

4 Design and Conservation

Conservation Area Guidelines

4.1 Most of the borough's built fabric dates from the extensive building programmes in the nineteenth and early twentieth centuries. Hammersmith and Fulham has maintained a much-valued built heritage, much of which falls within the Borough's 44 designated conservation areas.

4.2 Of the borough's residential areas those that were laid out to a consistent design and are of high architectural quality are also included in the borough's conservation areas. In many of these areas, the street provides a sense of scale and the setting for the consistent terraces of uniform architectural design.

4.3 The town centres at Hammersmith, Fulham and Shepherds Bush, have developed from the earliest patterns of settlement, and now have their own character and sense of place. Their architectural and historic quality is reflected in their conservation area designations. In recognition of the importance of these areas in the sustainable regeneration of the borough, it is essential that development is encouraged which is mindful of the areas' historic form and which is of an appropriate high quality architectural design to complement the existing character and ensure the long term vitality and viability of these centres.

4.4 The current land use structure of Hammersmith and Fulham with its three town centres, local shopping parades, residential areas, open spaces, riverside and industrial/commercial areas is the main generator of the Boroughs rich and varied character.

4.5 The varied character of Hammersmith's riverside is reflected both in the Mall Conservation Area including Upper and Lower mall, and in the contrasting old industrial areas such as the Sands End Conservation Area. The River Thames is the main topographical feature in the Borough, defining its southern boundary. It contributes to the character and development patterns of Hammersmith and Fulham in many ways . There is a strong relationship between the river, the river edge, landward development and open spaces within the borough. The riverside in Hammersmith and Fulham has seen many changes over the centuries, and the last thirty years are no exception. Several key sites have been subject of major development proposals.

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Policy Context - Conservation Areas

National Policy

The Government's overarching aim is that the historic environment and its heritage assets should be conserved in a manner appropriate to their significance and enjoyed for the quality of life they bring to this and future generations. Section 12 of the NPPF is titled 'Conserving and enhancing the historic environment' and condenses the former PPS5. However, it maintains the essence of the PPS in upholding the general policy that heritage assets should be "sustained" and "enhanced" for the benefits they bring to the community.

Planning (Listed Buildings and Conservation Areas) Act 1990

Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

"Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and shall designate those areas as conservation areas."

Designation introduces a general control over the demolition of unlisted buildings and provides the basis for policies designed to preserve and enhance all the aspects of character and appearance that detract/contribute to an area's special interest.

Under Section 71 of the Act, once an area has been designated:

"It shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas."

London Plan

The London Plan policy 7.8 on heritage assets includes the following:

- London's historic environment, including natural landscapes, conservation areas, heritage assets, World Heritage sites, Scheduled Ancient Monuments and memorials should be identified, preserved and restored.
- Development should preserve, refurbish and incorporate heritage assets where appropriate
- New development in the setting of heritage assets, and conservation areas should be sympathetic to their form, scale, materials and architectural detail.

Local Plan

Local Plan policy DC1 states, amongst other things, that all development within the borough should create a high quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that considers how good design, quality public realm, landscaping and land use can be integrated to help regenerate places.

Local Plan policy DC8 Heritage and Conservation which states, amongst other things, that "the council will aim to protect, restore or enhance the quality, character, appearance and setting of the borough's conservation areas and its historic environment, including listed buildings, historic parks and gardens, buildings and artefacts of local importance and interest, archaeological priority areas and the scheduled ancient monument".

Character Profiles

The council is producing a Conservation Area Character Profile for each conservation area. The "profile" is an appraisal which aims to give a clear assessment of the special interest, character, and appearance which justified the designation of the area as a Conservation Area. It also identifies key components that define the character or those which affect it, introduces relevant background material and suggests design guidelines to deal with each one. Some design guidelines are generic and these are reproduced here to aid all concerned in their efforts to preserve or enhance the character and appearance of all conservation areas in the Borough.

The profiles and these design guidelines support the council's statutory Local Development Framework which sets out the planning policy framework for the development of the Borough and development control decisions.

The Borough has 44 conservation areas with the first being designated in 1971. These are reviewed on a regular basis. All published and approved profiles are available on the council's web site. Profiles for each of the remaining conservation areas are to be produced as part of the council's ongoing work programme.

Key Principles

Key Principle - CAG1

Land Use in Conservation Areas

The mixture of uses within a conservation area is a component of character and often reinforces the role and quality of its individual buildings and local townscape. The impact of changing the balance of uses on that character must be carefully considered. Where new uses are proposed, they should be configured and accommodated in a manner that is consistent with the character of the conservation area and its architectural form, scale and features.

4.6 The experience of the particular mix of uses within a historic area helps determine its character. This often reinforces the role and quality of its individual buildings and local townscape. The balance of uses within a conservation area is, therefore, important in defining its character, particularly if they reflect the historic development of the area. Conservation Area designation is seen as the means of recognising the importance of such factors and in ensuring that appropriate policies are adopted to address the preservation or enhancement of such character by maintaining the balance of uses where it exists. 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.

Key Principle - CAG2

Urban Design in Conservation Areas

New development should contribute positively to the townscape and visual quality of the area and achieve a harmonious relationship with its neighbours to preserve or enhance the character and appearance of the conservation area. A successful design will take account of the characteristics of setting, urban grain, key townscape features, architectural details, landscape features, views, landmarks of the conservation area.

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4.7 New development will be considered on the basis of the following urban design characteristics:

Setting: The setting of the conservation area is determined by its surroundings within which the area is experienced and describes its relationship in particular to the spatial, visual, historic and topographic context. The setting may contain buildings or features that have a positive, neutral or negative impact on the significance of a conservation area. Where necessary, applicants should describe the impact of their proposals on the setting of a conservation area in accordance with the method outlined in Historic England's Good Practice Advice Note: The Setting of Heritage Assets (GPA 3) (2015).

Urban Grain: The urban grain of an area is composed of the plot layout, form and scale of buildings, the public realm and street pattern that define the distinct character of the conservation area and give clues to its historic development.

Key Townscape Features: All new development should respect the key townscape features, such as height and massing, building types and density, that define the sense of place. Proposed works within consistent groups of buildings such as terraces or set piece developments should respect the established homogeneity of the townscape.

Architectural Detail: The scale, proportion, alignment, style and use of features and materials must be carefully conceived to achieve high quality buildings that form a harmonious relationship with their neighbours.

Landscape Features: All new development should respect terrain and landscape features of the site and surroundings and respect their relationship to the built context.

Views: Significant views in and out of a conservation area and within it that can be appreciated from the street should be protected and opportunities to enhance existing views and shape or define new ones should be sought when considering new development.

Landmarks: Established landmarks, such as a church, theatre, town hall, rail station, an imposing office or mansion block or industrial building, should be retained as visual focal points where they make a positive contribution to defining and identifying the character of the conservation area.

4.8 (1)

4.9 The council will require applications for planning permission, whether outline or full, to be in sufficient detail for a judgement to be made in relation to the impact of the proposal on the character and appearance of the adjoining buildings and street scene and the conservation area as a whole. For this reason an outline application without any details is unlikely to provide sufficient information. The council has statutory powers to ask for additional details within one month of the lodging of a planning application, if these are necessary to enable it to make a decision.

Key Principle - CAG3

New Development in Conservation Areas

New buildings, extensions and alterations should be sympathetic to the architectural character of the built context and should not have a harmful impact on the character and appearance of the conservation area. Characteristics such as building heights, building lines, roof forms, rear and side additions, front gardens and boundary treatment, lightwells, materials, windows and building features as well as disabled access measures should be considered in this context.

1 Further guidance can be found in 'Building in Context: New Development in Historic Areas', CABE 2001.

4.10 The following building characteristics are relevant when planning new development:

Building Height: Any new development should respect the general townscape and prevailing height of buildings in each area where there is general consistency in height and scale. Where this is not the case, a townscape analysis would be required that supports the judgement about appropriate building heights on a site.

Building Line: The relationship between the frontages of buildings and the street space they are enclosing is an important townscape characteristic. New development should respect the dominant building line and the general rhythm of the facades within a street. The building line of the rear of buildings, often with a repetitive pattern of original subordinately designed rear extensions, can also be important in its relationship with gardens. It should be respected by the careful design of any proposed rear extensions.

Roof Extensions: Front roof extensions are likely to interrupt continuous parapet and eave lines in the townscape and are generally unacceptable for typical buildings styles within the Borough. Rear roof extensions should be sympathetic and special attention should be paid to their design where they are visible from the street and from surrounding properties. Alterations to the ridge height and the front roof slope are considered to be unacceptable where they harm the uniformity of a terrace or the proportions of a building. The use or reinstatement of original rainwater goods, decorative detail and materials including tiling patterns will be expected where appropriate. The demolition of original chimney stacks that are a significant feature in the roofline and silhouette of a building or terrace is considered to be a material alteration to the roofscape and shape of a dwelling house. Their removal may require planning permission and will be resisted. Similarly, original chimney pots should be retained wherever possible.

Hip to Gable Roof Extensions: Hip to gable roof extensions can undermine the symmetry of groups of properties or terraces. Where hipped roofs form part of the pattern of original development in an area their loss will be resisted.

Extensions: Extensions should never dominate the main building and should meet the policies in the section of the SPD on Housing Quality with regard to the provision of garden space, its proportions and quality. The size of rear and side extensions should have regard to existing building patterns within a conservation area and respect the symmetry of original additions in terraces. The design and materials of such extensions should integrate successfully with the host building and its neighbours.

Front Gardens: Front gardens define the edge of the public realm and form an important element of the character of most of the Borough's streets and terraces. Planted front gardens improve privacy, the appearance of properties and their relationship to the street, amenity value and local biodiversity. The retention and maintenance of planted front gardens will be encouraged and their destruction in order to create vehicular crossovers, access and hard standings will be resisted. Further guidance can be found in the Sustainable Drainage Systems, Biodiversity and Transport sections of this SPD.

Boundary Treatment: Traditional front boundaries are important in defining the character of a street and visually unite street frontages of buildings. Alterations to or removals of front boundaries that interrupt the sense of enclosure and rhythm in the relationship between private and public space will be resisted, and where missing, front boundaries should be replaced to their original design. Boundaries of the 19th & early 20th Century can vary from the earlier style of metal railings on a stone plinth with matching gates, to the later style of low brick walls with stone copings (simple flat blocks or more distinctively moulded) surmounted by metal railings or panels, and matching gates all flanked by stone or terracotta capped piers, and hedges, or a combination of these. In the majority of cases black or dark green is the most appropriate colour to paint metal railings and gates, but wherever possible the original colour scheme should be investigated. Invisible Green⁽²⁾ is often used. Visible side and rear

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boundary treatments can be of equal visual importance and their original design should be retained or reinstated. Any new structure over one metre in height on a boundary adjoining the highway and over two metres in height on a boundary at the rear of properties would require planning permission. Where the installation of bin, cycle or meter enclosures in gardens is considered to be acceptable, their design should be in proportion to the height of the boundary treatment and the size of the garden, and the enclosures should not be accessed through new openings in boundary walls, hedges or railings.

Lightwells: Where lightwells are considered to be appropriate they must be sensitively designed and proportioned to accord with the Basements and Lightwells chapter of 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.

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.

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.

Outbuildings: 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.

Continuity and Historic Names: 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.

Brickwork and Stonework, Painting, Render and Cladding: External brick or stone walls (including pilasters to shop surrounds) should be retained in their original condition and should not be painted, rendered or clad in any material. Existing brick or stone elevations including chimney stacks should be properly maintained and appropriate repointing undertaken where necessary (usually with lime based mortar in a flush finish). Properties that have original unpainted stucco rendering, or have stucco mouldings, should preferably be left in their original state and specialist advice should be sought where re-rendering or repairs are necessary. Where render or stucco is painted, it should be repainted an appropriate matt colour (or colours) i.e. white, pale or pastel shades rather than vivid colours. Glazed

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bricks or tiles and terracotta tiles or decorative panels should not be painted. Planning permission may be needed for changes to original facades and consultation with the Borough's conservation officer should be sought.

Windows and Original Features: Original architectural features such as timber sash windows, timber or metal casement windows, panelled doors, decorative stucco, moulded window surrounds and door cases, and historic shopfronts should be maintained and repaired wherever possible. Where renewal is unavoidable, owners are encouraged to reinstate these with exact replicas in the original style, detailing and materials. New windows should be designed with matching frame materials and profiles, pattern of glazing bars and glazing types. The type of glazing including secondary glazing options and design details should be carefully considered on a case by case basis. Planning permission may be needed for replacement windows and advice from the Borough's conservation officer should be sought. Owners of properties with unsuitable replacement windows, including PVC (plastic) windows, will be encouraged to change them for those of a more appropriate design and materials to match the originals when an opportunity arises.

Disabled Access: Applications for development affecting heritage assets should achieve accessible and inclusive design wherever possible and practicable, for example, level access. The Council supports the dignified and easy access for disabled people to and within historic buildings and historic public spaces. Suitable access for disabled people, which does not compromise a building's or areas special interest, can normally be achieved if treated as part of an integrated review of access requirements for all visitors or users, and if a flexible and pragmatic approach is taken. The Historic England publication – Easy Access to Historic Buildings (2015) provides useful guidance.

Key Principle - CAG4

Historic Shopfronts in Conservation Areas

The removal of historic shopfronts will be resisted and where they have been fully or partially removed, restoration will be encouraged. New shopfronts, including signage, lighting and other external installations, should incorporate high quality designs and materials which are appropriate to the architectural character of the building.

4.11 Proposed works to shopfronts will be considered with regard to their characteristic setting and features:

Shopfronts: New shopfronts and alterations should be designed to achieve a satisfactory visual relationship between the frontage and the rest of the building. Shopfronts spanning more than one original shop unit should not disrupt the vertical emphasis by the removal of intermediate pilasters and corbel brackets that originally divided the individual shop units.

Shopping Parades: A group of shops within a terrace normally has a unified appearance within well designed surrounds common to each shop and with related shopfront designs. The replacement of shopfronts with individual features and surrounds that are not common to the group would harm the unified appearance of the terrace. The retention, repair or restoration of original shop surrounds and frontages therefore is of high importance to the character and appearance of historic buildings and conservation areas.

Shop Fascias, Signage and Lighting: Fascia panels and shop signs should be integrated into the design of a shopfront, respect architectural details, use appropriate materials of high quality and should be located below the perceived floor level of the first floor. Internally illuminated box fascias and signs are considered to be inappropriate for shops within conservation areas.

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Shop Security Shutters and Canopies: Security grilles, where absolutely necessary, should consist of an open mesh to avoid dead frontages and be located internally. Shutter boxes should always be hidden from external views. Canopies should be traditionally designed and integrated into the shopfront.

4.12 More detailed guidance can be found in the Local Plan, Policy DC5, and in the Shopfronts chapter of this SPD.

Key Principle - CAG5

External Installations in Conservation Areas

Any external installations, such as solar/PV panels, satellite dishes and antennas, must be integrated into the design of a building by installing these within the envelope of the building or in a discrete manner in the least intrusive locations to minimise their visual impact both in ground level and high level views. Such installations within a conservation area will require planning permission and need careful consideration.

4.13 The proposed details of the installation of the following external additions must be considered:

Energy efficiency measures: Installation of energy efficiency technologies such as micro-generation equipment must be sensitively designed and situated to limit their visual impact on heritage assets. Internal alterations to increase energy efficiency, such as secondary glazing or heat pumps that require the installation of external grilles, should be designed to be sympathetic to the exterior character.

Satellite Dishes: Satellite dishes will not be permitted where they would be visually obtrusive and where alternative locations are possible.

Other Additions: External impedimenta such as original rainwater goods must be replaced in their original form and material. In some cases, powder coated aluminium may be acceptable but the use of PVC (plastic) is considered visually inappropriate. The installation of small size equipment such as alarm and antenna boxes and cameras should be limited and sited away from important architectural details and screened appropriately. The routing of cables should be internal – where this is not possible, cables routes should be in the least prominent locations with a colour finish to match the background.

Key Principle - CAG6

Open Spaces, Trees and Streets in Conservation Areas

Open spaces, trees and streets make a significant contribution to the character and appearance of conservation areas. It is important that any proposed changes preserve the character and reinforce local distinctiveness of the area.

4.14 Proposals will be assessed with regard to the following considerations:

Open Spaces: Public and private open spaces within a conservation area have a major visual and amenity value and impact upon the character of a otherwise built up area. Many open spaces within the Borough's conservation areas are identified within the Council's Local Plan as Nature Conservation Areas or Metropolitan Open Spaces. Any development should be designed to ensure it is harmonious with the open space context, and views within and from the outside of open spaces should be given special consideration. Where sports pitches, playgrounds and associated lighting are appropriate and satisfy these policies, they must be carefully integrated within the original layout and landscape to minimise their visual intrusion and enhance their surroundings.

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Trees: Mature planting and trees are an important characteristic of historic areas and most trees in a conservation area, including those in rear gardens, are protected [see the Town and Country Planning [Trees] Regulations 2012]. Owners are urged to look after trees on their land and plant new ones, and the Council will continue to re-instate and plant new street trees where appropriate, in order to ensure a continuing stock of mature trees for future generations and to provide an opportunity for biodiversity. Trees and shrub planting along boundaries of properties is a common characteristic in conservation areas, and their retention and maintenance will be encouraged.

Streets: Roads, pavements and public spaces should form a neutral setting for buildings within the conservation area and all work should be carried out in accordance with the Council's street design guide "Street Smart". Original kerb stones and historic paving should be kept and repaired. Where this is not possible, high quality natural materials such as York stone and granite setts can greatly add to the visual interest of an area, however, surfaces should be visually subordinate within the townscape, providing a coherent character throughout the conservation area. Any hard and soft landscaping, paving, road surfaces or footpaths should be designed to contribute where necessary to managing surface water run-off in accordance with the Flood Risk Mitigation and Sustainable Drainage section of this SPD.

Street Furniture: 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. 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.

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Basements and Lightwells

4.15 In London, many of the larger Georgian terrace houses had separate front access to the basement to allow for coal, waste and service matters to be dealt with separately from the main entrance to the house. In smaller houses basement access would be to the coal cellars which were to be found under the pavements. However, later medium sized and smaller London houses had no separate access and coal and bins were moved through the same main entrance. Towards the end of the 19th Century (after 1870) all medium sized houses and many smaller houses were built with a front garden (even those with basements). Gardens were regarded as adding status and, if kept in good order, improving privacy and the appearance of the house. Iron railings (most removed during the Second World War), sometimes on a low brick wall, often enclosed the gardens. By the end of the 19th Century, almost all new houses had a front garden, or at least a forecourt, [a paved stretch of ground of the depth of a bay window].

4.16 These front gardens now form the character of most of the Borough's streets and terraces, and when planted, provide a welcome greening of an otherwise hard urban environment. Rear landscaped gardens can also contribute to the street scene, particularly where there are important gaps between terraces and a general open aspect in which trees and large shrubs in rear gardens are visible. The street scene can be enhanced by borrowing from the landscape in these private rear spaces. The value of these spaces for their planting and potential tree planting is great, not only for aesthetic reasons but also for biodiversity and habitats and dealing with surface water run-off.

Policy Context - Basements and Lightwells

National policy

The NPPF encourages good design. It warns that design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions should not be accepted. It states that high quality and inclusive design should be the aim of all those involved in the development process. Planning authorities are encouraged to prepare robust policies on design and access. A key objective of these policies is to ensure that developments respond to their local context and create or reinforce local distinctiveness.

London Plan

The London Plan promotes good design, for example see **policy 7.6 Architecture** and others concerned with London's Living Places and Spaces. It acknowledges that the quality and function of neighbourhoods and places, and local character, contribute to making London a special place and improve the quality of life.

Local Plan

The council's policies for the control of development and the improvement of the environment are set out in its Local Plan.

The council's Local Plan includes **policy DC4: Alterations and Extensions**. This states, amongst other things, that the council will require a high standard of design in all alterations and extensions to existing buildings. These should be compatible with the scale and character of existing development, their neighbours and their setting. In addition, policy DC11 provides guidance on basement accommodation and lightwells.

The council's Conservation Area Character Profiles generally discourage the excavation of front gardens. The Guidelines state :

"The creation of lightwells by the excavation of all or part of the front garden of a residential property to provide windows to basements to increase the light to basement rooms requires planning permission, as does the enlargement of an existing lightwell. Where there is no tradition of a lightwell in a particular property or street the introduction of an over-large, visible and inappropriately designed lightwell could be harmful to the appearance of an area. This has a negative impact and will not normally be permitted where the lightwell would take up more than 50% of the front garden or would result in the loss of a substantial part of any planted area of the front gardens that forms an integral part of the design of the street or terrace."

Assessment of Proposals for Lightwells and Basement Excavation

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 ⁽³⁾

3 (<https://www.lbhf.gov.uk/planning/planning-policy/consultation-article-4-directions>).

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4.18 Where lightwells already exist, and are to be enlarged, planning permission will also be required for that enlargement. Some schemes for excavation and lightwells at the side and rear of properties may not require planning permission. Applicants are advised to discuss proposals for such work at an early stage with the Council's Planning Division.

4.19 The introduction of an overly large, visible and inappropriately designed lightwell could be harmful to the appearance and architectural integrity of the property, the street scene, and the area generally. For example, the scale of a property can be increased, and the relationship of the property to its front garden threshold space and the street can be eroded, or the softness given by a planted front garden can be lost with consequent damage to the street scene. The addition of further protective railings can add unnecessary clutter to the appearance of the street scene.

4.20 In addition, there are parts of the Borough that are designated as Archaeological Priority areas. Where excavation is required in these areas the council will take into account the Heritage Conservation policies in the Local Plan. The requirement to fully understand any impact on archaeology is normally expressed as a condition to any planning permission.

Assessment of Lightwells

Key Principle - BL1 Any application for a lightwell will be treated on its individual planning merits, taking into account local circumstances, impact and the proposed size of the excavated area.

Key Principle - BL1 The following key points should be considered when creating a lightwell:

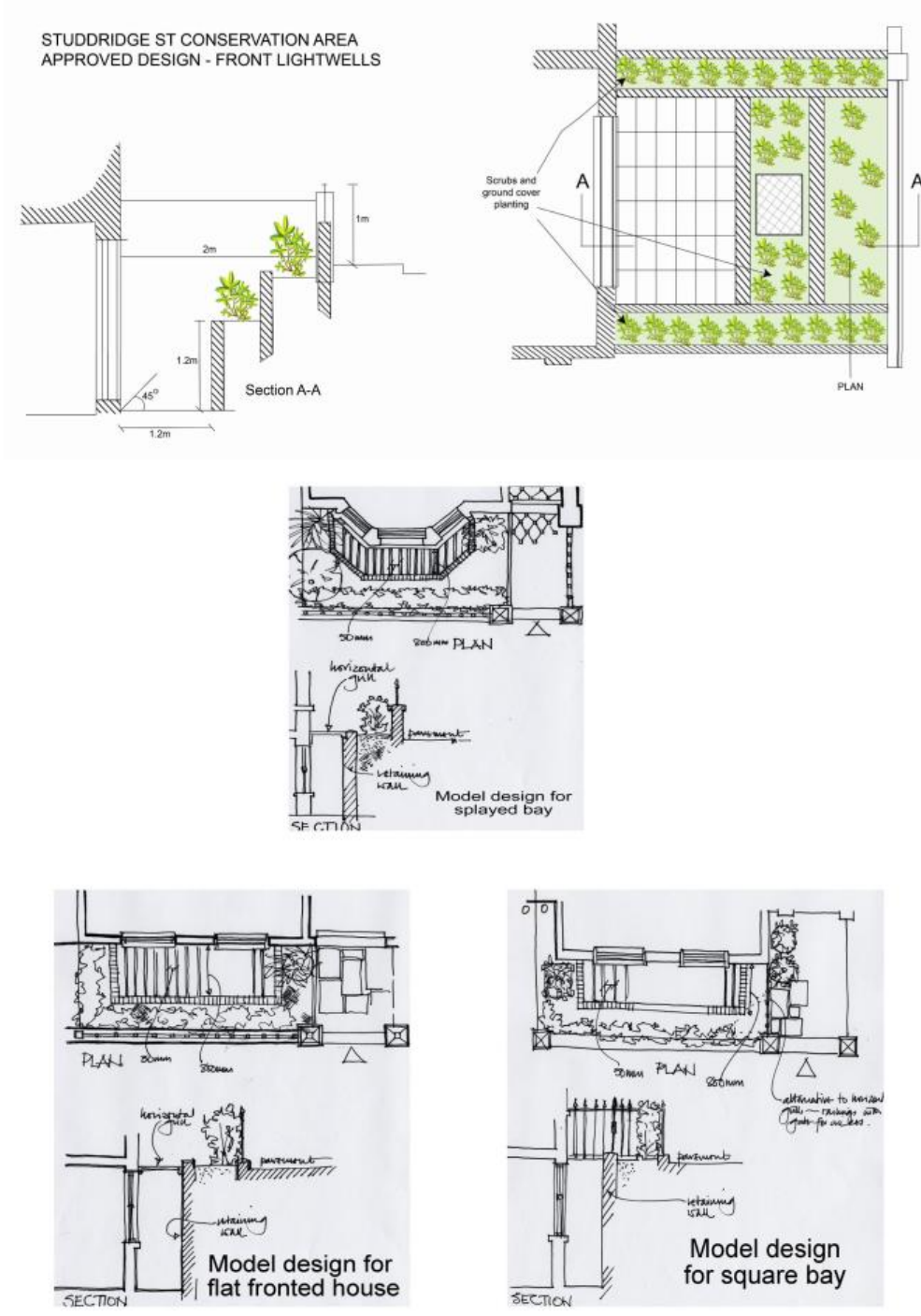
Key Principle - BL1

- Proposals for excavation and a lightwell where the whole of the front or rear garden would be lost would normally be refused permission.
- Front lightwells should be designed in accordance with the model designs for lightwells in figure BL1.
- Rear lightwells should not be excessive in size and should not either on its own or in combination with a basement excavation result in the loss of more than 50% of the rear garden area in accordance with Local Plan Policy DC11.
- Where they are not part of the original design, proposals to insert stairs into the front lightwell would normally be resisted.
- Where a basement is being excavated to form additional living space, lightwells may be formed in the rear and/or side garden, where one exists.

4.21 There will be instances where excavation and the construction of a lightwell could be detrimental to the character of a building or the street scene and could be refused permission. Examples of such cases would be where front gardens or forecourts (both residential and commercial) are particularly small and excavation and the creation of a lightwell would result in the loss of the entire garden, or where a large lightwell would be clearly visible from public areas. Figure BL1 below provides examples of model lightwell designs for different types of property. Where lightwells exist already in a particular street or terrace, such as on the Peterborough Estate in the Studdridge Street Conservation Area, and where a different model has already become established, further lightwells which match the predominant design may be considered acceptable.

Figure - BL1

4.22 Recommended lightwells are shown in the drawings on the next page, these show a plan and section from front to back, for each type of property, together with dimensions. The examples have been designed to comply with building regulations requirements for means of escape in case of fire, if the only possible means of escape is through the front lightwell area.



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4.23 Rear gardens are important for providing the space and environment within which flora and fauna have the opportunity to thrive and, therefore, sufficient space should be left for trees and shrubs to grow. The presence of trees and shrubs in rear gardens provides a green foil to the surrounding development and can enhance the sense of privacy, especially in densely built up areas.

4.24 Providing access to the basement via the front lightwell increases the size of the lightwell and erodes the remaining area available for planting. Stairs and railings would also give a cluttered appearance to the front garden area which often provides a soft landscaped setting for the property and the street. Such proposals would detract from the appearance of the front elevation of the house and the character of the street scene.

4.25 Ideally, where a basement is being excavated to form additional living space, lightwells should be formed in the rear and/or side garden, where one exists. Such a location would almost always be more appropriate. There would be scope at the rear for the provision of light and air to any new basement room, and there would also be the opportunity to create links with any rear garden.

Key Principle - BL2

Lightwells and basement excavation relating to listed buildings and lightwells in and conservation areas

In the case of a listed building whose special interest would be harmed by the construction of a lightwell, such a development would almost always be unacceptable unless outweighed by public benefits.

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.

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.

In some parts of some conservation areas, even the model lightwell designs included in Figure BL1 may be harmful, for example where the front garden is clearly visible from the street, or where there is no front boundary enclosure.

4.26 ~~Some heritage assets will be extremely sensitive to changes in level at the threshold of a building~~ **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.

4.27 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 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.~~

Key Principle - BL3

Front lightwells

Where a new front lightwell is acceptable in policy, it should be as discreet as possible, and allow the scale, character and appearance of the property, street or terrace to remain largely unchanged. The design of any basement elevation, in its form and fenestration [and in particular the material, opening style and subdivision of any fenestration], should relate to the design of the ground floor elevation.

The following key points should be considered when creating a front lightwell:

- **The excavation should retain a significant amount of accessible and usable planting area at ground level.**
- **Fences, glazed screens or vertical railings to surround the lightwell should be avoided, as they draw attention to the change, and would look cluttered especially if there are differing styles. It would be acceptable however, to put a railing from the front to back adjacent to the garden path in order to give protection.**
- **In the case of splay bay and square bay windows, the lightwell should follow the shape of the bay window on the ground floor.**
- **In the case of a flat fronted property the excavation should be no wider than the outer edge of the window or windows in the ground floor elevation.**
- **All excavations should not exceed 800mm from front to back**
- **A horizontal metal grille flush with the surface of the garden should be used to achieve such protection over the excavation**
- **Where a lightwell is used as a means of escape, a ladder will also need to be provided to affect the escape arrangements from the basement.**

4.28 Many houses in Hammersmith and Fulham have a splayed bay window on the front elevation (a result of the late Victorian love of fresh air and extra space); others have a square bay, while fewer have a flat elevation. The majority of terraced houses have small front gardens where the formation of a lightwell would have the greatest impact. These guidelines are predominantly aimed at these small gardens. The guidelines may only be relaxed where the proposals relate to larger front gardens (i.e. more than 6 metres when measured from the main front wall). All excavations should not exceed 800mm from front to back, except on the Peterborough Estate where a more generous model design incorporating a secondary planter in the lightwell has become established.

4.29 The Council is not seeking to prevent the use of fences and railings on the front property boundary, or along the path leading to the front door. The Building Regulations require that in order to prevent any one falling into a lightwell where it is deeper than 600mm, the opening should be protected by a guard. In order to avoid a cluttered appearance in the front of a property a horizontal metal grille flush with the surface of the garden should be used to achieve such protection over the excavation. The need for a grille can be avoided if a vertical railing is erected from the front entrance gate to the front door.

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4.30 If the lightwell is not used as a means of escape, or required for ventilation, other traditional measures such as glass blocks could be used. These features should be included in any planning application. Any proposal should have sufficient space left in the front garden to provide the opportunity for planting, and in the case of small gardens, there should be at least sufficient space left for a hedge.

4.31 Any planning permission will have conditions attached relating to the grilles, materials, windows, tree protection measures for any adjacent trees and a requirement to build the proposals in their entirety. The removal of permitted development rights for railings may also be conditioned.

Buildings of Merit

4.32 The borough has an established local register of Buildings of Merit which has been drawn up and maintained in close collaboration with local amenity groups ⁽⁴⁾. The list gives a clear indication of those buildings which are valued by the local authority and local community, and a better understanding of the locally important heritage assets and their contribution to the character and distinctiveness of each local area. The buildings on the list are now widely recognised as local heritage assets in the planning process.

4.33 The borough's Buildings of Merit are important for the contribution they make to the local area, reinforcing local historic and architectural distinctiveness. They are also important in the preservation and enhancement of local character and appearance of areas.

Policy Context - Buildings of Merit

National Policy

The Government's overarching aim regarding the historic environment and its heritage assets is that they should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Section 12 of the NPPF is entitled 'Conserving and enhancing the historic environment' and condenses the former PPS5. However, it maintains the spirit of the PPS in upholding the general policy that heritage assets should be "sustained" and "enhanced" for the benefits they bring to the community. There is a clear direction to local authorities in paragraph 126 that these general aspirations should be linked into a positive strategy for conservation within local plans.

London Plan

The London Plan recognises that London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. Crucial to the preservation of this character is the careful protection and adaptive re-use of heritage buildings and their settings. The Plan contains a policy on heritage assets (see Policy 7.8).

Local Policy

Local Plan Policy Built Environment DC1 states that all development within the borough should create a high quality urban environment that respects and enhances its townscape context and heritage assets.

The Council's Local Plan includes policy DC8 Heritage and Conservation. This states amongst other things that: "The council will aim to protect, restore or enhance the quality, and character, appearance and setting of the borough's conservation areas and its historic environment, including listed buildings, historic parks and gardens, buildings and artefacts of local importance and interest, archaeological priority areas and the scheduled ancient monument".

4 (see list published separately on the council's website)

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Key Principles

Key Principle - BM1

Designation of Buildings of Merit

Given the importance of non-designated heritage assets to the local townscape of the Borough, it is considered that the opportunity to add to, or in exceptional cases remove buildings from the Local Register, is available, and such additions may be put forward from time to time, in consultation with the relevant amenity societies. Furthermore the council may recommend that particular buildings on the Local Register should be added to the Statutory National List of Buildings of Special Architectural or Historic Interest by the Secretary of State. A regular review and update of the local register will be carried out to ensure it remains relevant as a record of the boroughs locally important historic environment.

4.34 Historic England suggest that similar selection criteria to that currently used for national designation would be appropriate for local listing. The criteria for adding new buildings to the list would include:

- Age – where the age of a building may be important in the local context
- Rarity – maybe rare in the borough but not nationally so not fulfilling national criteria
- Aesthetic value – where the design is important in the local context
- Group value – where the grouping has a clear design or historic relationship
- Evidential value – where the significance of the asset is supported by written record
- Historic association – would include association with important local persons and events
- Archaeological interest – where the asset is locally significant
- Designed landscape – locally important designed landscapes and gardens
- Landmark status – an asset with strong historical associations or particularly striking design value
- Social and communal value – relating to places perceived as a source of local identity

Key Principle - BM2

Proposals affecting buildings of merit

Development will not be permitted if it would result in the demolition, loss or harmful alteration to buildings, structures and artifacts that are of local townscape, architectural or historic interest, including all buildings identified on the council's Register of Buildings of Merit unless:

- 1. (a) The building or structure is no longer capable of beneficial use, and its fabric is beyond repair; or**
- (b) The proposed development would outweigh the loss or harm to the significance of the non-designated heritage asset; and**
- (c) The proposed development cannot practicably be adapted to retain any historic interest that the building or structure possesses; and**
- (d) The existing building or structure has been fully recorded; and**
- 2. In the case of artifacts, they cannot practicably be retained in situ or, failing that, retained for re-use elsewhere within the site.**

4.35 All applications relating to Buildings of Merit or their setting should include a description of the significance of the heritage asset. The level of detail in the description should be proportionate to the importance of the heritage asset. An assessment of the effect of any proposal on the setting and significance of the Building of Merit should be included with the application. The council will be keen to ensure that any proposals preserve those elements that make a positive contribution to, or better reveal the significance of the Building of Merit.

4.36 The council wishes to encourage the retention of the architectural, townscape and historic character of the borough. There are many buildings in the borough on the Local Register of Buildings of Merit which are of merit and which contribute to the character of the locality because of their townscape value, architectural quality, or historic associations. Most buildings on the register have been selected through external inspection on the basis of their architectural character and/or their contribution to the visual quality of the street scene. However, there may be instances where buildings also have a valuable interior.

4.37 Many terraces, parades and other groups of buildings make an important contribution to the townscape and local distinctiveness of the borough which is greater than the individual importance of each building. Several of these groups have been identified as Buildings of Merit. Every effort should be made to protect these facades of terraces, parades or groups of buildings, especially the rooflines and any architectural detailing which adds to their character.

4.38 Both within and outside conservation areas, proposals for demolition or alteration should have particular regard to the effect of that proposal if the building is part of a terrace, parade or group because the consequences of demolition or unsympathetic alteration could be detrimental to the value of that group.

4.39 Locally important buildings are heritage assets of high local value in terms of townscape, architectural or historic interest, and it is especially important that they shall be retained in any development. Any alterations should only be carried out in a way that respects the scale, character and materials of the building. Within conservation areas, there are statutory controls over the demolition

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of buildings and consent is normally required. Outside conservation areas specific consent for demolition is not normally required. Nevertheless, the council will seek to protect locally important buildings because they contribute to the character and heritage of the borough.

Accessible and Inclusive Design across the borough

4.40 Hammersmith and Fulham is a generally flat borough with few steep inclines. However, many buildings are of older construction and some multi-storey buildings were built without lift access. It is therefore important to improve accessibility in the built environment when development, including new buildings, alterations or extensions and changes of use, takes place.

4.41 The council considers that much of the guidance in the London Plan and the additional guidance in the Housing and Accessible London SPGs is relevant to the local circumstances in H&F and supports the policies in the Local Plan relating to accessible and inclusive development. Therefore where the London Plan policies and accompanying SPG provides more detailed guidance, the council will use it in assessing relevant planning applications. For some types of development more detailed supplementary policy guidance will be considered necessary.

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Policy Context - Design and Access

National policy

Approved Document M of the Building Regulations introduces minimum specifications for wheelchair User Dwellings M4(3). This is subdivided into Wheelchair Adaptable and Accessible Dwellings M4(2) and Wheelchair User Dwellings M4(3), which are fitted out for occupation by a wheelchair user. Approved Document M link for reference: <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>

The National Planning Practice Guidance states that category M4(3) 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) may therefore only apply to social rented and affordable rented homes, all other wheelchair user dwellings may only be conditioned to meet M4(3) standard.

The National Planning Policy Framework (NPPF 2012) recognises the need for an accessible and inclusive environment, including accessible adaptable general purpose housing and specialised housing as being among the ways that Local Plans can aim to meet the housing needs of older people.

Paragraph 35 of the NPPF states that where practical, the location and design of development should create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, and consider the needs of disabled people to arrive by any modes of transport.

London Plan

London Plan policy 7.2: An Inclusive Environment seeks to ensure that future development requiring planning permission is accessible and inclusive. This policy also outlines the information that should be included with design and access statements submitted with development proposals, including whether relevant best practice standards such as British Standard 8300:2009 have been complied with.

Other relevant London Plan policies include:

- London Plan Policy 3.1 for ensuring equal life chances for all;
- London Plan 3.8: Housing Choice which seeks to ensure that 90% of housing meets building regulation requirement M4(2) and 10% to meet M4(3).
- London Plan Policy 4.5: London's Visitor Infrastructure which seeks inclusive and accessible visitor accommodation, including 10% of hotel bedrooms to be wheelchair accessible; and
- London Plan Policy 2.15: Town Centres which promotes measures to improve accessibility, including Shopmobility schemes in town centres.

Local Plan

Hammersmith and Fulham Council in discharge of its planning function, must engage with public body duties in the Equality Act 2010. One of these duties requires it to take active steps to generally advance equality of opportunity for groups protected by the Equality Act 2010 and to ensure that disabled people in particular are not more disadvantaged than groups who are not disabled, where this might be a consequence of the council's decision or policy applied to a particular development.

The Local Plan seeks accessible and inclusive development and policy DC1 specifically states that “development throughout the borough should be attractive, durable, adaptable and accessible in order to achieve good sustainable and inclusive design.” The Local Plan also includes more specific policies on the need for inclusive and accessible development in relation to different types of development. For example, **Policy H06** of the Local Plan seeks high quality accessible homes in all developments, specifically 90% of housing to meet building regulation requirement M4(2) and 10% to meet M4(3).

Key principles

Key Principle - DA1

Access and inclusive design

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.

Drawings submitted for planning approval should show external access features for detailed approval and how in general, internal facilities (including those requiring detailed building regulations approval) will cater inclusively for all categories of user.

Key inclusive design issues

- **how any innovative feature is expected to achieve a particular building design objective**
- **potential barriers to accessibility and the means to overcome these barriers for all members of the community and for specific groups of disabled people such as wheelchair users and other mobility impaired people, blind and partially sighted people, hearing impaired people, and people with learning difficulties**
- **plans that show how the proposal integrates into the urban fabric and circulation routes**
- **sources of inclusive design advice and guidance used**
- **how accessibility will be managed when the development has come into use**

4.42 The Design and Access statement should be appropriate for the type and scale of the planning application. For example Design and Access statement for:

- a new shop front should explain how level access to the building will be achieved
- a change of use application from a shop to a café should show how an accessible toilet will be designed in
- a school extension will explain how it will assist in improving accessibility for pupils and other users of the building.

4.43 When considering potential barriers to inclusive access developers should consider:

- getting to and from a development
- moving around a development
- signage and information
- surfacing materials
- open space
- entering a development
- getting use of facilities
- accessible housing for disabled people

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- historic buildings and historic areas
- circulation space within the building, for example, landing space outside of lifts and sufficiently wide corridors for wheelchair and other users.

4.44 It is recognised that for some conversions and changes of use it may not be possible to incorporate fully accessible and inclusive facilities. In these cases applicants should demonstrate in the design and access statement how they have sought to achieve as high a level of accessibility as possible. Planning applications for developments required with some urgency for the use of a home or other building by an occupier or employer can be given priority on request.

4.45 National advice is that it is not necessary for a planning application, or the Design and Access Statement attached to a planning application, to state that Building Regulations requirements under Building Acts will be met. Nor need they show detail that would fall to be approved under Building Regulations requirements, or submit information about service access arrangements that might satisfy an Equality Act 2010 requirement on service providers to remove physical barriers confronting disabled people (see paragraph 4.51).

4.46 Access and inclusive design should also apply to heritage assets in the borough, in accordance with the Key Principles in the Archeaology 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.

Key Principle - DA2

Accessible and adaptable dwellings M4(2)

To ensure that residential accommodation offers standards of accessibility that can be relied upon, and to ensure that homes are adaptable without the need for post-construction alterations, the Council requires in Local Plan Policy H06 that 90 % all new homes are designed to the standards set out in Approved Document M to the Building Regulations M4(2).

4.47 A wheelchair adaptable and/or accessible dwellings (M4(2)) is one which is designed and built for potential occupation by a wheelchair user (possibly after minor, non-structural, alterations).

4.48 M4(2) will be met where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users. Reasonable provision is made if the dwelling complies with all of the following:

1. Within the curtilage of the dwelling, or of the building containing the dwelling, it is possible to approach and gain step-free access to the dwelling and to any associated parking space and communal facilities intended for the occupants to use.
2. There is step-free access to the WC and other accommodation within the entrance storey and to any associated private outdoor space directly connected to the entrance storey.
3. A wide range of people, including older and disabled people and some wheelchair users, are able to use the accommodation and its sanitary facilities.
4. Features are provided to enable common adaptations to be carried out in future to increase the accessibility and functionality of the dwelling.
5. Wall-mounted switches, socket outlets and other controls are reasonably accessible to people who have reduced reach.

Key Principle - DA3

Wheelchair user dwellings M4(3)

To ensure that residential accommodation offers standards of accessibility that can be relied upon, the Council requires 10% of all new housing to be designed to meet the standards prescribed in Approved Document M to the Building Regulations for an M4(3) home.

4.49 A wheelchair user home (M4 (3)) is constructed and fitted to a standard suitable for 'day one' occupation by a wheelchair user without the need for alterations.

4.50 M4(3) will be met where a new dwelling makes reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling and use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants. Reasonable provision is made if the dwelling complies with all of the following:

1. Within the curtilage of the dwelling or of the building containing the dwelling, a wheelchair user can approach and gain step-free access to every private entrance to the dwelling and to every associated private outdoor space, parking space and communal facility for occupant's use.
2. Access to the WC and other accommodation within the entrance storey is step-free and the dwelling is designed to have the potential for step-free access to all other parts.
3. There is sufficient internal space to make accommodation within the dwelling suitable for a wheelchair user.
4. The dwelling is wheelchair adaptable such that key parts of the accommodation, including sanitary facilities and kitchens, could be easily altered to meet the needs of a wheelchair user or, where required by a local planning authority, the dwelling is wheelchair accessible.
5. Wall-mounted switches, controls and socket outlets are accessible to people who have reduced reach.

Key Principle - DA4

Public realm and open spaces

Where new public and open spaces/areas are created or enhanced planning applications should indicate how the interests of disabled people are to be protected:

- How access to public space and walking routes will be enhanced.
- Where pavement or open air dining is proposed, loose or movable furniture and tables should be confined to areas around which there is a rail, planter or other form of visual guarding whose lower part is rigid enough to be detectable with a long cane up to height of between 150mm and 300mm above ground.
- Bollards in a public space should be a minimum of 1000mm high, and be in a contrasting colour or texture to paving or have a high visibility collar.
- Where public seating is provided in public space, it should have:
 - A seating surface 450 - 470mm high, heel space underneath and central or end of seat arms to help people to rise, and
 - at one end, a hard surfaced draw back space for a wheelchair user or a buggy to stand on.

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4.51 Local organisations of disabled people and their caregivers can assist designers. An example of two community groups in Hammersmith and Fulham who have come together to do this, are the Parents Active group of parents with young disabled children, and the Borough Mencap organisation. Their local guidance entitled “We want to play too” (2012) is written to help ensure that the needs of children with impairments who often need to spend longer in play or may need more choices in public play settings than do their peers, are fully catered for.

4.52 “We want to play too” guidance comments on the need for carer seating and fencing to allow social play in free-play parts of a playground, what to consider when choosing from playground equipment products when each have a strong visual appeal, and the positive message sent by signs that welcome all users.

4.53 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. The Guidance can be found on the following link: <https://www.sportengland.org/facilities-planning/active-design>

Key Principle - DA5

Changes of level in public spaces

Where level changes cannot be levelled off or sloped away across larger sites, the public space affected should be made accessible by handrailed steps and short ramps starting and finishing at the same point, or by signposted alternative route options. Signposted alternative route options should include steps and lifts where long ramps and steeper slopes would be too tiring or steps too high even with rest landings for all people to use without discomfort.

The BS 8300:2009 Code Of Practice recommends the provision of lifts in urban contexts where changes of level exceed 2m.

Gradients in excess of 1:12 will be resisted unless alternative and acceptable step-free routes are provided.

4.54 Changes of level pose problems for people with mobility impairment, and for care givers who may be parents, partners or children of disabled public space users. If insufficient attention is given to making designs for routes and level change options work for everyone, disabled users, and older people who are frail, are likely to be those most affected. When designing ramps and stairs, Part K1 of the Building Regs. should be used.

Key Principle - DA6

Entry into a building

Entrances to a building and to residential block entrances which are above or below street level or positioned to be level should be level or the slope should not exceed a gradient of 1 in 20 from the street, and any doorway threshold chamfer should be less than 50mm. Where this cannot be achieved there should be:

- adjustment of the internal floor level, or
 - a ramped access cut into the floor slab to meet building regulations requirements, or
 - a short ramp access, or
 - a handrailed stair with a ramp or with an open air platform lift at least 1000mm wide x 1250mm and a 900mm wide gate, all of which should be to building regulations guidance
- Where there is a stair up to the entrance of a building, and there is the space, there should always be standard warning texture on the landing above the topmost stair to warn a blind person of the descending stair ahead, or, failing this, handrailing that leads around the landing.
 - At least one of the main doorways into a service use building should have a level threshold and a door (or one door in a pair when in use on its own) that when fully open, has a clear opening width of 800mm, is lightly sprung or power-assisted, and is readily identifiable as an accessible entrance from the street.

4.55 Planning guidance aims to ensure that all the entrances to buildings are practically accessible from the public realm, usually the street.

4.56 The guidance will normally apply to non-residential and mixed use sites, new shopfronts and to new and altered public or visitor entrances.

4.57 However in LBHF there are also some residential sites entered above or below street level. For example there are some that are on back land sites below street level; other sites may be over railway tracks. In these cases, the guidance above should apply outside the entrances to residential sites and buildings, on any sites where there are not to be unstepped street entrances with level access to internal lifts that meet London Plan Supplementary Planning Guidance for circulation in residential buildings.

4.58 In neighbourhoods where flooding is a concern, the March 2012 National Planning Framework Technical Guidance on flood risk states that where the lowest floor level of a new development or a conversion to create a new dwelling is raised above predicted flood level, consideration must be given to providing access for those with restricted mobility.

4.59 For existing non-residential development, the guidance reflects the reality that many business and service premises in LB Hammersmith and Fulham have been built with floor slabs slightly above street level. This is the case even with modern blocks constructed before Building Regulation level access requirements first came into force.

4.60 This guidance aims to help businesses and other service providers of all sizes to consider how to remove access barriers from existing premises as required by the Equality Act 2010. For further information about Equality Act 2010 and Building Regulations access requirements see Appendix 1 below

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Key Principle - DA7

Access to facilities inside a building

Facilities that are essential to disabled people enjoying full access to a building in its planned use should normally be designed to be all-purpose. Plans submitted for new development or change of use should indicate generally how facilities and circulation will be available to each main area of general public or business visitor use, or to the main area, such as an entrance level, where fully accessible services are to be provided. Guidance on ensuring that sufficient space has been allowed for lifts, toilets, and interview rooms is given below:

- Lifts to main general public use areas should have an 1100mm wide door and lift cars that are 2000mm x 1400mm inside in accordance with BS 8300:2009. Otherwise lifts in or at the entrances to public use areas should meet building regulation Part M Approved Document requirements. They should have space at each end clear of gates and door swings for wheelchair users to approach, and 1500mm turning squares outside the doors.
- In larger buildings, plans should identify which enclosed car passengers lifts (other than fire-fighting lifts) are to have a secondary or backup power supply and are equipped to function as Evacuation Lifts for disabled people.
- Accessible unisex toilets in main general public use areas should be 2.0m x 2.2m in size, and meet the recommendations for internal fittings and layout set out in Fig 51b of BS 8300:2009. Such toilets can be regarded as meeting all user needs, as an alternative to building regulations compliant separate sex toilets with 800mm and 1200mm wide cubicles and at least one unisex wheelchair user facility.
- In a main general public or business visitor use area, the minimum size of an accessible interview room, quiet room, or one-to one support teaching room, should be 2.1m x 2.3m, as recommended in BS 8300:2009 [Fig. 30].
- New buildings or major building extensions on smaller school campuses can be designed to provide small group tutorial rooms and all-user or assisted user toilet facilities, as an element in school accessibility plan enhancements that provide ramp entrances and enhance acoustics in other existing school buildings on the campus.

4.61 The guidance above does not take the place of Building Regulations Part M 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. 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.

4.62 There are many old buildings in LBHF. Existing buildings can be made more sustainable for future use by being updated with the accessibility features, and facilities that are recommended in BS 8300:2009 and the other best practice codes that the London Plan considers should be applied when planning applications are submitted.

4.63 An accessible and inclusive local environment enables disabled and older people in particular, with family or neighbourhood support, to remain mobile and to live fully independent everyday lives.

4.64 The most efficient arrangements for inclusive access are usually those where rooms, acoustics, facilities and entrances are designed for all people to use: options that separate people with different needs can be far more costly to manage and maintain.

Key Principle - DA8

Additional facilities in larger buildings

Larger buildings may require the following additional facilities:

In major conference and education centres, and in large leisure, shopping centres, health and education buildings, there should be:

- A 3m x 4m changing room facility in the building with shower, changing table and other BS 8300:2009 recommended fittings, that is identified for exclusive use by disabled people needing care by one or two assistants. The equivalent facility in a large primary or secondary school setting is a 12m² hygiene room fitted out for either staff assistance or independent use.
- Rooms, halls and atria in the main general public or business visitor use areas of a building where people gather to learn, train, meet, dine, socialise or be entertained, should have an acoustic suitable for the use of microphone systems. Microphones in turn can amplify speech through soundfield or auditorium loudspeakers, and through the induction loop or other hearing enhancement transmitters that BS 8300:2009 recommends are in place for hearing impaired building users to tune their hearing aids into.
- Sign systems that guide people around buildings or complexes. BS 8300:2009 gives advice on how pictogram information on signs should have text to explain them, and where notches should be cut into signs so that blind users can feel where Braille text is positioned.

4.65 The guidance above does not take the place of Building Regulations that require new construction to provide accessibility to disabled people, and key features in new buildings and extensions that will prevent anyone being excluded from using them.

4.66 Larger buildings when first built or converted to new use can provide important new facilities for people to use, if comprehensively re-designed for inclusion.

4.67 In LBHF itself, larger public buildings make an essential contribution to the social infrastructure of the Borough. These range from older church buildings converted or extended for learning and public use, to new complexes that bring new business and entertainment or leisure opportunity into town centres, or that create hubs of new activity in neighbourhoods.

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Key Principle - DA9

Hotels and student accommodation

In all building types, (including hotels, nursing and residential homes, university and college halls of residence, and relatives accommodation in hospitals), a proportion of sleeping accommodation should be designed for use by disabled people.

In accordance with London Plan policy 4.5, an Accessibility Management Plan that demonstrates the highest standards of accessibility and inclusion should accompany development applications proposing visitor accommodation.

Accessible accommodation should:

- be located close to lifts on upper floors and close to reception on the ground floor;
- be located along accessible routes;
- be situated so that they have equal access to views enjoyed from standard bedrooms;
- feature an en-suite bathroom;
- cater for a wide range of disabilities;
- provide some rooms with a connecting door to an adjoining room for use by someone assisting;
- allow manoeuvring space for a mobile hoist (where ceiling hoists are not installed);
- ensure walls are capable of supporting the required fittings, e.g. grab rails and drop down support rails.

In line with BS 8300: 2009, the total number of accessible rooms as a percentage should be:

- 5% without a fixed tracked-hoist system;
- 5% with a fixed tracked-hoist system (or similar system giving the same degree of convenience and safety);
- 5% capable of being adapted in the future to accessibility.

Overnight accommodation should ensure a mixture of bathtub and continental style level access shower (Wet Room) en-suite rooms.

The requirements for accessible accommodation applies to new build, conversions and refurbishments.

4.68 Inclusive travel is a growing market opportunity yet many hotel operators fail to integrate accessible room into their business model. The council consider that disabled and older people should enjoy the same level of access and service provided to all other customers. The aim of this supplementary planning document and the London Plan Policy is to encourage all hotel operators to provide an inclusive hotel experience. This requires the whole hotel premises and experience to be welcoming and accessible, achieved through the integration of an appropriate physical environment, room fit-out and equipment and management practices, thereby implementing the London Plan aim of an accessible and inclusive visitor experience for all visitors.

4.69 It is important that proposals achieve the suitable standards of inclusive design. Applicants proposals for student accommodation will be required to demonstrate how the principles of inclusive design, including the specific requirements that some disabled people have, have been integrated, including access to all student facilities, accessibility to all accommodation rooms (encouraging social opportunities).

Key Principle - DA10

Automatic Teller Machines (ATMs)

ATMs should be located where outside ground or internal floor levels allow access to controls at the all-user recommended height.

4.70 The all user recommended height is for angled keypads, screens and slots altering elevations where this requires planning permission should be more than 900mm, but no more than 1200mm above the ground/floor where the user stands.

4.71 Where the screen or keypad is at or near horizontal, and the user has to look down to operate the ATM, no part of the screen or keypad viewed from above should be higher than 900mm. The host business should position the ATM, as advised in national guidance, on level ground, and where it can be read without excessive solar glare.

4.72 ATM's are a form of access to a service, often from a public street or pavement. They are not covered by building regulations when there is no structural opening or alteration to a regulated means of access formed in a building to install the facility, but good practice guidance ⁽⁵⁾ has been prepared to cover product design issues that in turn facilitates access to controls, software and services for disabled people.

Key Principle - DA11

Design of ramps and steps

Ramps and steps in public gardens, parks and other public places should be fitted with handrails and rest landings to suit designs and to integrate with adjoining features such as companion stairs, balustrades, parapets, or landscaping to guard open edges, and barriers installed for crowd safety reasons.

4.73 In open public spaces the principles for inclusive access design are how stairs can be designed to be safe for users with limited sight, and useable by people who need to grip a handrail going up or down, and the way that ramps are designed for wheelchair users both when propelling themselves or being helped by people who are themselves of limited strength.

4.74 Accepted best practice for ramps and companion stairs is as follows:

- ramps should be at least 1.5m wide, and have level rest landings without tactile warning surfacing at least 1.5m by 1.5m across where ramp legs join.
- On long ramps and on ramps that are busy enough for people to have to need to pass each other in both directions, ramps should be 1.8m wide.
- Where ramp legs are longer e.g. than about 3m, or where there is not a more direct companion stairway across the route for walking people to use, there should be handrails each side of ramps and around top and intermediate landings.
- Stairways should have handrails each side with extenders that run on beyond the top and lowest steps;
- Stair nosings and kerbs should visibly contrast with tread and riser surfaces in brightness and hue or stand out in other ways under natural and artificial light.

5 (Access to ATM's: UK design guidelines, Centre For Accessible Environments, 2002)

4 Design and Conservation

Key Principle - DA12

Consulting with disabled people on shared space plans

Public space when shared with cyclists and vehicles, should be designed to ensure the safety and comfort of all users of the space, including older and disabled people.

Where shared space is planned, developers should carry out consultation with communities of disabled people, in particular communities of people with little useful and with limited sight

4.75 The Department of Transport has issued research-based recommendations in Local Transport Note 1/11 “Shared Space” October 2011, for shared space design that there should be “comfort space” safe zones provided in any space shared with traffic or parked vehicles.

4.76 Disabled people can use a safe zone to make their way around a public space that is shared with vehicles, if it has a detectable kerb upstand or corduroy surface edge paving that blind people can readily identify. This can operate in conjunction with the de-cluttering, lighting and streetscape enhancement objectives for streets that are sought in the London Plan 2011.

4.77 There is a nationally standardised raised white line with tactile paving markings at each end and at intervals along it, that can be laid along tarmac surfaces to stream cyclists away from pedestrians, where routes are shared with cyclists. This should be provided wherever the flow of pedestrians or speed of approach of cyclists justifies “a safe zone” approach, and where signage has been shown to be ineffective in preventing aggressive or inconsiderate cycling.

Key Principle - DA13

Major regeneration projects

Where there are major regeneration projects involving public spaces and large facilities with public access disabled people should be enabled to engage in the design processes.

4.78 A way that has been used successfully to engage disabled people in such design processes, and where public space extends into and around large new shopping and sports complexes such as in the 2012 Olympics legacy developments, is for the developers, or the lead developer to set up a Consultative Access Group. The Consultative Access Group or CAG is drawn from national and local organisations of disabled people, to consider and review outline and more detailed plans prior to the construction of large new public spaces.

4.79 The developer is responsible for the reasonable costs of establishing the CAG, convening regular meetings, making accessible accommodation and media available at meetings, and covering administration costs. Public and private bodies who manage new public space can find it helpful for a CAG who has been involved in the planning process, to be engaged in any monitoring of new public space in use, e.g. as at Exhibition Road in Kensington, where a CAG will help to review the design assumptions.

Key Principle - DA14

Fire Safety

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.

4.80 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.

4 Design and Conservation

Shopfront Design across the borough

4.81 Shop fronts and their associated advertisements play a vital role in determining the character of our town centres and shopping streets, primarily because they are the part of the building which has direct interface with the public realm, and have an immediate relationship with the human scale. The design of new shop fronts, therefore, needs careful attention.

4.82 The Council has encouraged a significant improvement in the standard of shop front design and the aim of this document is to maintain this trend of raising the quality, and promoting better designs.

4.83 There has been a revival of interest in shop front design which stems largely from the damage that inappropriate designs and the erosion of key architectural features have caused to our shopping streets.

4.84 Many of Hammersmith and Fulham's Victorian terraces of shops were originally unified in appearance by having their shop fronts installed within a well proportioned framework of pilasters and fascias which were finished in a uniform manner and provided the architectural base for the building. The individual shop fronts were inserted within this strong framework.

Insensitive Designs

4.85 The character and individuality of many of our shopping terraces has been eroded by insensitive shopfront design. Important architectural components and interesting architectural details which make buildings attractive have been discarded over a period of many years to make way for off-the-shelf replacements. It is now widely recognised that shopfronts and signs which disregard the architecture above and around them are the most damaging to an areas character and appearance.

4.86 Nevertheless, the Council still receives some applications for either new shop fronts or illuminated signs which involve designs that are unrelated to the buildings which house them and their location. The inherent qualities of a building, such as architectural character, scale and proportion are largely ignored, resulting in proposed alterations which are unsympathetic and inappropriate to the building and local street scene.

4.87 The shopfront with large areas of uninterrupted glazing in a standard square section aluminium frame and bulky internally illuminated box signs together with the crude imposition of a corporate identity, are usually the most visually discordant elements in shopping areas. The integrity of the building and character of the street is eroded by such insensitive proposals.

4.88 Fascia signs, canopies and roller shutters are often regarded as a later addition distinct from the shop front and building façade. This is inappropriate in most cases, creating a projection which ignores both the design and structure of the building. Excessive fascia depth can also destroy the unity of both the façade and shopping street. Standard projecting box signs can be equally as intrusive where they are unrelated to the architectural character and design of the building or context of other neighbouring signs. The cumulative effect of these when viewed along the street can be one of visual chaos.

4.89 These guidelines are aimed at encouraging an approach to shop front design which acknowledges the relationship between the proposed shop front and the building into which it is set. The age and architectural character of the building will determine the approach to the design of the shop front.

4.90 The opportunity will be taken with each application to apply this guidance in conjunction with Development Plan policies to inspire good design adapted to individual circumstances. Thus each approved application could add to the general upgrading in the quality of shop fronts whilst enhancing the attractiveness and character of the street. The proposed designs for new shop fronts should recognise this aim and seek to be appropriate to their location.

4.91 The cumulative effect of better shopfront designs will be the enhancement of the visual appearance of the Boroughs shopping streets, thereby improving first impression and quality for users, visitors and potential investors. The emphasis is on good quality design of shop fronts and advertisements which will enhance the character of the shopping street and encourage investment and spending, bringing rewards which will ultimately benefit traders.

Planning Permission

4.92 Planning permission is required for new or replacement shop fronts or any other alterations materially affecting the external appearance of the building. Routine maintenance, such as replacing a door or window with one of the same design and materials, or repainting the existing shop front does not normally require planning permission.

4.93 When submitting planning applications for new shop fronts, applicants should submit elevation drawings, sections and floor plans showing the proposed shop front in its context. Its relevant context may vary from solely the upper floors of the building to a setting which incorporates existing shop fronts adjoining the application site. Drawings should be annotated to make reference to proposed materials and colour.

Building regulations

4.94 Even if planning permission is not required, approval for changes to a shopfront may be required under the Building Regulations. These make sure that buildings are constructed or adapted in the right way, and with suitable materials. In particular, Fire Regulations have to be checked both from the structural aspect and also to ensure fast and easy escape from a building. Building regulations are completely separate from planning control: approval under them does not mean that planning permission has been given, nor does a planning permission imply approval under the Building Regulations. Applicants are advised to contact the – Building Control for further guidance and advice.

4 Design and Conservation

Policy Context - Shopfront Design

National Policy

The NPPF encourages good design. It warns that design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions should not be accepted. It states that high quality and inclusive design should be the aim of all those involved in the development process. A key objective of these policies is to ensure that developments respond to their local context and create or reinforce local distinctiveness.

London Plan

The London Plan promotes good design. It acknowledges that the quality and function of neighbourhoods and places, and local character, contribute to making London a special place and improve the quality of life.

Local Plan

Local Plan policy DC1 states that all development should “*create a high quality environment that respects and enhances its townscape context and heritage assets*”, whilst Local Plan policy DC5 Shopfronts states, amongst other things, that:

“In order to improve the appearance of the borough’s streets, the council will encourage high quality shopfronts that are designed in sympathy with the age and architectural style of the building concerned, achieving a satisfactory relationship between the ground floor and the rest of the building. The scale of the shopfront should be carefully considered with its proportions, detailing [including vertical and horizontal subdivision] and materials, which have an affinity with the building”

In addition, policy DC9 Advertisements states that, amongst other things:

“The council will require a high standard of design of advertisements which are in keeping with the character of their location and do not impact on public safety and will resist excessive or obtrusive advertising and inappropriate illuminated signs. The design of advertisements should be appropriate to their context and should generally be restrained in quantity and form. The council will use its powers to remove unsightly and inappropriate signs”.

Key Principles

Key Principle - SD1

Shopfront Design

In order to improve the appearance of our streets, the council will encourage high quality frontages that are designed in sympathy with the age and architectural style of the building concerned, achieving a satisfactory relationship between the ground floor and the rest of the building. Architectural detail such as decorative pilasters, console brackets and other attractive features should be retained intact and restored where necessary.

4.95 The scale of the shop front needs to be carefully considered with its proportions, detailing [including vertical and horizontal subdivision] and materials, which have an affinity with the building. It may be appropriate in areas of consistent terraces or shopping parades for the shop front to reflect the scale and height of stallrisers and fascias of its neighbours thereby harmonising with the overriding character of the street scene.

4.96 All buildings, old and new, will provide a framework into which a shop front can be inserted. Many of Hammersmith and Fulham's 19th century buildings provide a framework of classical elements – pilasters, fascia and cornice which have a proportional relationship with the building. These elements are an integral part of the building façade and should be regarded as such in any design. The area for change is clearly defined within this framework. It is visually disruptive both for the building and street when the new shop front spills out beyond this framework obliterating architectural decoration and features.

4.97 It is important that redevelopment proposals which include retail areas similarly provide a framework into which a shop front of a suitable scale can be inserted. In some schemes it would be appropriate for the detailed design of the shop front to be considered at the same time as the architectural detail on the upper floors in order to ensure that the elevation in its entirety is consistent in terms of design and quality. An area of appropriate scale to accommodate a fascia sign for incoming shop tenants should be clearly defined.

4.98 Provision should be made for satisfactory integration of building services in the overall design where these cannot be located in less sensitive locations. The design of the shop front should not be compromised by unsightly rows of louvres which interfere unacceptably with the proportions of the ground floor. Installations such as louvres and access to refuse stores should be designed to be in keeping with and subservient to the shop front appearance and proportions. In some instances, such installations should be screened by decorative panels that relate to the features and materials of the shop front or building.

4.99 Existing shop windows should not be blanked out by internal or external installations or applications to the glazing in order to retain active frontages. Where a shop front is part of a parade of shops of matching or similar design or within one building, the frontage including any signage should be designed to retain the unified appearance of the parade.

4.100 Fully openable shopfronts will be resisted. They visually erode the base of the building and destroy the established proportions of the façade, and the relationship between the ground floor and the rest of the building. Where the building forms part of a shopping parade, the continuity, cohesion and rhythm of the shopping frontage will be interrupted to the detriment and harm of the local townscape.

4.101 The emphasis is on quality and the flexibility of the design to adapt to individual circumstances. Good shop front design requires skill and sensitivity. Many of the most successful shop fronts in Hammersmith and Fulham have evolved through negotiation. Early consultation with the Council's Planning Division is encouraged.

4 Design and Conservation

Key Principle - SD2

Shopfront access

The Council will expect new or altered shop fronts to accommodate the needs of disabled people.

In particular the following should be taken into account:

- Doorways should therefore be at least 800mm wide, should have doors that are easy to open and should provide a level entrance or a non-slip ramp within the unit
- Entrance doors should be clearly distinguished from their surroundings.
- Vision strips should be introduced on large unbroken areas of glazing.

4.102 The design of shop fronts should secure easy access for everyone by taking account of differing needs, such as the needs of people with partial sight and people who have an ambulant disability and use a walking aid such as a stick or wheelchair ⁽⁶⁾. Large areas of glazing can be confusing and potentially dangerous for partially sighted people and children.

Key Principle - SD3

Shopfront canopies & blinds

Shopfront blinds should be appropriate to the period and character of the building and sensitively integrated into the overall design. Blind boxes should not project forward of the fascia panel, nor obscure any architectural detail or features. Drawn sections will be required with the application.

Canopies and blinds should:

- Be located between the pilasters, respecting the architectural sub-division of the building or terrace. They should not span more than one unit.
- Only be sited at ground floor fascia level. Blinds will not be permitted over doors alone or upper storey or basement windows
- Not interfere with the visibility of traffic signals or signs

4.103 Blinds can add colour and interest to the street scene. They should be appropriate to the period and character of the building and sensitively integrated into the overall design.

4.104 The need to achieve sufficient headroom on the public footway beneath the blind means that the mounting position of the blind needs to be considered in the overall context of the architectural features of the building and the shop front and fascia design. The erection of a blind will not always be feasible given these considerations. The purpose of canopies and blinds should be to afford weather protection, not act as a permanent and prominent substitute for a fascia or projecting sign. They should be retractable so that they may be pulled down only when required and so that the fascia is not permanently obscured.

6 (See the section of the SPD on Accessible and Inclusive Design)

4.105 Traditional canvas roller blinds were a common addition to 19th century shop fronts. These blinds were housed in boxes which were traditionally located internally behind the fascia or retracted to form a moulded panel within the cornice above the fascia. This model should be used for any proposed blinds on the 19th century buildings.

4.106 Rigid bolt-on blinds made of acrylic or similar shiny materials can often mar an otherwise pleasant shop front design. They are often erected as a means of increasing advertising space. Their structure tends to obscure the fascia and introduces a dominant shape which would be out of character with much of Hammersmith and Fulham's townscape.

Key Principle - SD4

Shopfront burglar alarms & fire alarms

Burglar alarms & fire alarms should:

- not be mounted on the front elevation of the building, and key architectural features such as corbel brackets on the pilasters should be avoided.
- be positioned on the soffit or on the door returns of recessed entrances
- on new shop fronts be incorporated into the design of the frontage, where it should be possible to modify one part of the design to successfully accommodate the unit.

4.107 Burglar alarms and fire alarms are necessary for many premises, their insensitive siting can be visually detrimental to a building. They should not be mounted on the front elevation of the building and on key architectural features.

Key Principle - SD5

Shopfront roller shutters

Roller shutters covering the whole of the frontage of an individual ground floor façade will be discouraged. Efforts should be made to minimise any impact.

Applicants should:

- Plan for and accommodate roller shutters internally, where possible
- Incorporate security glass in shop windows as an alternative to shutters.
- Only provide security grilles, where absolutely necessary and these should be open mesh and located internally.
- Mount all box housings containing roller shutters or grilles internally behind the fascia.
- Consider removable external window security grilles of an open mesh form in certain circumstances.

4.108 Roller shutters covering the whole of the frontage of an individual ground floor façade will be discouraged as they inevitably detract from the architectural integrity of the building. Where they form part of a continuous run of security shutters along a shopping parade, they have a particularly deadening effect on the street scene.

4 Design and Conservation

4.109 Shop traders are entitled to protect their goods and premises and many feel this is best achieved by installing security shutters. However solid roller shutters give the impression that an area is particularly unsafe and tend to provide a canvas for graffiti artists or flyposting to the detriment of the local visual amenity.

Key Principle - SD6

Shopfront advertisements

In the interests of amenity the design of advertising should respect and enhance its locality and use materials of high quality. Particular care will be necessary within conservation areas. All signs should be designed as an integral part of the shop front and not as free-standing items.

The following should be considered for all shop front advertisements:

- Fascia panels should be in proportion with the shop front and building and should be designed as an integral part of the shop
- Where corbels / console brackets remain at the top of the pilasters, the fascia panel should normally be no deeper than the height of these architectural features and positioned below the cornice line, and line through with the capital mouldings on the pilasters.
- New fascia panels should not project forward from the face of the surrounding framework, and should not extend uninterrupted across a number of distinct buildings or architectural bays.
- The temptation to conceal a bulkhead of a suspended ceiling by increasing the depth of the fascia sign should be avoided. A visually more pleasing solution is to set the false ceiling back from the glazing line.
- The size of the lettering should be related to the area of the fascia.

Projecting or hanging signs

The following should be considered for all projecting or hanging signs:

- They should be at fascia level and fixed centrally on a pilaster avoiding damage to architectural detail and ornamentation.
- The size of the sign should be no greater than 900 x 600mm
- The leading edge of the sign should be set back from the kerb by at least 500mm, and the sign should allow for a clearance height of at least 2.6m from the underside of the sign to the pavement [similar dimensional clearances should be used for canopies and awnings].
- No more than one sign per business per elevation will normally be acceptable
- On multi-occupied premises, advertisements should be restricted so as to avoid the appearance of clutter and should be displayed so as to achieve harmony in the appearance of the elevation and in the context of the street scene.

Design and Conservation 4

4.110 All signs should be designed as an integral part of the shop front and not as free-standing items. "A" boards on the pavement outside the shopfront cause clutter and can be particularly hazardous for pedestrians, especially partially sighted and blind persons.

4.111 Projecting or hanging signs can add interest to the appearance of the shopfront and street. In some cases, the scope for fixing a projecting sign may be limited or non-existent due to minimum clearance distances for safety reasons, and the architectural detailing of the shopfront or building concerned.

4.112 Visually, the fascia is the most prominent part of the shopfront and in some cases the whole building. It is therefore important that any proposed fascia is appropriate. Traditionally the fascia displayed the name of the shop, the nature of the business and the street number. This is still important today. The fascia area to receive this information is usually determined by the framework of the buildings ground floor. In some instances, where there is no natural fascia zone to install signage, such as in some modern designs, internal signage displayed behind or within the glazing of the shop front would be acceptable.

4.113 Where premises are multi-occupied advertisements should be restricted so as to avoid the appearance of clutter and should be displayed so as to achieve harmony in the appearance of the elevation and in the context of the street scene.

4.114 Individually applied lettering or hand-painted signs will be encouraged as they give the shop a unique character respecting the individual approach necessary for each shopfront project. Gilding on a dark background can be visually prominent and particularly effective at night where it remains clearly visible.

4.115 Where illumination is considered to be appropriate it should be achieved by using unobtrusive light fittings without, or with limited physical impact [e.g. LED strips, LEDs behind lettering or on the edges of individual letters. Individual back-lit or halo-lit letters can give a subtle but effective form of illumination and will avoid clutter of multiple light fittings across the fascia. Lighting from an external source e.g. swan neck lamps or light troughs will be appropriate for traditional shopfronts or public houses. In order that they are a discrete addition to the elevation, they should be restricted in size and number.

Signs

4.116 Alterations to signs and signboards may require consent under the Advertisement Regulations. Detailed drawings which show the design of the proposed signs, the proposed position and materials, in relation to the shopfront and surrounding architectural detail should be submitted with any application. Applicants are advised to consult the Regulations and contact the councils Planning Division for further advice on the type of signs considered to be appropriate for a particular location.

Conservation Areas

4.117 Many areas of special architectural or historic interest within Hammersmith and Fulham are designated as conservation areas in order to protect their character and appearance. Shop fronts of interest and character make a significant contribution to the street scene within conservation areas, and so their retention will, where appropriate, be sought.

4.118 Sometimes, original features survive hidden under later installations. These should be revealed and retained as they are likely to contribute to the special architectural and historic interest of the area.

4.119 The design of a new shop front should preserve or enhance the character or appearance of the conservation area by the sensitive use of appropriate design styles and materials.

4 Design and Conservation

Listed Buildings

4.120 Any alteration to a shop front which is part of a listed building will require Listed Building Consent if the proposed works affect the special character of the building. Even relatively small-scale changes to the exterior such as those to shop window frames and decorative detail would require listed consent, and may require planning permission. In addition, repainting and alterations to the interior of the shop where they affect the special character of the building require consent.

Local Register of Buildings of Merit

4.121 There are many buildings in the borough, in addition to the listed buildings, which are of merit and which contribute to the character of the locality because of their townscape value, architectural quality, or historic associations. These buildings are included in a Local Register contained within a Supplementary Planning Document. Although alterations to Buildings of Merit on the Local Register do not require Listed Building Consent, planning permission is required for new or replacement shop fronts or any other alterations materially affecting the external appearance of the building. Development will not be permitted if it would result in harmful alteration to Buildings of Merit identified on the Local Register. Any alterations should only be carried out in a way that respects the scale, character and materials of the building.

Additional Guidance

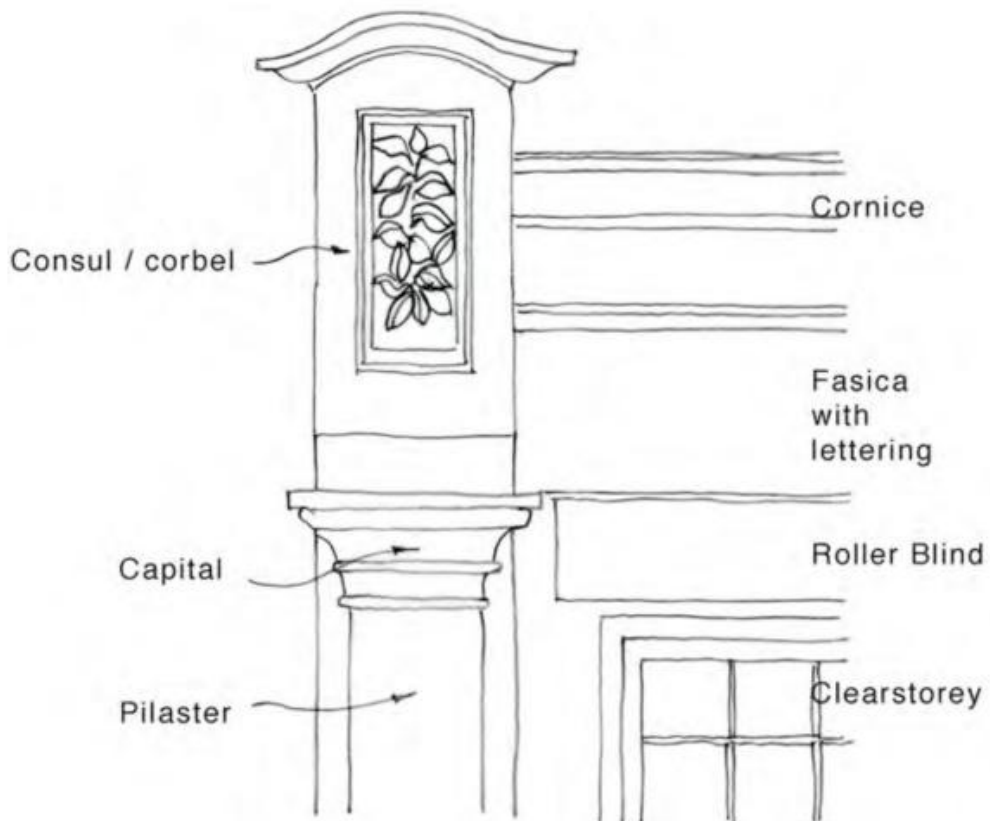
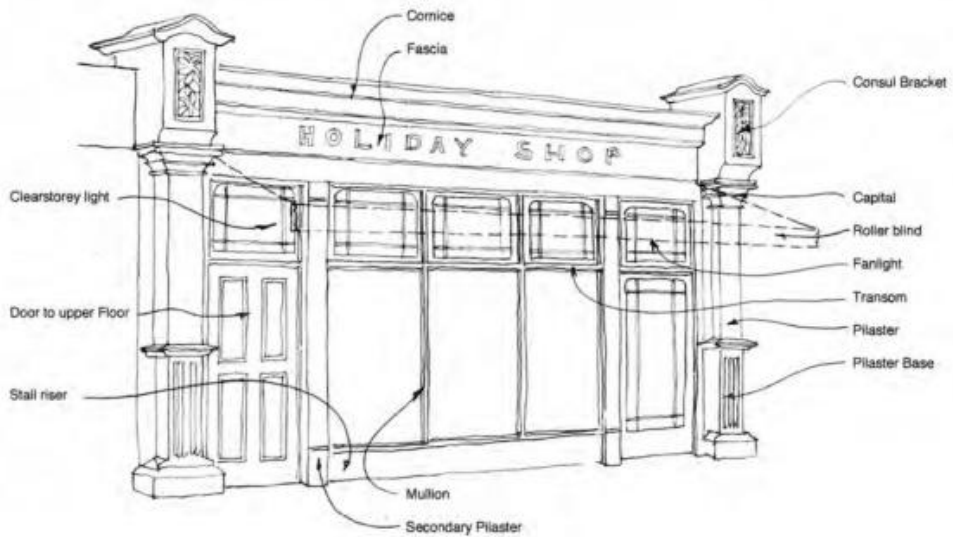
4.122 The council has issued guidance on shopfront design as part of the guidelines for frontage improvements to nos. 54 – 108 Uxbridge Road, a key terrace of buildings on the Local Register of Buildings of Merit forming an important frontage in Shepherds Bush Town Centre and Shepherds Bush conservation area.

4.123 The shopfront design guidance in the Uxbridge Road document has been informed by, and is complementary to, the generic guidance in this publication.

4.124 The Department has also contributed to a shopfront design study for Latymer Court in Hammersmith Road, in conjunction with the Latymer Court Freehold Company. The aim of this project is to encourage the general improvement to the ground floor frontages of the building with a consistent design based on the proportions and form of the original shopfronts.

4.125 You are encouraged to discuss your proposals at an early stage with planning officers. More detailed advice on the appearance of shopfronts and signs for particular locations within Hammersmith and Fulham can be obtained by contacting the Planning Division.

Example shopfronts



4 Design and Conservation

Archaeology and Heritage Assets

4.126 The Borough's rich and varied townscape character that is evident today is largely a result of its historical development. Archaeological remains including prehistoric, Roman, Saxon, Medieval and post Medieval have been discovered in the Borough in areas which today form the focus for development and new information on the borough's archaeological heritage is regularly being provided through excavations linked to redevelopment schemes.

4.127 The current townscape and landscape structure of the Borough can be clearly traced through the successive layers of development over the past two hundred years. Most of the Borough's earliest buildings are now statutorily listed along with historic parks and gardens, and most of the early patterns of development are recognised in conservation area designation. For example, the small crossroads and village greens that first shaped the Borough are now the focus of conservation areas at Parsons Green, Walham Green, Brook Green, Starch Green and Shepherds Bush Green. There are also a number of buildings and artefacts of local importance and interest.

4.128 Historic England has identified one ancient monument and 15 archaeological priority areas (APAs) in the borough. These are identified on the Local Plan Policies Map and are provided with a brief description below. In some cases further details may be found in the identified conservation area character profiles.

Policy Context - Archaeology and Heritage Assets

National policy

The National Planning Policy Framework (NPPF) published in March 2012 has as one of its 12 policies to:

“conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”.

Section 12 of the NPPF is entitled ‘Conserving and enhancing the historic environment’ and condenses the former PPS5. However, it maintains the spirit of the PPS in upholding the general policy that heritage assets should be “sustained” and “enhanced” for the benefits they bring to the community.

English Heritage is the Government's lead advisory body for the historic environment and has a statutory role in the planning system. The Greater London Archaeology Advisory Service (GLAAS) is part of English Heritage London Region and seeks to promote understanding and enjoyment of the archaeological heritage through its protection, management and interpretation.

London Plan

London Plan **policy 7.8** is concerned with heritage assets and archaeology. This states in sub policy F that:

“Boroughs should, in LDF policies, seek to maintain and enhance the contribution ofburied heritage to London’s environmental quality, cultural identity and economy as part of managing London’s ability to accommodate change and regeneration”.

Local Plan

The council’s Local Plan **policy DC1** on the Built Environment states that:

“all development in the borough.... should create a high quality urban environment that respects and enhances its townscape context and heritage assets” and adds that development throughout the borough should “protect and enhance the character, appearance and setting of the borough’s conservation areas and its historic environment, includingarchaeological priority areas and the Fulham Palace Moated Sites scheduled ancient monument”.

Local Plan **policy DC8** on Heritage and Conservation states that, amongst other things:

” The presumption will be in favour of the conservation and restoration of heritage assets, and proposals should secure the long term future of heritage assets. The more significant the designated heritage asset, the greater the presumption should be in favour of its conservation ”.

Key principles

4.129 The archaeological key principles establish more detailed guidance on the application of policies within the Local Plan. In applying these policies the council will use Historic Environment Planning Practice Guide which has been published to assist local authorities, owners, applicants and other interested parties in applying archaeological principles.

4 Design and Conservation

Key Principle - AH1

Information requirements for applications for consent affecting heritage assets

The council will require an applicant to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance.

4.130 The level of detail should be proportionate to the importance of the heritage asset (see Glossary) and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the relevant historic environment record should have been consulted and the heritage assets themselves should have been assessed using appropriate expertise where necessary given the application's impact. Where an application site includes, or is considered to have the potential to include, heritage assets with archaeological interest, the council will require developers to submit an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation. The council will encourage developers to inform local archaeological societies of the start of any archaeological excavation and to 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.

4.131 This information together with an assessment of the impact of the proposal should be set out in the application (within the design and access statement when this is required) as part of the explanation of the design concept. It should detail the sources that have been considered and the expertise that has been consulted.

4.132 The council will not validate applications where the extent of the impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents.

4.133 See also Greater London Archaeology Advisory Service (GLAAS) Charter as a source of archaeological best practice, pre-app advice and best practice principles.

Key Principle - AH2

Protection of Heritage Assets

There will be a presumption in favour of the conservation of ~~designated~~ heritage assets and the more significant the ~~designated~~ heritage asset, the greater the presumption in favour of its conservation will be. The council will seek to identify and assess the particular significance of any element of the historic environment that may be affected by the relevant proposal (including by development affecting the setting of a heritage asset) taking account of:

- (i) evidence provided with the application
- (ii) any designation records
- (iii) the historic environment record and similar sources of information
- (iv) the heritage assets themselves
- (v) the outcome of the usual consultations with interested parties; and
- (vi) where appropriate and when the need to understand the significance of the heritage asset demands it, expert advice (from in-house experts, experts available through agreement with other authorities, or consultants, and complemented as appropriate by advice from heritage amenity societies).

Where the loss of the whole or a material part of a heritage asset's significance is justified, the council will require the developer to record and advance understanding of the significance of the heritage asset before it is lost, using planning conditions or obligations as appropriate.

4.134 In considering the impact of a proposal on any heritage asset, the council will take into account the particular nature of the significance of the heritage asset and the value that it holds for this and future generations. This understanding will be used by the council to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.

4.135 If the evidence suggests that the heritage asset may have a special significance to a particular community that may not be fully understood from the usual process of consultation and assessment, then the council will take reasonable steps to seek the views of that community.

4.136 The council will take into account:

- the desirability of sustaining and enhancing the significance of heritage assets, and of utilising their positive role in place-shaping; and
- the positive contribution that conservation of heritage assets and the historic environment generally can make to the establishment and maintenance of sustainable communities and economic vitality.

4.137 The council will take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design will include scale, height, massing, alignment, materials and use.

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4.138 Where there is evidence of deliberate neglect of or damage to a heritage asset in the hope of obtaining consent, the resultant deteriorated state of the heritage asset will not be a factor taken into account in any decision.

4.139 Where loss of significance is justified on the merits of new development, the council will not permit the new development without taking all reasonable steps to ensure the new development will proceed after the loss has occurred by imposing appropriate planning conditions or securing obligations by agreement.

4.140 Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset will require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden will be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, including scheduled monuments, grade I and II* listed buildings and grade I and II* registered parks and gardens, will be wholly exceptional.

4.141 Where the application will lead to substantial harm to or total loss of significance to designated heritage assets the council will refuse consent unless it can be demonstrated that:

- (i) the substantial harm to or total loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss; or
- (ii) (a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - (b) no viable use of the heritage asset itself can be found in the medium term that will enable its conservation; and
 - (c) conservation through grant-funding or some form of charitable or public ownership is not possible; and
 - (d) the harm to or loss of the heritage asset is outweighed by the benefits of bringing the site back into use.

4.142 To be confident that no appropriate and viable use of the heritage asset can be found, the council will require the applicant to provide evidence that other potential owners or users of the site have been sought through appropriate marketing and that reasonable endeavours have been made to seek grant funding for the heritage asset's conservation and to find charitable or public authorities willing to take on the heritage asset.

4.143 Where a proposal has a harmful impact on the significance of a designated heritage asset which is less than substantial harm, in all cases the council will:

- (i) weigh the public benefit of the proposal (for example, that it helps to secure the optimum viable use of the heritage asset in the interests of its long-term conservation) against the harm; and
- (ii) recognise that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

4.144 Not all elements of a Conservation Area will necessarily contribute to its significance. The above policy will apply to those elements that do contribute to the significance. When considering proposals, the council will take into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole. Where an element does not

positively contribute to its significance, the council will take into account the desirability of enhancing or better revealing the significance of the Conservation Area, including, where appropriate, through development of that element. This should be seen as part of the process of place-shaping.

4.145 The process of investigating the significance of the historic environment, as part of plan-making or development management, should add to the evidence base for future planning and further the understanding of our past. The council will make this information publicly available, including through the relevant historic environment record.

4.146 A documentary record of the past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the past will not be a factor in deciding whether a proposal that would result in a heritage asset's destruction should be given consent. The extent of the requirement to record the past should be proportionate to the nature and level of the asset's significance. Developers should publish this evidence and deposit copies of the reports with the relevant historic environment record. The council will require any archive generated to be deposited with a local museum or other public depository willing to receive it. The council will impose planning conditions or obligations to ensure such work is carried out in a timely manner and that the completion of the exercise is properly secured.

Scheduled Ancient Monuments

Fulham Palace

4.147 Historic England has classified the Fulham Palace Moated Site as a Scheduled Ancient Monument. This is the most important archaeological site in the borough and lies in the Bishops Park Conservation Area. Excavations at Fulham Palace have uncovered Neolithic pottery, flint implements and features dating to circa 3,000-4,000 BC. Some of the flints may date to the even earlier Mesolithic period.

4.148 There is also evidence of Iron Age occupation, but the most extensive settlement evidence to date is of the Roman-British period, 3rd-4th centuries and possibly 5th century AD. Ditches, pits, gravel surfaces, coins, pottery, animal bones and items of women's jewellery; as well as building materials, stone brick and tiles, infer a substantial settlement. Its exact nature though is not yet known. The settlement appears to be centred on a road or trackway, probably in use since pre-Roman times, connecting with a ford across the Thames, linking Fulham with Putney. There is evidence of similar occupation there.

4.149 The gardens to Fulham Palace were first documented in the 16th century when Bishop Grindal established a botanic garden between 1559-70. Bishop Compton (Bishop between 1675-1713) was a horticulturalist and collector of rare plants and his collection included species from North America. It is thought that a formal garden layout recorded by Rocque in 1746 was the work of George London who advised Bishop Compton during the 1670s. These gardens were replaced by a less formal layout for Richard Jarvis in the 1760s. Further alterations took place between 1813-28 and 1828-56 and were undertaken by Bishops Howley and Blomfield. In 1973, Fulham Palace ceased to be the official residence for the Bishops of London and the gardens were opened as a public park.

Archaeological Priority Areas

4.150 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

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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.

Fulham Village APA

4.151 This was the main settlement of the parish from Saxon times onwards and now lies in the Bishops Park Conservation Area. According to documentary evidence, the principal Medieval settlement at Fulham was concentrated on the eastern side of Fulham High Street in the Fulham Park Gardens Conservation Area. However, this settlement included the parish church (All Saints for the whole of the Borough) and the Bishop's Manor House at Fulham Palace, which are situated within the Bishops Park Conservation Area. The Bishops of London held the Manor from 704, when the Bishop of the East Saxons bought the estate from the Bishop of Hereford. The Medieval palace was demolished in 1506. By 1086, the time of the Domesday Book, Fulham appears to have been fairly prosperous with ample ploughland, meadows, woodland and a small weir, or fish trap. Areas of land were allocated to Normans and some burgesses of London, the latter of whom were possibly the predecessors of the affluent Londoners who held large estates in Fulham during the Medieval period.

4.152 There is no evidence from the Domesday Survey that in the 11th century Fulham village possessed a church. However, the first known rector was appointed in 1242 when a church must have existed. This Medieval church at All Saints was demolished in 1880 except for its 15th century tower. Bear Street was the original name for Fulham High Street, and it was used up to the end of the 18th century. Prior to the construction of the old Fulham bridge across the river Thames in the early 18th century, Bear Street extended from the river front, where the ferry docked, for a short distance north-easterly and then almost due north to the high ground by Colehill. Here the way divided, with one way extending north-west to Hammersmith (the existing Fulham Palace Road), and the other way extending eastwards to Walham Green.

Ravenscourt Leper Hospital APA

4.153 This area (now to the south of Ravenscourt Park station) had long had a reputation as a healthy place to live and provided the location for the most distant of the leper hospitals set up in and around London at the end of the mediaeval period. Known to have been in use from c. 1500 to the mid-17th century. The APA is situated within the Ravenscourt and Starch Green Conservation Area.

Ravenscourt Manor House (Palingswick) APA

4.154 The APA is situated within the Ravenscourt and Starch Green Conservation Area south of Ravenscourt Park. The house was first recorded in the 12th century and became one of the most significant houses after Fulham Palace. By 13th century there was a large moated mansion situated in the ecclesiastical manor of the Bishop of London. In 14th century it was much enlarged and probably had an outer court occupied by Alice Perrers, the companion of Edward III's declining years. It was rebuilt as a brick mansion in the 16th century and again in 18th century. The Georgian brick building was too badly damaged by incendiary bombs in 1941 to be refurbished and was demolished.

Hammersmith Creek, Queen Caroline Street and Broadway APA

4.155 The APA lies within the King Street East, Mall and Hammersmith Broadway Conservation Areas. includes the possible original Saxon settlement of Hammersmith around the mouth of the now culverted Creek. It includes the Medieval and post-medieval settlement of Hammersmith along riverfront,

and Roman coins and pottery have been uncovered from foreshore of Queen Caroline Street and Broadway. A 17th century convent and 17th century Portuguese embassy were on Hammersmith Road. The town brewery was established in 1780 by Thomas Cromwell and existed near the mouth of the Creek.

4.156 The village of Hammersmith was described in the mid 1720's by Defoe as "formerly a long scattering place, full of gardeners grounds with here and there a house of some bulk." In the first quarter of the 19th century Hammersmith Village was extending outwards from the Broadway and its principal thoroughfare King Street was lined with terraces.

Winslow Road Area APA

4.157 This APA, consisting mainly of the Hammersmith Embankment development site, has revealed prehistoric and Saxon settlements, a 17th century mansion, subsequently Brandenburg House, and an 18th century theatre. On the southern edge of the grounds of Brandenburg House an early Saxon settlement of the 5th/6th centuries AD was discovered during trial archaeological excavations in the 1980's. This is one of the most important early Saxon settlements in the London area discovered to date. Finds include the sunken floors of several huts, pottery, and the skeleton of a horse.

Parson's Green APA

4.158 Situated in the parsons Green Conservation area this APA is centered on Roman, medieval and post-medieval settlement around the green and Peterborough House to the south. The area was formerly part of the Manor of Fulham. Records state that Peterborough House once stood on the south-east of the green, having been built on the site of a famous mansion, formerly as Brightwells. Near to Peterborough House stood an ancient mansion which was formerly owned by Sir Edward Saunders, Lord Chief Justice of the King's Bench in 1682, and later became the residence of the famous novelist, Samuel Richardson.

Walham Grove APA

4.159 Medieval and post-medieval settlement and market place of the parish.

Sandford Manor House APA

4.160 The APA on the south side of King's Road extends from the borough boundary east of Stamford Bridge west as far as Cambria Street, and south to include Glyn Close. It relates to Sandford Manor House, a Grade II* listed building which was a sub-manor house from medieval times. The post-medieval manor house had saltpetre works, stoneware and tin-glaze pottery works, and cask and dye works within its curtilage

William De Morgan Pottery Works (Townmead Road Estate) APA

4.161 Late-19th and early-20th century, of interest to collectors and historians of the Arts and Crafts Movement. In 1888 the business was moved, for the last time, to Sands End (Fulham), where De Morgan began a ten-year partnership with the architect Halsey Ricardo. It was here that De Morgan created much of his finest work.

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Hurlingham Park APA

4.162 Neolithic finds and 17th century plague pit. From before 1066 the land within this conservation area belonged to the Bishops of London and formed nursery gardens and meadows along the riverside. Hurlingham House, to the south of the APA, which was built from 1760 as a villa fronting the River Thames, now forms the main part of the Hurlingham Club House.

Broomhouse APA

4.163 Medieval and possible Saxon settlement.

Martin Brothers Pottery Works APA

4.164 Site of 19th century works of interest to collectors and historians. The Pottery was started in Fulham in 1873. The pottery is considered to represent the transition from decorative Victorian ceramics to twentieth century studio pottery in England.

Lygon Almshouses and corner of Finlay Street/Fulham Palace Road APA

4.165 This area was occupied in Neolithic times. Site of the village windmill from at least the beginning of the 15th century.

Rowberry Close APA

4.166 The riverside area has been occupied since pre-historic times. Archaeological work in the 1970's, during the redevelopment of Rosebank and adjoining wharves, produced Neolithic flint implements and pottery (circa 3,000 BC), late Iron Age pottery and an isolated Roman coin of the 4th century AD.

4.167 There is a high and dry sandbank here in a marshy stretch along the edge of the Thames and there may well have been a ford across the Thames in earlier times. The trackway connecting it is today represented by Crabtree Lane and Lillie Road.

4.168 Until the 19th century there was evidence of man-made earthworks along the riverside, possibly dating back to pre-Roman times.

4.169 Next to the Crabtree public house was a pottery operating in the 18th century and referred to in contemporary documents as the pot-house. Some green-glazed waste pottery fragments, possibly from this site, were found on the Crabtree Wharf opposite, during its redevelopment as Adam Walk in the 1970's.

King Street APA

4.170 Iron Age prehistoric earthwork, a short section of which was excavated at 120-124 King Street. May have protected a single farmstead, but may have been a more substantial settlement - a "proto-town", or possibly have been a long linear territorial boundary.

Archaeology elsewhere in the borough

4.171 The archaeological heritage of the borough does not stop at the boundaries of the ancient monument and the APAs, and heritage assets have been found elsewhere in the borough. The Greater London Archaeological Advisory Service (GLAAS) are of the view that it would be beneficial to have an APA designation along the whole riverside/foreshore area of the borough, given the highly significant potential of the River Thames to yield archaeological finds and sites both generally and in this section of the River more specifically.

4.172 The council has designated its existing APAs through the Local Plan process and are identified on the Policies Map. The council considers this to be the appropriate process for such designations, and whilst it is open to the possibility of a riverside/foreshore APA it is not intending to designate a new APA through this SPD. Instead it acknowledges the possibility of designating an additional APA at a future review of the Local Plan and recognises the Thames to be an important area of archaeological potential.

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