



The Hammersmith Society

LBHF : Comments on Consultation Draft for 'Planning Guidance Supplementary Planning Guidance (SPD)'

The Hammersmith Society have reviewed the draft document and have the following comments:

- We support the Principles and supporting text as set out in the document.
- We note that in large part the policies set out are similar to those currently contained in the Planning Guidance Supplementary Planning Guidance and Development Management Local Plan documents.
- It is unfortunate that the draft of the Council's document has preceded the recent issue of the latest draft of the London Plan, which has just been published. It would be helpful if any major changes to the London Plan which impact on the Council's Plan could be highlighted in any final version.
- The Society has previously commented on the Council's draft Local Plan and participated in the E.I.P. We understand that a final version of the Plan, which has been approved by the Inspector, will be put forward for ratification by the Council in the New Year.
- The reference to a 'future review of the Core Strategy' (Para 4.166) is confusing as we understand that the term has now been replaced by 'the Local Plan'.
- We suggest that the major section and sub-section headings are increased in font size (or type or colour) so that they stand out more.
- As regards the layout and order of the proposed SPD, we found the Design and Conservation sub-sections confusing in that 'Conservation Area Guidelines', 'Buildings of Merit' and 'Archaeology and Heritage Assets' have been interspersed with other topics. We suggest that it would be more logical if these could be kept together, and also that 'Basement and Lightwells' and 'Shopfront Design' are grouped, and the section concluded with 'Accessible and Inclusive Design'.
- There appear to be a number of omissions in this draft including a section on Light Pollution for example (Although there are brief references in the text Paras. 5.61 – 5.65 and Appendices 4f and 4g). There is no 'Principle' covering nor reference in the Index. Under 5.64 and 5.65, please change 'should' to 'must' in each case.
- There is no reference to 'Continuity and Historic Names' (Existing SPD Design Policy 57), for example : It would be helpful to have a schedule, which lists the existing SPD Design, Amenity and other policies and where they will be found

in the revised documents. Some items (Eg. Roller Shutters and Burglar and Fire Alarms are covered in the draft but not included in the Index).

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- Housing : We are pleased to note that the Council is retaining its higher standards policy for amenity space (Key Principle HS1) than the London Plan, and that the SPD includes space standards for conversions (HS3).
- Although it is explicit that the 'Conservation Area Guidelines' are intended specifically for properties within these Areas, it would be useful to identify that these can also be applied outside Conservation Areas on the basis of good practice.
- The paragraph at the head of page 21 should clarify that many Conservation area Character Profiles exist although some have still to be produced. And that all profiles will be reviewed and updated from time to time.
- We could not find the reference to the previous presumption that in all streets where there are not already front roof extensions, these would not be permitted.
- Under BM2, we would like to see it more explicitly required that in the event that a building is allowed to be demolished, it must be fully recorded. It should also be clarified as to where such records are to be stored. (ie. Borough Archives).
- In the 'Archaeology and Heritage Assets' section, the abbreviation APA should be clarified and their status explained. APA should also be included in the Glossary.
- The description of 'Ravenscourt Manor House (Palingswick) APA needs to be clarified. If it is the house within Ravenscourt Park, it is obviously not 'south of' the Park, which implies Palingswick House in King Street is being referred to. The recent excavations by Museum of London should also be mentioned.
- (Also within the Glossary, we suggest the abbreviation 'FRA' for 'Flood Risk Assessment' precedes the full text).
- We welcome the expanded policies covering 'Basements and Lightwells', but the overlap between this draft SPD and the Local Plan Policy DC11 needs to be clarified. The documents should advise that Article 4 directions will apply across the Borough as from April 2018.
- Accessible and Inclusive design : We note the assumption that the Principles are consistent with Part M of the Building Regulations. In respect of the Design of ramps and stairs, it should be noted that designs should also conform to Part K1 of the Building Regulations.
- Air Quality : There seems to be no mention of the Council's Air Quality Commission or its report and recommendations which were approved by the Council during 2017. We would appreciate confirmation that the AQC have endorsed the proposals as set out in this document.
- Within the 'Transport' section, TR11 should be clarified that the Cycle Superhighway is 'proposed' at this stage and is subject to final agreement by TfL and the Council (ie. Not just TfL). Any approval must reflect the views and

concerns of local people, and be a balanced policy. Para. 13.31 should be amended to read . . . running from 'outer or outside' London instead of 'out London'. 2.

- Under 13.99, it should be clarified that this is an initiative to limit A frame type advertising hoardings on the public highway.
- Under 'Waste Management', the Table at Principle WM4 is confusing as it requires that containers are required for 'Food Waste' although Para. 14.32 confirms that 'at present the Council does not provide a separate food waste collection'.
- Under Residential Moorings, we support the submission made by the West London River Group, but would also like to see the following amendments :
- RM3 Para. 15.20, please change 'are unlikely to' to 'will not' and at the beginning of para 15.22, take out the words 'generally' and further on 'normally'. Under 15.25, add an extra sentence at the end of the first bullet point 'It will never be acceptable for the superstructure to be more than a single deck'. Delete the second bullet point as this would allow multiple deck boats which have been allowed further up the Thames causing much controversy.
- Although the Paddington Arm of the Grand Union Canal which runs through the Borough, is now within the OPDC area, this may not always be the case. We therefore ask that any residential moorings on the canal comply with both the policies in this section and with the moorings strategy and rules of the Canal and River Trust.

The Hammersmith Society
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