

Appendix 2: Schedule of Representations to the Planning Guidance SPD Consultation and Officer Responses (17th November to 15th December 2017)

Including Technical Changes Schedule

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

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General Comments

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(2)	Natural England	All	<p>Thank you for your consultation on the above dated and received by Natural England on 17th November 2017. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk.</p>	<p>Comments noted.</p> <p>As it is stated that the SPD “is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments”, no amendments are proposed as a result of these comments.</p> <p>No change required</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(4)	HS2	All	Thank you for consulting HS2 Ltd on the above matter we have no specific comments to make on the document.	Noted. No change required
(6)	Sport England	All	<p>Thank you for consulting Sport England on the above named documents. Please find herein our formal comments for your consideration.</p> <p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Active Design Sport England would strongly encourage reference to Sport England Active Design guidance within the SPD, which goes far beyond sport and recreation and aims to build physical activity into everyday life.</p> <p>Having reviewed the SPD, I note a commitment to high quality design which would be further underlined by reference to Active Design within the SPD. As well as referring to the guidance, including suggestions within the Active Design guidance, such as the provision of signage telling pedestrians how far a walk it is from one location to the other (in minutes rather than distances) and the provision of public water fountains and public toilets, would also be beneficial to residents' health and wellbeing.</p> <p>Sport England and Public Health England have recently</p>	<p>Comments noted. The Council supports this and the integration of Active Design. To support this, the Council proposes including a reference to Sport England Guidance as proposed:</p> <p>Insert into Design and Accessibility section, add following text to follow paragraph 4.49:</p> <p><u>“In the design of public realm and open spaces, the Council supports the integration of Sport England Active Design Principles for the benefit of all user groups. The objectives are to improve accessibility, enhancing amenity and increasing awareness, as well as the Ten Principles of Active Design. This guidance can be found online (insert hyperlink).”</u></p>

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			<p>refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity.</p> <p>Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into the SPD – please see website extract and link below:</p> <p>We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities. That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.</p> <p>The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.</p> <p>The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health</p>	

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			<p>professionals to create the right environment to help people get more active, more often. The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.</p> <p>https://www.sportengland.org/facilities-planning/active-design/</p> <p>Or watch our short video here https://www.youtube.com/watch?v=mDaVBh1Bs7Y</p> <p>Thank you once again for consulting Sport England.</p>	
(8)	H&F Biodiversity Commission	All	In general we appreciate the thoroughness of the SPD and especially the extensive section on Biodiversity. We are also very keen on the integration of SuDS schemes with improving biodiversity and people's social wellbeing.	Support welcomed. No change required.
(11)	Canal & River Trust	All	Thank you for this recent consultation. However, I am not clear how this affects the Grand Union Canal, due to this now falling within the OPDC area. I have attached our comments, on behalf of the Canal & River Trust, and would welcome a follow up discussion or meeting with you to clarify this and ensure that our concerns for the Grand	Please note the Grand Union Canal is entirely within the boundary of the OPDC. The Canal and River Trust have been contacted to advise. All references to the Grand Union

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			<p>Union Canal are appropriately addressed.</p> <p>I have also attached the Trust's response to the most recent consultation on the OPDC Local Plan, as this relates to the LB Hammersmith and Fulham stretch of the Grand Union Canal.</p> <p>The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives". In LB Hammersmith and Fulham we own and manage the Grand Union Canal and its towpath. Recognised in Chapter Seven of the London Plan, the canals form a key part of the Blue Ribbon Network and do, or have the potential to, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities, a heritage asset and, increasingly, are a space where Londoners are choosing to live. Waterways can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. These valuable local assets are very well used within London for walking, cycling, jogging, dog walking, angling, rowing, and by boaters. The canals also bring a unique heritage value to the areas they pass through, and contribute to a strong identity of place.</p> <p>The Trust has reviewed the consultation document, and</p>	<p>Canal throughout the SPD have been deleted</p>

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			<p>has the following comments to make.</p> <p>The stretch of Grand Union Canal within LB Hammersmith and Fulham is now within the administrative area of Old Oak and Park Royal Development Corporation (OPDC), and we are therefore unclear how this is treated by the LB Hammersmith and Fulham Planning Guidance SPG. Reference is made to the Grand Union Canal, but particularly in terms of Chapter 15 Residential Moorings, the canal does not appear to be addressed. If the SPD is intended to address development proposals along the Grand Union Canal, within the OPDC area, then the Trust would like to make several comments on the draft document, and in particular the Residential Moorings chapter 15. If however, the OPDC Local Plan and policy guidance supersedes this within their area, then we have very few comments to make. We would therefore welcome further discussion with the Development Plans Team on this.</p> <p>We also note that within the document, the Grand Union Canal is referred to alongside the River Thames, and yet these two watercourses have very varied characteristics and are used and managed differently. We consider that it may be appropriate to separate out policies relating to the River Thames and the Grand Union Canal, so that they may be more appropriately dealt with as unique spaces within the borough.</p> <p>Other Matters There are a range of other issues that affect development around the Grand Union Canal, such as overshadowing</p>	

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			<p>from tall buildings, structural integrity of the waterway walls and associated canal structures, surface water drainage (which can sometimes be accepted into the canal), energy (using the canal water for heating and cooling), sustainable transport, including walking and cycling along the towpath, lighting and ecological impacts. The SPD should make reference to these within a Grand Union Canal key principle.</p> <p>Pre-application Advice We would request that there be a section in the Local Plan encouraging developers to seek pre-application advice from the Canal & River Trust. We would also advise them to consult our Code of Practice for practical advice: https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice</p> <p>We would also request that the Council refer to the Town and Country Planning Association's Policy Advice note: Inland Waterways (2009). Although it refers to British Waterways (we transferred to the Trust from BW in 2012), it is still relevant to waterside development and the Trust's aims. In particular, see Appendix 1 – 'Water proofing of planning policy': https://www.thenbs.com/PublicationIndex/documents/details?Pub=TCPA&DocID=294166</p> <p>We hope to work with you closer as you progress the draft SPD, should this be intended to relate to the Grand Union Canal (within the OPDC area). If so, I would request a follow up meeting to ensure that our concerns for the Grand Union</p>	

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			<p>Canal are appropriately addressed. Please contact me on the number or email below.</p> <p>Please see comments on OPDC Local Plan Regulation 19 Consultation also.</p>	
(13)	Hammersmith Society	All	<p>There appear to be a number of omissions in this draft including a section on Light Pollution for example (Although there are brief references in the text Paras. 5.61 – 5.65 and Appendices 4f and 4g). There is no 'Principle' covering nor reference in the Index</p>	<p>Comments noted.</p> <p>Although there is no specific key principle on light pollution, Key Principle NN7 on Environmental Pollution includes consideration of light pollution with further guidance on lighting outlined in para's 5.61 to 5.65. In addition, the council's Local Plan Policy CC12 on Light Pollution is a detailed policy which provides information on what is required to be submitted. Therefore, a specific key principle on light pollution is not considered necessary.</p> <p>No change required</p>
(13)	Hammersmith Society	All	<p>We suggest that the major section and sub-section headings are increased in font size (or type or colour) so that they stand out more.</p>	<p>The SPD is already a large document and we consider the current font size achieves the right balance between being large enough to easily read the text while keeping the document to a</p>

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				manageable and practical number of pages. No change required
(13)	Hammersmith Society	All	<p>We support the Principles and supporting text as set out in the document.</p> <p>We note that in large part the policies set out are similar to those currently contained in the Planning Guidance Supplementary Planning Guidance and Development Management Local Plan documents.</p> <p>It is unfortunate that the draft of the Council's document has preceded the recent issue of the latest draft of the London Plan which has just been published. It would be helpful if any major changes to the London Plan which impact on the Council's Plan could be highlighted in any final version.</p> <p>The Society has previously commented on the Council's draft Local Plan and participated in the E.I.P. We understand that a final version of the Plan, which has been approved by the Inspector, will be put forward for ratification by the Council in the New Year</p>	<p>Comments noted and support welcomed.</p> <p>The SPG provides further guidance to the Council's emerging Local Plan policies.</p> <p>No change required</p>
(15)	Environment Agency	All	<p>Overall we consider the guidance within this SPD is very clear and helpful. We do have the following additional comments to make which we hope you find useful.</p>	<p>Support welcomed.</p> <p>No change required</p>

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(17)	H&F Historic Buildings Group	All	<p>The Hammersmith & Fulham Historic Buildings Group (HBG) has reviewed the draft document and we have the following comments:</p> <p>We support the principles and accompanying text as set out in the document.</p> <p>The HBG has commented on the Proposed Submission Local Plan 2016.</p> <p>We endorse the detailed comments made by the Hammersmith Society to the SPD.</p>	<p>Comments noted and support welcomed.</p> <p>No change required</p>
(19)	H&F Disability Forum	All	<p>Introduction</p> <ol style="list-style-type: none"> 1. Hammersmith and Fulham Disability Forum (DF) is a user led group of volunteers who are local disabled people or older disabled residents. 2. We work on behalf of the 20,403 (27.05%) households with at least one person with a disability or limiting long term illness. <p><i>Source: 2001 census. www.neighbourhood.statistics.gov (KS21) updated 9 November 2004.</i></p> <p>2011 census included 22,958 (12.6%) people in Hammersmith and Fulham who self reported that their day to day activities were limited due to long term illness or disability.</p>	<p>Comments noted. The council will respond directly to each point in the relevant sections.</p> <p>The council will prepare a more online user-friendly version of the document for adoption.</p> <p>No change required</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>3. Whether we look at statistics on households or individuals with a long term illness or disability they include people with a physical impairment, older disabled people, deaf or hard of hearing people, blind and visually impaired people, people with a learning difficulty or mental health problems as well as people living with long term illness. Please note that disabled people or people with a long term illness are represented in all equality groups as defined by Equality Act 2010. In this response we refer to these people as disabled people or disabled visitors as appropriate.</p> <p>4. Disabled people like everyone else aspire to</p> <ul style="list-style-type: none"> • Accessible and inclusive housing they can afford to rent or buy • Employment opportunities that pay more than being on benefit • Education and training opportunities • take part in community activities • use accessible and inclusive transport and pedestrian environment • being supported by accessible and inclusive housing, health and social care services that meet their needs. <p>5. Disability Forum Planning Group provides advice to Hammersmith and Fulham Council to make sure that new public buildings and new housing are step free and accessible to all (disabled, ill and older people).</p>	

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			<p>It also provides advice on selected pedestrian improvement proposals in the borough and responses to relevant consultations. We act as a local Access Group for planning and development in Hammersmith and Fulham.</p> <p>6. The Disability Forum Planning Group meets on the first Wednesday every month to discuss planning and development issues. Every month a volunteer comments on relevant planning applications validated in the previous month. The Group selects 4/5 planning applications to review with the relevant case officer on the third Wednesday every month. After each meeting we send formal written advice to the case officer.</p> <p>Our response is based on scanning nearly 5,000 applications, commenting on 280 applications and reviewing in detail 48 to 50 applications a year for nearly 10 years; experience of responding to previous LDF and housing consultations as well as the London Plan; SPGs, SPDs as well as various Examinations in Public.</p> <p>Executive Summary</p> <ul style="list-style-type: none"> • We welcome information on access and inclusion throughout the SPD. • We would like to see a much greater emphasis on 	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>getting space requirements right at planning application stage (see section 9 on HS2)</p> <ul style="list-style-type: none"> • We consider the national guidance on wheelchair user dwellings to be confusing and unhelpful. (See section 12 on Design and Access) • Inclusive Access Management Plan (IAMP) is about managing the development for the lifetime of the development not demonstrating the highest standard of design (see section 16 on IAMP) • We want to ensure that proposals for historic buildings and historic shopfronts promote solutions to make access easier for disabled people. (see sections 17 to19) • We are keen to ensure that the TA should consider accessibility from the perspective of disabled people or people with mobility impairments. (see section 20) • Finally we understood that this SPD will provide direct electronic links to relevant guidance, chapters etc. I only managed to do this for one document. We did not see this in the draft SPD. Is this still the plan? Otherwise we recommend providing sources of guidance in each section with cross reference to a bibliography. 	

3. Housing Standards

Rep No.	Name/Organisation	Para No.	Comment	Officer Response
(7)	U & I Group	KP HS1	<p>U+I welcomes the opportunity to be involved in the emerging new Local Plan. The representations offered here provide comment in relation to a small number of the draft policies outlined in the Planning Guidance SPD.</p> <p>The draft policy states:</p> <p><i>“All new dwellings should have access to an area of amenity space, appropriate to the type of housing being provided. The Council will expect to see a more generous provision of outdoor amenity space than the minimum provision standards in the Housing SPG and the Play and Informal Recreation SPG accompanying the London Plan.</i></p> <p><i>Every new family (3 or more bedrooms) dwelling should have access to amenity or garden space of not less than 36 square metres.”</i></p> <p>It is noted that the Housing SPG outlines minimum standards for outdoor amenity space and U+I query the necessity for LBHF to explicitly state within policy its desire for this to be exceeded.</p> <p>Similarly, with regards to the requirement for every new family dwelling to have access to amenity space of</p>	<p>Comments noted. Supplementary Planning Guidance contains guidance for applicants and officers when assessing applications. The purpose of the 36 square metres is used as a guide and there is sufficient flexibility provided in this Key Principle.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Para No.	Comment	Officer Response
			<p>36sqm or more, this is clearly unduly restrictive and risks prejudicing the acceptability or otherwise of potential development schemes. This is a quantum which is unlikely to be possible to provide for in flatted schemes, particularly on constrained sites and would undermine the high delivery targets arising from the London Plan.</p> <p>U+I considers that the policy should be instead worded to recognise that, in some instances, the provision of outdoor amenity space in excess of the minimum standards and of >36sqm for family dwellings may not always be realistically achievable or feasible in higher density schemes.</p>	
(7)	U & I Group	KP HS8	<p>U+I suggests that the draft policy is amended, as below:</p> <p><i>“Planning permission will not be granted for roof terraces or balconies if the use of the terraces or balcony is likely to cause unreasonable harm to the existing amenities of neighbouring occupiers by reason of noise and disturbance; or, if it would result in an additional opportunity for material overlooking or result in a significantly greater degree of overlooking and consequent loss of privacy than from the access point onto the proposed roof terrace/balcony.”</i></p>	<p>Comments noted. The Council considers this to be an important matter in the determination of planning applications. Matters such as loss of sunlight, daylight, outlook and privacy are frequent reasons for objection to new development in the borough. The Council is keen to ensure new development does not adversely impact upon existing amenity and therefore considers this relevant as a key principle in the</p>

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			<p>U+I considers it important to clarify that new overlooking implications should be material to be included in a planning balance, rather than just notional as expressed in the draft policy. Whilst U+I recognises the importance of minimising overlooking, it notes that national and local policy promotes the optimisation of development and concentration of higher densities and as a result development, particularly in urban areas, often results in a level of increased overlooking between properties.</p>	<p>SPD.</p> <p>No change required.</p>
(8)	H&F Biodiversity Commission	KP HS4 Rear Extensions	<p>iii) Re planning permission. In the SPD you say it would not normally be granted if the proposed extension would cover more than 50% of the open area at the rear of the property.</p> <p>Similarly re lightwells under Alterations and Extensions, BL1 Lightwells, you say :</p> <p>Rear lightwells “should not result in the loss of more than 50% of the original rear garden area.” We wish to contest allowing as much as 50% of garden green space being lost.</p> <p>In our report we say under Planning Policy and Practice,</p>	<p>The Council notes the comments provided by the H&F Biodiversity Commission.</p> <p>The Council is committed to the value of private gardens upon the borough’s urban environment, and to all forms of urban greening. However, we are highly aware of the high house and land values in the borough and the restrictive effect this has upon residents, particularly families, wanting more space. Household</p>

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			<p>Recommendation 4 a): “All commercial and residential development, including householder extensions undertaken within permitted development rights, to provide green space on a 1:1 basis at the very least”.</p> <p>Gardens make a crucial contribution to biodiversity, especially in a densely built- up borough like H&F. The current trend of paving over front gardens and sometimes back gardens too (or replacing lawns with gravel or artificial grass) is already diminishing this resource, and we cannot afford to permit building extensions to take away a further 50% of garden green space. Green walls and roofs to make up the lost space would at least mitigate this to some extent.</p> <p>The Commission was so concerned about loss of garden green space that we also recommended: “The Council to take a more active role in preventing building developments in gardens and in promoting diversity within gardens.</p> <ul style="list-style-type: none"> a) H&F to undertake a study of the decline in garden green space within the Borough since 2000..... b) The Council to assist householders to covenant their gardens to prevent development. c) H&F to pioneer an initiative to designate areas 	<p>extensions provide a way for people to extend without requiring to move house and potentially, outside of the borough.</p> <p>To mitigate this impact upon gardens, the Council has included a requirement in policy CC4 – Minimising Surface Water Run-off with Sustainable Drainage Systems in the Local Plan for all new flat roofs be either brown or green roofs.</p> <p>The SPD does not explicitly deal with cellars and cellar extensions, however, the Council would apply Basement policy and further guidance.</p> <p>No change required.</p>

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			<p>of the Borough “Sites of Special Garden Interest”.</p> <p>See the report for more details on these ideas. Because so many gardens have already been paved over and are no longer green spaces for biodiversity, we also recommended under Greening Policy and Practice, Recommendation 10: “The Council to promote a scheme to green gardens, called “From Grey to Green” and to sponsor an annual award for the best transformation.”</p> <p>We also consider education to be crucial for residents to understand the importance of preserving the green space in their gardens and indeed of enhancing it. We are therefore very pleased that the Council have published 10 Tips for improving biodiversity in one’s garden, balcony or windowbox. We want to ensure that this is ongoing through having an ecology officer and an ecology centre, and through reviving Greenfest.</p> <p>Re Cellars and Cellar Extensions</p> <p>It should also be noted that the Commission was concerned about the practices deployed by some developers which reduced tree planting flexibility. To ensure that additional impediments are not presented to tree</p>	

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			planting in existing streets and give maximum flexibility for tree planting in new housing developments, the Commission recommended that all cellar/lower ground floor extensions in existing properties and cellars in new housing developments should not protrude beyond their ground level footprints.	
(12)	Fulham Society	KP HS1: Amenity Space	<u>P9 HS1 Amenity space</u> . "The council will expect to see a more generous provision of outdoor amenity space than the minimum provision standards in the Housing SPG and the Play and Informal Recreation SPG accompanying the London Plan." We strongly support this and hope that you can enforce it.	Support noted. No change required.
(13)	Hammersmith Society	KP HS1	Housing: We are pleased to note that the Council is retaining higher standards policy for amenity space (Key Principle H) than the London Plan, and that the SPD includes space standards for conversions (HS3).	Support noted. No change required.
(19)	H&F Disability Forum	Para 3.3	We would like this SPD to specifically mention providing play space for disabled children not just leave it to a general statement of "where communal open space is provided it is important that it is well designed, safe and	Comments noted.

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			can be used by all residents and has a range of functional uses”.	<p>For clarity, we propose the following amendments:</p> <p>Paragraph 3.3</p> <p>“...Where communal open space is provided it is important that it is well designed, safe and can be used by all residents <u>including wheelchair users</u> and has a range of functional uses.”</p> <p>Change required.</p>
(19)	H&F Disability Forum	KP HS2	<p>We note that the SPD expects proposals to adhere to London Plan internal space standards (based on nationally described space standards) and applicants encouraged to exceed these where possible. We are very surprised that para 3.6 in the SPD does not make any cross reference to</p> <ul style="list-style-type: none"> Approved Document M: access to and use of 	<p>Comments noted. The Council agrees that the SPG should reflect the guidance on wheelchair accessible space and will add reference to Part M of the Building Regulations.</p> <p>Add further paragraph to follow</p>

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			<p>buildings, volume 1; M4(2) accessible and adaptable dwellings or M4(3) wheelchair user dwellings.</p> <p>Part M in Chapter 4 under Accessible and Inclusive Design but we recommend a simple cross reference to Housing Standards.</p> <p>Approved Document M “Access to and use of buildings” Volume 1</p> <ul style="list-style-type: none"> <u>Technical housing standards – nationally described space standard para 9:</u> <i>“The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.”</i> <p>We understand that the nationally described space standards are for compliance with M4(1) visitable dwellings but that an experienced architect could adapt minimum London Plan internal space standards to comply with M4(2) accessible and adaptable dwellings. The Technical Housing Standards Para 9 above confirms</p>	<p>‘Notes’ in Key Principle – HS2:</p> <p><u>4. The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required (or may be in the case of Category 2 homes) to accommodate increased circulation and functionality to meet the needs of wheelchair households.</u></p> <p>Policy HO6: Accessible Housing sets out the Council’s requirement in terms of the standards required to ensure that housing is accessible and adaptable. The policy includes M4(2) and M4(3) as requirements in all new developments. The SPD is subsidiary to the Local Plan and is policy.</p> <p>The Council can confirm it has</p>

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			<p>that these space standards are not sufficient to ensure compliance with M4(3) wheelchair user dwellings. We strongly recommend that this SPD makes this clear to both developers and case officers.</p> <p>We understand that planning permission is normally granted on the assumption that the space for the footprint or building envelope is sufficient to deliver the detailed residential standards at a later stage. Our experience with DET or RES applications at the later stage is that this assumption of sufficient space is not always well founded. The consequence is that the applicant may not have the space</p> <ul style="list-style-type: none"> • to provide drawings compliant with M4(2) or more likely M4(3) 2(a) wheelchair adaptable dwellings or M4(3)2(b) wheelchair accessible dwellings • so may need to change the number of housing units or housing mix approved at planning approval stage • We know from our conversations with developers that many are unaware of para 9 above. Our impression is that there is a misplaced belief that compliance with minimum Internal space 	<p>nomination rights for all affordable housing in the borough. Furthermore, sites built within land previously in LBHF planning control in the Old Oak and Park Royal Development Corporation (OPDC) area, the OPDC have proposed that LBHF will have 70% nomination rights for all affordable housing units.</p> <p>Change required.</p>

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			<p>standards in the London Plan provides enough space to comply with</p> <ul style="list-style-type: none"> • M4(2) accessible and adaptable dwellings for market and affordable housing • M4(3) 2(a) wheelchair adaptable dwellings for market and affordable housing • M4(3)2(b) wheelchair accessible dwellings for affordable rent or social rent housing where the local authority has nomination rights. <p>Some developers have discovered that the only way they can achieve compliance with M4(3) wheelchair user accessible dwelling within the M4(2) footprint at DET stage is, for example, to reduce the number of bedrooms from the number approved at planning application stage. This means eg a purchaser thinks they are buying a 3B wheelchair adaptable dwelling as approved by the planning authority but in reality if the occupier needs to adapt it to be a wheelchair accessible dwelling they may be faced with accepting poor circulation areas; reducing the number of bedrooms or making structural alterations beyond the scope of M4(3) wheelchair user dwellings. We do not believe this is acceptable. Other examples are</p> <ul style="list-style-type: none"> • no space for corridors outside the apartment wide enough for wheelchair users; 	

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			<ul style="list-style-type: none"> • no 1500x 1500 circulation space immediately outside communal lifts or entrance door to apartment enable wheelchair user to navigate entrance doors; • no storage or transfer space for wheelchairs close to the entrance door. We have seen drawings where the storage and transfer space is either in the middle or at the far side of the living room well away from the entrance door. Outdoor wheelchairs can be muddy so there is a reason for locating this by the entrance door. <p>This is a very important point of principle for the Disability Forum Planning Group. DF as a group of volunteers are discouraged by the number of times we repeat advice that developers should know if they read the regulations and existing guidance. Unfortunately the London Housing Design SPG does not make it clear that the minimum London internal space standards does not automatically confer compliance with space requirements in Part M.</p> <p>We strongly recommend that the Planning Guidance SPG confirms that “Planning permission will not be granted unless the applicant provides evidence that the</p>	

Rep No.	Name/Organisation	Para No.	Comment	Officer Response
			<p>proposed development is based on the correct footprint and building envelope to deliver detailed drawings at a later stage compliant with</p> <ul style="list-style-type: none"> • M4(2) accessible and adaptable dwellings for market and affordable housing • M4(3) 2(a) wheelchair adaptable dwellings for market and affordable housing • M4(3)2(b) wheelchair accessible dwellings for affordable rent or social rent housing where the local authority has nomination rights”. <p>In this context it will be very helpful to clarify whether the local authority has nomination rights to shared ownership affordable housing. see also section 13 of representation below.</p>	
(19)	H&F Disability Forum	Para 3.8	<p>para 3.8 conversions</p> <p>We recommend confirming that wherever practicable conversions should comply with M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings rather than “take account” of M4(2) and M4(3).</p>	<p>Agreed. Change last sentence in paragraph 3.8:</p> <p>“...The size and shape of rooms should allow for a satisfactory layout and adequate range of furniture and equipment, taking account of <u>where practicable should comply with</u> Building Regulations M4(2)</p>

Rep No.	Name/Organisation	Para No.	Comment	Officer Response
				<p>'accessible and adaptable' dwellings and M4(3) 'wheelchair user dwellings', where relevant.</p> <p>Change required.</p>
	<p>Cllr Phibbs</p>	<p>KP HS2</p>	<p>I do think it is very prescriptive about ceiling height, bedroom sizes and so on. Really none of our business and very obstructive in terms of getting affordable new homes built. Also thus perversely making it harder to alleviate overcrowding.</p> <p>In practical terms what relevance do you think these requirements have in terms of the feasibility of demolishing all these empty garages we own and converting them into micro homes? I would imagine this very restrictive approach would prevent new homes being viable on some sites. Please may I have your comments.</p>	<p>Comments noted. The internal space standards for new build residential (Key Principle HS2) reflect the statutory government guidance published in March 2015. The purpose of including them in the Planning Guidance SPD is to signpost these standards for developers and residents. The Mayor of London has adopted these standards in the London Plan and they are already being used as guidance in the determination of planning applications.</p> <p>These standards identify the minimum gross internal area for new build property. The purpose is to ensure adequate floorspace for the</p>

Rep No.	Name/Organisation	Para No.	Comment	Officer Response
				<p>number of likely occupants, commonly required furniture and the spaces needed for different activities and moving around, in line with Lifetime Home Standards.</p> <p>Our development plan policies seek to promote housing delivery beyond our London Plan targets and optimise housing delivery on brownfield sites. We also want to ensure the quality of individual homes and neighbourhoods are not compromised given the higher density flatted developments that are common in London.</p> <p>The Planning Guidance SPD is guidance to the development plan policies and while being a material planning consideration, it does not present new policies. Internal floorspace that falls below space guidelines may be permitted if the scheme proposal is demonstrated to</p>

Rep No.	Name/Organisation	Para No.	Comment	Officer Response
				<p>be of exemplary design and contributes to achievement of other objectives and policies of the development plan.</p> <p>The Council's preference is to construct homes that meet the national and London size standards. However, we would consider smaller homes on a case by case basis, in appropriate locations and with communal amenity that could compensate for lack for private space.</p> <p>No change required.</p>

4. Design & Conservation

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(10)	Peterborough Road & Area Residents Association	Section 4: Design & Conservation	<p>Thank you for your letter of 17th November inviting PRARA to comment on the draft Planning Guidance Supplementary Planning Document.</p> <p>The section of most relevance to us is Section 4, Design & Conservation, and we are therefore confining our main observation to this section.</p> <p>All the guidance proposed appears to be beneficial to our area and to the borough and we are therefore pleased to be able to provide PRARA's endorsement of this section.</p> <p>Additionally we would like to note our appreciation of the very clear and easy to understand way in which the SPD document is written.</p>	<p>Comments noted and support welcomed.</p> <p>No change required.</p>
(12)	Fulham Society	Para 4.15	<p><u>Para 4.15ff. Basements.</u> We cannot see that it is explicitly stated in this guidance that basements of more than one level will not be allowed although we know it is council policy.</p>	<p>Noted. Policy DC11 in the Local Plan sets out this requirement. The guidance in the SPD and the policies in the Local Plan are consistent and do not need to be repeated.</p> <p>No change required.</p>
(12)	Fulham Society	Para 4.32	<p><u>Para 4.32. Buildings of Merit.</u> It would seem sensible to support Historic</p>	<p>The Council fully endorses Historic England's criteria for identifying Buildings of Merit.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			England's criteria.	<p>By listing Historic England's criteria (Paragraph 4.32) for adding new Buildings of Merit to the council's existing Register, we feel that we are fully supporting their approach.</p> <p>No change required.</p>
(12)	Fulham Society	Para 4.133	<p><u>Para 4.133. Heritage assets.</u> The danger is that the owners of an important building do nothing with it and it gradually falls into disrepair. We are pleased the council will not then be forced to accept their proposals, but it does not solve the problem of what happens to the building.</p>	<p>We welcome your support in our approach to safeguarding Heritage Assets.</p> <p>The Council is keen to ensure heritage assets do not fall into disrepair - paragraph 4.133 outlines that where there are signs of deliberate neglect, applicants will not gain any undue advantage in gaining planning consent. We hope that this approach will deter owners from deliberately letting their buildings fall into disrepair. The Council has a range of planning and listed building powers available to deal with buildings in disrepair.</p> <p>No change required.</p>
(13)	Hammersmith Society	Section 4: Design & Conservation (Accessible & Inclusive Design)	<p>Accessible and Inclusive design: We note the assumption that the Principles are consistent with Part M of the Building Regulations.</p> <p>In respect of the Design of ramps and stairs, it should be noted that designs should also conform to Part K1 of the Building Regulations.</p>	<p>Comments noted and agree to make reference to Part K1 of the Building Regulations.</p> <p>"4.50 ...most affected. <u>When designing ramps and stairs, Part K1 of the Building Regs. Should be used.</u>"</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(13)	Hammersmith Society	Section 4: Design & Conservation (Basements & Lightwells)	<p>We welcome the expanded policies covering 'Basements and Lightwells', but the overlap between this draft SPD and the Local Plan Policy DC11 needs to be clarified.</p> <p>The documents should advise that Article 4 directions will apply across the Borough as from April 2018.</p>	<p>We welcome your support for Policy DC11 – Basements and Lightwells in the emerging Local Plan. The guidance in the SPD and the policies in the Local Plan are consistent with each other.</p> <p>Agreed – reference to the Basement development Article 4 Direction will be added above paragraph 4.17:</p> <p><u>"4.17 The council will be bringing an Article 4 Direction to remove permitted development rights for basement development in April 2018. Applicants will be required to submit planning applications for any basement development, lightwells or any other development below the dwellinghouse or curtilage. The Local Plan and following guidance will be used to assess any applications (https://www.lbhf.gov.uk/planning/planning-policy/consultation-article-4-directions).</u> The creation of lightwells by the excavation of all or part of the front garden of a residential property will require planning permission.</p> <p>4.18 Where lightwells already exist..."</p> <p>Change required.</p>
(13)	Hammersmith Society	KP AH2 Archaeological Priority Areas	<p>The description of 'Ravenscourt Manor House (Palingswick) APA needs to be clarified. If it is the house within Ravenscourt Park, it is obviously not 'south of' the Park, which implies Palingswick House in King Street is</p>	<p>Archaeological Priority Areas are set out on the Policies Map by the Council on the advice of Historic England.</p> <p>Historic England is currently reviewing APAs across London and updates to existing APA boundaries</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			being referred to. The recent excavations by Museum of London should also be mentioned.	<p>and descriptions and new designations are expected shortly. This work will be informed by the results of recent archaeological investigations which have advanced understanding of the significance of archaeological remains in the Borough.</p> <p>Reference to updated Historic England work to be included. See below for full change.</p>
(13)	Hammersmith Society	Section 4: Design & Conservation (Archaeology & Heritage Assests)	In the 'Archaeology and Heritage Assets' section, the abbreviation APA should be clarified and their status explained. APA should also be included in the Glossary.	<p>We have noted your comments regarding Archaeological Priority Areas (APA) and agree that a fuller description of what they are and their function will be beneficial in understanding their significance. A definition of an APA is available in the Local Plan glossary.</p> <p>Add the following text above paragraph 4.142:</p> <p><u>“An Archaeological Priority Area (APA) is a defined area of particular archaeological significance or vulnerability. APAs inform the practical use of national and local planning policies for the recognition and conservation of archaeological interest. APAs are set out on the Policies Map by the Council on the advice of Historic England. Historic England is currently reviewing APA boundaries and descriptions; new designations are expected in the near future. This work will be informed by the results of recent archaeological investigations which have advanced understanding of the significance of archaeological remains in the Borough.”</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>The following text will be added to the glossary:</p> <p><u>“Archaeological Priority Areas are areas of particular archaeological importance or vulnerability in the Borough which have been identified by the council with the advice of Historic England. In these areas, the council’s policies and proposals for archaeological sites will apply. Planning applications affecting such areas will generate appropriate consultation, which could in turn lead to further processes of site assessment.”</u></p>
(13)	Hammersmith Society	KP BM2	<p>Under BM2, we would like to see it more explicitly required that in the event that a building is allowed to be demolished, it <u>must</u> be fully recorded. It should also be clarified as to where such records are to be stored. (ie. Borough Archives).</p>	<p>KP BM2 requires that full recording takes place prior to a building of local townscape, architectural or historic interest being demolished. In practice records are already deposited at the Borough Archives, as this is the only local facility.</p> <p>No change required.</p>
(13)	Hammersmith Society	Section 4: Design & Conservation	<p>There is no reference to ‘Continuity and Historic Names’ (Existing SPD Design Policy 57), for example: It would be helpful to have a schedule, which lists the existing SPD Design, Amenity and other policies and where they will be found in the revised documents. Some items (Eg. Roller Shutters and</p>	<p>Comments noted.</p> <p>Roller shutters and burglar and fire alarms have not been included in the index because they are covered within the broad topic of shopfront design.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			Burglar and Fire Alarms are covered in the draft but not included in the Index).	
(13)	Hammersmith Society	Section 4: Design & Conservation	As regards the layout and order of the proposed SPD, we found the Design and Conservation sub-sections confusing in that 'Conservation Area Guidelines', 'Buildings of Merit' and 'Archaeology and Heritage Assets' have been interspersed with other topics. We suggest that it would be more logical if these could be kept together, and also that 'Basement and Lightwells' and 'Shopfront Design' are grouped, and the section concluded with 'Accessible and Inclusive Design'.	Comments noted. We intend to reorder the chapters in the following way so that they will be easier to navigate and will follow a more logical flow. These changes have not yet been implemented, but will be incorporated into the published version of the document.
(13)	Hammersmith Society	Para 4.166	The reference to a 'future review of the Core Strategy' (Para 4.166) is confusing as we understand that the term has now been replaced by 'the Local Plan'.	Agreed. Amend paragraph 4.166 to: "The council has designated its existing APAs through the Core Strategy <u>Local Plan</u> process and <u>are</u> identified these on the <u>Policies</u> Proposals Map..."
(16)	Berkeley Group (Quod)	KP CAG1	I am writing on behalf of the Berkeley Group in response to the London Borough of Hammersmith and Fulham	Comments noted and support welcomed. We have noted your comments and agree that

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			<p>(‘LBHF’) consultation on the Draft Planning Guidance Supplementary Planning Document (‘draft SPD’). The Berkeley Group is a significant investor in the borough, having delivered 2,772 homes, 1,131 of which are affordable, at developments including Imperial Wharf, Chelsea Creek, Fulham Reach and Sovereign Court (St George), and Hurlingham Walk and Lime Grove Mews (St James). At present Berkeley has several land interests in the borough, including St William’s proposed development at Fulham Gasworks, the remaining phases of St George’s development at Chelsea Creek, and St James’ development at White City Living and proposed development at Centre House.</p> <p>The purpose of the draft Planning Guidance SPD is to provide supplementary detail to policies concerned with a variety of topics within LBHF’s emerging Local Plan. We are broadly supportive of the emerging plan and welcome the use of the draft SPD to provide additional guidance that will assist with the preparation of successful applications and aid the delivery of infrastructure. It is on this</p>	<p>reference to new uses within Regeneration Areas should be included.</p> <p>Additional text to be added to para 4.6:</p> <p><u>“Within Regeneration Areas and where significant areas of new townscape are proposed, the impact of introducing new uses will need to be carefully considered in conjunction with other strategic objectives.”</u></p>

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			<p>basis that we provide comments about the draft guidance below.</p> <p>The objective in the Local Plan to create a high quality urban environment that respects and enhances its townscape context and heritage assets is fully supported. The draft SPD seeks to support this by requiring new uses within a Conservation Area to be configured and accommodated in a manner that is consistent with the character of the Conservation Area and its architectural form, scale and features. However, as currently drafted the wording of this key principle does not reflect the fact that some Conservation Areas overlap with strategic development sites where significant changes to land use are encouraged. For example, the Imperial Square and Gasworks Conservation Area.</p>	
(17)	Historic England	Section 4: Design & Conservation	Thank you for consulting Historic England on the draft Planning Guidance Supplementary Planning Document (SPD). As the Government's Adviser on the historic environment, Historic England is keen to ensure that conservation and enhancement of the	<p>We welcome your comments in support of our SPD and the approach we have taken in its preparation.</p> <p>We believe that we are proactive in terms of providing a positive framework for addressing issues and opportunities relating to the historic environment across the borough. This is reflected by the fact that</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>historic environment is taken fully into account at all stages and levels of the planning process.</p> <p>We are pleased to see that the SPD includes sections providing detailed advice on conserving the borough's heritage assets and local character. This additional guidance will prove extremely helpful to applicants and should assist in de-risking the planning process. We have a small number of points on the consultation document, as set out in the attached annex. The National Planning Policy Framework and Planning Policy Guidance see conservation as an active, rather than passive exercise.¹ As a general comment, the SPD could be even more effective if some elements were identified for proactive enhancement, for instance, in relation to shopfronts and signage. Alternatively you could consider preparing a separate heritage strategy to provide a positive framework for addressing issues and opportunities relating to the historic environment across the borough. If you would like to discuss this further please do not hesitate to contact me.</p>	<p>we follow the guidance in the NPPF in terms of conservation and enhancement of the historic environment.</p> <p>Our Local Plan contains a robust planning framework to ensure that the borough's heritage assets are safeguarded or enhanced by any development affecting them.</p> <p>No change required.</p>

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(17)	Historic England	p.21	<p>Conservation Area Character profiles (p21)</p> <p>We are pleased that the Council is continuing with preparation of these important appraisals. If you would like to forward a small number of your statements as they are prepared in draft we would be pleased to comment on them.</p>	<p>Noted.</p> <p>No change required.</p>
(17)	Historic England	P25/6 and p49-51)	<p>Shopfronts (p25/6 and p49-51)</p> <p>- It would be good to see a strategy for positive enhancement of certain shopping parades through targeted assistance with design and renewal and, if necessary, through enforcement to secure removal of signage that does not have consent. Perhaps a joint initiative with the Hammersmith Business Improvement District (BID) could achieve enhancement along King Street, for instance.</p> <p>- The preservation of independent access to upper floors, next to the access to ground floor shops, could be highlighted as desirable in the guidance on shopfronts. The SPD makes a good connection between use as part of the character of conservation areas. Retaining or re-using upper floors for residential accommodation</p>	<p>Noted. The Council is working on the Hammersmith Town Centre SPD, which may address some of the issues raised here.</p> <p>No change required.</p>

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			will be increasingly important as a contributor to local vitality and as a source of residential units.	
(17)	Historic England	Para 4.90	Archaeology and Heritage Assets - Para 4.90. We suggest amended phrasing here, as follows: <i>'Once the impact upon archaeology has been fully understood, any further assessment or mitigation may be expressed as a condition to any planning permission'</i> . The current phrasing otherwise may imply that archaeology is usually expressed as a condition of planning permission. This is not always the case as in some instances an assessment of the impact may be possible by Greater London Archaeological Advisory Service (GLAAS) early on so that an informed planning decision can be taken.	The SPD text does not state this, Key Principle AH1 and supporting text sets the Council's requirements in terms of heritage assets and sites containing archaeological interest. No change required.
(17)	Historic England	Para 4.3.11	There are revisions needed here to change from English Heritage to Historic England London Planning. Further information on GLAAS is available on the Historic England website but a phrase could be added <i>'The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in</i>	Comments noted. We will update any references to Historic England and amend paragraph 4.128 to read: "4.128 See also Greater London Archeology Advisory Service (GLAAS) Charter as a source of archaeological best practice, pre-app advice and best practice principles."

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p><i>accordance with the National Planning Policy Framework and GLAAS Charter and provides pre-application advice on archaeology on their behalf’.</i></p> <p>There are currently 15 APA’s and we note the intention to update the riverside/foreshore APA when the SPD is next reviewed. This is appreciated, however, it should also be noted that all of the APA’s may be subject to change following a GLAAS review of all Borough’s APA’s. It would be helpful if the riverside APA was added now for consistency with neighbouring boroughs and as we requested when we were consulted on the draft Local Plan. In the meantime Historic England’s Greater London Archaeological Advisory Service should be consulted during the pre-application stage to ensure that archaeology is appropriately scoped.</p>	<p>Noted. We have noted the forthcoming review of all APAs in the borough, to avoid potential confusion we do not propose to change APA descriptions prior to the review taking place.</p> <p>We do propose to make reference to this on-going work and to clarify what an APA is, by adding the the following text underneath the title, Archaeological Priority Areas:</p> <p><u>“An Archaeological Priority Area (APA) is a defined area of particular archaeological significance or vulnerability. APAs inform the practical use of national and local planning policies for the recognition and conservation of archaeological interest. APAs are set out on the Policies Map by the Council on the advice of Historic England. Historic England is currently reviewing APAs boundaries and descriptions and new designations are expected in the near future, this work will be informed by the results of recent archaeological investigations which have advanced understanding of the significance of archaeological remains in the Borough.”</u></p>
(17)	Historic England	Para 4.125	The SPD states <i>‘The council will encourage developers to inform local archaeological societies of the start of any archaeological excavation and to</i>	Comments noted. We have proposed to update the reference to GLAAS in para. 4.128 and consider this further reference adequate. (Please see previous comment).

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p><i>make arrangements for public viewing of excavations in progress, wherever possible, and for subsequent analysis, interpretation and presentation to the archaeological societies and the public of any archaeological results and finds’.</i></p> <p>Although this quite helpfully covers public archaeology – we think the above should be amended to <i>‘the council will encourage developers to appoint a Registered Archaeological Organisation to undertake archaeological work in accordance with a Written Scheme of Investigation to be agreed by the LPA and GLAAS which includes arrangements for....’</i> Should you wish to discuss this further, please contact GLAAS.</p>	<p>No change required.</p>
(17)	H&F Historic Buildings Group	Section 4. Design & Conservation	<p>4. Basements There appears to be no specific mention of basements under listed buildings in section 4 Design and Conservation.</p> <p>There appears to be no specific mention of studios in rear gardens which by virtue of having a basement are in reality 2-storey houses.</p>	<p>Comments noted. The Council agrees that further reference to basements should be made in this section and will provide further guidance to the Local Plan policies.</p> <p>In light of this comment, we propose the following amendments to bullet point 2 in Key principle BL1:</p> <ul style="list-style-type: none"> • “Rear lightwells should not be excessive in size and should not <u>either on its own or in combination with a basement excavation</u> result in the loss of more than 50%...

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>We propose to amend the BL2 to read:</p> <p>“Key Principle – BL2</p> <p>Lightwells <u>and basement excavation relating to listed buildings and lightwells in</u> conservation areas</p> <p>In the case of a listed building whose special character <u>interest</u> would be harmed by the construction of a lightwell, such a development would almost always be unacceptable <u>unless outweighed by public benefits.</u></p> <p><u>Proposals for lightwells or basement excavation relating to listed buildings or their curtilage should be informed by an assessment of the significance of the designated heritage asset and the impact of the proposals on that significance, paying special attention to the type, period, character and setting of the listed building; its historic fabric, plan form, volume, floor to ceiling heights; and original spatial hierarchy within both the listed building and its curtilage.</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p><u>Details of the method of construction and excavation; details of any temporary internal or external works required to facilitate the construction and excavation process such as the removal of spoil; and details of measures to protect the existing fabric during construction and excavation will be required with any application relating to a listed building or a building within its curtilage.</u></p> <p>In some parts of some conservation areas, even the recommended forms of <u>model</u> lightwell <u>designs</u> <u>included in Figure BL1</u> enclosed in this guidance may be harmful, for example where the front garden is clearly visible from the street, or where there is no front boundary enclosure.</p> <p>Additional paragraph to follow 4.25:</p> <p><u>The significance of listed buildings can be adversely affected by the construction of lightwells or basement excavation, therefore careful consideration is required in relation to impact of such proposals on both the internal and external character and appearance of the listed building and on the spatial hierarchy within the listed building and its curtilage. Some designated heritage asset types such as dwelling houses built with a clear hierarchy of floors and a cellular plan form can be particularly</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p><u>vulnerable to harmful change from proposals for lightwells and basement excavation. It will be important to consider not only the impact of the permanent alterations, but also the impact of any temporary works that will be required to facilitate the proposed works. Listed buildings and buildings in conservation areas can be sensitive to proposals for lightwells or basement excavation, 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>
(17)	H&F Historic Buildings Group	KP BM2	<p>Proposals affecting buildings of merit (demolition, loss or harmful alteration to buildings) – Key principle BM2</p> <p>Under section (b) The proposed replacement would bring substantial benefits to the community and which would decisively outweigh the loss.... Is this consistent with the Local Plan?</p>	<p>Comments noted. We believe that the highlighted text under key principle BM2 is consistent with Local Plan Policy DC8 Heritage and Conservation.</p> <p>No change required.</p>
(17)	H&F Historic Buildings Group	Para 4.80	<p>Shopfront Design</p> <p>Insensitive Designs – We are pleased to note the detailed guidance on the impact of insensitive design especially 4.80 It is now widely recognised that shopfronts and signs which disregard the architecture above and around them are the most damaging to an</p>	<p>We welcome your support regarding our approach.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			area's character and appearance.....The integrity of the building and character of the street is eroded by such insensitive proposals.	
(19)	H&F Disability Forum	Para 4.11	<p>Historic shopfronts. 2nd para: We recommend inserting a new sentence “ Applicants are encouraged to provide level access into the building” after “the rest of the building” with a cross reference to SF2 below. Reason: see Accessible London SPG paras 4.12 – 4.12.7; Easy Access to historic buildings, English Heritage, 2012</p>	<p>Comments noted and agreed. We propose to amend Disabled Access at paragraph 4.10 to read:</p> <p>4.10...</p> <p>“Disabled Access:...wherever possible and practicable, <u>for example, level access.</u>”</p>
(19)	H&F Disability Forum	Para 4.14	<p>Trees: The Disabled People Commission received evidence from disabled residents that trees on the footway can result in uneven surfaces making it difficult for wheelchair users and ambulant disabled people to use the footway. We need to deal with this. We suggest a possible way forward is for either this SPD or the StreetSmart Guide to have mitigating actions to avoid trees becoming a hazard and unsafe for disabled pedestrians.</p>	<p>Trees on the public highway are not normally subject to planning controls. This issue is best dealt with through Highways Streetscene Design Guidance.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(19)	H&F Disability Forum	Para 4.37	<p>Buildings of Merit</p> <p>After “Any alterations should only be carried out in a way that respects the scale, character and materials of the building” insert “Applicants are encouraged wherever practicable to provide level access into the building”</p> <p>Reason: see Accessible Londonot SPG paras 4.12 – 4.12.7; Easy Access to historic buildings, English Heritage, 2012</p>	<p>Comments noted and agreed.</p> <p>Comments noted and agreed. We propose to amend Disabled Access at paragraph 4.10 to deal with this concern, to read:</p> <p>4.10...</p> <p>“Disabled Access:...wherever possible and practicable, <u>for example, level access.</u>”</p>
(19)	H&F Disability Forum	Section 4: Design & Conservation (Accessible & Inclusive Design)	<p>Design and Access</p> <p>p40 We consider that the national policy as described is confusing and unhelpful to both case officers and developers.</p> <p>The SPD should confirm whether shared ownership wheelchair user dwellings should also be wheelchair accessible on completion. Does the local authority allocate shared ownership to people on the shared ownership waiting list? If so M4(3)2(b) wheelchair accessible dwelling standard should also apply to these dwellings.</p> <p>We have suggested some</p>	<p>Both Key Principles – DA2 (Accessible and adaptable Dwellings M4(2) and Key Principle -DA3 (Wheelchair accessible and wheelchair adaptable M4(3), reflect national and strategic policy standards. Local Plan policy HO6 Accessible Housing also sets out the Council’s requirements for accessible and adaptable housing.</p> <p>Neither the national or strategic standards specifies the type of housing (i.e. market, social rented, shared ownership, affordable rent) that should meet these standards. Instead national and strategic standards require that all new homes have to meet this requirement regardless of their tenure.</p> <p>For information the Council has nomination rights for all affordable housing.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>amendments in red below.</p> <p>“Approved Document M of the Building Regulations introduces minimum specifications for Wheelchair User Dwellings M4(3). This is subdivided into</p> <ul style="list-style-type: none"> • Wheelchair Adaptable Dwellings M4(3)(2a) • Wheelchair Accessible Dwellings M4(3)(2b), which are fitted out at completion for occupation by a wheelchair user. <p>The National Planning Practice Guidance states that category M4(3)(2b) wheelchair accessible dwellings may only be required where the local authority is responsible for allocating or nominating a person to live in that dwelling. M4(3)(2b) wheelchair accessible dwellings applies to social rented and affordable rented homes.</p> <p>Wheelchair user dwellings for market sale may only be conditioned to meet M4(3)(2a) wheelchair adaptable standard on completion”.</p>	<p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(19)	H&F Disability Forum	KP DA1	<p>Key Principle: DA1</p> <p>We think it would be helpful to provide some drawings compliant with</p> <p>M4(2) accessible and adaptable dwellings; M4(3)2(a) wheelchair adaptable dwellings M4(3)2(b) wheelchair accessible dwellings</p> <p>To illustrate important differences in space requirements.</p>	<p>Comments noted.</p> <p>This information can be accessed in Building Regulations Part M. We proposed to include a link to the Approved Document M and update references to the document in the Policy Context, to read:</p> <p>“Policy Context – Design and Access National Policy</p> <p>Approved Document M of the Building Regulations introduces minimum specifications for wheelchair User Dwellings M4(3). This is subdivided into Wheelchair Adaptable <u>and Accessible</u> Dwellings M4(3)(2a)(2) and Wheelchair <u>User</u> Dwellings M4(3)(2b), which are fitted out for occupation by a wheelchair user. <u>Approved Document M link for reference:</u> <u>https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m</u></p> <p>The National Planning Practice Guidance states that category M4(3)(2b) may only be required for wheelchair user dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. M4(3)(2b) may therefore only apply to social rented and affordable rented homes, all other wheelchair user dwellings may only be conditioned to meet M4(3)(2a) standard.</p>
(19)	H&F Disability	Para 4.43	We do not understand this paragraph.	This paragraph should not be read in isolation from

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
	Forum		We believe Planning is responsible for approving the space in the footprint and building envelope to provide drawings that can comply with the Building Regulations in due course. It can't be correct to prevent the council from requiring drawings that provide assurance that the space provided will comply with Part M	<p>Key Principle – DA1 Access and Inclusive design. The main policy guidance shows that the council is committed to ensuring that, “Applications for new buildings, changes of use, extensions and other building work should ensure that the building is designed to be accessible and inclusive to all who may use or visit the building”</p> <p>Paragraph 4.43 outlines that the local planning authority cannot require applicants to prove that standards relating to Building Regulations will be met. Instead, detailed drawings relating to Building Regulations will need to be provided to Building Control officers to meet their approval.</p> <p>No change required.</p>
(19)	H&F Disability Forum	Para 4.4	It would be helpful to include the requirement for clear landing 1500 x 1500mm in front of the lift at every floor level. Developers often forget to include space for this on drawings	<p>We have noted and agree. We propose to add a further bullet point to para. 4.41:</p> <ul style="list-style-type: none"> • <u>“circulation space within the building, for example, landing space outside of lifts and sufficiently wide corridors for wheelchair and other users.”</u> <p>No change required.</p>
(19)	H&F Disability Forum	Para 4.5	it would be helpful to insert M4(3) 2(a) after wheelchair adaptable dwelling	<p>We have noted your request and agree. As per the NPPF, wheelchair adaptable and accessible dwellings are referred to as M4(2).</p> <p>Amend paragraph to read:</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>“4.45 –A wheelchair adaptable <u>and accessible dwellings (M4(2))</u> is one which is <u>are</u> designed and built for potential occupation by wheelchair user (possibly after minor, non-structural, alterations). Also, we propose to move paragraph 4.45 to follow Key Principle DA2, as they follow.</p>
(19)	H&F Disability Forum	Para 4.46	<p>It would be helpful to in insert M4(3) 2(b) after wheelchair accessible dwelling: delete “day one” and replace with “completion”. This is important as many housing associations do not realise this. We understand that Housing are keen to ensure that wheelchair accessible dwellings are compliant on completion.</p>	<p>Agreed. To comply with the NPPF, we propose to include M4(3) when referring to wheelchair user dwellings.</p> <p>Amend para. 4.46 to read:</p> <p>“A wheelchair accessible- <u>user</u> home (M4(3)), however- is constructed and fitted to a standard suitable for “day one” occupation by wheelchair user without the need for alterations.”</p> <p>In light of the above, we propose the following change to the heading of DA2:</p> <p>“Key Principle DA2 Wheelchair <u>user dwellings</u> accessible and wheelchair adaptable M4(3)</p> <p>To ensure that residential accommodation offers standards of accessibility that can be relied upon, and to make provision for wheelchair accessible and adaptable homes, the Council requires 10% of all new housing to be designed to meet the standards prescribed in Approved Document M to the Building</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>Regulations for an M4(3) home.”</p> <p>We do not agree however with the request to delete “day one” and replace it with completion. This is because there is a debate as to what fully constitutes a “completion” as there is no legal definition as to what constitutes a completion.</p>
(19)	H&F Disability Forum	Para 4.47	<p>The SPD needs to alert applicants that there are differences in space between M4(3)2(a) wheelchair adaptable dwellings and M4(3)2(b) wheelchair accessible dwellings. Where applicants are required to provide M4(3)2(b) wheelchair accessible dwellings they must demonstrate at planning application stage they have the space for M4(3)2(b).</p> <p>The SPD should clarify that the list of reasonable provisions in this para is not exhaustive and that applicants need to refer to the building regulations themselves for the full list. We suggest this list also includes:</p> <p>Wheelchair storage (min1100 x 1700mm including power socket) and transfer space (minimum clear width 1200mm) within dwelling close to the principal private entrance. Our experience is that this space</p>	<p>Comments noted. This information can be accessed in Building Regulations Part M.</p> <p>The local planning authority cannot require applicants to prove that standards relating to Building Regulations will be met. Instead, detailed drawings relating to Building Regulations will need to be provided to Building Control officers to meet their approval.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			requirement is often over looked or put in the middle or far end of the sitting room.	
(19)	H&F Disability Forum	KP DA5	Key Principle: DA 5 Change in level in public spaces What is important is that DA 5 confirms that alternative routes must provide level access	We have noted your comments and propose to amend the description of Disabled Access at paragraph 4.10, to deal with this concern. Proposed amendment: 4.10... “ Disabled Access :...wherever possible and practicable, <u>for example, level access.</u> ”
(19)	H&F Disability Forum	Para 4.57	Para 4. 57 it would be worth stating that Part M is in 2 Volumes: Volume 1 Dwellings and Volume 2 Buildings other than Dwellings.	We have noted your request. Amend paragraph 4.57 to insert the following words: “The guidance above does not take the place of Building Regulations <u>Part M</u> 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>Building Regulations Part M consists of 2 Volumes: Volume 1 Dwellings and Volume 2 Buildings other than dwellings. Standards relating to accessibility and inclusive design within this document refer to standards as outlined in Part M Volume 1.</u> ”
(19)	H&F Disability Forum	KP DA9	Key Principle: DA 9 Hotels and student accommodation Inclusive Access Management Plan (IAMP)	Comments noted. The reference to an AMP is consistent with London Plan policy 4.5. The SPD also clearly states that the AMP should demonstrate

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>London Plan Policy 4.5 encourages IAMP “to ensure that the management and operation of facilities are fully considered at the outset of the design....” This is relevant to hotels but also applies to other facilities open to the public such as a public car park, retail, educational establishments, public toilets etc.</p> <p>The IAMP is NOT a document that demonstrates the highest standard of accessible and inclusive design: that is the role of the Design and Access Statement.</p> <p>The DAS should set out the physical provision and design rationale. (for more information on the difference between DAS and IAMP see p 131 para 9: London Plan 2011: Accessible London: Achieving an Inclusive Environment SPG 2014)</p>	<p>the highest standards of accessibility and inclusion.</p> <p>No changes required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>The IAMP should include: NB details to vary according to type of development.</p> <ul style="list-style-type: none"> • Concise description of the development • Nomination of person responsible for monitoring to ensure compliance with IAMP for duration of the development • Lifts: who is responsible for maintaining lift and ensuring 24/7 lift maintenance contract to ensure no one trapped on upper floors • Means of escape procedures • Parking: who is responsible for monitoring and enforcing blue badge/accessible parking to prevent abuse by non blue badge holders; • provision of compliant accessible parking equates to future demand from blue badge holders (including allocation of bays to blue badge holders in wheelchair housing units and lifetime homes) • ensuring accessible parking bays not sold during lifetime of 	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>the development</p> <ul style="list-style-type: none"> • ensuring accessible parking for visiting blue badge holders • ensuring entrance barriers and ticket machines are accessible and inclusive • ensuring maximum height (if less than 2.6m) shown at entrance to car park to enable blue badge holders to avoid the car park or being in a queue they cannot escape. Alternative provision for • blue badge holders high topped vehicles to be identified. • Public realm: who is responsible for ensuring adequate lighting, ongoing step free access free from obstructions etc for the duration of the development. • Public Toilets/Changing Places toilets: who is responsible for ensuring all toilets including are secure, kept clean and usable at all times. 	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<ul style="list-style-type: none"> • Retail: Responsibility of the developer to include in any lease that the tenant is responsible for fitting out retail units so they are accessible and inclusive (e.g provision of accessible toilets; accessible changing rooms etc). • developer to ensure occupying tenants comply with lease conditions. • Signage: who is responsible for ensuring all signage is up to date and is accessible and inclusive for the duration of the development. • Staff training: who is responsible for ensuring all managers and frontline staff are trained to respond appropriately to any disabled person using facilities. 	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(19)	H&F Disability Forum	KP SF2	<p>Key Principle: SF2 Shopfronts We are concerned that the emphasis on preserving historic shopfronts may over rule the requirement to provide level access. The SPD should indicate that planning permission will not be granted unless proposals comply with SF 2.</p>	<p>Key Principle - CAG4 – Historic Shopfronts should be read in conjunction with Key Principle – SD2 Shopfront access. Key Principle - SD2 states that “The Council will expect new or altered shop fronts to accommodate the needs of disabled people”. Key Principle SD2 further states that:</p> <p>“Doorways should therefore be at least 800mm wide, should have doors that are to open and should provide a level entrance or a non-slip ramp within the unit”</p> <p>Therefore your request for level access in shopfronts (whether historic or new), has been addressed in Key Principle SD2.</p> <p>We also propose to amend the description of Disabled Access at paragraph 4.10 to read, to meet these concerns. Proposed change:</p> <p>4.10...</p> <p>“Disabled Access:...wherever possible and practicable, <u>for example, level access.</u>”</p>
(19)	H&F Disability Forum	KP SD6	<p>Key Principle SD6: we consider this policy should include a requirement for lettering and logos to be large enough so people can read the signs</p>	<p>Comments noted. This key principle seeks to find the balance between accessible public realm and ensuring that signage and fascia panel is proportionate and respects the built environment. We consider the current wording appropriate.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				No change required.
(19)	H&F Disability Forum	Paras 4.121-141	<p>Archaeology and heritage assets (paras 4.121 – 4.141)</p> <p>We are concerned that the SPD has overlooked ensuring that heritage assets can be used by the whole community including disabled people.</p> <p>London Plan policy 7.8 Heritage Assets and Archaeology includes improving access to the historic environment and heritage assets and their settings where appropriate.</p> <p>We recommend this section ensures planning applications relating to heritage assets promote solutions to make access easier for disabled people.</p> <p>It would be helpful to include references to the guidance below in the text to help applicants.</p> <p>Guidance Accessible London SPG paras 4.12 – 4.12.7 Easy access to historic buildings English Heritage 2012 Easy access to historic landscapes English Heritage 2013</p>	<p>Comments noted. The Council is keen to ensure that all the borough is accessible for all user groups. The Local Plan Policy DC8 – Heritage and Conservation outlines that heritage assets should be accessible to everyone in a community, including disabled people.</p> <p>This policy will work in conjunction with the principles in the SPD, and will help to ensure that heritage assets are accessible to all groups.</p> <p>The Council agrees that reference may be made in the SPD regarding accessibility and heritage assets to other external documents that may be of assistance. Proposed additional paragraph to follow para. 4.43:</p> <p><u>“Access and inclusive design should also apply to heritage assets in the borough, in accordance with the Key Principles in the Archaeology and Heritage Assets chapter. The council also advises applicants to refer to external up to-date guidance on this matter from Historic England and London Plan guidance.”</u></p> <p>We have also proposed a change to para. 4.10 Disabled Access (please see previous comment).</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>London Plan SPG London World Heritage Sites 2012 paras 4.48 - 4.52</p>	
(20)	The Friends of Ravenscourt Park	Para 4.148	<p>We wish to submit the following comments as there are a series of inaccuracies in paragraph 4.148 on page 65. All sources can be referenced and verified.</p> <p>1.2 A suggested replacement draft entry follows, below. Given the time constraints, we hope this is helpful.</p> <p>1.3 The comments are based on my own ongoing research using primary sources in the London Metropolitan Archives (LMA), local archive sources and elsewhere, plus work done by the Friends in partnership with the Museum of London, and the results of a geophysical survey and subsequent trial dig carried out in 2015 by Archaeology South East, a department of UCL.</p> <p>1.4 Our work on this project was supported and highly commended by the Greater London Archaeological Advisory Service (GLAAS), who added the ensuing report to the Greater London Historic Environment record</p>	<p>We note your comments and concerns.</p> <p>Archaeological Priority Areas are set out on the Policies Map by the Council on the advice of Historic England. Historic England is currently reviewing APAs across London and updates to existing APA boundaries and descriptions and new designations are expected in the near future, this work will be informed by the results of recent archaeological investigations which have advanced understanding of the significance of archaeological remains in the Borough. We therefore do not consider it appropriate at this stage to make alterations to the Ravenscourt Manor House (Palingswick) APA, until this research is complete.</p> <p>We will alert Historic England to your research when the Borough's APAs are reviewed. We do propose to make reference to this on-going work and to clarify what an APA is, by adding the following text underneath the title, Archaeological Priority Areas:</p> <p><u>"An Archaeological Priority Area (APA) is a defined area of particular archaeological significance or vulnerability. APAs inform the practical use of national and local planning policies for the recognition and conservation of archaeological</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>(GLHER). This is one of the most important archaeological areas in the borough, located in one of the borough's two flagship parks.</p> <p>2 Comments on para 4.148</p> <p>2.1 The house now known as Palingswick House in King Street, built in the middle of the 19th century, was part of an estate called Seagreens. It was only given the name Palingswick in the 1950s and should not be confused with either the manor or the manor house of Ravenscourt/Palingswick.</p> <p>2.2 The correct Archaeological Priority Area is shown on a map in the ASE report (p19 figure 1), and should be amended on maps etc elsewhere in the SPD.</p> <p>2.3 The paragraph confuses 'manor' and 'manor house' and uses these terms indiscriminately. The heading: Ravenscourt Manor House (Palingswick) should be replaced by: Ravenscourt Park: manor house site (see suggested replacement draft entry, at 3 below).</p>	<p><u>interest. APAs are set out on the Policies Map by the Council on the advice of Historic England. Historic England is currently reviewing APAs boundaries and descriptions and new designations are expected in the near future, this work will be informed by the results of recent archaeological investigations which have advanced understanding of the significance of archaeological remains in the Borough."</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>2.4 The third sentence is inaccurate in employing the anachronistic term 'mansion': it was always a relatively small manor house. (This accounts for the number of owners through the centuries as until the 19th century it was used as a pied-a-terre near the city of London for those with larger estates further afield.)</p> <p>2.3 The site can be identified in maps from the 16th century onwards, and was described in detail in the comprehensive and scholarly Survey of London published by the LCC in 1915, and confirmed by our trial excavations carried out in 2015. (See also aerial photographs from the 1930s from Historic England.)</p> <p>2.4 Contemporary scholars view Alice Perrers as a prominent medieval landowner, dismissing the misogynist stereotype employed in earlier times. She owned over 50 manors across England, and it is not confirmed whether she ever lived at Ravenscourt for any length of time - or at all.</p> <p>2.4 The manor house was refurbished and rebuilt many times over the</p>	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>centuries, not as stated.</p> <p>2.5 The Georgian building was damaged by an incendiary bomb in January 1941, but although demolished was not in fact too damaged to be saved, as photographs dated May 1941 reveal (LCC archive in the LMA).</p> <p>3 Suggested draft replacement SPD entry</p> <p>Ravenscourt Park: manor house site</p> <p>The APA is located in the north east of Ravenscourt Park, between the lake and the park boundaries along Paddenswick and Ravenscourt Roads. It marks the site of the medieval moated manor house in what was originally known as the manor of Palingswick, itself part of the much larger manor of Fulham, then owned by the Bishop of London. First reliably documented in the 14th century, the Palingswick estate then consisted of “ forty acres of land, sixty of pasture and one and half of meadow” while the house itself was said to possess halls, chapels, kitchens, bakehouses and stables. At this time, this was one of</p>	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>the many manors owned by Alice Perrers, medieval landowner and lady in waiting to Queen Phillipa at the court of the Plantagenet King Edward III.</p> <p>Rebuilt and refurbished on the same site by a succession of well-documented owners, including Lord Mayors of London, Members of Parliament, a speaker of the House of Commons , court officials and one Lord Chancellor, the manor house was rebuilt in its final form in the 18th century. It was also renamed as Ravenscourt during this period. The LCC Survey of London describes it in 1915 as a very good example of an early Georgian structure “excellent alike in arrangement and in its architectural detail”. This comprehensive 20th century account also records that the house retained numerous features dating back to Elizabethan and Stuart times. After the death of its last family owners, the estate was saved from development by the Metropolitan Board of Works, who purchased it in 1887 for use as a public park. Opened in 1890 as Hammersmith’s first public library, the house was hit by an incendiary bomb</p>	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			in January 1941 and subsequently demolished.	

5. Noise & Nuisance

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(3)	Port of London Authority	All/ Section 5: Noise & Nuisance	<p>As a general point, the PLA are disappointed that the boroughs three Safeguarded Wharves, Hurlingham Wharf, Swedish Wharf and Comley's Wharf are not referred to in the planning guidance SPD, particularly as part of the noise section of the SPD. These sites are subject to relevant policies in the London Plan, notably policy 7.26, as well as policy SI15 of the draft new London Plan, and in line with the current safeguarding directions all three sites remain safeguarded. Through this safeguarding all three of these safeguarded wharves are deemed to be viable or capable of being made viable for cargo-handling, and must be protected from alternative development and indeed their use for waterborne transport promoted. With this in mind any proposed development adjacent, or opposite these safeguarded wharves must be designed in such away to address any potential conflicts, even if the wharf sites are not currently in use. In the draft new London Plan, the Agent of Change principle is introduced, which places the responsibility of mitigating the impact of noise from existing noise generating businesses on proposed new developments close by, thereby ensuring that residents of the new development are protected from noise, this is particularly relevant for safeguarded wharf sites. The PLAs specific comments on the draft SPD are below:</p>	<p>Comments noted.</p> <p>As requested, reference to the boroughs three safeguarded wharves has been included in the SPD as part of chapter 5 on noise & nuisance. Reference to London Plan Policy 7.26 on safeguarded wharves has also been included in section 15 of the SPD on residential moorings.</p> <p>Please see the officer response & proposed changes (below) to specific points you have raised in your representation.</p> <p>No change required</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(3)	Port of London Authority	Para 5.10	<p>Noise</p> <p>It is noted that paragraph 5.10 states the borough will ensure that existing waste and recycling sites are protected by ensuring any proposed new residential developments that might be exposed to noise from the sites are carefully planned, with appropriate noise mitigation installed to maintain appropriate internal noise levels, to protect future residents. This must be expanded to also include the boroughs three safeguarded wharves, Hurlingham Wharf, Swedish Wharf and Comley's Wharf. There are also two safeguarded wharves opposite in the London Borough of Wandsworth at Smugglers Way and Pier Wharf which should also be considered. This would be in line London Plan policy 7.26 and paragraph 7.79, as well as the draft new London Plan, which states that in order for safeguarded wharves to remain capable of continuing to be viable for waterborne freight handling uses, new development next to or opposite wharves should utilise the layout, use and environmental credentials of buildings to design away potential conflicts, including noise, to minimise the potential for conflicts of use and disturbance. This would also be supported by paragraph 5.106 of the boroughs Local Plan regarding the protection of safeguarded wharves in the borough.</p>	<p>Comments noted.</p> <p>A paragraph referring to the boroughs three safeguarded wharves will be added to chapter 5 on noise & nuisance.</p> <p>Add new para following para 5.10 as follows:-</p> <p><u>“There are three safeguarded wharves in the borough which are located within the South Fulham Riverside Regeneration Area. They are, Hurlingham Wharf, Comley's Wharf and Swedish Wharf. The development of sites adjacent or opposite to the boroughs safeguarded wharves should be designed in a way as to minimise the potential for conflicts of use and disturbances, including noise.</u></p>
(3)	Port of London Authority	KP NN1 & NN2	<p><i>NN1 (Noise and Vibration – survey & report) & NN2 (Noise sensitive development – noise and vibration)</i></p> <p>The PLA broadly supports these key principles, but as noted above safeguarded wharves must be referenced in</p>	<p>Comments noted.</p> <p>Reference to the boroughs three safeguarded wharves to be added into KP NN1 (Noise and Vibration- survey</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>the second bullet point of paragraph 5.11 in regards to noise and/or vibration surveys. For example this could read– “ Residential and other noise sensitive developments proposed in areas that would be exposed to existing noise from sources including transport, commercial and industrial uses, (including at safeguarded wharves).....</p> <p>Key Principle NN2 on noise sensitive development must also specifically refer to safeguarded wharves. Development proposals at sites adjacent to or opposite safeguarded wharves, whether they are in operation or not, must also be accompanied by an acoustic report detailing existing or potential noise levels for night time and daytime periods, as well as noise mitigation measures, as mentioned in the second paragraph of the key principle NN2.</p>	<p>& report).</p> <p>Amend second bullet point of para 5.11 as follows:-</p> <p>“Residential and other noise sensitive developments proposed in areas that would be exposed to existing noise from sources including <u>such as</u> transport, commercial and industrial uses (<u>including the boroughs three safeguarded riverside wharves</u>) and vibration.....”</p> <p>Comments noted. Reference to the boroughs three safeguarded wharves to be added into KP NN2 (Noise Sensitive Development- noise & vibration).</p> <p>Amend first paragraph of KP NN2 as follows:-</p> <p>“Wherever possible and practicable, residential and other noise sensitive development including hospitals, sheltered and nursing homes, offices, schools & similar establishments proposed in areas where they would be exposed to existing external noise shall be designed so as to be located</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>away and protected from significant transport , industrial (<u>including the boroughs three safeguarded riverside wharves</u>) and/or commercial.....”</p> <p>Amend second para of KP NN2 as follows:-</p> <p>“Planning applications for sites near substantial transport and/or other non residential noise (<u>including the boroughs three safeguarded riverside wharves</u>) must be accompanied.....”</p>
(3)	Port of London Authority	KP NN7	<p><i>NN7 (Environmental Pollution)</i></p> <p>The PLA broadly supports this key principle, which sets out a list of guidance & criteria regarding applications for developments that have the potential to emit pollution from various environmental elements, including dust & lighting. The PLA consider that under the dust section on page 81 of the document, where it mentions the requirement for a demolition method statement, construction management statement, and a list of control measures, such as using ‘sustainable alternative and/or additional measures’ the use of the River Thames for the transportation of construction and waste materials must be specifically referenced, in line with London Plan policy 7.26 of the London Plan, and the PLAs Thames Vision.</p>	<p>Comments noted.</p> <p>Amend KP NN7 (Environmental Pollution) to refer to the River Thames as part of demolition/construction method statements, under the heading ‘Dust’ as follows:-</p> <p>Demolition & Construction</p> <ul style="list-style-type: none"> • “Suitable alternative and/or additional measures, <u>including the use of the River Thames for the transportation of construction and/or waste materials where feasible</u>”

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(13)	Hammersmith Society	Para 5.64 & 5.65	Under 5.64 and 5.65, please change 'should' to 'must' in each case.	<p>Comments noted.</p> <p>As this is only guidance, the Council considers the current wording is acceptable.</p> <p>No change required</p>

6. Air Quality

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(3)	Port of London Authority	KP AQ2	<p><i>AQ2 – Mitigation of Emissions caused by new developments</i></p> <p>The PLA broadly supports key principle AQ2 on the mitigation of emissions caused by new developments. The PLA request that in this section as part of the potential mitigation of emissions during the construction / demolition phase of a development, there must be a reference to using the River Thames for the transportation of construction materials and waste. The PLAs Thames Vision (July 2016) includes the goal to move more goods off roads and onto the river; this will significantly help to reduce congestion in London and improve air quality. For developments near to the river, Construction Environmental Management Plans (CEMPs) must be submitted which include consideration for waterborne transport methods. There are also references to using the River Thames for the transportation of goods and materials in the GLAs Supplementary Planning Guidance (SPG) on the Control of Dust and Emissions during Construction and Demolition which is mentioned in paragraph 6.21 of this document.</p>	<p>Support welcomed.</p> <p>The comments on highlighting the use of the River Thames to transport construction/demolition waste is noted and a revision is proposed to add the following text at the end of the supporting text in Para 6.21 for Key Principle AQ2: “<u>Emissions from vehicles delivering construction materials and removing waste should be minimised and where feasible, the river should be used to transport construction materials and waste</u>”.</p> <p>With regard to the need for Construction Environmental Management Plans (CEMPS), the draft SPD document already includes in Appendix 4 guidance on requirements for Construction Management Plans. This is currently mainly referenced in the Noise and Nuisance Chapter, although the guidance is relevant for air quality and other issues. It is therefore proposed to refer to the Appendix in the Air Quality Chapter as follow:</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>Para 6.21, add the following text to follow on from the first sentence: <u>“Further guidance on requirements in relation to Demolition Method Statements and Construction Management Plans are provided in Appendix 4”</u>.</p> <p>It is also considered to be appropriate to include reference to this issue in the Chapter on Sustainable Design & Construction, as follows: Para 12.17, add the following text to the end of the existing text: <u>“Further guidance on requirements in relation to Demolition Method Statements and Construction Management Plans are provided in Appendix 4”</u>.</p>
(8)	H&F Biodiversity Commission	Section 6: Air Quality	Air quality affects wildlife as well as human beings , so we agree with the aim for developments to be “Air Quality neutral” and for more planting of trees and hedges as buffers. As with all planting, we would want this to consist wherever possible of native trees and shrubs to simultaneously provide habitats for wildlife. And we agree with the recommendation in the Air Quality Commission report that pruning/pollarding of street trees should be done on a one- in three basis, so that the air quality buffers and also the habitats they provide are not all removed at once.	<p>Support for Air Quality Neutral approach is welcomed.</p> <p>Accept the comment regarding use of native planting being prioritised where possible and propose to revise the supporting text for Key Principle AQ3 as by adding the following text to the end of Para 6.24: <u>“Where possible, the use of native plants should be prioritised as these are likely to provide increased biodiversity benefits</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p><u>over non-native invasive species”.</u></p> <p>Regarding, pollarding of street trees, this is outside the remit of the Planning Guidance SPD. However, this recommendation has been noted by the council’s Arboricultural Officer and it is understood that there are plans to modify the approach to pollarding along main roads with high traffic volumes so future maintenance is staggered to avoid all trees being done at the same time.</p> <p>No amendments necessary.</p>
(9)	Transport for London	Section 6: Air Quality	<p>Thank you for consulting TfL for our view on your Council’s Planning Guidance SPD. It is understood this provides supplementary detail to policies on a variety of topics. . The following comments are made by TfL City Planning officers on a ‘without prejudice’ basis and are intended to ensure that this policy document is in line with relevant London Plan transport policies and reflects the draft Mayor’s Transport Strategy. You should not interpret them as indicating any subsequent Mayoral decision and these comments do not necessarily represent the views of the GLA.</p> <p>Suggested changes that should be considered are set out in the attached table/annex. TfL previously confirmed that the transport policies in the draft Local Plan the Council</p>	<p>Support welcomed.</p> <p>The comment on the importance of the council applying its policies principles in relation to air quality issues is noted.</p> <p>With regards to the suggestion of following the LLAQM SPD template, this is felt to be more appropriate if the Air Quality SPD was a standalone document, but the council’s current approach is to combine all SPD documents into a single document. However, use of the template will be considered when the next opportunity</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>consulted on earlier this year are broadly in line with strategic transport policies in the London Plan. However the Mayor has last week published his new Draft London Plan, the policy changes in which are a material consideration in some of our comments below.</p> <p>It is welcomed that the SPD places due importance on Air Quality (AQ) and its assessment for impacts of new development, it will be especially important the Council applies its key principles and policies on AQ to assessment of planning submissions, given the whole of the Borough is an Air Quality Management Area. It is recommended the London Local Air Quality Management template SPD for AQ is more widely utilised/referenced in the SPD – the link is https://www.london.gov.uk/sites/default/files/template_supplementary_planning_guidance.pdf</p>	<p>arises.</p> <p>No changes proposed.</p>
(9)	Transport for London	Para 6.1	Reference needs to be made to the full range of Draft London Plan Policies relevant to AQ i.e. SI1, SI2, SI3 and SI4	<p>Comment noted.</p> <p>The Draft London Plan is at an early stage of consultation ending 2nd March 2018. Because of this very little weight has been given to the draft policies and where relevant Adopted London Plan policies are used throughout the SPD.</p> <p>No changes proposed.</p>
(9)	Transport for London	Para 6.17	In this paragraph on reducing emissions, reference should also be made to the Non-Road Mobile Machinery Low	<p>Comment Noted.</p> <p>Non-Road Mobile Machinery is used</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			Emission Zone (NRMM LEZ).	<p>during the construction/demolition phase which is dealt with in Para 6.21. It is therefore proposed to add the following text at the end of Para 6.21: <u>“Hammersmith & Fulham is located within the Non-Road Mobile Machinery (NRMM) Low Emission Zone which means that during the construction/demolition phase, that machinery that complies with the emissions requirements outlined here: http://nrmm.london/ will need to be complied with. It should be noted that for the majority of construction sites in the borough, compliance with the Stage IIIB NRMM emission criteria of Directive 97/68/EC and its subsequent amendments will be expected”.</u></p>
(12)	Fulham Society	Para 6.1	<p><u>Para 6.1. An environmentally sustainable borough.</u> If you want to make the borough the greenest and reduce pollution & congestion, think home working and local work places. Fast communications are an integral part of the success of most business operations. It is up to BT how fast the superfast fibre is available but the council should actively encourage them to expand across the whole borough.</p>	<p>Comment Noted.</p> <p>The Proposed Local Plan includes a commitment to work with partner organisations to reduce social exclusion and facilitate access to high speed internet across the borough.</p> <p>No changes proposed.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(13)	Hammersmith Society	Section 6: Air Quality	Air Quality : There seems to be no mention of the Council's Air Quality Commission or its report and recommendations which approved by the Council during 2017. We would appreciate confirmation that the AQC have endorsed the proposals as set in this document.	<p>Comment noted.</p> <p>The Air Quality Commission provided detailed comments on the draft Local Plan and a number of their recommendations were adopted by amending and revising Policies and supporting text in the final version. Further details can be found here: https://www.lbhf.gov.uk/sites/default/files/section_attachments/rep_schedule_with_officer_comments.pdf</p> <p>The Commission did not comment on the draft SPD. However, it is proposed to include an acknowledgement in the SPD of the AQ Commission's work as follows:</p> <p>Amend para 6.1 to include the following text to the last sentence: "It is important for air quality issues to be considered early in the planning process and to be assessed in detail where necessary as mitigation measures may be required to reduce emissions and reduce exposure, <u>as highlighted by the Air Quality Commission in its 2016 report</u>".</p>

7. Energy

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(16)	Berkeley Group	Para 7.15	<p>Paragraph 7.15 states that ‘where a new CHP/CCHP system is deemed to be viable, the developer should also assess whether there is any potential to extend the system beyond the site boundary to adjacent sites. Where future network opportunities are identified, proposals should be designed to connect to these networks.’</p> <p>Whilst the ambition of the guidance is supported, the current drafting does not specifically reference the need for opportunities to extend a CHP/CCHP system to be viable. The text should be amended to clarify that the assessment should also take into account the viability of extending the CHP/CCHP system to ensure that the draft SPD complies with paragraph 173 of the NPPF, which sets out that sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.</p>	<p>Comments Noted.</p> <p>Suggest amending the text in para 7.15 in line with the comments to read as follows:</p> <p>“Where a new CHP/CCHP system is deemed to be viable, the developer should also assess <u>the feasibility of</u> whether there is any potential to extend the system beyond the site boundary to adjacent sites. Where future network opportunities are identified, proposals should be designed to connect to these networks”.</p>

8. Land Contamination

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(15)	Environment Agency	KP LC3	<p>Land Contamination</p> <p>We support the policies within this chapter and would only comment that proposers of potentially contaminated sites should also refer to Environment Agency guidance on groundwater protection available: https://www.gov.uk/government/collections/groundwater-protection</p> <p>This could be included in Key Principle LC3.</p>	<p>Comments noted and support welcomed.</p> <p>Reference to the Environment Agency's guidance on groundwater protection will be added to para 8.1 on "further guidance & legislation".</p> <p>New bullet point to be added to para 8.1 as follows:-</p> <ul style="list-style-type: none"> • <u>"Environment Agency Guidance- The Environment Agency is responsible for the protection of controlled waters (both ground and surface waters) and suitable guides can be downloaded from their website."</u> (insert link: www.gov.uk/government/collections/groundwater-protection)

9. Sustainable Urban Drainage Systems

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(5)	Thames Water	Section 9: SuDs	<p>Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewerage undertaker for the area and is hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. Thames Water have the following comments to make on the SPD consultation.</p> <p>Section 9 – Sustainable Drainage Systems (SuDs) Thames Water support the content of Section 9 in relation to the requirements for SuDs. The provision of SuDs through new development help to ensure that there is sufficient capacity within the sewerage network by reducing surface flows entering the network. This can free up capacity within the network to deal with increased dry weather flows arising from population growth. The delivery of SuDs in new development can therefore help to ensure that the sewerage network is resilient to increased pressures arising as a result of population growth and climate change.</p>	<p>Support welcomed.</p> <p>No change required.</p>
(7)	U & I Group	KP SuD5	<p>Whilst the draft policy states: <i>“All flat roofs in new developments should be living roofs to help contribute to reducing surface water run-off”</i>.</p> <p>U+I considers this draft policy to be unnecessarily or inherently generic, applying it to all flat roofs in all new developments. Whilst U+I recognises the benefits of living roofs, it also notes that the feasibility of implementation on</p>	<p>Comments noted.</p> <p>This principles reflects Local Plan policy has been through a full process of public consultation and Examination in Public overseen by a Planning Inspector. It is not appropriate to use the SPD consultation process to seek</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>all flat roofs is limited by other planning factors. In addition, this may be costly and have consequent implications on the viability of schemes and impact on affordable housing and its delivery.</p>	<p>changes to Local Plan Policies at this late stage.</p> <p>Our assessment and use of living flat roofs shows that they can be used without entailing excessive costs. Where necessary, the viability of their inclusion can be assessed on a case by case basis as part of the planning process.</p> <p>No change required.</p>
(8)	H&F Biodiversity Commission	Para 9.24	<p>Householders are not now allowed to install hard surfacing above 5m² in their front garden.</p> <p>We say that any new hard surfacing, if allowed for a compelling reason, must be offset by a green roof or a green wall of at least equal area. (See our recommendation re rear extensions above.)</p> <p>We enthusiastically endorse the new greening provided when SuDS schemes replace a stretch of road, as well as the social benefits. However we would emphasise that native planting of species that promote wildlife should be the norm. (We note that Australia Road raingarden is planted with Himalayan birches and exotic grasses.)</p>	<p>Comment noted.</p> <p>A new requirement for new flat roofs to be living roofs has been introduced into Policy CC4 of the Local Plan which will provide biodiversity benefits. We cannot amend the Policy at this stage in the way recommended by the Commission.</p> <p>The comments regarding use of native plant species are noted. It is considered more appropriate to include reference to this issue in para 9.27 as follows:</p> <p>“Above ground SuDS can also provide amenity space or be integrated into existing open spaces,</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				increase biodiversity levels, help reduce the urban heat island effect and also provide improvements in local air quality. Green infrastructure SuDS can help create visually attractive developments which help improve people's quality of life and general health and also help to comply with Local Plan Policies on Open Space i.e. Policy OS4 on Nature Conservation and Policy OS5 on Greening the Borough. <u>Where possible, the use of native plants should be prioritised as these are likely to provide increased biodiversity benefits over non-native invasive species.</u> There is also scope to integrate SuDS measures into streetscapes where these form part of development proposals, contributing to improved environments for cyclists and pedestrians.
(15)	Environment Agency	Section 9: SuDs	The Lead Local Flood Authorities (LLFA's) are responsible for advising on surface water flood risk.	Comment noted. No change required.
(18)	H&F Historic Buildings Group	Para 9.23	9. Sustainable Drainage Systems (SuDs) We are only commenting on SuDs in minor developments as we know from 9.9 that major applications that do not	Comment noted. The inclusion of SuDS measures in minor developments is something that

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>include a Sustainable Drainage Strategy will not be validated by the planning authority.</p> <p>9.23 Small-scale works such as householder extensions can provide an opportunity for installing Suds. We do not consider that most householders are aware of this. We suggest a condition requiring permeable paving or a rain garden or water butt should be inserted prior to their planning permission/permitted development rights being granted.</p>	<p>the Local Plan requires and the SPD provides guidance on the types of measures that should be considered, such as those suggested by the HBG – i.e. permeable paving, soft landscaping and water butts.</p> <p>Conditions will be used to require SuDS as appropriate for minor developments where permission is to be granted. Making changes to permitted development rights, which are laid down by the national Permitted Development Order, is not something that the council can do unilaterally in a Local Plan or SPD document.</p> <p>No change required.</p>
(18)	H&F Historic Buildings Group	Para 9.24	<p>9.24 Installation of hard surfacing in front gardens.</p> <p>We do not think that most householders are aware of the requirement to use permeable surfacing. We do not think that most householders are aware of the need for permission to pave over front gardens if they are not applying for a cross over. (We have recently noticed in Greenside Rd and Goldhawk Rd instances of both the front and back gardens being paved over with impermeable surfaces).</p>	<p>Comments noted.</p> <p>If residents are aware of works carried out at properties in the borough that they suspect contravene permitted development rights, then details can be provided to the Planning Enforcement Team who will investigate further and take action as appropriate.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(18)	H&F Historic Buildings Group	KP SUD7	<p>SuDs Maintenance Key Principle – SuD7 Where installed, SuDs measures on all developments must be retained and maintained for the lifetime of the development and details of their planned maintenance must be provided to the council.</p> <p>(We have noticed that the excellent SuDs scheme on the Queen Caroline Estate is in reality to be maintained by the residents. This is also the case for the SuDs scheme in Melina Rd/Cathnor Park. Both schemes were beautifully planted and landscaped but in reality it is up to the residents to maintain the beds i.e. weed and prune when necessary. We consider that some initial training should have been afforded to those residents and this should have been conditioned).</p>	<p>Comment noted. The inclusion of residents in ongoing maintenance of the SuDS schemes referenced by the Group was done with their agreement and involved residents throughout the design and implementation process. It is generally considered to be a positive aspect of the schemes. Also, it should be noted that residents are not required to maintain the schemes on their own, but in partnership with the council and our contractors. Residents were provided with training in this respect.</p> <p>No change required.</p>
(18)	H&F Historic Buildings Group	Section 9: SuDs	<p>Drafting Notes SuDS is now interpreted as Sustainable Drainage Systems (the Urban emphasis has been removed)</p>	<p>Comment noted.</p> <p>“Sustainable Urban Drainage System” is not used in the SuDS Chapter, but it has been noted that in Para 11.49 (Biodiversity) and Para 13.83 (Transport) that “Urban” has been included and will need deleting as recommended.</p>

10. Flood Risk & Water Efficiency

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(3)	Port of London Authority	KP FR9	<p>Flood Risk</p> <p><i>FR9 – Thames Estuary 2100 Plan Requirements</i></p> <p>The PLA supports this principle regarding meeting the requirements of the Thames Estuary 2100 Plan for developments adjoining the River Thames.</p>	<p>Support welcomed.</p> <p>No change required.</p>
(5)	Thames Water	Section 10.42	<p>Thames Water welcome the acknowledgement within Section 10.42 that basement development is susceptible to sewer flooding. However, it is considered that the recommended mitigation measures are revised to ensure consistency with the emerging Local Plan. Currently the mitigation measures set out include non-return valves or pumped sewage devices being installed to prevent sewer flooding. Emerging Policy DC11 requires the provision of active drainage devices (i.e. pumped solutions) to minimise the risk of sewer flooding. Supporting text at 6.2.41 of the submission Local Plan states <i>“To protect against sewer flooding, developments must include the provision of a pumped solution or</i></p>	<p>Comments noted.</p> <p>As recommended, amend Para 10.42 as follows:</p> <p>“Basement developments are susceptible to sewer flooding so in addition to the structural water-proofing measures outlined above, it is recommended that where kitchens, bathrooms or other water related installations are planned at basement level, that mitigation measures in the form of <u>provision of a pumped solution or 'active drainage devices' incorporating non-return valves</u> non-return valves or pumped sewage devices are installed to prevent surcharge flooding from the sewer system during intense storm events.”</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p><i>'active drainage devices' incorporating non-return valves to prevent water entering a property from drains and sewers."</i></p> <p>Provision of a non-return valve alone while providing protection from sewers surcharging may not prevent flooding as once closed any wastewater from the property will not be able to enter the sewer. As such properties can be at risk from flooding from wastewater from within their own property which has nowhere to drain to. The provision of active or pumped solutions prevent this risk by pumping flows into the network. It is therefore considered that the text in Section 10.42 is revised to match the text in Section 6.2.41 of the submission Local Plan as set out above.</p>	
(5)	Thames Water	Section 10.45-47	<p>In relation to the delivery of development, where development will take place over or in close proximity to existing water or wastewater assets there will be a need to ensure that the assets are protected from damage in order to prevent adverse impacts such as burst water mains or collapsed sewers.</p> <p>Where such assets cross a site or lie in close proximity to a site developers should contact Thames Water Developer Services to discuss any protection measures or build over agreements required. It is therefore suggested that the following text is inserted into the SPD:</p> <p><i>"Where water or wastewater assets cross a</i></p>	<p>Comment noted.</p> <p>Suggest we insert the following text at the end of Para 10.46:</p> <p><u><i>"Where water or wastewater assets cross a site, or lie in close proximity to a site, developers are advised to contact Thames Water Developer Services to discuss any protection measures or build over agreements that may be required"</i></u>.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p><i>site, or lie in close proximity to a site, developers are advised to contact Thames Water Developer Services to discuss any protection measures or build over agreements that may be required.”</i></p> <p>I trust the above and enclosed comments are satisfactory, but please do not hesitate to contact me if you have any queries.</p>	
(15)	Environment Agency	KP FR1	We support Key Principle – FR1 but suggest the following amended changes to the text for clarification purposes (blue text).	<p>Support for Key Principle FR1 welcomed.</p> <p>No change required.</p>
(15)	Environment Agency	Para 10.5	<p>Section 10.5 page 123 identifies that FRA’s should make use of relevant flood risk information. From June 2017, we have begun using updated modelling data for the tidal Thames floodplain upriver of the Thames Barrier. This more comprehensive model replaces our previous modelling created in 2015; which is also used in your Strategic Flood Risk Assessment (SFRA). This means that some areas that appear to be in breach in your SFRA are now not and similarly areas which were before not considered to be in breach are now at risk. We expect FRA’s to make use of the most relevant flood risk information available. Our 2017 breach flood risk data can be requested from hnlquiries@environment-agency.gov.uk in the form of a Product 4 or Product 8 and will be supplied within 20 working days.</p>	<p>The comments on the updated EA modelling are noted. The council is in the process of updating the breach map information contained in its SFRA document. This information will be made available on the council’s website in due course.</p> <p>With regard to the template issue, amend the text in para 10.5 in line with the EA’s comments as follows:</p> <p>“The Environment Agency also provides detailed advice on flood risk issues, including FRA templates which can be used for minor applications. These are available on the EA website: www.gov.uk/government/organisations/environment-agency providing guidance on establishing when a FRA is required, how to complete one and how it’s processed. Further information, including guidance on FRA requirements for minor applications, is available on the EA website:</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>Section 10.5 goes on to say that the Environment Agency also provides detailed advice on flood risk issues, including FRA templates which can be used for minor applications. We do not provide templates as such, but do provide guidance on establishing when a FRA is required, how to complete one and how it's processed. This is available https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications as mentioned in section 10.8.</p> <p>10.5 FRA's must make use of the most relevant flood risk information, including but not exclusive to that provided in the councils Strategic Flood Risk Assessment and Surface Water Management Plan and the Environment Agency. The Environment Agency provides detailed advice on flood risk issues including Product 4 data that provides flood extents, historic flood extents, flood depth flood levels and defence information and through their cost recovery process they can also provide detail site specific advice. FRA guidance for minor applications can be found at the EA website: https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications</p>	<p>www.gov.uk/guidance/flood-risk-assessment-for-planning-applications"</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(15)	Environment Agency	KP FR2	We support Key Principle - FR2.	Support welcomed. No change required
(15)	Environment Agency	Para 10.11	Section 10.11 page 124 identifies that all parts of the borough are considered as potentially suitable for development and there is no need for FRAs to include a Sequential Test Assessment – this is noted	Comments noted. No change required
(15)	Environment Agency	Tables 1&2	We are pleased to see that Tables 1 and 2 adapted from the Governments Planning Practice Guidance clearly outlines when the Exception Test should be applied. We accept that contrary to national guidance highly vulnerable development is considered appropriate in the borough subject to the Exception test being passed.	Comments noted. No change required
(15)	Environment Agency	KP FR3	We support Key Principle – FR3	Support welcomed. No change required
(15)	Environment Agency	Para 10.21	We are pleased to see that section 10.21 page 126 identifies the importance of FRA's to consider the scenario of a breach or over-topping of defences. In 2012 we undertook a flood risk modelling study which mapped	Comment noted. No change required

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			areas which would be at risk of flooding if flood defences along the tideway were to breach or fail (updated in 2015 and 2017). In instances where a site is shown as being within Flood Zone 3 from the River Thames but outside the area impacted by a breach/failure of the flood defences, we would consider this to be at low risk of flooding	
(15)	Environment Agency	KP FR4	We support Key Principle - FR4 it is very clear and helpful.	Support welcomed. No change required
(15)	Environment Agency	KP FR9	We support Key Principle – FR9 and are pleased to see that the Thames Estuary 2100 Plans are given clear recognition.	Support welcomed. No change required
(16)	Berkeley Group (Quod)	KP FR6	(‘LBHF’) consultation on the Draft Planning Guidance Supplementary Planning Document (‘draft SPD’). The Berkeley Group is a significant investor in the borough, having delivered 2,772 homes, 1,131 of which are affordable, at developments including Imperial Wharf, Chelsea Creek, Fulham Reach and Sovereign Court (St George), and Hurlingham Walk and Lime Grove Mews (St James). At present Berkeley has several land interests in the borough, including St William’s proposed development at Fulham Gasworks, the remaining phases of St George’s development	Comments noted in relation to basement flood-proofing. Para 100 of the NPPF states that “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere”. Th Local Plan includes Policy CC3 which requires developments to minimise current and future flood risk by implementing a range of measures, including structural waterproofing for all developments that

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>at Chelsea Creek, and St James' development at White City Living and proposed development at Centre House.</p> <p>The purpose of the draft Planning Guidance SPD is to provide supplementary detail to policies concerned with a variety of topics within LBHF's emerging Local Plan. We are broadly supportive of the emerging plan and welcome the use of the draft SPD to provide additional guidance that will assist with the preparation of successful applications and aid the delivery of infrastructure. It is on this basis that we provide comments about the draft guidance below.</p> <p>Key principle FR6 requires all developments that include a subterranean element to provide details of the structural waterproofing measures to be integrated to prevent any increase in on or off-site groundwater flood risk. The supporting text at paragraph 10.39 then follows to state that the use of internal drained cavity protection with a sump and pump is the recommended type of waterproofing. However, the recommendation for this specific type does not accord with BS8102:2009, from which the guidance is derived. This is a matter for Building Regulations, not for planning policy. We therefore consider that the sentence should be removed.</p>	<p>include a subterranean element. This is to prevent any increase in on or off-site groundwater flood risks. Protecting new developments (and neighbouring land uses) from flood risk is within the remit of the planning system.</p> <p>It is considered appropriate to provide guidance on this topic and reasonable to highlight our recommendations in terms of structural flood-proofing measures.</p> <p>No change required</p>

11. Biodiversity

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(3)	Port of London Authority	Para 11.23	<p>Biodiversity</p> <p>The PLA support and welcome the key principles introduced as part of the biodiversity section of the draft Planning Guidance SPD, specifically paragraph 11.23 on development adjacent to the River Thames and Grand Union Canal, and Key Principle BD8 which includes a requirement for a green buffer between the River Thames and the Grand Union Canal and any development site, where appropriate. This could be made stronger by clarifying on what the principle means by 'where appropriate' in regards to the green buffer.</p>	<p>We welcome your support regarding our policy approach on safeguarding and promoting biodiversity in the borough. We accept your comment that there should be clarity in relation to the term "Where appropriate" in regards of the green buffer.</p> <p>We will seek to highlight this point by adding the following as a bullet point to Para 11.55 (Supporting text for Key Principle BD8):</p> <ul style="list-style-type: none"> • <u>Assess the suitability of riverside sites for inclusion of green buffers between developments and the river.</u>
(8)	H&F Biodiversity Commission	Section 11 Biodiversity: Surveys	<p>Re Surveys:</p> <p>You say that a survey may not be required if there are no Protected or Priority species present on the site. But biodiversity is the total web of life.</p> <p>As John Goodier, one of the commissioners, says: "Important to biodiversity are the LBBS-</p>	<p>Comments noted. Amend KP BD1 (protection of existing biodiversity) as follows:-</p> <p>"Applications for development proposals should:</p> <ol style="list-style-type: none"> 1. ensure thorough initial investigations <u>and/or surveys</u> are

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>little brown bugs, little brown birds and little brown bacteria.” It really needs to be appreciated that there can be no bats, barn owls or peregrine falcons without sufficient provision for the creatures at the bottom of the food chain and all the way up to flourish.</p> <p>We therefore recommend that all green space and brownfield sites should be presumed to be supporting biodiversity and should be surveyed for all kinds of wildlife before any development is considered.</p>	<p>conducted on the proposed development site to assess existing levels of biodiversity”</p>
(8)	H&F Biodiversity Commission	KP BD6: Ecological Management Plan	<p>We endorse aims like: putting in “measures to increase the ecological value of the site once development is complete” but would emphasise that every bit of nature that is destroyed for development is a real loss and can never be replaced exactly as it was. (See the Introduction to our report: What is biodiversity and why is it important?) It is particularly important as you say to take all possible measures to preserve mature trees. They will have provided habitat for a great variety of wildlife and it will take another 30 years or more (maybe over 200 years) to replace them. Even planting 3 younger trees in their place will not replace them, and if the” replacement trees” are smaller and less supportive of biodiversity, there will be permanent loss.(eg in Lyric Square a very big</p>	<p>We welcome your comments in relation to KP BD6: Ecological Management Plan. We agree with your sentiments that every bit of nature destroyed for development is a real loss. KP BD6 seeks to create a framework to ensure that nature is safeguarded.</p> <p>We acknowledge your concern in relation to preserving trees. Key principle BD9 – Biodiversity and Tree Planting fulfils the function of seeking to preserve trees.</p> <p>We are committed to maintaining biodiversity in nature conservation areas for the long term.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>tree was replaced with multiple smaller trees, but these are not being allowed to grow to their full size.)</p> <p>Of course we endorse putting in “measures to ensure the biodiversity value of the site is maintained for the long term” but why does this mean only 5+ years? As explained above, biodiversity needs support into the next century -and the next millennium!</p>	<p>Therefore we will amend KP BD6 by deleting (5+ years) in the fourth bullet point as follows:-</p> <ul style="list-style-type: none"> • “measures to ensure the biodiversity value of the site is maintained for the long term (5+ years) after development is complete, including a monitoring program”
(8)	H&F Biodiversity Commission	KP BD7: Enhancement of Biodiversity	<p>This section is excellent. But we would like some clarification as to what “new green infrastructure” actually means. For the flourishing of biodiversity the new trees and hedges should be native as the norm and among those that support the most invertebrates. Mixed hedges support more biodiversity than those of one species only. And special attention needs to be paid to planting trees and shrubs with fruit and berries for birds and blossoms and flowers with accessible and plentiful nectar and pollen for pollinators. (NB not all accessible flowers have plentiful nectar and pollen).If non-native trees, shrubs, flowers or herbs are planted, this should be because they are known to support wildlife in this country.</p>	<p>Support welcomed. Paragraph 11.48 describes Green Infrastructure as being “the network of functional green space which supports natural and ecological processes and is integral to the health and quality of life of communities”</p> <p>As noted below by the Commission (Rep 8), Key Principle BD8 also refers to the fact that some species provide higher quantities of nectar and these should be chosen where they can be demonstrated not to become invasive non-native species.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(8)	H&F Biodiversity Commission	KP BD8: Landscape & Planting	<p>You do mention planting nectar-rich plants and trees here but it would be good to highlight the current plight of bees and butterflies and other pollinators and the need to ensure they are finding sufficient food.</p> <p>We question the stipulation that only 50% of plants should be native if they are not near a Nature Conservation Area or a green corridor. A German study suggests there has been a 70% decline in insects of all types in the last 30 years, and Paul de Zylva, nature expert at Friends of the Earth believes this may well be due to general loss of habitat so that even nature reserves are low in insects. To quote: “The German study is quite significant and although one study cannot be assumed to apply universally, the findings – of large declines in</p>	<p>Comments noted. Include reference for the need to ensure sufficient food for bees, butterflies and other pollinators as follows:-</p> <p>Amend 4th bullet point of para 11.55 as follows:-</p> <ul style="list-style-type: none"> • provide flowering periods scattered throughout the year and have food sources accessible to native fauna i.e. not be composed of double flowered cultivators, that prohibit access to nectar or do not have nectaries. <u>It is also important to ensure there is sufficient food for bees, butterflies and other pollinators.</u> <p>KP BD8 states “aim for at least 50% of plants used for landscaping to be native (both species and planted area) and preferably of local provenance”. Therefore, this does not provide a restriction and allows for more native species to be provided where feasible.</p> <p>With regard to the comments about large scale developments alongside Wormwood Scrubs. This area is now</p>

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			<p>insects in nature reserves – is surprising and may well underline the point that landscapes need to be treated as a whole, not “zoned” in ways that allow all manner of activity in one place while others are “protected”.</p> <p>.....The review led by Professor Lawton from 2010-2011 found that the network of nature reserves, National Parks, Areas of Outstanding Natural beauty and Sites of Special Scientific Interest was not operating as a coherent network because it is too fragmented and affected by development and activities elsewhere”</p> <p>This surely means that provision for biodiversity needs to be EVERYWHERE, not just in designated areas like NCAs and “green corridors”. We feel this is particularly concerning with regard to the huge developments planned next to Wormwood Scrubs</p>	<p>within the boundary of the OPDC and so Hammersmith and Fulham Council no longer have planning control of this area.</p> <p>The OPDC are preparing their own Local Plan for the Old Oak area which includes policies for Wormwood Scrubs.</p>
(8)	H&F Biodiversity Commission	KP BD11: Green & Brown Roofs	<p>We are impressed with the amount of detail here, but for reasons given above question the provision that on intensive roofs, only 25% of planting should be native and 50% non-native.</p> <p>Why shouldn't at least 75% of vegetation be of known value to wildlife? (Why not 100%?)</p> <p>We are also a little puzzled at the stipulation that wildflowers on an “extensive” green roof should</p>	<p>Thank you for your supportive comments. We will amend para 11.66 to address your concerns on the targets as follows:-</p> <p>Intensive roofs - Intensive and semi-intensive roofs are similar to gardens and parks and are valuable for biodiversity. Public access is allowed</p>

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			<p>include at least 10 species of “medium” ecological value, and at least 10 species of “standard” ecological value as well as at least 10 species of “high” ecological value. Would it not be good to plant mostly species of high ecological value?</p> <p>The description of a living wall is excellent, but could a few other plants that flower at different times of the year be mentioned, apart from ivy?</p>	<p>on these roofs (to residents for example) and the green roof is in effect a roof garden. The council will expect intensive roofs to be designed to the following criteria:</p> <ul style="list-style-type: none"> • Intensive roofs should aim to cover at least 70 per cent of the roof area in soil, vegetation and water features. This will reduce water run-off from the roof and ensure the roof’s effectiveness in the drainage strategy for the development; • At least 25 per cent of the vegetation should be native. <u>The use of native vegetation should be maximised;</u> (preferably endemic native species that occur on or within 250m of the development site) No more than 50 per cent of the vegetation used should to be non-native; The use of non-

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>native vegetation should be minimised;</p> <ul style="list-style-type: none"> • At least 25 per cent of the vegetation should be of known value to wildlife; The use of vegetation of known value to wildlife should be maximised and be 100% where possible; • No more than 25 per cent of the vegetation should be purely ornamental; The use of purely ornamental vegetation should be minimised; • A range of bird nesting boxes, invertebrate boxes, logs and log piles should be included to create habitat niches for biodiversity. <p>We will also amend para 11.69 to:</p> <p>A mix of wildflowers and sedums. The wildflower species should preferably be species that already</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>occur on or within 250m of the development site. Where these are not available species should be chosen <u>to maximise the ecological value of the living roof</u>, based upon the guidance provided by the Environment Agency below. A complete list of these species and their ecological value is provided in Appendix 2.</p> <ul style="list-style-type: none"> • at least 10 species of high ecological value • at least 10 species of medium ecological value • at least 10 species of standard ecological value
(11)	Canal & River Trust	Para 11.23	<p>We are not clear what is meant by the term ‘managed retreat of the riverbank’ and how this would be implemented or affect the Grand Union Canal. The canal has a hard edge and towpath, which reflects its manmade nature and industrial heritage, and it is therefore unlikely to be appropriate to address it in this way, particularly given the very limited space available around the canal (currently and historically, as warehouses were often built hard up against the canal to make use of it for transport of goods).</p>	<p>Comments noted.</p> <p>“Managed retreat” does not apply to canals and it is only relevant for the riverside.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(11)	Canal & River Trust	KP BD8	<p>The Trust has concerns about this key principle, which states that “Where appropriate a green buffer should be planted between the River Thames and the Grand Union Canal and any development site.” We do not consider that a blanket requirement for a green buffer is effective or appropriate for canalside developments, where this may constrain the design of active and animated waterspaces and waterside places. As above, it is an historic characteristic of the canals that development often took place directly up to the waterside.</p>	<p>Comments noted. The Grand Union Canal now lies within the boundary of the OPDC area. All reference to the Grand Union Canal throughout the SPD have been deleted.</p> <p>Amend text in Key Principle BD8 as follows:</p> <p>Development sites adjacent to, or in the vicinity of a designated nature conservation area, green corridor or green / blue infrastructure, should use native plant species, preferably of local provenance in landscape schemes. Where appropriate a green buffer should be planted between the River Thames and the Grand Union Canal and any development site.</p>
(15)	Environment Agency	Section 11: Biodiversity	<p>Biodiversity</p> <p>We consider the guidance on Biodiversity within this SPD a sound approach to retaining, enhancing and conserving biodiversity through the borough. We do have the following comments and recommendations to make:</p>	<p>Support welcomed.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(15)	Environment Agency	KP BD8	<p>We support Key Principle BD8 page 145, specifically the text that a green buffer zone should be planted between the River Thames and the Grand Union Canal and any development site. River corridors and the adjacent buffer zones create an important natural network of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. We suggest that where feasible there should be a minimum of 8 metre buffer zones for all watercourse, and 16 metres for the Tidal Thames measured from the top of the bank.</p> <p>With any development alongside watercourses, consideration should be given to the requirements of the Water Framework Directive (WFD) which includes causing no overall deterioration in water quality or the ecological status of any waterbody.</p>	<p>Support welcomed. Key Principle FR9 on the Thames Estuary 2100 Plan Requirements refer to the need (in Para 10.50) for setting back of flood defences and other measures to manage flood risk from the River Thames.</p> <p>We have noted your suggestions regarding the distances of the buffer zone, but we consider that it is not appropriate to provide a specific figure in the key principle in order to ensure greater flexibility. Applications will be assessed on their merits and considered on a case by case basis.</p> <p>Reference to the Water Framework Directive will be added into para 11.11 as follows:-</p> <p>“Proposed developments adjacent to or in the vicinity of a designated nature conservation area will also need to ensure that landscaping schemes provided as part of the development do not adversely affect the nature conservation area and are biodiversity friendly. <u>For developments alongside the watercourse, consideration should be given to the requirements of the</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<u>Water Framework Directive (WFD)</u> ".
(17)	H&F Historic Buildings Group	Section 11: Biodiversity	<p>11. Biodiversity</p> <p>The HBG has an interest in parks, open spaces and in the wider streetscape. We have a particular interest in the Grand Union Canal. The HBG is in general agreement with the text of the document</p>	<p>Support welcomed.</p> <p>No change required.</p>
(17)	H&F Historic Buildings Group	Para 11.5-11.13	We welcome the strengthening of Biodiversity in the Planning Process. (11. 5-11.13)	<p>Support welcomed.</p> <p>No change required.</p>
(17)	H&F Historic Buildings Group	Para 11.14-11.31	We welcome the criteria and structures provided for the conduct of surveys (11.14 -11.31)	<p>Support welcomed.</p> <p>No change required.</p>
(17)	H&F Historic Buildings Group	Para 11.33-11.38	We welcome the comments about invasive plant species (11.33-11.38).	<p>Support welcomed.</p> <p>No change required.</p>
(17)	H&F Historic Buildings Group	Section 11: Biodiversity	<p>Japanese Knotweed. We comment that there is a serious Japanese Knotweed problem on the railway embankment north of Wormwood Scrubs. We believe an aquatic invasion may be a particular problem as there are several ponds in LBHF and these could become invaded if any part of the Japanese Knotweed were to become</p>	<p>Comments noted.</p> <p>No change required.</p>

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			present. It is additionally present in many H & F domestic gardens.	
(17)	H&F Historic Buildings Group	Section 11: Biodiversity	We note the guidance and regulations only apply to alien species. We believe some consideration should be given to invasive native endemic species e.g. Blackberry (<i>Rubus fruticosus</i>).	Noted. Key Principle BD5 on Invasive Plant Species states that “where a site is to be redeveloped, developers should identify the presence of any invasive plant species (i.e. not just “alien species”) at an early stage and introduce measures to prevent the spread of these species during and after construction”. No change required.
(17)	H&F Historic Buildings Group	Para 11.39-11.40	We welcome the Ecological Management Plans (EMP) , and suggest that these should apply to the Council’s Parks and Gardens 11.39-11.40. We support the idea of encouraging householders to adopt simplified EMP.	Support welcomed. No change required.
(17)	H&F Historic Buildings Group	11.41-11.5	The guidance on Enhancement is welcome 11.41-11.5.	Support welcomed. No change required.
(17)	H&F Historic Buildings Group	Section 11: Biodiversity	We note that light pollution is a problem. The HBG wrote to the Council pointing out the number of bats on Wormwood Scrubs was lower	Comments noted. No change required.

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			that expected for that type of habitat. We suggested that the lights at night on Linford Christie Stadium are the probable cause.	
(17)	H&F Historic Buildings Group	Para 11.48	Clause 11.48: we suggest adding playing fields to 2 nd bullet point. Areas such as the playing fields on Wormwood Scrubs are habitats for sub soil creatures i.e insect larvae.	Comments noted Amend second bullet point of para 11.48 as follows: • Amenity Greenspace – informal recreation spaces, housing green spaces, domestic gardens, village greens, urban commons, <u>playing fields</u> , other incidental space, green roofs;
(17)	H&F Historic Buildings Group	Para 11.59-11.62	Trees are important for street and garden design and the HBG takes an interest in them (11.59-11.62). We report a matter raised by Stephen Smith (Historic Gardens Consultant) in a lecture to London Parks and Gardens Trust (13 November 2017) that some tree species such as Sycamore (<i>Acer Pseudoplatinus</i>) which we might not plant today were planted as specimen trees in the 18 th C. A more flexible approach should be taken with historic landscapes when planting and removal plans are being drawn up.	Comments noted. No change required.
(17)	H&F Historic	Para 11.63	H & F Council has done well with SuDS on housing estates, parks and highways. The Group	Comments noted and support welcomed.

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
	Buildings Group		believes SuDS contribute to biodiversity and landscape (11.63).	No change required.
(17)	H&F Historic Buildings Group	Para 11.64-11.76	Green and brown roofs are valuable for biodiversity and add to the total green areas. They can also add value and architectural interest to buildings (11.64-11.76). The levels stated for inclusion of species are helpful. The HBG will comment on green and brown roofs and living walls in future Planning Applications	Comments noted. No change required.
(17)	H&F Historic Buildings Group	Section 11: Biodiversity	<p>Drafting Notes SuDS is now interpreted as Sustainable Drainage Systems (the Urban emphasis has been removed)</p> <p>There should be consistency in the use of plant names</p> <p>Butterfly Bush (<i>Buddleia davidii</i>) is probably the easiest for non-biologists</p> <p>Japanese Knotweed is given the scientific name <i>Reynoutria Japonica</i> in Weber E, <i>Invasive Plant Species of the World</i> 2017 Wallingford CABI.</p>	<p>Comments noted.</p> <p>Amend text of first bullet of para 11.49 as follows:</p> <ul style="list-style-type: none"> • Naturalised Sustainable Urban Drainage System such as swales, rain-gardens and ponds;

12. Sustainable Design & Construction

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(3)	Port of London Authority	Para 12.41	<p>Sustainable Design and Construction</p> <p>The PLA broadly support paragraph 12.41 regarding Site Waste Management Plans, and associated criteria, for what should be included in such a plan, including for a plan to state the proposed means of transport for waste disposal. The PLA consider that there should be a reference to using the River Thames for the transportation of waste materials, as mentioned in comments above.</p>	<p>Comments noted.</p> <p>Add the following text to the end of Para 12.42: <u>“Emissions from vehicles removing waste materials should be minimised and where feasible, the river should be used to transport waste away from site”.</u></p>

13. Transport

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(3)	Port of London Authority	KP TR14	<p>Transport</p> <p><i>TR14 – River Thames</i> The PLA notes that this key principle broadly replicates the boroughs Local Plan policies RTC1 (River Thames) and RTC2 (Access to the Thames Riverside and Foreshore).</p> <p>The PLA consider that there must be specific reference to the boroughs three safeguarded wharves in this principle. The Local Plan policy RTC1 promotes the use of the River Thames for transport uses including passengers and freight, in order to fully support this key principle it should be noted in this document that there are three wharves in the borough, Hurlingham, Swedish and Comleys, and through the Secretary of States Safeguarding Directions they are all currently safeguarded and should be treated as such. Through the safeguarding directions and the associated London Plan policy, these sites must be protected from alternative development and their use for waterborne transport promoted.</p> <p>Regarding access to the foreshore, as</p>	<p>Noted. KP TR14 - River Thames and supporting text has been deleted. This key principle merely replicates Local Plan Policies RTC1 and RTC2 and adds no additional information to the SPD. The three safeguarded wharves are adequately referenced in the Local Plan.</p> <p>Delete KP TR14 as follows:-</p> <p>Key Principle - River Thames As set out in Local Plan Policy RTC1 – River Thames, the council promotes the use of the River Thames for Transport uses including passengers and freight. Local Plan Policy Policy RTC2 - Access to the Thames Riverside and Foreshore seeks accessible and inclusive public access to the riverside, including through site links when riparian development takes place and the provision and enhancement of the Thames Park National Trail (the riverside walk). The riverside walk should generally be at least 6m wide and should be accessible to cyclists if this can be achieved without risk to the safety of pedestrians and river users.</p> <p>13.38 The River Thames is of considerable benefit to the borough and is of strategic importance to London as a whole. Further details of the qualities and character of the river and riverside can be found in the Thames Strategy – Kew to Chelsea – 2002.</p> <p>13.39 The Mayor supports the increased opportunities for transport on the Thames within sustainable limits. The London Plan policies for this matter are contained in 7.25, 7.26 and 7.27.</p> <p>13.40 Although priority will be given to pedestrians, the council also wants to encourage cycling. Measures will be taken to reduce</p>

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			<p>noted in previous consultations in relation to policy RTC2 (Access to the Thames Riverside and Foreshore) the PLA consider that the policy as it stands is unclear in regards to where it requires access to the foreshore to be safe, regardless of whether the foreshore in the vicinity of any access is actually safe to be on. In addition, there should be reference to the need to provide riparian life saving equipment (such as such as grab chains, access ladders and life buoys) as part of any enhancements to the Thames Riverside and Foreshore.</p> <p>In addition, within this SPD guidance it should be specifically stated that the PLA will need to be consulted on all proposals concerned with or affecting access to the riverside and foreshore, as stated in the justification of policy RTC2 of the Local Plan. The PLA also requests that consideration be given to the PLAs Thames Vision Document (July 2016) as part of this principle. This document sets out the PLAs goals and priority actions, which include more trade and more jobs associated with the River Thames, improved use of the River for the transportation of freight, use of the Thames for the transportation of passengers, use of the Thames for sport and recreation, improved environment and river heritage and as a hub for community</p>	<p>riverside pedestrian/cycle conflicts by providing separate paths where appropriate or measures to slow cyclists. 13.41 Development proposals on sites extending to the river edge will be required to ensure that safe access to and from the foreshore is maintained or, where appropriate enhanced. 13.42 The inclusion in appropriate development proposals of facilities that improve managed access for pedestrians and cyclists to the Grand Union canal will also be welcomed.</p> <p>In terms of access to the foreshore, the Local Plan policies adequately refer to the Port of London Authority in RTC1, RTC2 and supporting paragraphs including 6.172 (of Proposed Submission Local Plan version). Therefore, issues of safety can be dealt with at application stage.</p> <p>No change required.</p>

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			and culture.	
(9)	Transport for London	KP – TR3	The supplementary detail on a wide range of transport policy approaches is generally supported. However the parking section should be stronger and more explicit about the housing developments and office developments in areas best connected by public transport will now be expected (by the Mayor, in the draft London Plan) to be car-free, with no parking provided, other than for disabled people.	<p>In light of this comment, the following changes are proposed to include this addition and to make the principle clear. Amend KP TR3 as follows:-</p> <p>“Vehicle parking standards-<u>including car parking permit free</u></p> <p><u>Vehicle parking</u></p> <p>For residential development In order to achieve compliance with the principle of London Plan Policy the council will require car parking permit free measures on all new development (major and minor applications) unless evidence is provided to show that there is a significant lack of public transport available, which is most likely to apply to PTAL Levels 1-3. In these circumstances there will need to be an assessment to ensure that the level of on-street overnight parking resulting does not result in parking stress.</p> <p><u>Development in areas well connected by public transport will be expected to be car-free, with no parking provided, other than for disabled people.</u> Where a development is accepted as only partly car free the smaller residential units will generally be considered to be permit free.</p> <p><u>Proposals for residential development in areas of PTAL 1-2 may be issued parking permits. In these circumstances, this will require an assessment to ensure that the level of on-street overnight parking resulting does not result in parking stress. This will be assessed on a case by case basis.</u></p> <p> Holders of disabled persons Blue Badge parking would be</p>

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				excluded from car permit free arrangements. However, developers are expected to address the needs of Blue Badge holders by provision of appropriate facilities as set out in key principle TR6 below.”
(9)	Transport for London	Para 13.20	In this paragraph on Blue Badge Holders, please refer to Draft London Plan Chapter 10, Policies T6.1 and T6.5	The Draft London Plan is at an early stage, consultation ending 2 nd March 2018. Because of this, very little weight has been given to the draft policies and where relevant Adopted London Plan policies are used throughout the SPD. No change required.
(9)	Transport for London	Para 13.26	The parking guidance (including on accommodating electric vehicles) referred to is found in the Draft London Plan’s Chapter 10, policies T6.1 and T6.5.	The Draft London Plan is at an early stage with consultation ending 2 nd March 2018. Because of this very little weight has been given to the draft policies and where relevant Adopted London Plan policies are used throughout the SPD. No change required.
(9)	Transport for London	Para 13.29	In regard to the Mayor’s current proposed strategy for facilitating and encouraging cycling, its is suggested reference is made to a) the aim (Draft London Plan) that by 2041, 80% of Londoners’ trips to be on foot, by cycle or by using public transport and b) the opening paragraph of Policy T5 Cycling: “Development Plans and development proposals should help remove barriers to cycling and create a healthy environment”.	The Draft London Plan is at an early stage with consultation ending 2 nd March 2018. Because of this, very little weight has been given to the draft policies and where relevant Adopted London Plan policies are used throughout the SPD. No change required.
(9)	Transport for London	Para 13.70	Please refer also to TfL’s guidance on “Construction & Logistics Plan[s]” published	Agreed. The following link will be added to Paragraph 13.70:

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			July 2017 http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf	“... This plan should be based upon the Mayor's Construction Logistics Plan (2017) (http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf) and include:...”
(9)	Transport for London	Para 13.81	Suggest change ‘likely to’ ‘ <i>will be</i> ’ in following “Forecourt parking and vehicle crossovers are likely to resisted on the TRLN and Strategic Road Network. Supplement the reference to SUDS to refer to use of materials which reduce/retard run-off to drains – check latest policy wording	Agreed. Add the following text change to Paragraph 13.81: “Forecourt parking and vehicle crossovers are likely <u>will be</u> resisted on the TRLN and Strategic Road Network. ” The details of SuDs requirements are contained in Section 9 of the SPD – Sustainable Urban Drainage (SuDs).
(9)	Transport for London	Para 13.96	Suggest addition of reference to TfL guidance on delivery & service plans published 2017 http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf	Agreed. The following link will be added to Paragraph 13.96: after the sentence In accordance with Transport for London’s Guidance and Service Plans.... http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf
(9)	Transport for London	KP 25, 26 & 30	TfL Streetscape guidance should be referred to in these principles. http://content.tfl.gov.uk/streetscape-guidance-.pdf	Agreed. Reference will be added to TfL’s Street Scape guidance. KP TR 25 First sentence of text to read: <u>Refer to TFL StreetScape Guidance</u> (http://content.tfl.gov.uk/streetscape-guidance-.pdf). KP TR 26 Add in new final sentence <u>TFL StreetScape guidance should be referred to when applying for tables and chairs</u> (add link). KP TR 30 Add in new final sentence <u>TFL StreetScape guidance</u>

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				should be referred to when applying for street furniture (add link).
(11)	Canal & River Trust	Para 13.42	<p>“13.42 The inclusion in appropriate development proposals of facilities that improve managed access for pedestrians and cyclists to the Grand Union canal will also be welcomed.”</p> <p>The Trust supports this statement.</p>	<p>KP TR14 - River Thames and supporting text including Para. 13.45 have been deleted. This key principle merely replicates Local Plan Policies RTC1 and RTC2 and adds no additional information to the SPD.</p> <p>No change required.</p>
(11)	Canal & River Trust	Para 13.45	<p>“13.45 Development about the use of the River Thames and Grand Union Canal for the operation of public transport services will be welcomed, particularly between central London, Chelsea Harbour, South Fulham and Hammersmith.” We would also suggest that a water taxi/trip boat service could be promoted between Park Royal and Paddington.</p>	<p>The reference to the Grand Union Canal has been removed from Paragraph 13.45 as this is entirely within the OPDC.</p>
(12)	Fulham Society	Para 13.6	<p><u>Para 13.6. Developers’ travel plans.</u> Fulham is very aware that the borough suffers bad congestion and overcrowded underground travel. Much of any travel plan will refer to public transport but this involves TfL. Even if extra money is forthcoming and is in a s106, any major change needs TfL to agree and implement.</p>	<p>Comments noted.</p> <p>No change required.</p>
(12)	Fulham Society	p.168: Parking	<p>We agree with parking free developments in principle, but it is a problem for the</p>	<p>Disabled parking is an exception to car-free development as set out in KP-TR3 and KP-TR6.</p>

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			elderly or mildly disabled. They cannot stand on the tube for half an hour, nor can they get up the stairs at Putney Bridge Station. Nor does it help the concern expressed in the Local Plan that families are moving away from the borough: one or two bed flats do not need parking but family units are likely to own a car.	No change required.
(12)	Fulham Society	p.174: Access for All	<u>P174 Access for All</u> . “accessible routes from bus stops and stations” but what is also needed is accessible stations. Fulham Broadway station is good but Parsons Green and Putney Bridge stations are appalling. Both urgently need some step-free access. Putney Bridge is a busy transport hub, with a nearby hotel, and caters for a large number of both elderly residents and young families. But this cannot be solved by developers or the council but, again, is the responsibility of TfL. How can it be influenced?	Comments noted. The Council is keen to improve and enhance transport connections for all users. Add additional sentence to paragraph 13.48 as follows: <u>“We will lobby and work with TFL and other local stakeholders to improve access to tube stations within the borough.”</u>
(12)	Fulham Society	Para 13.40	<u>Para 13.40 Cycling</u> . “Although priority will be given to pedestrians, the council also wants to encourage cycling. Measures will be taken to reduce riverside pedestrian/cycle conflicts by providing separate paths where appropriate or measures to slow cyclists.” This refers to the river but is needed in the borough as a	KP TR14 - River Thames and supporting Paragraph 13.40 have now been deleted. This key principle merely replicates Local Plan Policies RTC1 and RTC2 and adds no additional information to the SPD. TfL consulted on a proposed cycle superhighway in 2017. The Council will work with TfL to implement this project and will be designed to minimise pedestrian-cyclist conflict and the aim is to

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			whole. But there are no specifics as to what measures and when. The fear of aggressive speeding cyclists led to a lot of the disquiet over the super cycleway.	encourage people who don't currently cycle due to fear of traffic, such as older people, to take up cycling. The Council has also proposed other measures such as reducing the speed limit in the borough. No change required.
(13)	Hammersmith Society	Para 13.99	Under 13.99, it should be clarified that this is initiative <u>to limit A frame type advertising hoardings</u> on the public highway.	Comments noted. The following changes have been made to paragraph 13.99 to clarify the point: "The council is considering an initiative for <u>limiting</u> advertising boards (A <u>frame</u> boards) on the public highway. <u>This is to ensure they don't impede the safe and convenient passageway of pedestrians.</u> "
(13)	Hammersmith Society	KP TR11	Within the 'Transport' section, TR11 should be clarified that the Cycle Superhighway is 'proposed' at this stage and is subject to final agreement by TfL <u>and the Council</u> (ie. Not just TfL). Any approval must reflect the views and concerns of local people, and be a balanced policy. Para. 13.31 should be amended to read . . . running from 'outer or outside' London instead of 'out London'.	Comments noted. New text will be added to the end of 13.32 as follows: <u>"Any proposed Cycle Super Highway will be subject to extensive public consultation with the final agreement approved by both the council and TfL on the borough's roads.</u> Text changed in 13.31 as follows: "Cycler super highways are cycle routes running from <u>out-outer</u> London into and across central London."
(16)	Berkeley Group (Quod)	KP TR3	I am writing on behalf of the Berkeley Group in response to the London Borough	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>of Hammersmith and Fulham ('LBHF') consultation on the Draft Planning Guidance Supplementary Planning Document ('draft SPD').</p> <p>The purpose of the draft Planning Guidance SPD is to provide supplementary detail to policies concerned with a variety of topics within LBHF's emerging Local Plan. We are broadly supportive of the emerging plan and welcome the use of the draft SPD to provide additional guidance that will assist with the preparation of successful applications and aid the delivery of infrastructure. It is on this basis that we provide comments about the draft guidance below.</p> <p>For residential development, Key Principle TR3 requires <i>'car parking permit free measures on all new development (major and minor applications) unless evidence is provided to show that there is a significant lack of public transport available, which is most likely to apply to PTAL Levels 1-3'</i>.</p> <p>There is some ambiguity in the phrasing of the principle as it is currently worded. This principle should be amended to specify that this relates only to on-street parking permits, and a definition of</p>	<p>The wording of KP TR3 is consistent with the London Plan and the Local Plan.</p> <p>A glossary definition will also be added to define what is meant by residential parking permits: <u>Residential Parking Permits</u></p> <p><u>These are issued by the council to residents in parking controlled zones, to be used during controlled hours and subject to conditions as specified by the council.</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>'Residents' Parking Permits' should be included in the glossary to explain that these permits relate only to on-street car parking.</p>	
(16)	Berkeley Group (Quod)	KP TR9	<p>Key Principle TR9 states that a Cycling Environment Review should 'normally' be included as part of a Transport Assessment.</p> <p>Whilst the objective of the Cycling Environment Review is broadly supported, the draft SPD must ensure that the requirements it sets for planning applications are appropriate and proportionate to the likely scale of impact resulting from the application, in accordance with paragraph 193 of the NPPF, which requires requirements for applications, to be proportionate to the nature and scale of development proposals.</p> <p>It is recognised that such a review would reasonably be required as part of an application for the redevelopment of a strategic site, however, it may not be appropriate for all other applications requiring a Transport Assessment. The principle should, therefore, be amended to reference the need for a Cycling Environment Review to be carried out</p>	<p>Transport Assessments are only required for Major Development. Paragraph 13.3 states the following: The level of detail required within a Transport Assessment (TA) or Transport Statement (TS) will be dependent upon the size/type of scheme.</p> <p>This approach is considered in accordance with paragraph 193 of the NPPF, which requires requirements for applications to be proportionate to the nature and scale of development proposals.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			only where developments will have an impact on local facilities and routes.	
(19)	H&F Disability Forum	Section 13. Transport	<p>Transport</p> <p>The Disabled People Commission received evidence during 2017 from disabled residents on they barriers they still face on using transport and the pedestrian environment.</p> <p>Currently Transport Assessments, Travel Plans; PTAL and PERS assessments do not routinely review transport issues from the perspective of disabled people. We would like to change this culture with a more proactive approach on ensuring transport and the pedestrian environment in Hammersmith and Fulham is accessible to disabled residents.</p> <p>The Disability Forum Planning Group warmly welcomed the addition of a new sentence to paragraph 6.314 in the new Local Plan as follows:</p>	<p>Comments and support noted. Additional text in terms of PERS will be added to KP - TR13: <u>The PERS should include an assessment of disabled people and people with mobility impairments.</u></p> <p>Support for Local Plan Paragraph 6.314 is welcome.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>“The TA should consider accessibility from the perspective of disabled people or people with mobility impairments. Further guidance on this is contained within the Mayor of London’s Accessible London SPG” Source: MC195</p> <p>A good start will be to encourage all Transport Assessments, Travel Plans; PTAL and PERS assessments to routinely review transport issues from the perspective of disabled people and to make recommendations for mitigating actions.</p>	
(19)	H&F Disability Forum	KP TR6	<p>Parking for blue badge holders This comes under residential dwellings, buildings other than dwellings and the public realm.</p> <p>TR 6 Blue Badge parking We recommend that the narrative on blue badge parking be expanded to cover our advice on blue badge parking together with reference to relevant guidance.</p> <p>DF advice on parking for blue badge holders</p> <p>Location and correct dimensions of accessible parking bays at current standards to be clearly marked out on</p>	<p>Comments noted. The technical guidance H&F Disability Forum referenced has been included as an additional paragraph as follows:</p> <p><u>“Further information on disabled parking can be found in The Mayor of London’s Accessible London SPD (Paragraph 4.3.7 - 4.3.23).”</u></p> <p><u>https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/creating-london</u></p> <p><u>There are many building control standards for disabled parking including:</u></p> <ul style="list-style-type: none"> • <u>BS8300:2009 + A1: 2010 for current parking standards and key issues</u> • <u>BS 9266 2013 Design of Accessible Housing (Paragraph 5.2.1 - communal parking, Paragraph 5.2.2 -designated</u>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>drawings Ensure</p> <ul style="list-style-type: none"> • Standard 4.8m x 2.4m designated parking space with 1.2m wide marked access zone between designated parking spaces and 1.2m wide safety zone for boot access and cars with rear hoists. • pillars and columns do not obstruct access to accessible parking bays. • vertical clearance 2.6m to allow high topped vehicles to reach an accessible bay. • If less than 2.6m vertical clearance essential maximum height (eg 2.1m) is clearly shown at entrance to car park to enable blue badge holders to avoid the car park or being in a queue they cannot escape • Signage to direct blue badge holders to alternative parking bay with 2.6 vertical clearance • Level access routes to accessible parking bays • Ticket dispensing machines accessible and inclusive • Vehicular control barriers accessible and inclusive <p>Car park management plan needed to ensure:</p> <ul style="list-style-type: none"> • provision of accessible parking 	<p><u>accessible parking bays, Paragraph 5.3 - setting down points, Annex A – car park management</u></p> <ul style="list-style-type: none"> • <u>Park M Building Regulations (Vol 1: dwellings and Vol 2 buildings other than dwellings)</u>.

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>equates to demand from blue badge holders (including allocation of bays to blue badge holders in wheelchair user dwellings)</p> <ul style="list-style-type: none"> • accessible parking bays effectively policed to ensure only blue badge holders use accessible parking bays • accessible parking bays never sold during lifetime of the development • accessible parking for visiting blue badge holders <p>Guidance Accessible London SPG Paras 4.3.7 to 4.3.23 BS 8300:2009 + A1: 2010 for current parking standards and key issues. BS 9266 2013 Design of Accessible Housing .</p> <ul style="list-style-type: none"> • See Para 5.2.1 on communal parking, • para 5.2.2 on designated accessible parking bays • and para 5.3 on setting down points. • Annex A on car park management <p>Part M Building Regulations Vol 1: dwellings and Vol 2 buildings other than dwellings</p>	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(19)	H&F Disability Forum	Para 13.34	Para 13.34: para needs to be updated to reflect M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings not lifetime homes etc	Agreed, M4(2) and M4(3) need to be reflected in the document. Rather than in para 13.34 a more suitable location for this information is as part of KP TR16 Access for all. 13.46 will include the following additional text: <u>“Further advice on accessible and adaptable dwelling can be found in Building Control guidance M4 (2) accessible and adaptable dwellings and M4(3) for wheelchair user dwellings.”</u>
(19)	H&F Disability Forum	Para 13.26	electric vehicle bays Para 21: 13.26: we recommend advice provided on ensuring a clear footway for pedestrians and level access routes around electric vehicle parking bays in car developments.	Comments noted. Additional text added to paragraph 13.26 as follows: <u>“A clear footway for pedestrians and level access routes will be required around electric vehicle parking bays.”</u>
(19)	H&F Disability Forum	P.175	p 175 PERS from perspective of disabled people (See no 19 above)	Agreed and as set out above additional text in terms of PERS will be added to KP - TR13: <u>“The PERS should include an assessment of disabled people and people with mobility impairments.”</u>
(19)	H&F Disability Forum	Para 13.47	para 13.47 need to delete DDA 1995 replace with Equality Act 2010	Agreed, this reference will be changed at paragraph 13.47, as follows: <u>“Disability Discrimination Act 1995 (as amended) <u>The Equalities Act 2010</u>”</u>
(19)	H&F Disability Forum	Para 13.54	Tactile Paving 13.54. We recommend including a statement either here or in policy TR25	Agreed, an additional sentence will be added to Paragraph 13.54 as follows: <u>“The council has produced guidance on providing tactile paving, which can be found here:</u>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>Kerbs and Pedestrian crossings on providing correct and accurate tactile paving</p> <p>Guidance Understanding Tactile Paving on Pedestrian Crossings (attached to this reponse)</p>	<p>https://www.peoplefirstinfo.org.uk/media/1233740/understanding_tactile_paving_at_pedestrian_crossings_29_sept_2015_tcm21-198689.pdf</p>
(19)	H&F Disability Forum	Para 13.78	<p>need revised version of StreetSmart. We strongly recommend co-producing (working together) with disabled residents a revised version of StreetSmart once the new BS 8300 is available in 2 volumes in 2018. We understand that for the first time this BS includes standards in Volume 2 for the public realm.</p>	<p>StreetSmart is currently being revised and a new version will be produced and H&F Disability forum will be consulted on this document, along with other stakeholders. The text of 13.78 will be amended to provide a clearer statement regarding this matter:</p> <p>13.78: ... These reviews are published in January of every new year and can be viewed on the council website. <u>As part of this all stakeholders including the H&F Disability Forum will be consulted</u></p>
(19)	H&F Disability Forum	KP TR30	<p>TR 30 New Street furniture</p> <p>Main issues for DF: pedestrian safety; colour contrast between footway and any street furniture including telephone boxes; street clutter including distances between different types of street furniture. We recommend a paragraph to include these points</p>	<p>Noted. The revised StreetSmart Guidance will cover the design issues regarding street furniture.</p> <p>KP TR26 - Tables and chairs sets out the principles for the placing of tables and chairs to ensure safe unobstructed access including those with visual or mobility disabilities (including wheelchair users).</p> <p>KP 30 – New Street furniture including broadband cabinets and telephone boxes sets out the principles for the placing of street furniture to ensure safe unobstructed access including those</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				with visual or mobility disabilities (including wheelchair users). No Change required.

14. Waste Management

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(13)	Hammersmith Society	KP WM4	Under 'Waste Management', the Table at Principle WM4 is confusing as it requires that containers are required for 'Food Waste' although Para. 14.32 confirms that 'at present the Council does not provide a separate food waste collection'.	There is the potential for food waste to be collected in the future so there is a need to futureproof developments. No change required.
(14)	Resource London	Section 14: Waste Management	Overall the waste section contained some very good points, particularly futureproofing by including the requirement to provide space for food waste containers, despite the Council not yet collecting this waste stream separately. It makes reference to the Mayor of London's environment strategy and the proposed updates from the London Plan.	Support welcomed. The SPD includes reference to the fact that the Mayor has produced a draft Environment strategy which was published for consultation late 2017. However, the SPD does not include reference to the new draft London Plan (2017) policies as this does not currently hold material weight until it progresses further through the plan process. No change required.
(14)	Resource London	Para 14.23	the table for container provision suggests a need for multiple 23litre food waste containers for a family of 4-6 people. The maximum that would be required is two. 23 litres contains a lot of food waste due to the high bulk density of this material. It is standard for LAs to only provide one 23 litre caddy per household. They don't tend to offer more as standard – only upon request.	Comments noted. Amend para 14.23 as follows: "Additional space of at least 160 Litres is also needed for recycling sacks and at least space for a 23 litre s for the storage of food waste food waste caddy. "

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response			
				<p>Amend table 'recommended capacities for properties served by kerbside collections' under the heading 'Food waste' as follows:-</p> <table border="1" data-bbox="1581 464 2047 743"> <thead> <tr> <th data-bbox="1581 464 2047 536">Food waste</th> </tr> </thead> <tbody> <tr> <td data-bbox="1581 536 2047 636">4-6 1 23 Litre food waste caddy (minimum 4)</td> </tr> <tr> <td data-bbox="1581 636 2047 743">4-3 1 23 Litre food waste caddy (minimum 1)</td> </tr> </tbody> </table>	Food waste	4-6 1 23 Litre food waste caddy (minimum 4)	4-3 1 23 Litre food waste caddy (minimum 1)
Food waste							
4-6 1 23 Litre food waste caddy (minimum 4)							
4-3 1 23 Litre food waste caddy (minimum 1)							
(14)	Resource London	Para 14.26	14.26 – this point does not mention food waste, only the provision of recycling and refuse receptacles.	<p>Noted. Amend para 14.26, 14.27 & 14.28 to refer to food waste.</p> <p>Amend para 14.26 as follows:</p> <p>“The refuse and recycling bins are emptied weekly or more frequently if necessary. <u>Although a food waste collection service is not currently in operation within the borough, space must be made available to shared external food waste bins, as this service may be offered in the future.</u> The exception to providing the communal recycling..... “</p> <p>Amend para 14.27 as follows:-</p>			

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>“Internal storage for waste and recycling <u>and food waste</u> must be located in an accessible and commonly used area....”</p> <p>Amend para 14.28 as follows:-</p> <p>“Internal storage must be provided <u>d</u> for both non-recyclable waste and mixed-recyclables <u>and food waste</u>. If residents will be.....”</p> <p>Amend para 14.28 as follows:-</p> <p>“it is recommended that between 100 and 150 litre capacity is provided internally, split approximately 50:50 between refuse and recycling. <u>In addition space for a 7 litre food waste caddy should be provided internally.</u> The council provides reusable bags.....”</p>
(14)	Resource London	KP WM7	Key Principal WM7 – have you considered requesting underground bins being utilised? This saves space on site and can ensure the site looks a lot neater than a row of bins.	<p>Comments noted. Underground bins would require a boroughwide shift in underground storage, unless it can be accommodated in considerably large developments.</p> <p>Underground waste systems e.g. Envac are promoted by the Council, particularly for large flatted developments proposed in the council’s regeneration areas. (Please see section in the SPD on alternative waste management technologies.)</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>For flats that cannot accommodate underground storage, can you request that bin frames or locking posts are provided? This will help to ensure the bins are less prone to anti-social behaviour and can help reduce contamination, buy keeping the lids closed.</p> <p>I'd also push back as much as possible on bins being stored in a basement.</p>	<p>Amend para 14.38 to include reference to bin frames and locking posts as follows:-</p> <p>“if bins are to be located in the open then these must have a fence or wall on at least three sides. However, they must be safe for users by being well lit and visible from public vantage points. <u>For flats that cannot accommodate underground storage, bin frames and locking posts will be requested.</u>”</p> <p>To clarify, bins are not collected from a basement unless a vehicle can access the basement.</p>
(14)	Resource London	Para 14.43	please consider requesting all communications utilises the Recycle for London branding and brand guidelines	<p>Comments noted. In para 14.43, applicants are advised to speak to the council's recycling team who will instruct them to do this.</p> <p>No change required.</p>
(14)	Resource London	KP WM11	Key Principal WM11 – It's great that you have put in a requirement for every planning application to be supported by a Refuse and Recycling Waste Management Plan. LWARB worked on producing a template waste management strategy for all London boroughs to encourage their developers to complete at the pre-planning stage. We encourage you to	<p>Support welcomed.</p> <p>Make reference to the recommended guidance from the LWRB on preparing a Refuse and Recycling Waste Management Plan.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>utilise this document which can be found on LWARB's website http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/ A link to these documents currently feature in the Mayor of London's housing SPG.</p>	<p>Add sentence to end of para 14.85 as follows:-</p> <p><u>"In addition to the Council's requirements, the London Waste and Recycling Board have also produced some useful guidance for developers to consider, which can be found on their website"</u>(add hyperlink).</p>
(14)	Resource London	14.70-75	<p>Points 14.70 – 14.75 do not mention food waste, only residual and recycling.</p>	<p>Comments noted.</p> <p>At this stage, the council is only aware of alternative technologies for waste management (refuse and recycling) but this doesn't stop these from coming forward as part of new developments in the future if proposed. The council will investigate other possible alternative waste management technologies that may be available for food waste.</p> <p>No change required</p>

15. Residential Moorings

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(1)	West London River Group		<p>Many thanks for your time on 23 November when Angela Dixon and I met with you to discuss the new SPD. We spoke specifically about section 15 Residential Moorings.</p> <p>The West London River Group and others have been concerned that there is not sufficient policy guidance in place to regulate the size and type of vessels in the river used for residential purposes. If a residence was to be built on shore there is extensive guidance. If it was close by but on the water there appears to be none. We are therefore very pleased to see that this omission is to be rectified, and in general we think the proposals are appropriate and thorough.</p> <p>However we would like to make the following observations:-</p>	<p>Support welcomed.</p> <p>No change required.</p>
(1)	West London River Group	Policy Context	<p>We suggest the <i>Thames Strategy - Kew to Chelsea</i> is relevant and should be listed. We attach our original note on this subject which includes references to specific Policy Recommendations</p>	<p>Comments noted.</p> <p>Agree, policy context of residential moorings to be amended to include reference to the Thames Strategy Kew: to Chelsea.</p> <p>Under the heading Local Plan, add reference to Thames Strategy: Kew to Chelsea as follows:-</p> <ul style="list-style-type: none"> • “Policy RTC4- water-based activity

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p><u>The Thames Strategy: Kew to Chelsea also provides further local guidance for the stretch of the River Thames within Hammersmith & Fulham</u>".</p>
(1)	West London River Group	15.7	<p>Para 15.7 refers to the PLA's responsibilities. We found the link given does not work.</p> <p>You said the PLA is a consultee so this will be followed up.</p>	<p>Noted. Officers will ensure all hyperlinks are working for the final published version.</p> <p>The PLA were consulted on the Planning Guidance SPD and provided detailed comments to the consultation on the section on river moorings. Please see their comments for further information.</p> <p>No change required.</p>
(1)	West London River Group	15.13	<p>Para 15.13 also refers to the PLA's policies. The PLA needs to give a River Works Licence for the construction of the necessary bollards, piles etc needed to hold the vessel in place. It is not clear what policies the PLA has as to the size, character, etc of the vessel itself, if any, or their method of enforcement.</p> <p>We very much hope the PLA's policies on the matter will fit with the Borough's.</p>	<p>Comments noted.</p> <p>The PLA's Vision for the Tidal Thames document (July 2016) includes a goal to create new appropriate residential moorings accommodating suitable vessels. Please also see their representation for further information. In their representation, the PLA broadly supports the key principles on residential moorings, but also provided some detailed comments where changes could be made.</p> <p>No change required.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(1)	West London River Group	15.8	Para 15.8 We note that the Environment Agency is also a statutory consultee, and very much hope it will support this guidance.	The Environment Agency were consulted on the Planning Guidance SPD and submitted representations. However, no specific comments were made in relation to section 15 on residential moorings. No change required.
(1)	West London River Group	15.11	Para 15.11 distinguishes between residential craft and vessels whose primary use is leisure and recreation. As these uses might overlap we suggest this will need careful but strict enforcement.	Noted. The Council considers that Key Principle RM4 adequately deals with the design of permanently moored vessels in terms of characteristics of moored vessels and will be enforced through planning conditions and/or S106 agreements. No change required.
(1)	West London River Group	KP RM4	RM4 Characteristics of moored vessels We very much welcome this key principle and paras 15.24 and 15.25 which set out the detail.	Support welcomed. No change required.
(1)	West London River Group	15.24	Para 15.24 Amend as follows <i>A key objective of the council is for these developments to complement and enhance the distinctive existing character...</i> As worded this reads as if residential mooring are being promoted <i>in order to</i> complement and enhance.	Comments noted. Amend para 15.24 for clarity as follows:- “ A key objective of t The Council in promoting <u>is keen to ensure that</u> residential moorings <u>is for these developments</u> to complement and enhance the distinctive existing character of their waterside location.....”
(1)	West London River	15.25	Para 15.25 We very much support the terms of the first bullet point of this paragraph and the first sentence of	Comments noted.

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
	Group		the second bullet point, (noting the typo <i>oin</i> to read <i>in</i> ?) We are curious about the second sentence: we don't see what exceptions might be appropriate, and would ask for it to be deleted.	Amend para 15.25 as follows:- Correct typo and amend second bullet point of para 15.25 to clarify as follows:- <ul style="list-style-type: none"> “Conform to the typical attributes of houseboats on the waterway they are to be located on ie. The River Thames ø in terms of their size, appearance and design .Exceptions may be made in instances <u>and</u> where these would relate to or enhance the surrounding area, the existing character of the river or canal and will contribute to the ecological and visual amenity of the area.”
(1)	West London River Group	15.25	The word <i>navigation</i> is used to mean different things: In 15.25 a vessel <i>capable of navigation</i> means it has the necessary methods of propulsion and steerage	Comments noted. Amend para 15.25 for clarity as follows:- “Vessels moored on a permanent basis at approved residential moorings should:- <ul style="list-style-type: none"> Be capable of navigation, moving under their own power <u>with necessary propulsion and steerage</u>. The vessel’s superstructure....”
(1)	West London River Group	KP RM5	Key principle RM5 <i>Impacts on Navigation</i> refers to whether the vessel would obstruct other vessels. The guidance includes specifically "recreational boat use".	Comments noted and support welcomed. No change required.

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			We think that important because sometimes it is taken to refer to powered vessels using the channel only	
(1)	West London River Group	15.27	We ask that 15.27 second bullet point be amended to read "... established water-based uses including rowing, <i>sailing, kayaking etc</i> and recreational cruising."	Comments noted. Amend second bullet point of Para 15.27 to include reference to other water based uses as follows:- <ul style="list-style-type: none"> “the range and operation of established water based uses including rowing, sailing, kayaking etc. and recreational cruising.”
(3)	Port of London Authority	Residential Moorings	<p>Residential Moorings</p> <p>Broadly the PLA welcome the section on residential moorings in the draft planning guidance SPD, and note that the borough considers that there is potential to develop additional residential moorings in the South Fulham Area, between the Hurlingham Club and Cremorne railway bridge – is there any background work regarding this area being identified as suitable for residential moorings?</p> <p>The PLA’s Vision for the Tidal Thames document (July 2016) includes a goal to create new, appropriate residential moorings accommodating suitable vessels, and this should be referenced in this SPD, along with a link to the vision. The PLAs Thames Vision also has a goal to see new visitor moorings provided within the Tidal Thames area and would welcome reference to the provision of visitor moorings within this SPD as well as residential moorings.</p>	<p>Comments noted and support welcomed.</p> <p>The Thames Strategy: Kew to Chelsea provide further guidance on the potential for additional new residential moorings along the stretch of the River Thames within Hammersmith and Fulham.</p> <p>Amend para 15.7 to make reference to PLA’s Thames Vision & Boating on the Thames document (2016) as follows:-</p> <p>“The Port of London Authority policy on residential and visitor moorings on the tidal river Thames is available at www.pla.co.uk and further guidance can be found in the PLA’s Vision for the Tidal Thames (2016) and the Boating on the Thames website.” (insert Link)</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>www.boatingonthethames.co.uk is another useful website that should be referred to specifically in regards to visitor moorings.</p> <p>I hope these comments are useful; the PLA would welcome a future meeting with the Hammersmith and Fulham Planning Policy Team to discuss this SPD and future proposals concerning the River Thames. Please contact me on the details below to discuss.</p> <p>The PLA note that nine key principles have been identified in this section and have the following comments to make:</p>	
(3)	Port of London Authority	KP RM1	<p><i>RM1 – Proposals for Residential Moorings</i></p> <p>The PLA broadly supports this policy on proposals for new residential moorings and welcome reference to the need for a licence to be required from the PLA for any new mooring, along with a link to the PLA website</p>	<p>Support welcomed.</p> <p>No change required.</p>
(3)	Port of London Authority	KP RM2	<p><i>RM2 – Provision of suitable infrastructure</i></p> <p>The PLA broadly supports key principle RM2 regarding the provision of suitable services for proposed residential moorings. This principle should also include reference to the need to provided appropriate riparian life saving equipment (such as grab chains, access ladders and life buoys) along the river edge to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety, to help to improve the safety and security of the River Thames.</p>	<p>Support welcomed, make reference to the need to provide riparian life saving equipment in KP RM2 (provision of suitable infrastructure).</p> <p>Add new bullet point to KP RM2 as follows:-</p> <ul style="list-style-type: none"> • <u>“Appropriate riparian life saving equipment”</u> <p>Also amend para 15.16 to include reference to the need for provision of riparian life saving equipment in justification text as follows:-</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<p>“As vessels moored on residential moorings are taken to constitute the primary residence for occupants, the council will normally expect new mooring developments to be provided with basic infrastructure and facilities. <u>This includes provision of appropriate riparian life saving equipment (such as grab chains, access ladders and life buoys) along the river edge to a standard recommended in the 1991 Hayes Report on the inquiry into River Safety to help improve the safety and security of the River Thames</u>”.</p>
(3)	Port of London Authority	KP RM3	<p><i>RM3 – Preserving the character and amenity of the River Thames and waterside locations.</i></p> <p>The PLA broadly support this key principle. The PLA note paragraph 15.22 which states that generally planning consent will not be granted for development proposed alongside the boroughs public parks and other open space if these will result in a loss of the open character or amenity of the area.</p>	<p>Support welcomed.</p> <p>No change required.</p>
(3)	Port of London Authority	KP RM4	<p><i>RM4 – Characteristics of moored vessels.</i></p> <p>The PLA broadly support this policy, however note that this is very detailed and may be difficult to enforce in some circumstances. For example what sort of evidence would be required from an applicant to justify that their houseboat conforms to the typical attributes of houseboats on the waterway they are located in? Would it be to show evidence of similar vessels</p>	<p>Comments noted and support welcomed.</p> <p>Amend KP RM4 (Characteristics of Moored Vessels) to refer to the council using S106 agreements as well as planning conditions when controlling the design and other attributes of vessels as part of new residential moorings.</p> <p>Amend KP RM4 as follows:-</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			located in a similar area elsewhere on the Thames? If so this should be stated in the supporting text.	<p>KP RM4 Characteristics of Moored Vessels</p> <p>“When granting planning permission for new residential moorings, the council will use planning conditions <u>and/or S106 Agreements</u> aimed at controlling the design and other attributes of the vessels to....”</p> <p>Add the following text to second bullet point at paragraph 15.25:</p> <ul style="list-style-type: none"> • <u>“demonstrate the above with relevant evidence in a supporting statement.”</u>
(3)	Port of London Authority	KP RM5	<p><i>RM5 – Impacts on navigation</i></p> <p>The PLA strongly supports this policy stating that any new moorings should not impede or pose any risk to navigation on the River Thames. This must also be referenced at the start of this section as a key consideration for any new development / moorings in the Thames.</p>	<p>Support welcomed.</p> <p>The SPD includes a specific policy on impacts of navigation (KP RM5) which requires new moorings to be suitably designed and located so as not to impede or pose any risk to navigation on the River Thames.</p> <p>However, add specific reference to navigation into para 15.13 as follows:-</p> <p>“The PLA has policies in place to determine whether to grant licenses for new moorings developments. Links to these policies are provided in the section above. <u>As explained further in KP RM4 (Impacts of Navigation) new moorings need to be suitably located and</u></p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				<u>managed as to not impede or pose any risk to navigation on the River Thames</u> ".
(3)	Port of London Authority	KP RM6, 7 & 8	<p><i>RM6 – Access for Emergency Services to residential moorings</i> <i>RM7 – Residential Moorings and Flood Risk Management</i> <i>RM8 – Parking for Residential Moorings</i></p> <p>The PLA broadly supports these principles, and has no specific comments.</p>	<p>Support welcomed.</p> <p>No change required.</p>
(3)	Port of London Authority	KP RM9	<p><i>RM9 – Residential moorings and access for all</i></p> <p>The PLA broadly supports this principle, which aims to ensure that any new development is designed to allow safe access to and from the moored vessels for people of all ages and abilities. To strengthen this policy further, it could be made clearer in the supporting text what the responsibilities of the applicant are in regards to this principle - if the applicant cannot deliver the development in accordance with the principles of accessible and inclusive design – how should this be justified? Through the submitted Design and Access Statement or equivalent document?</p>	<p>Support welcomed.</p> <p>No change required.</p>
(15)	Canal & River Trust	Section 15: Residential Moorings p.204	<p>Thank you for this recent consultation. However, I am not clear how this affects the Grand Union Canal, due to this now falling within the OPDC area. I have attached our comments, on behalf of the Canal & River Trust, and would welcome a follow up discussion or</p>	<p>Comments noted.</p> <p>The Grand Union Canal now falls within the boundary of the Old Oak and Park Royal Development Corporation (OPDC). Therefore</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>meeting with you to clarify this and ensure that our concerns for the Grand Union Canal are appropriately addressed.</p> <p>I have also attached the Trust's response to the most recent consultation on the OPDC Local Plan, as this relates to the LB Hammersmith and Fulham stretch of the Grand Union Canal.</p> <p>The stretch of Grand Union Canal within LB Hammersmith and Fulham is now within the administrative area of Old Oak and Park Royal Development Corporation (OPDC), and we are therefore unclear how this is treated by the LB Hammersmith and Fulham Planning Guidance SPG. Reference is made to the Grand Union Canal, but particularly in terms of Chapter 15 Residential Moorings, the canal does not appear to be addressed. If the SPD is intended to address development proposals along the Grand Union Canal, within the OPDC area, then the Trust would like to make several comments on the draft document, and in particular the Residential Moorings chapter 15. If however, the OPDC Local Plan and policy guidance supersedes this within their area, then we have very few comments to make. We would therefore welcome further discussion with the Development Plans Team on this.</p> <p>We also note that within the document, the Grand Union Canal is referred to alongside the River Thames, and yet these two watercourses have very varied characteristics and are used and managed differently. We consider that it may be appropriate to</p>	<p>all references throughout the Planning Guidance SPD relating to the Grand Union Canal will be deleted.</p> <p>The OPDC's Local Plan and any future planning guidance they produce will include policies/guidance for development along the Grand Union Canal.</p>

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
			<p>separate out policies relating to the River Thames and the Grand Union Canal, so that they may be more appropriately dealt with as unique spaces within the borough.</p> <p>This chapter provides extensive advice on the development of residential moorings, and yet refers to the 'canal' only once, and the Canal & River Trust are not referred to at all (or within any other part of the supplementary planning document), despite being a statutory consultee for planning applications and statutory undertaker for the canals, as well as licencing authority for boats on our network.</p> <p>It would appear that the chapter is really intended to address residential moorings along the River Thames, and not the Grand Union Canal, and we consider that it should therefore be amended to clarify this, with the heading changed to 'Residential Moorings on the River Thames'. If the SPD is intended to also address development within the OPDC area, then we would request that residential moorings (and other canalside development matters) should be dealt with by way of a separate chapter for the Grand Union Canal. Should the Development Plan Team disagree and intend to retain the document as it currently stands, then we would request the opportunity to add more comments on this chapter.</p> <p>Please see comments on OPDC Local Plan Regulation 19 Consultation also.</p>	

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(13)	Hammersmith Society	Section 15: Residential Moorings	Under Residential Moorings, we support the submission made by the West London River Group, but would also like to see the following amendments :	Support for the West London River Group's representation is noted. Please see their representation (above) to see how their comments have been addressed. No change required.
(13)	Hammersmith Society	Section 15: Residential Moorings	Although the Paddington Arm of the Grand Union Canal which runs through the Borough, is now within the OPDC area, this may not always be the case. We therefore ask that any residential moorings on the canal comply with both the policies in this section and with the moorings strategy and rules of the Canal and River Trust.	As acknowledged, the Grand Union Canal now falls within the boundary of OPDC. As the OPDC have planning control of this area, it would be inappropriate for LBHF to provide planning guidance for the Grand Union Canal. In the event of future change, policy documents would be updated/reviewed. No change required.
(13)	Hammersmith Society	Para 15.20	RM3 Para. 15.20, please change 'are unlikely to' to 'will not' and at the beginning of para 15.22, take out the words 'generally' and further on 'normally'. Under 15.25, add an extra sentence at the end of the first bullet point 'It will never be acceptable for the superstructure to be more than a single deck'. Delete the second bullet point as this would allow multiple deck boats which have been allowed further up the Thames causing much controversy.	Comments noted. As this is guidance, the Council considers the current wording is acceptable. Amend second bullet point of para 15.25 for clarity as follows:- <ul style="list-style-type: none"> Conform to the typical attributes of houseboats on the waterway they are to be located on ie. The River Thames in terms of their size, appearance and design .Exceptions may be made in instances and where these would relate

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
				to or enhance the surrounding area, the existing character of the river or canal and will contribute to the ecological and visual amenity of the area.
(17)	H&F Historic Buildings Group	Section 15. Residential Moorings	We endorse the new section 15 on Riverside Moorings submitted by Roger Weston on behalf of the West London River Group	Support for the West London River Groups Representation is noted. Please see their representation (above) to see how their comments have been addressed. No change required.

16. Glossary

Rep No.	Name/Organisation	Section/ Para No.	Comment	Officer Response
(13)	Hammersmith Society	Glossary	Also within the Glossary, we suggest the abbreviation 'FRA' for 'Flood Risk Assessment' precedes the full text.	Noted. No change required.
(13)	Hammersmith Society	Glossary	In the 'Archaeology and Heritage Assets' section, the abbreviation APA should be clarified and their status explained. APA should also be included in the Glossary.	Noted. Proposed amendment: add definition of Archaeological Priority Areas to glossary- <u>“Archaeological Priority Areas are areas of particular archaeological importance or vulnerability in the Borough which have been identified by the council with the advice of English Heritage. In these areas the council’s policies and proposals for archaeological sites will particularly apply. Planning applications affecting such areas will generate appropriate consultation, which could in turn lead to further processes of site assessment.”</u>

Appendix 3: Technical Changes to the Planning Guidance SPD (changes not arising from consultation responses)

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

Paragraph/Section	Technical Change Proposed	Reason for Change
KP - TR3 Vehicle Parking Standards	<p>Amend KP TR3 as follows:-</p> <p>“In these circumstances, there will need to be an assessment to ensure that the resulting level of on-street overnight parking does not result in parking stress, <u>which will be assessed on a case by case basis.</u> Where a development....”</p>	<p>This addition clarifies that an individual assessment will be carried out for each application to determine parking stress.</p>
KP – TR26 Tables and Chairs	<p>Amend KP TR26 as follows:-</p> <p>Key Principle - TR26 Tables and chairs</p> <p>The placing of tables and chairs outside premises on the public highway will normally require planning permission because it will involve a change in the use of the land on which they are placed. The use of a private forecourt for purposes which are ancillary to the main use of the building itself will not normally require planning permission.</p> <p>It is not considered generally practical to provide tables and chairs within a depth of less than 1.5 metres from the building line allowing for space to reach the table. Applications for tables and chairs in particular types of location will be considered as follows:</p> <ul style="list-style-type: none"> ● in fully pedestrianised streets a minimum clear path 2.3 metres wide for pedestrians must be maintained 0.9 of a metre either side of the centre line. Where the street is wider than 5.4 metres the depth provided for tables and chairs should not exceed 1/3 of the width of the street on each side. If access is required for emergency vehicles, the clear width between tables and chairs on either side should be increased to 5.4 metres to allow pedestrians to stand clear to the emergency vehicles' path ● in streets with a carriageway and footways provided an absolute minimum of 1.8 metres is kept clear. Footways are provided primarily for the convenience and safety of 	<p>The revised policy sets out clearer and more concise guidance.</p>

Paragraph/Section	Technical Change Proposed	Reason for Change
	<p>pedestrians. Where footway widths exceed 3.6 metres, the area considered should not exceed ½ the available footway width</p> <ul style="list-style-type: none"> • as part of an overall environment improvement scheme, subject to the same considerations listed above. • <u>A minimum width of 3.5m clear and unobstructed footway will usually be required in Town Centres.</u> • <u>A minimum width of 1.8m clear and unobstructed footway will usually be required outside Town Centres.</u> • <u>In both above locations where there is a high level of footfall, even over short bursts a greater width of clear and unobstructed footway than specified above will be required.</u> <p>13.87 It is essential in all cases that an absolute minimum width of 1.8metres of unobstructed highway to the line of any fixed infrastructure e.g. streetlights, litter bins etc. is kept free for safe and convenient pedestrian movement and to include those who use wheelchairs and people with mobility and visual impairment. Where there are heavy pedestrian flows, even over very short periods or in concentrated bursts, widths of 3.5 metres will be required.</p> <p><u>Key Principle TR26 ensures the safe and convenient movement of pedestrians including those with visual or mobility disabilities (including wheelchair users).</u></p>	
<p>KP – TR30 New Street Furniture including Broadband Cabinets</p>	<p>Amend KP TR30 and justification text as follows:-</p> <p>Key Principle - TR30 New Street Furniture including Broadband cabinets and <u>telephone boxes</u> The proposed locations for new street furniture will only be acceptable if there is an appropriate clear and unobstructed width of footway. An absolute minimum width of 1.2m of clear and unobstructed footway will be</p>	<p>The Key Principle has been changed to provide conformity with KP TR26 and simplify advice for street furniture. The title has been changed to make clear that Telephone boxes are also included.</p>

Paragraph/Section	Technical Change Proposed	Reason for Change
	<p>applied in appropriate locations. In busy pedestrian areas this minimum is likely to be 1.8m.</p> <ul style="list-style-type: none"> • <u>A minimum width of 3.5m clear and unobstructed footway will usually be required in Town Centres.</u> • <u>A minimum width of 1.8m clear and unobstructed footway will usually be required outside Town Centres.</u> • <u>In both above locations where there is a high level of footfall, even over short bursts a greater width of clear and unobstructed footway than specified above will be required.</u> • <u>In special circumstances, where Broadband cabinets are required to meet Local Plan Strategic Objective 18 to facilitate access to high speed internet across the borough, a minimum width of 1.2 clear and unobstructed footway will be required, except within Town Centres and areas with a high level of footfall where a greater width than 1.2m will be required.</u> <p>13.100 Although there is a minimum width, 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. Street furniture should be provided in accordance with the H&F Streetsmart guidance and should also be appropriately protected against graffiti and fly posting and be regularly maintained.</p> <p>13.102 A scaled drawing showing the proposed location for the Street furniture as well as the dimensions should be provided.</p>	
Section 17: Technical Appendices (Para 17.29)	<p>In para 17.29 Change the word 'Goldhawk' to 'Uxbridge' as follows:-</p> <p>"River Terrace Deposits (Kempton Park gravels in the southern area of the borough (northern border approximately Goldhawk <u>Uxbridge</u> Road)....."</p>	To correct error in current document.

Paragraph/Section	Technical Change Proposed	Reason for Change
Section 17: Technical Appendices	Amend heading to include reference to vapours as well as ground gas as follows:- “Ground Gas <u>and Vapours</u> ”	There are several pockets of vapours known in the borough which should be mentioned in addition to ground gas.
Section 17: Technical Appendices	Add new para on the known vapours in the borough as follows:- “ <u>There have been several unexpected pockets of organic solvents found in the borough, principally Perchloroethene and Trichloroethene, both commonly used for dry cleaning and degreasing metals prior to other treatment. These can release toxic vapours and be transported in groundwater into sites where there has been no historic use of the solvents.</u> ”	There are several pockets of vapours known in the borough which should be mentioned in addition to ground gas.
Section 17: Technical Appendices	Amend first bullet point under the heading ‘Phase 2:Site Investigation Scheme’ as follows:- “Liaison with the <u>council’s specialist officers dealing with contaminated land</u> Local Authority Contaminated Land Officer ”	To correct the name of contaminated land officers.
Section 17: Technical Appendices	Amend second bullet of para 17.39 to include reference to Volatile Organic Contaminants as follows:- <ul style="list-style-type: none"> Where relevant, the identification of different species and distinction between varying carbon chain lengths etc, for example Polyaromatic Hydrocarbons (PAHs), Total Petroleum Hydrocarbons (TPHs), <u>Volatile Organic Contaminants (VOCs).</u> 	To include reference to Volatile Organic Contaminants (VOCs) in relation to analysing samples.
Section 8: Contaminated Land	Add reference to history of light industrial uses in the borough to the introductory section on contaminated land. Amend as follows:- “ In a heavily built up borough such as Hammersmith & Fulham where there has been a long history of heavy <u>and light</u> industry, contamination is known to exist.....”	To add reference to history of light industrial uses in the borough.
Throughout document	Remove references to out-of-date documents.	To update references to out-of-date documents (for example, ‘Proposals’)

Paragraph/Section	Technical Change Proposed	Reason for Change
Section 4: Design and Conservation (Lightwells paragraph)	<p>Amend paragraph:</p> <p>Where lightwells are considered to be appropriate they must be sensitively designed and proportioned to accord with the ‘Design Guidelines for Lightwells’ <u>Basements and Lightwells chapter of</u> in this SPD. The creation of lightwells by the excavation of all or part of the front garden of a residential property to provide windows to basements requires planning permission, as does the enlargement of an existing lightwell. The loss of a substantial part of front gardens that form an integral part of the character of the terrace and street will be resisted.</p>	<p>map)</p> <p>To give more specific guidance on lightwells.</p>
Section 4: Design and Conservation (Lightwells paragraph)	<p>Insert the following additional paragraphs after Lightwells:</p> <p><u>Basement excavation: More detailed guidance can be found in the Local Plan, Policy DC 11. The excavation of basements beneath existing or proposed buildings will generally be limited to one storey in depth beneath the original lowest floor level. Exceptions may be acceptable on larger redevelopment sites. The excavation of basement accommodation beneath front and side gardens will not normally be acceptable in accordance with Local Plan, Policy DC11. The excavation of basements beneath rear gardens will be limited to the criteria set out in the Local Plan, Policy DC 11. The excavation of basements beneath existing or proposed outbuildings will be resisted in order to preserve the spatial hierarchy between main building and outbuilding.</u></p> <p><u>Rear and side gardens: Rear and side gardens are an important element of the character of most of the borough's Conservation Areas and contribute to amenity value, local biodiversity, privacy and sustainable drainage. Views across rear and side gardens are often important elements in the townscape, providing relief in the streetscene and glimpses of planting. The retention and maintenance of rear and side gardens will be encouraged and their significant erosion to create extensions, basements, lightwells or outbuildings will be resisted. The retention of trees and soft landscaping in rear or side gardens and the provision of new planting will be encouraged.</u></p>	<p>To provide clarity on developments within Conservation Areas that relate to the highlighted topics.</p>

Paragraph/Section	Technical Change Proposed	Reason for Change
	<p><u>Outbuildings:</u> Any outbuilding should be clearly subservient in height, volume and purpose to the original property. they should relate to size of the garden, should not create a terracing effect at the rear of existing properties and should comprise of only one storey. Their materials should complement their garden setting; traditionally domestic outbuildings have been constructed of brick or timber rather than render, metal or ceramic tiles. The excavation of basements beneath existing or proposed outbuildings or creation of lightwells to serve proposed basements will be resisted in order to preserve the spatial hierarchy between main building and outbuilding.</p> <p><u>Continuity and Historic Names:</u> The retention of historic names of buildings and sites will be encouraged. the retention of historic signage, particularly in relation to public houses will also be encouraged. Historic names and associations will be considered when naming any new developments. The use of historic information plaques on existing buildings and in new developments will be encouraged. The Hammersmith and Fulham Historic Buildings Group has worked closely with the Council to develop a high-quality model design for historic information plaques.</p>	
Section 4: Design and Conservation: Key Principle CAG4	Amend the title of Key Principle CAG4: Key Principle – CAG4 Historic Shopfronts <u>in Conservation Areas</u>	To provide certainty that development in Historic Shopfronts relates to Conservation Areas.
Section 4: Design and Conservation (Street Furniture paragraph)	<u>Street Furniture:</u> The Council is committed to improving the streetscene. The aim is to promote high quality design and to eliminate visual clutter by removing redundant items of street furniture. Historic cast iron bollards, railings and cast iron or enamel street name plates add to the visual character of an area and should be retained and repaired or, if appropriate, replicas installed. New lighting columns and lanterns should be designed in keeping with the local character and context within the conservation area. <u>Telephone kiosks and other telecommunication facilities should be of a high quality design and materials and should not generate visual clutter in the streetscene through their appearance or siting. particular care should be paid to the setting of Listed Buildings and Buildings of Merit.</u>	To provide further guidance on telephone kiosk design in Conservation Areas

Paragraph/Section	Technical Change Proposed	Reason for Change
Section 4: Design and Conservation Key Principle – BL1 Assessment of Lightwells	Add additional bullet point in Key Principle BL1 and add the following text: <u>Front lightwells should be designed in accordance with the model designs for lightwells in figure BL1.</u>	To provide guidance in relation to front lightwells and recommend that applicants refer to the associated diagrams to check the council's standards on lightwell designs.
Section 4: Design and Conservation Key Principle – BL1 Assessment of Lightwells	Amend original text on second bullet point to read: Rear lightwells should not be excessive in size and should not result in the loss of more than 50% of the original rear garden area in accordance with Local Plan Policy DC11.	To bring into line the guidance of rear lightwells with Local Plan Policy DC11.
Section 4: Design and Conservation Key Principle – BL1 Assessment of Lightwells	Amend original text on fourth bullet point to read: Where a basement is being excavated to form additional living space, lightwells should <u>may</u> be formed in the rear and/or side garden, where one exists.	It is unreasonable to force applicants to provide a lightwell if they do not want one.
Section 4: Design and Conservation Archaeological Priority Areas	Move the title Archaeological Priority Areas from its current position to sit above Fulham Village APA. Add Scheduled Ancient Monuments and Fulham Palace as separate titles.	To prevent confusion. The title in its current position suggests that Fulham Palace Scheduled Ancient Monument is an Archaeological Priority Area which it is not.
Section 5: Noise & Nuisance (Policy Context)	Amend the Policy Context under the heading 'London Plan' as follows:- Mayor of London's Draft Environment Strategy The Mayor of London has <u>also</u> published a draft London Environment Strategy for consultation, <u>which is due to be adopted in early 2018.</u> The strategy brings together all current GLA environmental strategies into a single document and covers a a number of environmental issues including noise. The strategy sets out an ambitious vision for London that will sit alongside the Mayor's other strategic plans such as the London Plan. The strategy sets out a series of aims and actions for noise. Some of the key proposals in the draft strategy include:-	To shorten section, specific detail on draft proposals not needed at this stage. Just keep reference to the document and its status.

Paragraph/Section	Technical Change Proposed	Reason for Change
	<ul style="list-style-type: none"> • Reducing adverse impacts by targeting locations in London with the highest noise pollution from transport. • Protecting and improving the acoustic environment of London • Support the Agent of Change Principle • Promotion of the night time economy <p>Consultation on the draft environment strategy ended on Friday 17th November 2017, the Council submitted detailed comments on numerous issues outlined in the strategy including noise.</p>	
Section 14: Waste Management (KP WM11 planning application requirements for refuse & recycling)	<p>Amend KP WM11 (planning application requirements for refuse & recycling) as follows:-</p> <p>Planning applications should be supported by a Refuse and Recycling Management Plan. which clearly identifies The proposed refuse and recycling storage points and the access routes for collection vehicles <u>should be clearly identified on submitted plans.</u></p>	To improve clarity
Section 14: Waste Management (KP WM11 planning application requirements for refuse & recycling)	<p>Amend title of KP WM11 as follows:-</p> <p>“Planning Application Requirements for refuse & recycling”</p>	To make title more concise.
Section 14: Waste Management (paragraph 14.83)	<p>Amend para 14.83 to include reference to the refuse and recycling management plan as follows:-</p> <p>“Appendix 5 indicates the information that is required to be submitted <u>as part of</u></p>	To improve clarity

Paragraph/Section	Technical Change Proposed	Reason for Change
	<p><u>a Refuse and Recycling Management Plan</u></p>	
<p>Section 14: Waste Management (Other Guidance p.188)</p> <p>Section 14: Waste Management (Policy Context)</p>	<p>Delete section on 'Other Guidance' from para 14.8 to 14.10 as follows:-</p> <p>Other Guidance Sustainable Design & Construction SPG (2014) 14.8 Promoting sustainable waste behaviour is an important element of the Mayor's Supplementary Planning Guidance SPG on Sustainable Design and Construction, 2014.</p> <p>The SPG provides guidance on the implementation of London Plan Policy 5.3 on sustainable design and construction. It also features guidance on a range of other policies, primarily in chapters 5 and 7 which focus on matters relating to the environment and sustainability. The three main priorities in the strategy include:-</p> <ul style="list-style-type: none"> ● Maximising use of existing resources and minimising waste generated during the construction process through implementing the waste hierarchy. ● Minimising use of resources in the design of development including designing to use prefabrication elements, sustainably sourced and, so not harm health and robust. ● Ensuring developments contain sufficient and well designed storage for recycling, organic material and waste. ● <p><u>Mayor of London's Draft Environment Strategy</u></p> <p>The Mayor of London has also published a draft London Environment Strategy for consultation. The strategy brings together all current GLA environmental strategies into a single document and covers a number of environmental issues including waste. The strategy sets out an ambitious vision and targets for London that include becoming a zero waste city by 2050. Once adopted,</p>	<p>To shorten section, specific detail on 'other guidance' is not needed.</p> <p>Reference to be made to the Mayor's draft Environment Strategy, the Housing SPG and the Sustainable Design & Construction SPG to be added under the heading London Plan within 'Policy Context' of section 14.</p>

Paragraph/Section	Technical Change Proposed	Reason for Change
	<p>the Environment strategy will be used by the Mayor to deliver his vision for London, alongside his other strategic plans such as the London Plan. The strategy sets out a series of aims and actions for waste. Some of the key proposals in the draft strategy include:-</p> <ul style="list-style-type: none"> • Collection of food waste (kerbside) by 2020 • Improving recycling in flats • Focus on waste minimisation • By 2026, no biodegradable waste will be sent to landfill • By 2030, 65% of London's waste will be recycled • Encouraging circular economy principles <p>Consultation on the draft environment strategy ended on Friday 17th November 2017, the Council submitted detailed comments on numerous issues outlined in the strategy including waste.</p> <p>Add reference to Mayor's draft Environment strategy, the Housing SPG and the Sustainable Design and Construction SPG under the heading 'London Plan' within the Policy Context of section 14 as follows:-</p> <p><u>"The Mayor of London's Housing SPG and Sustainable Design & Construction SPG provides further guidance for applicants on waste management. Alongside this, the Mayor has also published a draft Environment Strategy for consultation which is due to be adopted in early 2018. This contains a number of proposals for waste including the aim of collecting food waste."</u></p>	
Section 14: Waste Management (Policy Context)	<p>Add reference to London Plan Policy 5.3 on sustainable design and construction under the heading 'London Plan' as follows:-</p> <ul style="list-style-type: none"> • "Policies 5.16 and 5.17 of the London Plan are particularly relevant to waste and recycling, <u>as well as Policy 5.3 on sustainable design and construction.</u>" 	To include reference to related policy within the London Plan.
Section 14: Waste		To improve clarity

Paragraph/Section	Technical Change Proposed	Reason for Change
Management	Amend para 14.73 as follows:- “This <u>For major developments, the council recommends underground Envac systems</u> and other technological waste solutions...”	
Section 14: Waste Management (Alternative Waste Management Technologies, para 14.70)	Add reference to commercial and residential developments in para 14.70 as follows:- “For large developments, <u>(commercial and residential)</u> such as those within the boroughs...”	To make reference to both commercial and residential developments.
Section 15: Residential Moorings (Policy Context)	Add relevant London Plan policy into Policy Context as follows:- London Plan <ul style="list-style-type: none"> • <u>Policy 7.26- Safeguarded Wharves (Hurlingham Wharf, Swedish Wharf & Comley's Wharf)</u> 	To include reference to relevant London Plan policy
Section 5: Noise & Nuisance	Amend KP NN3 as follows:- Sound Insulation between dwellings and between commercial and residential premises Careful consideration should be given to the design of stacking and adjoining similar rooms in adjoining dwellings and to sounds insulation or separation of dwellings from communal and commercial areas. <u>In the design of new residential dwellings (including changes of use/conversions) careful consideration should be given to stacking and layout</u>	To include guidance for residential dwellings to provide enhanced sound insulation for all parts of adjoining dwellings including where an adjoining room is of a similar use.

Paragraph/Section	Technical Change Proposed	Reason for Change
	<p><u>of rooms in relation to adjoining walls/floors/ceilings.</u></p> <p><u>To ensure the amenity of occupiers is not adversely affected by noise, the council expects all parts of adjoining dwellings to enhance the sound insulation, including where the adjoining room is of a similar use.</u></p> <p><u>Where a residential dwelling adjoins a commercial premise, substantially enhanced sound insulation will be expected.</u></p> <p>Amend justification text of para 5.23 as follows:-</p> <p><u>“ In residential dwellings, even where rooms of a similar use are adjoining one another, noise disturbances can still arise. With this in mind, the council expects all parts of adjoining dwellings to enhance the sound insulation above that in the Building Regulations. Where the arrangement of rooms is shown to be unsuitable and likely to give rise to neighbour noise nuisance, e-Enhanced sound insulation will be required by condition or in situations...”</u></p>	
<p>Section 17: Technical Appendices (Appendix 4c: Nosie Sensitive Premises)</p>	<p>Amend title and paragraph as follows:-</p> <p>Enhanced sound insulation between different residential uses <u>dwellings</u></p> <p>It is important to note that Part E of the Building Regulations list the minimum acceptable levels only. Therefore, 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, t <u>The council will require better sound insulation of adjoining relevant walls, floors and ceilings. Applicants and developers should aim for an enhancement of the minimum levels stated in the Building Regulations by at least 5dB.</u></p>	<p>To include guidance for residential dwellings to provide enhanced sound insulation for all parts of adjoining dwellings including where an adjoining room is of a similar use.</p>
<p>Section 4 (Design & Conservation)</p>	<p>Add new Key Principle DA14 on fire safety as follows:-</p>	<p>To ensure fire safety is considered as part of new developments taking place</p>

Paragraph/Section	Technical Change Proposed	Reason for Change
Accessible & Inclusive Design)	<p data-bbox="472 264 734 296"><u>Key Principle DA14</u></p> <p data-bbox="472 300 633 331"><u>Fire Safety</u></p> <p data-bbox="472 335 1512 499"><u>In the interests of fire safety, and to ensure the safety of all building uses, the council expects development proposals to achieve the highest standards of fire safety. How a building will function in terms of fire, emergency evacuation, and the safety of all users should be considered at the outset to ensure the most successful outcomes are achieved.</u></p> <p data-bbox="472 539 701 571"><u>Justification Text</u></p> <p data-bbox="472 611 1473 667"><u>Fire safety is covered by Part B of the Building Regulations, but applications should consider issues of fire safety before the building control application stage</u></p>	within the borough.