the definition into line with the accepted standard definition used in other documents.</p>
Environment Agency	Section 7	Sustainability	Support	<p>7.213</p> <p>We are pleased to see the inclusion of Paragraph 7.213 regarding development adjacent to the River Thames or the Grand Union Canal, and strongly support its retention in future iterations of the SPD.</p>	Support welcome.
Environment Agency	Section 7	Sustainability	Observations	<p>Paragraphs 7.23, 7.25, 7.27, 7.31</p> <p>As noted in our previous response, we recommend providing one link directly to the relevant page on our website, instead of several links to the PDF copies of our FRA Guidance Notes and Advisory Comments. When these documents are updated and reissued (as</p>	Comment noted. Text to be amended in the suggested paragraphs to provide a link the EA's main FRA Guidance web page rather than individual guidance documents to avoid the problem

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>the frequently are), direct links will be broken. However, linking to the webpage instead of the PDFs will ensure the new versions of the guidance are easily accessible and captured in the SPD. To avoid repetition we recommend that one paragraph is inserted to replace the various links as follows:</p> <p>Further guidance regarding the preparation of Flood Risk Assessments is available on the Environment Agency's website http://www.environmentagency.gov.uk/research/planning/93498.aspx</p>	highlighted.
Environment Agency	Section 7	Sustainability	Observations	<p>Paragraphs 7.5 and 7.6</p> <p>These sections appear to have been separated by mistake, and should be combined as one paragraph.</p>	<p>Comment noted.</p> <p>This formatting issue will be corrected by combing former paras 7.5 and 7.6 to create a new para 6.5.</p>
Hammersmith & Fulham Historic Buildings Group	Section 7	Sustainability	Observations	<p>Green Corridors and Green Chains p196</p> <p>We are concerned that although the Canal and River are identified as Nature Conservation Areas of Metropolitan Importance the canal tow path and riverside walk are not identified as Green Corridors alongside them. We consider that they should be to enable the requirement of sympathetic 'greening' from adjacent developments. This is particularly relevant along the river where we have just had a lamentable extension of the Riverside Walk at Hammersmith Embankment which has no sympathetic landscaping included although there appears to be ample space to do so.</p>	The designation of green corridors and similar features is undertaken through the Core Strategy and shown on the Proposals Map. It is not the role of SPDs to designate green corridors.
A2 Dominion Group	Section 7	Sustainability	Object	7 SUSTAINABILITY	No amendment necessary

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>Storage of Refuse and Recyclables</p> <p>Sustainability Policies 3 to 13</p> <p>OBJECTION</p> <p>These policies are repetitive and could easily be consolidated to create more concise and user friendly guidance. In respect of the storage of waste and recyclables, it would be helpful to have a clear indication of the dimensions and quantum of the receptacles required to inform the design development process.</p> <p>The approach to these policies is inconsistent with some dimensions included within the policy wording (i.e. Policy 5), some within the supporting text (paragraph 7.109) and others within the appendices (Appendix 2). This results in a convoluted and confusing section that is not easy to use.</p> <p>We suggest that these policies should be clarified and consolidated and should follow a consistent format.</p>	
A2 Dominion Group	Section 7	Sustainability	Object	<p>7 SUSTAINABILITY</p> <p>Sustainable Energy</p> <p>Sustainability Policies 30-32</p> <p>OBJECTION</p> <p>These policies reiterate the provisions of London Plan Policy 5.2 which relates to the Mayor's Energy Hierarchy. These policies do not provide further guidance to London Plan Policy 5.2. In our</p>	<p>Comment noted. No amendment necessary as the policies and supporting text are considered to provide H&F specific guidance that is relevant for an SPD.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>view, it is unnecessary for these policies to be included within the SPD as it is set out in the London Plan which forms part of the Development Plan for all London boroughs.</p> <p>The NPPF states that local plans should be succinct (paragraph 17; page 5). Whilst we understand that this SPD will not form part of the Development Plan, once adopted, it will be a material consideration in determining planning applications and in line with the aspirations of the NPPF, should be succinct. Sustainability Policies 30-32 unnecessarily repeat the requirements of the London Plan and in our view this does not result in a succinct document as envisaged by the NPPF. These policies are unnecessary and should be deleted.</p>	
Capital and Counties on Behalf of Earls Court and Olympia Group	Section 7	Sustainability	Object	<p>SPD Appendix 2</p> <p>Appendix 2 identified Sites of Importance to Nature Conservation (SINCS), although it is noted that an accompanying plan is not provided. A site identified as 'West London Line South of Earl's Court' is identified which is managed by Network Rail. If this is the area of land south of Lillie Road to the East of Seagrave Road, this is in the ownership of Capital & Counties.</p>	Comments noted. Appendix 2 will be deleted.
Thames Water Property Services	SPD Sustainability Policy 1	Flood Risk Assessment	Support with conditions	<p>The policy is supported. However, the wording could be strengthened by stating that "Planning applications must provide supporting information in line with the requirements of this SPD to show that appropriate consideration has been given to all forms of flood risk."</p>	<p>Comment noted. Text to be amended as suggested to ensure all forms of flooding are covered by Policy 1, namely.</p> <p>"Planning applications must provide supporting information in line with the requirements of this SPD to show that appropriate consideration has been given to <u>all forms of flood</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					risk.”
Thames Water Property Services	SPD Sustainability Policy 1	Flood Risk Assessment	Support with conditions	<p>The policy is supported. However, it is considered that the wording of the policy could be strengthened to ensure that ongoing management of drainage measures are considered to ensure that the drainage measures remain effective. The text below sets out suggested amendments to the policy:</p> <p>“Information should be included on proposed sustainable drainage measures and any ongoing management requirements, in consultation with the Environment Agency and Thames Water where necessary, to show compliance with Development Plan policies on sustainable drainage. Any approved drainage measures shall thereafter be retained and maintained in accordance with the approved details.”</p>	<p>Comment noted. Text to be amended as below to ensure ongoing maintenance issues are covered by Policy 1.</p> <p><u>“Information should be included on proposed sustainable drainage measures and any ongoing management requirements, in consultation with the Environment Agency and Thames Water where necessary, to show compliance with Development Plan policies on sustainable drainage. Any approved drainage measures shall thereafter be retained and maintained in accordance with the approved details.”</u></p>
A2 Dominion Group	SPD Sustainability Policy 1	Flood Risk Assessment	Object	<p>Sustainability Policy 1: Flood Risk Assessment</p> <p>OBJECTION</p> <p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications.</p>	<p>Comment noted. No amendment proposed.</p> <p>The guidance provided is far more detailed than can be included in validation list and also contains additional advice compared to that outlined in the NPPF. Whilst there is some reference to national</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document.</p> <p>This policy and the supporting paragraphs repeat the provisions of the NPPF (section 10 and PPS25 Development and Flood Risk – Practice Guide) and does not provide new policy or guidance. The NPPF requires the production of succinct local plans (paragraph 17; page 5). Whilst this policy is within an SPD which will not form part of the Development Plan, once adopted, it will be a material consideration in determining planning applications and, in line with the aspirations of the NPPF, should be succinct. In our view, this policy does not add anything that is not already covered by the NPPF or could be included within a local validation list and should be deleted.</p>	<p>guidance, this is not considered to be in conflict with the NPPF requirements.</p>
<p>English Heritage-London Region</p>	<p>SPD Sustainability Policy 2</p>	<p>Sustainable Drainage Measures</p>	<p>Object</p>	<p>English Heritage requests coverage of the importance of sensitive integration of sustainable urban drainage systems (SUDS) in designed landscapes, particularly those of heritage value, as this is currently not included in Sustainability Policy 2 on page 168</p>	<p>Comment noted. Amendment agreed.</p> <p>Add the following text to the end of Para 6.41 (formerly para 7.42): <u>“Where SuDS measures are proposed for integration into ‘designed landscape’ areas, this should be done in a way that is sensitive to their heritage value”.</u></p>
<p>H&F Disability Forum</p>	<p>SPD Sustainability Policy 4</p>	<p>Internal Storage</p>	<p>Object</p>	<p>H&F DF regularly give advice on refuse and recycling issues so we are surprised not to see any reference to accessible and inclusive design in the PG SPD. This is not consistent with DM DPD H5: sustainable waste management. The first bullet point of H5 requires accessible and inclusive communal storage facilities.</p>	<p>Under present legislation Local Authorities are given no role to impose Equality Act 2010 management plans on other bodies who have duties to make adjustments under the Equality Act</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>Our advice is:</p> <ul style="list-style-type: none"> • Step free access to refuse and recycling bins. • Residents should have a step free route from their housing unit so they can carry the bags independently otherwise the development needs a management plan to make a reasonable adjustment under the Equality Act 2010. • A percentage of refuse and recycling bins at an appropriate height so wheelchair users can fill the bins independently. <p>H&F DF believes this is an oversight that should be corrected. We recommend that there is a definition of accessible and inclusive communal storage facilities based on our advice. This should also be reflected in the EQIA.</p>	<p>2010.</p> <p>The Council will cross reference to its general guidance to developers by adding text under SPD SP7 after 6.114 (formerly para 7.115) to read:</p> <p><u>” Where resident service bodies have duties under the Equality Act 2010 to make service adjustments for individual disabled residents, this may in some instances include an assistance arrangement to porter refuse to communal bin and recycling stores. For further information about Equality Act 2010 and Building Regulation step-free access requirements, see Appendix 1 to the Access Section. “</u></p> <p>In para 6.110 (formerly para 7.111) it is stated that developments must provide space for kerbside collection bags in an area that is accessible to disabled people, and the Council will alter 6.114 (formerly para 7.115) to read:</p> <p><u>“for communal use located in a bin store or stores and /or at the end of chutes, accessible along a step-free route from the dwellings</u></p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					they serve.
St James Group Ltd and St George Plc	SPD Sustainability Policy 5	Compost bins	Object	<p>Storage of refuse and recyclables</p> <p>Reason/Justification:</p> <p>The guidance is considered to be over prescriptive. In accordance with emerging Development Management Policy A9 flexibility should be retained for waste and recycling to be dealt with flexibility through a full range of measures. The guidance should be deleted.</p> <p>Action: Delete</p>	<p>Home composting is a vital means of dealing with food and garden waste at the point of production. Whether a resident chooses to have a home compost bin is down to personal choice, but they should be given enough space in the garden to do so.</p> <p>Amend Sustainability Policy 5 as follows:</p> <p>“Where there is access to a garden, space must <u>should</u> be provided for a compost bin of at least 1 metre in diameter by 1.2 metres in height.”</p>
H&F Disability Forum	SPD Sustainability Policy 6	External Storage	Object	<p>H&F DF regularly give advice on refuse and recycling issues so we are surprised not to see any reference to accessible and inclusive design in the PG SPD. This is not consistent with DM DPD H5: sustainable waste management. The first bullet point of H5 requires accessible and inclusive communal storage facilities.</p> <p>Our advice is:</p> <ul style="list-style-type: none"> • Step free access to refuse and recycling bins. • Residents should have a step free route from their housing unit so they can carry the bags independently otherwise the 	<p>Under present legislation Local Authorities are given no role to impose Equality Act 2010 management plans on other bodies who have duties to make adjustments under the Equality Act 2010.</p> <p>The Council will cross reference to its general guidance to developers by adding text under SPD SP7 after 6.114 (formerly para 7.115) to read:</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>development needs a management plan to make a reasonable adjustment under the Equality Act 2010.</p> <ul style="list-style-type: none"> • A percentage of refuse and recycling bins at an appropriate height so wheelchair users can fill the bins independently. <p>H&F DF believes this is an oversight that should be corrected. We recommend that there is a definition of accessible and inclusive communal storage facilities based on our advice. This should also be reflected in the EQIA.</p>	<p><u>” Where resident service bodies have duties under the Equality Act 2010 to make service adjustments for individual disabled residents, this may in some instances include an assistance arrangement to porter refuse to communal bin and recycling stores. For further information about Equality Act 2010 and Building Regulation step-free access requirements see Appendix 1 to the Access Section “</u></p> <p>In para 6.110 (formerly para 7.111) it is stated that developments must provide space for kerbside collection bags in an area that is accessible to disabled people, and the Council will alter 6.114 (formerly para 7.115) to read:</p> <p><u>“for communal use located in a bin store or stores and /or at the end of chutes, accessible along a step-free route from the dwellings they serve.</u></p>
H&F Disability Forum	SPD Sustainability Policy 8	Internal storage	Object	H&F DF regularly give advice on refuse and recycling issues so we are surprised not to see any reference to accessible and inclusive design in the PG SPD. This is not consistent with DM	Under present legislation Local Authorities are given no role to impose Equality Act 2010

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>DPD H5: sustainable waste management. The first bullet point of H5 requires accessible and inclusive communal storage facilities.</p> <p>Our advice is:</p> <ul style="list-style-type: none"> • Step free access to refuse and recycling bins. • Residents should have a step free route from their housing unit so they can carry the bags independently otherwise the development needs a management plan to make a reasonable adjustment under the Equality Act 2010. • A percentage of refuse and recycling bins at an appropriate height so wheelchair users can fill the bins independently. <p>H&F DF believes this is an oversight that should be corrected. We recommend that there is a definition of accessible and inclusive communal storage facilities based on our advice. This should also be reflected in the EQIA.</p>	<p>management plans on other bodies who have duties to make adjustments under the Equality Act 2010.</p> <p>The Council will cross reference to its general guidance to developers by adding text under SPD SP7 after para 6.114 (formerly para 7.115) to read:</p> <p><u>" Where resident service bodies have duties under the Equality Act 2010 to make service adjustments for individual disabled residents, this may in some instances include an assistance arrangement to porter refuse to communal bin and recycling stores. For further information about Equality Act 2010 and Building Regulation step-free access requirements see Appendix 1 to the Access Section "</u></p> <p>In 6.110 (formerly para 7.111) it is stated that developments must provide space for kerbside collection bags in an area that is accessible to disabled people, and the Council will alter 6.114 (formerly para 7.115) to read:</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					“for communal use located in a bin store <u>or stores</u> and /or at the end of chutes, <u>accessible along a step-free route from the dwellings they serve.</u>
English Heritage-London Region	SPD Sustainability Policy 9	External storage	Object	English Heritage requests inclusion of a statement, relating to Sustainability Policy 9 concerning external storage on pages 185 and 186, about the importance of careful consideration of the design, siting and location of units so as not to adversely affect the streetscene, particularly in conservation areas	This principle can be inserted into the external storage section: <u>“careful consideration should be given to the design, siting and location of units so as not to adversely affect the streetscene, particularly in conservation areas.”</u>
St James Group Ltd and St George Plc	SPD Sustainability Policy 10	Bulky waste	Object	Storage of refuse and recyclables Reason/Justification: The guidance is considered to be over prescriptive. In accordance with emerging Development Management Policy A9 flexibility should be retained for waste and recycling to be dealt with flexibility through a full range of measures. The guidance should be deleted. Action: Delete	Developments constructed without a bulk storage area can be problematic in terms of maintaining street cleanliness. An area for bulky waste should be provided. <u>Amend to include “should” in place of “must”.</u>
A2 Dominion Group	SPD Sustainability Policy 13	Planning Application Procedures	Object	Sustainability Policy 13: Planning Application procedures OBJECTION The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for	Comment noted. The guidance provided is far more detailed than can be included in validation list and also contains additional advice compared to that

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.</p>	<p>outlined in the NPPF. Whilst there is some reference to national guidance, this is not considered to be in conflict with the NPPF requirements.</p>
<p>Helical Bar and Aviva</p>	<p>SPD Sustainability Policy 14</p>	<p>Protection of existing biodiversity</p>	<p>Support with conditions</p>	<p>This draft policy provides a set of detailed requirements for applicants to assess existing biodiversity. It seeks to protect habitats of value and mitigate any unavoidable impacts arising from a development. These requirements are all sensible and are supported.</p> <p>However, the first opening sentence of draft Policy 14 is inconsistent with all of the subsequent detail, by simply imposing a blanket requirement that “All development proposals should protect existing biodiversity in the Borough.” This would therefore apply even where the biodiversity is of little or no value. It would also have no regard to proposals which might seek to mitigate and enhance the biodiversity of land.</p> <p>It is clear that this oversimplified statement at the start of the policy is badly worded and is not intended to impose a simplistic blanket approach by virtue of the details that follow.</p> <p>The first sentence of draft Sustainability Policy 14 should therefore be deleted.</p>	<p>Agree in part. Reword Sustainability policy 14 by amending first two sentences with the following sentence read <u>“All development proposals should protect existing biodiversity in the borough Applicants for development proposals should:”</u></p>
<p>A2 Dominion Group</p>	<p>SPD Sustainability Policy 14</p>	<p>Protection of existing biodiversity</p>	<p>Object</p>	<p>Sustainability Policy 14: Protection of Existing Biodiversity</p> <p>OBJECTION</p>	<p>Paragraph 193 of NPPF concerns pre-application engagement and front-loading, with a recommendation that local</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.</p>	<p>authorities should publish a list of information required for applications (which should be frequently reviewed and proportionate, necessary, relevant and material). The council could set out that it would require a biodiversity assessment, but this would not explain what is required nor would it be a requirement for every site. Consequently it is better located in SPD to further explain how the requirements of DMDPD Policy DM E4 can be delivered. The wording changes to Policy 14 as shown above also clarify how this guidance will be applied.</p> <p>No amendment necessary</p>
<p>British Waterways</p>	<p>SPD Sustainability Policy 16</p>	<p>Designated sites, Priority Habitats, etc</p>	<p>Support with conditions</p>	<p>At paragraph 7.213, we would request that the first bullet point be amended to read "Enhance the function of the River Thames and the Grand Union Canal as wildlife corridors and introduce APPROPRIATE measures (or WHERE APPROPRIATE) to encourage riparian biodiversity". We support the important environmental function of the waterway network, but some measures carried out have not been successful, and we would not agree too, particularly where these encroach into the navigation and create an increased maintenance burden.</p>	<p>Other factors, such as navigation, will also be considered as a result of other policies, for example DM LP Policy DM F4.</p> <p>No amendment necessary</p>
<p>A2 Dominion Group</p>	<p>SPD Sustainability</p>	<p>Enhancement of Biodiversity</p>	<p>Object</p>	<p>Sustainability Policy 20: Enhancement of Biodiversity</p>	<p>The requirement for a Green Infrastructure Strategy only applies</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
	Policy 20			<p>OBJECTION</p> <p>This policy sets a requirement for a Green Infrastructure Strategy. This adds an unnecessary stage to the planning process that could place an unnecessary financial burden on development contrary to the NPPF (paragraph 153). Whilst it is accepted that due consideration should be given to biodiversity enhancements in line with adopted policy requirements, it is for the applicant to determine the appropriate means of reviewing and presenting this related to the specifics of the site. It is not for an SPD to prescribe the appropriate means of assessing and presenting biodiversity enhancements.</p>	<p>to strategic development sites, which are those set out in the Core Strategy (for which further information is appropriately set out here). These sites offer the greatest opportunity for biodiversity enhancement and the council considers it appropriate to require such a strategy as well as to offer guidance on what this should include to ensure that the aims of Core Strategy Policy OS1 and DM LP Policy DM E4 are met.</p> <p>No amendment necessary</p>
British Waterways	SPD Sustainability Policy 21	Landscaping and planting	Object	<p>We object to the requirement for a green buffer to be planted between the Grand Union Canal and any development site. In contrast to the River Thames, the canal is a man made structure developed for industrial transport. Its role has now widened to include much greater use for a range of leisure and recreation activities, and as a haven for wildlife and people, away from the hustle and bustle of urban living. We welcome biodiversity habitats and ecological enhancements established along its length, which can be introduced in a variety of forms, but a blanket requirement for a standard set back is not always characteristic of the canal environment, and in our experience of where this has been provided, has created 'dead' spaces that do not benefit the waterway. (please see photograph examples sent to ldf@lbhf.gov.uk). We would request that this be removed, or amended to read "Where appropriate, a green buffer should be planted between the River Thames and the Grand Union Canal</p>	<p>It is agreed to alter second sentence in second para of Sustainability policy 21 to read:</p> <p>"Where appropriate possible a green buffer should be planted between the River Thames and the Grand Union Canal and any development site."</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				and any development site".	
St James Group Ltd and St George Plc	SPD Sustainability Policy 21	Landscaping and planting	Object	<p>Biodiversity</p> <p>Reason/Justification:</p> <p>Greater flexibility needs to be provided in relation to the types and quantum of landscaping that is to be provided in new developments. An appropriate balance needs to be struck to ensure that development sites can deliver the appropriate contribution towards the enhancement of biodiversity and green infrastructure whilst also optimising the development capacity of sites and the objectives to deliver new homes and employment.</p> <p>Action: Amend by adding the following opening sentence:</p> <p>Where feasible, new developments should seek to comply with the following measures:</p>	The component parts of this policy are not considered onerous. The use of words such as “should” and “encourage” allow for flexibility.
A2 Dominion Group	SPD Sustainability Policy 24	Green and Brown Roofs	Object	<p>Sustainability Policy 24: Green and Brown Roofs</p> <p>OBJECTION</p> <p>This policy encourages the incorporation of green or brown roofs on developments. This policy does not afford any flexibility when considering development proposals in areas where the character is such that green/ brown roofs would not be appropriate, for example within conversation areas or where it is more appropriate to use the roof as communal or private amenity space. A provision should be included that green/ brown roofs are encouraged where it is appropriate in the context of the surrounding character and does not conflict with other policy requirements and standards having regard to the wider package of sustainability measures.</p>	<p>Comment noted.</p> <p>The Policy clearly provides an element of flexibility by stating that “Developers <i>should seek</i> to incorporate biodiversity friendly Green or Brown Roofs and Living Walls into new developments” – i.e. it does not compel developers to include such features on all developments regardless of suitability, feasibility, etc.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
St James Group Ltd and St George Plc	SPD Sustainability Policy 24	Green and Brown Roofs	Object	<p>Biodiversity</p> <p>Reason/Justification:</p> <p>Flexibility needs to be provided in this guidance. This accords with the approach taken at the regional level.</p> <p>In this regard, Policy 5.11 of the London Plan states that “Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver...”</p> <p>Furthermore, Standard 6.4.3 of the London Draft Housing SPG states: “New development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of achieving a Greenfield run-off rate...”</p> <p>Action: Amend as follows:</p> <p>Developers should seek to incorporate biodiversity friendly Green or Brown Roofs and Living Walls into new developments where feasible.</p>	<p>Comment noted.</p> <p>The Policy clearly provides an element of flexibility by stating that “Developers <i>should seek</i> to incorporate biodiversity friendly Green or Brown Roofs and Living Walls into new developments” – i.e. it does not compel developers to include such features on all developments regardless of suitability, feasibility, etc.</p>
A2 Dominion Group	SPD Sustainability Policy 25	Conserve Energy, Materials and Water Use	Object	<p>Sustainability Policy 25: Conserve Energy, Materials and Water Use</p> <p>OBJECTION</p> <p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale</p>	<p>Comment noted.</p> <p>The guidance provided is far more detailed than can be included in a validation list and also contains additional advice compared to that outlined in the NPPF. Whilst there is some reference to national</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.	guidance, this is not considered to be in conflict with the NPPF requirements.
A2 Dominion Group	SPD Sustainability Policy 26	Reduce Air, Noise and Water Pollution Impacts	Object	Sustainability Policy 26: Reduce Air, Noise and Water Pollution Impacts OBJECTION The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.	Comment noted. The guidance provided is far more detailed than can be included in a validation list and also contains additional advice compared to that outlined in the NPPF. Whilst there is some reference to national guidance, this is not considered to be in conflict with the NPPF requirements.
A2 Dominion Group	SPD Sustainability Policy 27	Promote Sustainable Waste Behaviour	Object	Sustainability Policy 27: Promote Sustainable Waste Behaviour OBJECTION The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a	Comment noted. The guidance provided is far more detailed than can be included in a validation list and also contains additional advice compared to that outlined in the NPPF. Whilst there is some reference to national guidance, this is not considered to be in conflict with the NPPF requirements.

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				matter for a supplementary planning document. On this basis, this policy should be removed.	
A2 Dominion Group	SPD Sustainability Policy 28	Conserve the Natural Environment, particularly Biodiversity	Object	<p>Sustainability Policy 28: Conserve the Natural Environment, particularly Biodiversity</p> <p>OBJECTION</p> <p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.</p>	<p>Comment noted.</p> <p>The guidance provided is far more detailed than can be included in a validation list and also contains additional advice compared to that outlined in the NPPF. Whilst there is some reference to national guidance, this is not considered to be in conflict with the NPPF requirements.</p>
A2 Dominion Group	SPD Sustainability Policy 29	Submission of Detailed Energy Assessment	Object	<p>Sustainability Policy 29: Submission of Detailed Energy Assessment</p> <p>OBJECTION</p> <p>The NPPF states, in paragraph 193, that local planning authorities should publish a list of their information requirements for application, which should be proportionate to the nature and scale of development proposals and reviewed on a regular basis. This policy provides details of information requirements for applications. Information requirements for planning applications should be set out in a local validation list that can be easily updated and is not a matter for a supplementary planning document. On this basis, this policy should be removed.</p>	<p>Comment noted.</p> <p>The guidance provided is far more detailed than can be included in a validation list and also contains additional advice compared to that outlined in the NPPF. Whilst there is some reference to national guidance, this is not considered to be in conflict with the NPPF requirements.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
English Heritage-London Region	SPD Sustainability Policy 30	Maximise Energy Efficiency (Be Lean)	Object	We request that Sustainability Policy 30 on page 246 be renamed Optimising Energy Efficiency to ensure that the conservation and enhancement of the historic environment is not compromised when attempting to conform with this policy. We would also welcome a reference to our Climate Change and Your Home website (www.climatechangeandyourhome.org.uk) in the justification paragraphs for this policy.	Comment noted. The phrase “maximising energy efficiency” is in common usage in planning policy and related documents across central and local government. It is also used in the London Plan.
British Waterways	SPD Sustainability Policy 32	Integrate Renewables where Feasible (Be Green)	Other	Canal water can also be utilised as an efficient method of heating and cooling buildings. A hotel in London Docklands, as well as the GSK data centre in Brentford, both successfully use this system.	Comment noted. No amendment necessary. Table 1 has been reproduced from the Heat Mapping Study referred to in paragraph 6.333. This did not consider the suitability of Water Source Heat Pumps in the borough at the time of the study.
Stanhope PLC	SPD Sustainability Policy 32	Integrate Renewables where Feasible (Be Green)	Object	Policy 32 states the following: "The council will expect major developments to include on-site renewable energy generation where this is required to meet the carbon dioxide reduction targets set out in policy 5.2 of the London Plan". This policy wording does not allow for sufficient flexibility for developers of major developments as it expects all major development to include on-site renewable energy generation where it is required to meet the carbon dioxide reduction targets set out in policy 5.2 of the London Plan. There may be instances	Comment noted. No amendment necessary. The supporting text for this policy already accepts that some development sites will have limitations that restrict the feasibility of certain renewable technologies. If renewables are not feasible and further measures are required to meet CO2 reduction measures, the

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>where it is not feasible or practical to provide on-site renewable energy generation and this policy does not reflect such circumstances. We request that the wording of the policy is revised to allow for flexibility and suggest the following wording for Policy 32:</p> <p>"The Council should identify opportunities where possible for on-site renewable energy generation where this is required to meet the carbon dioxide reduction targets set out in policy 5.2 of the London Plan".</p>	<p>London Plan already makes provision for a payment in lieu to be made to cover this.</p>

River

The council has considered the representations on Residential Moorings and has decided not to proceed with SPD on this matter. The policies included in the draft SPD, although grouping together guidance on issues that would be considered in assessing applications for moorings, added little to policy guidance included elsewhere in the Core Strategy, Development Management Local Plan and London Plan. Because the policies in the draft SPD were basically repeating those in development plan documents, they could, indeed, have lead to confusion where wording was not identical.

The decision not to proceed with council SPD on Residential Moorings does not impact on the policies of other bodies, such as the Environment Agency, Port of London Authority and Canal and River Trust (formerly British Waterways).

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
British Waterways	Section 8	River	Object	The Grand Union Canal is a man made structure and not a river, and we would therefore request that this policy be renamed "Waterways".
Environment Agency	Section 8	River	Object	<p>Having reviewed the draft SPD, we remain satisfied that the policies and explanatory text outlined in the draft SPD reflects the environmental priorities set out in the Hammersmith and Fulham Core Strategy and emerging Development Management DPD. However, we retain significant concerns regarding the chapter on Residential Moorings, and the impact that such moorings could have on the environment.</p> <p>We would therefore find it difficult to support the SPD as a whole while it contains the section on residential moorings. This section lacks the evidence and thorough assessment that supports the generally excellent planning guidance provided in the rest of the SPD. If the Council is determined to include the residential moorings section within the SPD, then we strongly recommend that it is supported by a formal Strategic Environmental Assessment or Sustainability Appraisal to examine the likely impact that the SPD may have on the environment.</p>
Environment	Section 8	River	Object	We must reiterate that we do not support moorings on the River

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
Agency				Thames that serve non river dependent uses (such as permanent residential moorings) as these are contrary to our national encroachment policy for tidal rivers and estuaries. We are highly likely to object to planning applications for new residential moorings on this basis, unless the applicant can demonstrate that exceptional circumstances apply. Further discussion of the Councils response to our previous comments in the Statement of Consultation is outlined below.
Port of London Authority	Section 8	River	Object	8.11 What is evidence or tests undertaken to substantiate the approach taken that the river between the Hurlingham Club to Cremorne Railway Bridge may be able to accommodate more residential moorings in a way that the river elsewhere in the Borough cannot?
Port of London Authority	Section 8	River	Object	Paragraphs 8.4 and 8.5 We are pleased to see that Policy 7.28 of the London Plan, the EU Water Framework Directive (WFD), and Thames River Basin Management Plan (RBMP) have been included in the SPD. However, there is no discussion of their relevance to residential moorings and the impact of any development within the river to cause deterioration in the status of the river, or to prevent achieving good ecological status as required by the WFD. The SPD does not discuss any of the mitigation measures to enhance the ecological value (eg. riparian habitat enhancement) specified in the RBMP.
Port of London Authority	Section 8	River	Object	Paragraph 8.11 While we acknowledge the additional caveats included in this section in response to our previous comments, we remain concerned that the SPD identifies a specific reach of the River

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
				Thames between Hurlingham Wharf and the Cremorne railway bridge as having potential for residential moorings. Although we accept that the area has not been allocated in a legal sense, we still consider that the SPD creates a presumption that residential moorings are acceptable in principle in this location, which may not be the case. No evidence or analysis is provided in the SPD explaining why the Council has identified that this area has potential to support residential moorings.
Hammersmith & Fulham Historic Buildings Group	Section 8	River	Object	<p>River Policies</p> <p>Although there is a section in the DM LP on the River Thames (pages 44-47) it appears that the specific UDP policy EN35, re encroachment on the river or foreshore, has been dropped despite a statement to the contrary in the analysis of UDP policies on page 97 of DPD. We ask that it is reinstated.</p> <p>The London Plan recognises the Thames Strategy - Kew to Chelsea, (TSKC) as an appraisal of the Thames Policy Area. We note that the very valuable policies and projects included in the Thames Strategy - Kew to Chelsea, (currently adopted as SPG in this Borough and LB of Hounslow and LB of Richmond) have been downgraded as the Strategy has been demoted to a pendant document. We are aware that the Strategy has not been reviewed (because of lack of funding) and that the policy sections are often no longer relevant. However this does not apply to the River related policies or to the projects. We suggest that a discussion with representatives of the TSKtoC could be helpful in carrying these policies and projects forward into the LDF with more weight that at the moment proposed.</p>
Environment Agency	Section 8	River	Observations	Paragraph 8.20

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
				<p>As a result of various comments and suggested changes to this section (including our own), we believe it has become unclear and repetitive – focussing on what we don't regulate to the detriment of what we do. We therefore suggest revising and simplifying the paragraph as follows:</p> <p>The Environment Agency regulates any works in, under, or over the River Thames, and within 16 metres of the tidal flood defences. The Environment Agency is also the statutory body responsible for the provision of flood defences along the river and ensuring that these defences are maintained by riparian owners. Developers of new residential moorings on the River Thames will therefore be required to obtain Flood Defence Consent from the Environment Agency. In determining applications for Flood Defence Consent, the Environment Agency will also consider the ecological impact of proposed works.</p>
Environment Agency	Section 8	River	Observations	8.20 Although it is for the EA (more than the PLA) to comment on this paragraph, The EA only consents development within a specified distance from the river's flood defences, usually the river wall. The way the paragraph is written appears to suggest that all development within the river requires the specific consent of the EA.
Environment Agency	Section 8	River	Observations	8.5 On the basis that the SPD includes London Plan policy 7.25 (increasing the use of the Blue Ribbon Network for passengers and tourism) as relevant to the development of residential moorings, it should also include policy 7.26 (Increasing the use of the Blue Ribbon Network for freight transport).
Dr Anthony Jelley	SPD River Policy 1	Proposals for residential moorings	Support with conditions	I support the provision of residential moorings along the South Fulham Riverside, but I would like to see the extra money raised from their sale used to help improve the quality of the public realm

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
				and improve the quality of public amenities, together with helping to reduce the density of development to a genuine medium density.
British Waterways	SPD River Policy 1	Proposals for residential moorings	Object	This suite of policies should be called "SPD Waterway Policy 1/2/3..." as the Grand Union Canal is not a river.
British Waterways	SPD River Policy 1	Proposals for residential moorings	Other	<p>On 2 July 2012, British Waterways ceased to exist in England and Wales and in its place the Canal & River Trust was born. The Canal & River Trust is the new charity set up to care for England and Wales' wonderful legacy of 200-year-old waterways, holding them in trust for the nation forever. The Trust has responsibility for 2,000 miles of canals, rivers, docks and reservoirs, along with museums, archives and the country's third largest collection of protected historic buildings.</p> <p>The Trust launched on 2nd July 2012, taking over responsibility from British Waterways and The Waterways Trust in England and Wales.</p> <p>The Trust has a range of charitable objectives including:</p> <ul style="list-style-type: none"> • To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; • To protect and conserve objects and buildings of heritage interest; • To further the conservation, protection and improvement of the natural environment of inland waterways; and • To promote sustainable development in the vicinity of any inland

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
				<p>waterways for the benefit of the public.</p> <p>The main sources of the Trust's funding are from a 15-year contract with government and income from boating, property and utilities. This funding is important for keeping our precious 200-year old waterways running, but it is not enough to fully support our canals and rivers as valuable resources for people and nature, particularly when under increased pressure and intensified use from expanding development.</p> <p>Our canals and rivers are today used by more people and for a wider variety of purposes than ever before, with over 35,000 boats and 13 million towpath visitors using them as an escape from the pressures of modern life. Once Britain's most important transport system, our waterways are now a focus for economic renewal in the towns and cities they helped to create.</p> <p>Please visit our website to find out more and to download 'Shaping our Future' from the About Us page. With regard to paragraphs 8.12, 8.13, 8.16, 8.17 and 8.19, reference to British Waterways should be substituted with the Canal & River Trust.</p> <p>The web address at paragraph 8.19 has now changed to the following:</p> <p>http://canalrivertrust.org.uk/boating/mooring/mooring-policies</p>
Port of London Authority	SPD River Policy 2	Provision of suitable infrastructure	Object	There appears to be a discord between the policy and paragraph 8.26 in relation to 'grey water'; it is included in the supporting paragraph but not the policy itself.
Port of London Authority	SPD River Policy 2	Provision of suitable	Object	8.27 The PLA is not convinced this represents the best approach. Surely, if the Council believe that residential moorings can

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
		infrastructure		contribute towards the housing stock of the Borough, it is utterly inappropriate for such stock not to have mains electricity or mains water? What comparable residential development on land would be permitted without the provision of these basic amenities because 'prospective occupiers of the site would prefer to be more self-reliant'? This approach is contrary to that taken in SPD Policy 1, in that the PLA would not permit any residential mooring development which did not provide this infrastructure. The PLA would recommend the complete deletion of this paragraph in its entirety.
Port of London Authority	SPD River Policy 2	Provision of suitable infrastructure	Object	8.28 As the PLA does not believe the approach taken in the preceding paragraph is appropriate, a comparable objection applies to this paragraph. As above, would a land-based residential development be permitted on the basis of the submission of a management plan explaining how basic services would be provided to the development?
Port of London Authority	SPD River Policy 3	Preserving the existing character and amenity of the borough's waterways and waterside locations	Object	SPD River Policy 3 In view of the SPD's proposed location of new residential development, and bearing in mind the approach taken within the London Plan, reference must be made within this policy and its supporting paragraphs to the safeguarded wharves within the Borough.
British Waterways	SPD River Policy 4	Characteristics of moored vessels	Other	Residential moorings can also provide passive surveillance and increase safety and security along the waterways.
Port of London Authority	SPD River Policy 4	Characteristics of moored vessels	Observations	8.36 Whilst a laudable aim, how would the conditions in relation to these bullets points be enforced and more particularly how will the Council check whether a moored vessel is capable of navigating

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
				under its own power? Furthermore (and whilst noting the caveat at 8.37) on the basis that any vessels moored at the location could move – it being a condition – how would the condition apply to new arrivals?
Port of London Authority	SPD River Policy 5	Impacts on navigation	Observations	8.38 The PLA would recommend the specific inclusion of reference to wash in the first bullet point.
British Waterways	SPD River Policy 6	Access for Emergency services	Observations	<p>With regard to access – below is the advice given in Canal & River Trust's guidance document:</p> <p>Emergency access</p> <p>Whilst it is desirable to provide some form of access for emergency vehicles, it may not always be practical to provide vehicular access directly to a site, or along its full length. The nearest access point should be identified and assessed for its suitability.</p> <p>A significant number of BW residential moorings have emergency access at least to part of the site; others only have access as far as the nearest road.</p> <p>BW has a 24 hour contact service where local knowledgeable staff are on-call to deal or assist with a range of issues, problems and emergencies. As a navigation authority with public safety responsibilities, BW regularly liaises with the emergency services. The research report shows how respondents rated the importance of emergency access to the site.</p> <p>The frequency of emergency calls from boaters is extremely low and we have no evidence of serious difficulty in fire or ambulance services attending call outs to moored boats.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation
Port of London Authority	SPD River Policy 6	Access for Emergency services	Observations	8.40 At what distance is this 'closest access point' unacceptable and therefore result in the refusal of planning permission? This paragraph seems to be weakening the laudable intention of River Policy 6.
Port of London Authority	SPD River Policy 7	Flood Risk Management	Observations	8.42 Is this paragraph, at least in part, a repetition of paragraph 8.20?
British Waterways	SPD River Policy 9	Access for all	Other	With regard to the Glossary, a residential mooring could also have 'deemed' planning permission through an established use of a mooring for residential purposes.

Transport

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Nhs Hammersmith & Fulham	Section 9	Transport	Observations	<p>Transport</p> <p>We recommend the council considers the introduction of more 20 MPH streets where appropriate. The evidence demonstrates that the introduction of 20 MPH streets leads to a reduction in accidents (41.9%), the severity of accidents and accidents involving pedestrians. This study also found the greatest reduction was in children aged 0-15.</p> <p>The provision of secure, well located cycle parking is essential if people are to be encouraged to use a bicycle as a means of transport. Sustrans recommends that cycle parking should be conveniently located within developments, particularly near to the entrance of buildings. It should be well-lit, well-signed, fully secured, weather protected and not hidden out of sight .</p> <p>We encourage the Council to require higher levels of cycle parking for student accommodation. For example, Hillingdon's cycle parking standards require one space per resident .</p>	<p>Comments noted.</p> <p>The council will continue to promote 20mph streets where appropriate and where supported by residents</p> <p>The provision of secure, well located cycle parking is always requested by the council as far as practicable</p> <p>Our cycle parking levels have been revised and are set out in the Development Plan Document (DM LP)</p>
Mr Anthony Williams	SPD Transport Policy 1	Transport assessments	Support		Support is welcome
A2 Dominion Group	SPD Transport Policy 1	Transport assessments	Object	<p>Transport Policy 1: Transport Assessments</p> <p>OBJECTION</p>	The DM LP examination has taken place and the document will be adopted in June 2013 therefore DM LP Policy DM J1 is considered to

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>This policy provides guidance additional to Development Management DPD Policy J1. The DM LP is in draft, is the subject of extant representations and as such should be afforded limited weight at present. In our view, the SPD is premature as it provides guidance on policy that have not yet been found to be legally compliant, sound or in line with national planning policy and could be subject to change at Examination. To be effective, the SPD should be delayed pending the Examination of the DM LP and reviewed and consulted on following receipt of the Inspector's report on the DM LP.</p>	<p>be acceptable.</p> <p>The SPD supports the DM LP and therefore cross referencing policies is appropriate.</p>
Mr Anthony Williams	SPD Transport Policy 2	Travel plans	Support		Support is welcome
A2 Dominion Group	SPD Transport Policy 2	Travel plans	Object	<p>Transport Policy 2: Travel Plans</p> <p>OBJECTION</p> <p>This policy provides guidance additional to Development Management DPD Policy J1. The DM LP is in draft, is the subject of extant representations and as such should be afforded limited weight at present. In our view, the SPD is premature as it provides guidance on policy that have not yet been found to be legally compliant, sound or in line with national planning policy and could be subject to change at Examination. To be effective, the SPD should be delayed pending the Examination of the DM LP and reviewed and consulted on following receipt of the Inspector's report on the DM LP.</p> <p>Further to the above, this policy suggests that travel plans will be secured by a Section 106 Agreement in the first instance. It is also reasonable for travel plans to be required by condition.</p>	<p>The DM LP examination has taken place and the document will be adopted in June 2013 therefore DM LP Policy DM J1 is considered to be acceptable.</p> <p>The SPD supports the DM LP and therefore cross referencing policies is appropriate.</p> <p>Paragraph 7.16 (formerly para 9.17) of the SPD states that "in the absence of a Section 106 Agreement a condition should be applied to planning permission." Therefore, the provision of condition is acknowledged but S106 is requested in first instance as the Travel Plan should provide funding</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					for monitoring and delivering aims and objectives.
Mr Anthony Williams	SPD Transport Policy 3	Vehicle parking standards	Support		Support is welcome
A2 Dominion Group	SPD Transport Policy 3	Vehicle parking standards	Object	<p>Transport Policy 3: Vehicle Parking Standards</p> <p>OBJECTION</p> <p>This policy provides guidance additional to Development Management DPD Policy J2. The DM LP is in draft, is the subject of extant representations and as such should be afforded limited weight at present. In our view, the SPD is premature as it provides guidance on policy that have not yet been found to be legally compliant, sound or in line with national planning policy and could be subject to change at Examination. To be effective, the SPD should be delayed pending the Examination of the DM LP and reviewed and consulted on following receipt of the Inspector's report on the DM LP.</p>	<p>The DM LP examination has taken place and the document will be adopted in June 2013 therefore DM LP Policy DM J2 is considered to be acceptable.</p> <p>The SPD supports the DM LP and therefore cross referencing policies is appropriate.</p>
Transport for London	SPD Transport Policy 3	Vehicle parking standards	Support	This policy cross references policy J2 of the proposed submission DM DMP and is acceptable as it conforms with London Plan parking policy 6.13 and standards set out in table 6.2.	Support is welcome
Mr Anthony Williams	SPD Transport Policy 4	Parking for conversions	Support		Support is welcome
Mr Anthony Williams	SPD Transport Policy 5	Car parking standards	Observations	Is there scope to limit the issue of parking permits to premises which have off street parking in order to reduce parking stress?	<p>Suggestion is welcome</p> <p>Developments with off street parking are normally self regulating and do not have a large impact on demand.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Mr Anthony Williams	SPD Transport Policy 6	Dimensions of Car Parking Spaces	Support		Support is welcome
H&F Disability Forum	SPD Transport Policy 6	Dimensions of Car Parking Spaces	Observations	<p>Dimensions of car parking spaces</p> <p>Para 9.34: we think this is an oversight. We suggest blue badge parking bays instead of disabled parking bays.</p>	<p>Comments noted. The Council will amend SPD para 7.33 (formerly para 9.34) as follows:</p> <p><u>" Disabled parking bays provided in communal car parks should be provided in accordance with the Mayor's draft housing SPG, which requests car parking spaces should be either 3.3 metres or 3.6 metres. Parking spaces designated for use by Blue Badge Holders should be 2.4M wide by 4.8M long with zone 1.2M wide provided between designated spaces and at the rear outside the traffic zone, to enable a disabled driver or passenger to get out of a vehicle and access the boot safely."</u></p>
St James Group Ltd and St George Plc	SPD Transport Policy 6	Dimensions of Car Parking Spaces	Object	<p>Transport</p> <p>Reason/Justification:</p> <p>The common standard for bays is 2.4 x 4.8 metre bays for 90o parking where the aisle width is 6m.</p> <p>Action: Clarification is sought as to the definition of 'echelon</p>	<p>Echelon parking is defined as angled parking.</p> <p>The standard within this Borough for echelon parking is 2.5m x 6.0m.</p> <p>No amendment necessary</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>parking’.</p> <p>The text in Paragraph 9.33 should also be amended as follows:</p> <p>“The minimum size of parking spaces for a private car is 2.4 x 4.8 metres for echelon parking and 2.0 x 5.0 metres for standard kerbside parking but these dimensions may need to be increased to take account of building columns, landscaping and available circulation and manoeuvring space. The width of circulation aisles should not normally be less than 6m for 90 degrees parking.”</p>	
A2 Dominion Group	SPD Transport Policy 7	Housing with reduced parking	Object	<p>Transport Policy 7: Housing with Reduced Parking</p> <p>OBJECTION</p> <p>This policy provides guidance additional to Development Management DPD Policies J2 and J3. The DM LP is in draft, is the subject of extant representations and as such should be afforded limited weight at present. In our view, the SPD is premature as it provides guidance on policy that have not yet been found to be legally compliant, sound or in line with national planning policy and could be subject to change at Examination. To be effective, the SPD should be delayed pending the Examination of the DM LP and reviewed and consulted on following receipt of the Inspector’s report on the DM LP.</p>	<p>The DM LP examination has taken place and the document will be adopted in June 2013 therefore DM LP Policy DM J2 and J3 are considered to be acceptable.</p> <p>The SPD supports the DM LP and therefore cross referencing policies is appropriate.</p>
Transport for London	SPD Transport Policy 7	Housing with reduced parking	Support with conditions	<p>The requirement for Car Parking Management Plans is supported by TfL. However, the wording of this policy 'where a residential development provides fewer car parking spaces than set out in Development Management DPD policy J2 and J3 ...' infers that the DM LP includes minimum parking levels. This is not the case as policy J2 contains maximum car parking standards.</p>	<p>Comment is welcomed, amend SPD Transport policy 7 to state:</p> <p>“Where a residential development provides fewer car parking spaces than that set out in Development Management DPD policy J2 and J3-</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>TfL recommends that this policy is re-worded in order to make it clear that, with the exception of blue badge spaces, developers are not encouraged to meet maximum parking standards but to provide spaces within the maximum dependent on specific circumstances such as PTAL as set out in the London Plan (including minor amendments). Where there is concern about the impact on local on-street parking, this can be alleviated through monitoring, consultation and potential amendments to or introduction of on street parking controls including conditions restricting residents from applying for parking permits.</p>	<p><u>market housing with zero or reduced parking which is compliant with Development Management DM LP policy DM J2 and DM J3...</u>"</p>
<p>St James Group Ltd and St George Plc</p>	<p>SPD Transport Policy 8</p>	<p>Car Clubs for New Developments</p>	<p>Object</p>	<p>Transport</p> <p>Reason/Justification:</p> <p>St George and St James do not consider that it is appropriate that developers should be asked to financially contribute to the operation or membership of car clubs, on the basis that car clubs operate as commercial businesses. St George and St James have, however, been willing to dedicate parking spaces in development car parks for the use of car club cars only.</p> <p>The requirement for a financial contribution to the operation or membership of car clubs should therefore be deleted.</p> <p>Action: Delete supporting paragraph 9.38</p>	<p>Paragraph 7.37 (formerly para 9.38) relates to car club requirements for developments.</p> <p>The contribution to car clubs would relate to operational needs of the development and therefore not unreasonable to request that the development contributes.</p> <p>This would also be controlled under the tests for Section 106 Agreement requirements.</p> <p>No amendment necessary</p>
<p>H&F Disability Forum</p>	<p>SPD Transport Policy 9</p>	<p>Blue badge parking</p>	<p>Support with conditions</p>	<p>PG SPD TP 9 blue badge parking: we welcome this policy and supporting paragraphs to support DM LP policy J4. There are a number of other issues.</p> <ul style="list-style-type: none"> • It is one thing to provide space for blue badge parking at planning application stage but quite another to ensure parking is 	<p>This support is welcome. The Council will make the following changes to the SPD:</p> <p>Amend paragraph 7.41 (formerly para 9.42) to read:</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>available for blue badge holders for the lifetime of the development.</p> <ul style="list-style-type: none"> • Developers may be under pressure to sell blue badge parking spaces if there is no blue badge holder using them. Unfortunately once a blue badge parking space is sold it is not then available if a resident subsequently acquires a blue badge. • H&F DF advice is that the council should have a condition that <ul style="list-style-type: none"> o blue badge parking bays shall never be sold in perpetuity if it means it is not available for a future blue badge holder and o there is a management plan to prevent sales of BB parking bays and to prevent other residents or visitors from parking illegally in blue badge parking bays. <p>We also understand that there is no standard in residential underground or multi storey to ensure that the car park height is not less than 2.6.</p> <p>H&F DF recommend that TP 9 ensures that such car parks are not less than 2.6 m to ensure that people carriers; high topped vehicles for carrying wheelchairs etc can use the car park.</p> <p>Para 9.59 We recommend a reference to LTN1/11 as agreed with Chris Bainbridge.</p>	<p>” Car parking spaces for Blue Badge Holders should be <u>permanently</u> reserved as close to the principal entrance as possible and the path to the principal entrance should be obstruction free and lit at night or entrances to residential blocks and plots <u>as possible</u>”</p> <p>Add new guidance below paragraph 7.44 (formerly para 9.44) to read:</p> <p><u>”Where Blue Badge holder bays are provided on residential development, they should not be sold off or permanently allocated to particular housing units, so that they can be available for any future residents who are Blue Badge Holders while living in the development. Management of on - site bays should restrict motorists who are not Blue Badge Holders from parking on designated Blue Badge Bays.”</u></p> <p>There is no guidance given in the Mayor’s draft Housing SPG about how to manage two different sizes of Blue Badge Holder car parking bay in the same communal</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p>residential car park; nor is there a national or London standard for the ceiling height of residential car parks, that can be added below SPD TP 10.</p> <p>The Council will recommend the standard in BS 8300:2009 for new car parks serving non-residential buildings, by rewriting SPD para 7.33 (formerly para 9.34) to read:</p> <p><u>"Parking spaces designated for use by Blue Badge Holders should be 2.4M wide by 4.8M long with zone 1.2M wide provided between designated spaces and at the rear outside the traffic zone, to enable a disabled driver or passenger to get out of a vehicle and access the boot safely. In all car parks serving non-residential uses, vertical clearances at entrances and exits and above parking areas should be 2.6M to enable access for high-top, roof-hoist converted, and accessible transport vehicles."</u></p> <p>The Council will make reference to inclusive design of shared surfaces as suggested by adding a new sentence to para 7.93 (formerly para 9.93) under SPD TP23 :</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p><u>” Where surfaces are to be used by vehicles as well as pedestrians, comfort space zones or routes should be clearly delineated as the part that is mainly for pedestrians, as recommended in Department of Transport Local Transport Note 1/11 and other best practice guidance”</u></p>
<p>St James Group Ltd and St George Plc</p>	<p>SPD Transport Policy 9</p>	<p>Blue badge parking</p>	<p>Observations</p>	<p>Transport</p> <p>Reason/Justification:</p> <p>Although SPD Policy 3 refers to Development Management Policy J2, which states that “The Council has adopted the car parking standards of the London Plan which are given in the table below”, there would appear to be inconsistency introduced by SPD Transport Policy 9.</p> <p>Policy 9 is not clear whether it refers to all new development or non-residential development. If Policy 9 refers only to non residential development then there remains inconsistency with the London Plan, in that 4% blue badge provision is not consistent with Table 6.2 of the London Plan.</p> <p>Action: Further clarification of guidance is required.</p>	<p>Comments noted.</p> <p>SPD Policy 9 deals with non-residential car parking. In LB Hammersmith and Fulham, there is unrestricted Blue Badge Holder parking in neighbourhood CPZ’s and metered zones. For this reason the transport policy 9 guideline of 4% for larger public and staff car parks is less than the London Plan Policy 6.13 Table 6.2 Addendum, while on larger sites, it is still possible for disabled people needing to park close to public building entrances to use on –site car parks.</p> <p>In the local Blue Badge Holder Parking context, for all new residential developments to be built</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
					<p>to be accessible and adaptable under DM LP Policy DM A4 and the London Plan Policy 6.13 Table 6.2 Addendum, 10% of units should have access to Blue Badge Holder parking where maximum car parking standards are achieved.</p> <p>To clarify the guidance, the Council will amend the second sentence of Transport Policy 9 to read :</p> <p>“.....Where car parking spaces are provided in <u>non-residential car parks within</u> new development.....”</p>
<p>St James Group Ltd and St George Plc</p>	<p>SPD Transport Policy 11</p>	<p>Motorcycle parking</p>	<p>Object</p>	<p>Transport</p> <p>Reason/Justification:</p> <p>The requirement for 10% of total car parking provision to be motorcycle parking appears excessive. It is accepted that motorcycle use appears to be increasing in London, but from examination of the TfL ‘Travel in London Report 4’, Table 2.6, published 2011, motorcycle trips as a proportion of car trips is only about 2%. Even allowing for future growth in motorcycle use 5% motorcycle parking provision, as a proportion of the total car parking provision, is generous.</p> <p>Action: The guidance should be amended to remove the requirement for 10% of total car parking provision to be motorcycle parking.</p>	<p>This policy is currently applied in other authorities and is therefore considered to be appropriate.</p> <p>The higher motorcycle parking provision encourages lower car ownership levels.</p> <p>No amendment necessary.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Ptarmigan Riverside AW LLP	SPD Transport Policy 14	Mayor's Cycle Hire Scheme	Object	<p>Policies 14 and 15 identifies that contributions will be sought from developments located near to the proposed extension of the Barclays cycle hire scheme and proposed Cycle Superhighway routes respectively.</p> <p>It is unclear why these policies are being proposed as it is not within the Council's remit to identify which developments are required to make contributions towards either of these schemes. It is for the Mayor to decide when payments towards these facilities are required.</p> <p>It is therefore suggested that these policies are deleted.</p>	The Mayor's Cycle Hire Scheme is not just Transport for London funded, the Council are contributing as well and the Councils LIP supports enhancing cycling as a mode of transport and the Mayor's Cycle Hire Scheme. Therefore, it is appropriate for LBHF to identify schemes that will have an impact on the Cycle Hire Scheme and seek contributions.
A2 Dominion Group	SPD Transport Policy 14	Mayor's Cycle Hire Scheme	Object	<p>Transport Policy 14: Mayor's Cycle Hire Scheme</p> <p>OBJECTION</p> <p>This policy states that contributions will be sought towards the extension of the Barclays cycle hire scheme from development that are 'near' the proposed extension. For clarity and to allow all financial considerations to be factored in to development proposals, it would be helpful for the policy or supporting text to include a definition of what is meant by 'near'.</p> <p>Whether a contribution will be sought should be assessed against Regulation 122 of the CIL Regulations 2010 and considered in the context of the package of contributions and balanced against the specific requirements of the site/ development and other local priorities.</p>	The Mayor's Cycle Hire Scheme is not just Transport for London funded, the Council are contributing as well and the Councils LIP supports enhancing cycling as a mode of transport and the Mayor's Cycle Hire Scheme. Therefore, it is appropriate for LBHF to identify schemes that will have an impact on the Cycle Hire Scheme and seek contributions.
Capital and Counties on Behalf of Earls	SPD Transport Policy 14	Mayor's Cycle Hire Scheme	Object	Policies 14 and 15 identifies that contributions will be sought from developments located near to the proposed extension of the Barclays cycle hire scheme and proposed Cycle Superhighway	The Mayor's Cycle Hire Scheme is not just Transport for London funded, the Council are contributing

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Court and Olympia Group				routes respectively. It is unclear why these policies are being proposed as it is not within the Council's remit to identify which developments are required to make contributions towards either of these schemes. It is for the Mayor to decide when payments towards these facilities are required. It is therefore requested that these policies are deleted.	as well and the Councils LIP supports enhancing cycling as a mode of transport and the Mayor's Cycle Hire Scheme. Therefore, it is appropriate for LBHF to identify schemes that will have an impact on the Cycle Hire Scheme and seek contributions.
St James Group Ltd and St George Plc	SPD Transport Policy 14	Mayor's Cycle Hire Scheme	Object	<p>Transport</p> <p>Reason/Justification:</p> <p>The policy is not required and should therefore be deleted. Policy 6.9 of the London Plan sets out guidance in relation to developments and the measures that will be required to facilitate the cycle hire scheme.</p> <p>Action: Delete</p>	The Mayor's Cycle Hire Scheme is not just Transport for London funded, the Council are contributing as well and the Councils LIP supports enhancing cycling as a mode of transport and the Mayor's Cycle Hire Scheme. Therefore, it is appropriate for LBHF to identify schemes that will have an impact on the Cycle Hire Scheme and seek contributions.
Transport for London	SPD Transport Policy 14	Mayor's Cycle Hire Scheme	Support with conditions	TfL welcomes that this policy states that contributions will be sought for delivering the Mayor's Cycle Hire Scheme. However, in addition to financial contributions, TfL requests that the policy is expanded to state that land within development sites will also be sought to facilitate delivery of the Mayor's Cycle Hire Scheme. Given the constrained environment in Central and Inner London, finding suitable space for Cycle Hire docking stations developers are encouraged to bring forward suitable sites. This point was also made in TfL's representations on the LBHF DM LP, but has not been addressed or changed in the submission version.	This response is helpful and the SPD Transport Policy 14 will be amended to include this request. "where appropriate land will also be sought and safeguarded to facilitate the delivery of the Mayor's Cycle Hire Scheme."
Ptarmigan Riverside AW	SPD Transport Policy 15	Cycle Superhighway	Object	Policies 14 and 15 identifies that contributions will be sought from developments located near to the proposed extension of the	Contributions to the Cycle Superhighway Scheme would be

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
LLP		Scheme		<p>Barclays cycle hire scheme and proposed Cycle Superhighway routes respectively.</p> <p>It is unclear why these policies are being proposed as it is not within the Council's remit to identify which developments are required to make contributions towards either of these schemes. It is for the Mayor to decide when payments towards these facilities are required.</p> <p>It is therefore suggested that these policies are deleted.</p>	sought from developments close to the routes for cycle awareness measures. For example cycle training. Therefore this policy is considered to be appropriate.
A2 Dominion Group	SPD Transport Policy 15	Cycle Superhighway Scheme	Object	<p>Transport Policy 15: Cycle Superhighway Scheme</p> <p>OBJECTION</p> <p>This policy states that contributions will be sought towards the Cycle Superhighway from development that are 'near' the proposed routes. For clarity and to allow all financial considerations to be factored in to development proposals, it would be helpful for the policy or supporting text to include a definition of what is meant by 'near'.</p> <p>Whether a contribution will be sought should be assessed against Regulation 122 of the CIL Regulations 2010 and considered in the context of the package of contributions and balanced against the specific requirements of the site/ development and other local priorities.</p>	Contributions to the Cycle Superhighway Scheme would be sought from developments close to the routes for cycle awareness measures. For example cycle training. Therefore this policy is considered to be appropriate.
Capital and Counties on Behalf of Earls Court and Olympia Group	SPD Transport Policy 15	Cycle Superhighway Scheme	Object	Policies 14 and 15 identifies that contributions will be sought from developments located near to the proposed extension of the Barclays cycle hire scheme and proposed Cycle Superhighway routes respectively. It is unclear why these policies are being proposed as it is not within the Council's remit to identify which	Contributions to the Cycle Superhighway Scheme would be sought from developments close to the routes for cycle awareness measures. For example cycle

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				developments are required to make contributions towards either of these schemes. It is for the Mayor to decide when payments towards these facilities are required. It is therefore requested that these policies are deleted.	training. Therefore this policy is considered to be appropriate.
St James Group Ltd and St George Plc	SPD Transport Policy 15	Cycle Superhighway Scheme	Object	<p>Transport</p> <p>Reason/Justification:</p> <p>The policy is not required and should therefore be deleted. Policy 6.9 of the London Plan sets out guidance in relation to developments and the measures that will be required to facilitate the cycle superhighway.</p> <p>Action: Delete</p>	Contributions to the Cycle Superhighway Scheme would be sought from developments close to the routes for cycle awareness measures. For example cycle training. Therefore this policy is considered to be appropriate.
H&F Disability Forum	SPD Transport Policy 17	Pedestrian Environment Review System	Object	<p>PG SPD TP 17 PERS</p> <p>Para 9.62 We are not confident that PERS assessments in fact properly assess pedestrian comfort levels from the perspective of disabled people who might use the local pedestrian facilities and routes under review.</p> <p>We recommend that this para be expanded to remind those carrying out PERS assessments to properly assess conditions for disabled pedestrians.</p>	<p>The response expresses a concern about the PERS process of auditing street environments.</p> <p>PERS audit as part of the assessment identifies and seeks to solve many issues including; Trip hazards, street clutter, disabled peoples access and Equality Act compliance.</p>
British Waterways	SPD Transport Policy 18	Riverside walk	Other	<p>It is not clear if the "Riverside Walk" also refers to the Grand Union Canal.</p> <p>With regard to greening of the canal towpath, this should be assessed as part of any canalside developments, to avoid any blanket approach which may not be appropriate in all situations, due to access requirements, utilities, operational requirements,</p>	<p>SPD Transport Policy 18 supports the council's Core Strategy policy RTC1.</p> <p>Paragraphs 7.63 and 7.64 (formerly paras 9.63 and 9.64) refer to the Grand Union Canal.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>and navigation. Maintenance of the canal towpath is managed by the Canal & River Trust, and must not be increased by inappropriate proposals. We are very happy to work with developers to design high quality landscaping that supports biodiversity habitats as well as the amenity requirements of new and existing communities.</p> <p>Paragraph 9.66 refers to a 6m wide path, which is obviously not possible on the Grand Union Canal towpath, and we would request that it be made clear that this only refers to the River Thames.</p>	<p>Paragraph 7.66 (formerly para 9.66) states that the walk should <i>generally</i> be at least 6m. Therefore, it is noted that there are constraints and its considered that no amendments are required.</p>
Natural England	SPD Transport Policy 18	Riverside walk	Support with conditions	<p>Natural England is supportive of sustainable transport schemes such as walking and cycling. However, the Council is reminded of the presence of the Thames Path National Trail along the river foreshore within the borough. This is a nationally designated long distance walking route, obstruction to or reduction of the path will not be supported, and considerations for permanent variations will need to be agreed by the Secretary of State.</p>	<p>Comments noted.</p> <p>Paragraph 7.64 (formerly para 9.64) refers to the Thames Path National Trail.</p>
British Waterways	SPD Transport Policy 20	Public transport	Other	<p>Paragraph 9.72 refers to the inclusion in appropriate development proposals of facilities that improve access for pedestrians and cyclists to the Grand Union Canal. We have recently launched a</p>	<p>Comments noted.</p> <p>Paragraph 7.72 (formerly para 9.72)</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>campaign that promotes considerate use of the towpath, to ensure that no particular user has priority over any other, particularly more vulnerable pedestrians and children. Please refer to 'Share the space, drop your pace' http://canalrivertrust.org.uk/see-and-do/cycling/share-the-space-drop-your-pace</p> <p>We would also request that the sentence be amended to "...inclusion in appropriate development proposals of facilities that improve managed access for pedestrians and cyclists to the Grand Union Canal...".</p>	<p>will be amended as follows</p> <p>"...inclusion in appropriate development proposals of facilities that improve <u>managed</u> access for pedestrians and cyclists to the Grand Union Canal...".</p>
<p>St James Group Ltd and St George Plc</p>	<p>SPD Transport Policy 20</p>	<p>Public transport</p>	<p>Observations</p>	<p>Transport</p> <p>Reason/Justification:</p> <p>It is presently unclear as to whether the policy applies to all development, including residential development.</p> <p>Action: Further clarification of guidance is required.</p>	<p>Comments noted. However, it is the case that "appropriate access by taxis" be a consideration for residential development.</p> <p>SPD Transport Policy 20 should be amended as follows:</p> <p>" The council will require, as a condition of granting planning permission that <u>where appropriate</u>, development proposals...."</p>
<p>St James Group Ltd and St George Plc</p>	<p>SPD Transport Policy 29</p>	<p>Streetscape</p>	<p>Observations</p>	<p>Transport</p> <p>Reason/Justification:</p> <p>This paragraph appears to state that all works in the highway should be undertaken by the Council and funded by the applicant. However, a S278 Agreement, by definition, allows the local highway authority to give permission for a developer to undertake</p>	<p>It is council policy that works on the highway be undertaken by the Council at the developer's expense.</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				<p>works in the public highway at the developer's expense. Clarification is required.</p> <p>Action: Further clarification of guidance is required.</p>	
Transport for London	SPD Transport Policy 30	Forecourt parking and vehicle crossovers	Support with conditions	<p>It should be made clear in this policy that where TfL is highway authority (on the Transport for London Road Network), or the proposal is located on the Strategic Road Network, applications for new vehicle crossovers will be strongly resisted when the proposals have the potential for adverse impacts on traffic flow and road safety in accordance with London Plan policy 6.1 1.</p>	<p>Comments noted.</p> <p>Paragraph 7.110 (formerly para 9.110) to be amended to include at the end of paragraph:</p> <p><u>“Forecourt parking and vehicle crossovers are likely to resisted on the TRLN and Strategic Road Network “</u></p> <p>Add bullet point to para 7.110 (formerly para 9.110) to read:</p> <p><u>“Proposed crossovers and forecourts to be located a minimum of 10 metres from road junctions, road bends, pedestrian crossings or bus stops/bus stop cage markings”</u></p>
H&F Disability Forum	SPD Transport Policy 31	Kerbs and pedestrian crossings	Support with conditions	<p>PG SPD TP 31 Para 9.83: kerbs and pedestrian crossings</p> <p>We welcome this policy. However the maximum gradient of 1:12 is too steep for wheelchair users to navigate independently particularly if there is a camber on the carriage way. The consequence is such wheelchair users prefer to use the carriageway rather than the footway which defeats the purpose of</p>	<p>Comments noted.</p> <p>Consultations with the H & F Disability Forum have identified that high kerbs make it difficult for target gradients to be achievable in every instance. Where kerb ramps are at</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				the dropped kerb. We suggest para 9.112 recommends that 1:15 is preferred if there is room on the footway.	<p>least 1.2 M long (measured along the slope) these are not found to be unreasonably difficult for wheelchair users.</p> <p>The Council will amend para 7.112 (formerly para 9.112) as follows:</p> <p><u>“ the kerb must be ramped flush to the carriageway, with a gradient not steeper than 1:42 and where possible, the ramp should be located away from where there is a steep road camber and have a kerb ramp that is at least 1.2M long;”</u></p>
H&F Disability Forum	SPD Transport Policy 32	Tables and chairs	Support with conditions	<p>PG SPD TP 32 tables and chairs</p> <p>We welcome the policy and para 9.114 to 9.124. it might be helpful to remind applicants and case officers that this benefits wheelchair users as well as visually impaired people.</p>	<p>Comments noted.</p> <p>The Council will amend the SPD in para 7.117 (formerly para 9.117) to say that the guidance width is to be: <u>“.....kept free for safe and convenient pedestrian movement, and to include those who use wheelchairs and people with mobility and visual impairment.”</u></p>
A2 Dominion	SPD Transport	Tables and chairs	Object	Transport Policy 32: Tables and Chairs	The wording of Transport Policy 32

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
Group	Policy 32			<p>OBJECTION</p> <p>This policy outlines when planning permission may be required for placing tables and chairs outside a premises and when it may not. This is set out in planning legislation and, in our view, an SPD is not the correct document for explaining legislation. It would be more helpful for the policy, rather than the supporting text, to set out the criteria against which an application for change of use to allow the installation of chairs and tables outside a premises would be assessed.</p>	<p>is considered appropriate.</p> <p>No amendment necessary.</p> <p>The Council will amend para 7.120 (formerly para 9.120) to make a clearer cross-reference to planning permission criteria as follows:</p> <p><u>“In or adjoining public space, areas are permitted to be used for given planning permission for pavement café open-air dining use and to have and street café tables loose or moveable furniture, should be confined into areas around which there is by a rail, planter or other form of visual guarding whose. The lower part of the guarding should be rigid enough to be detectable with a long cane up to a height of somewhere within a zone stretching between 150mm and 300mm above ground, as in SPD Design Public and Open Space Areas Policy 8”</u></p>
H&F Disability Forum	SPD Transport Policy 33	Mechanical parking solutions	Support with conditions	<p>PG SPD TP 33 mechanical parking solutions.</p> <p>We welcome the policy and para 9.123 to 9.122. It might be helpful to remind applicants and case officers that proper maintenance is essential for blue badge holders who may not have alternative means of access or exit should there be a</p>	<p>The importance of maintenance is highlighted in 7.124 (formerly para 9.124), and of some disabled people being reliant on cars travel, in para 7.79 (formerly para 9.79).</p>

Name/Org	Section/Policy	Topic	Nature Of Response:	Representation	Council Response
				mechanical failure.	The needs of disabled people in getting to and from a development as bus and taxi users, motorists and car passengers are identified as a key planning objective in SPD Transport Policy 33, and in 7.75 (formerly para 9.75) the Council will update this guidance to say that this is in accordance with obligations on designers in the Equality Act 2010, which supersedes the Disability Discrimination Act 1995 as amended as previously mentioned in 7.76 (formerly para 9.76).
A2 Dominion Group	SPD Transport Policy 33	Mechanical parking solutions	Object	<p>Transport Policy 33: Mechanical Parking Solutions</p> <p>OBJECTION</p> <p>The policy states that ‘the council will expect the following criteria to be met’. However, no criteria are included within the policy. The criteria are set out within the supporting text (paragraph 9.123). For clarity and ease of use/ reference, we suggest it may be more effective to include the criteria within the policy.</p> <p>Further to the above, the aim of this SPD, as set out in paragraph 3.2, is to provide detailed guidance on the application of policies within the Development Plan. It is not for an SPD to set stringent requirements that the council expect to be ‘met’. The wording should be amended to provide greater flexibility and to ensure that the document reads as guidance.</p>	<p>Comments noted.</p> <p>Amend transport policy 33 as follows:</p> <p>“Where mechanical parking solutions including car stackers, turntables and lifts are proposed as a means of maximising the space available for off-street car parking, the council will expect the following <u>require certain</u> criteria to be met, <u>as appropriate</u>.”</p> <p>Paragraph 7.123 (formerly para 9.123) states should consider and</p>

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					policy amended to state as appropriate. Therefore, Policy and criteria is appropriate and provided as guidance.
A2 Dominion Group	SPD Transport Policy 34	Servicing	Object	<p>Transport Policy 34: Servicing</p> <p>OBJECTION</p> <p>This policy requires new developments to provide off-street servicing. This is a restrictive provision that seeks to impose a blanket provision that does not recognise the constraints/ issues on individual sites. For example, the desire to reinforce historic street patterns and buildings lines within a conservation area where servicing from the highway would not cause an undue obstruction could outweigh the benefit of off-street servicing. The policy, in its current form, is unduly rigid and should be amended to recognise that each site and scheme will be assessed on their merits and in the context of the site constraints and other material considerations.</p>	<p>Comments noted.</p> <p>Policy 34 will be amended as follows:</p> <p>“The council will require <u>seek</u> off-street servicing for all new development in the first instance and will resist its loss in existing developments”</p> <p>Paragraph 7.125 (formerly para 9.125) repeats SPD policy 34 and will be deleted.</p>
St James Group Ltd and St George Plc	SPD Transport Policy 34	Servicing	Observations	<p>Transport</p> <p>Reason/Justification:</p> <p>It is presently unclear as to whether the policy applies to all development, including residential development.</p> <p>Action: Further clarification of guidance is required.</p>	Transport Policy 34 clearly states all new development, therefore including residential.
Transport for London	SPD Transport Policy 36	Broadband cabinets	Object	TfL objects to this policy in its current form particularly in relation to the TLRN and SRN. Given the varied characteristics found on roads and footways across the borough, TfL recommends omitting specific measures such as 1.2m. In locations with high footfall	This response helpfully alludes to other guidance, and while it is accepted the local plan policy guidance could also mention the

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				<p>such as high streets a minimum of 2m is recommended for a person with a buggy or in a wheelchair to pass, allowing 2-way movement for both. However, given varied characteristics, it is recommended that no exact measurement is quoted. For sites on the TLRN and SRN, the sites identified will need to comply with criteria set out in TfL's 'Pedestrian Comfort Guidance for London, Guidance Document (2010)', or subsequent guidance issued by TfL. Each proposal will be considered on its merit taking into account the characteristics of the proposed location.</p> <p>TfL strongly recommends that this policy is expanded to cover all new street furniture including but not limited to broadband cabinets, phone boxes and ATMs. These and other varieties of street furniture need to be managed carefully to avoid conflicts on roads with high footfall.</p>	<p>2000mm clearance, and the criteria such as footfall and the space needed by a disabled person or some using a wheelchair or wider type of double buggy which are suggested, there are other criteria such as land use, desire lines and public realm that are also relevant to local streetscape.</p> <p>The Council will therefore amend SPD Transport Policy 36 as follows:</p> <p>Change title to refer to:</p> <p><u>“New street furniture, including broadband cabinets”</u></p> <p>Amend policy to read:</p> <p><u>“The proposed locations for the BT broadband cabinets to the new street furniture will only be acceptable if there is a minimum of 1.2m of an appropriate clear and unobstructed <u>width of footway</u>”</u></p> <p>Add additional text to the beginning of para 7.131 (formerly para 9.131) as follows:</p> <p><u>“An absolute minimum width of 1.2 metres of clear and unobstructed</u></p>

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					<p><u>footway will be applied in appropriate locations. However, other local criteria such as footfall, land use, local desire lines, and where people including those in wheelchairs or using wider double buggies will need to pass others, for example, may dictate a wider pathway.</u></p> <p>Amend paragraph 7.131 (formerly para 9.131) as follows:</p> <p>“The colour of the cabinet should be stainless steel in town centres and black in the rest of the borough <u>Street furniture should be provided</u> in accordance with the H&F Streetsmart guidance <u>and</u> The cabinets should be appropriately protected against graffiti, fly posting and be regularly maintained.”</p> <p>Amend para 7.133 (formerly para 9.133) as follows:</p> <p>“A scaled drawing showing the proposed location for the BT cabinets street furniture as well as the dimensions of the cabinets should be provided.”</p>