

Hammersmith Society Comments on the draft London Plan

The Hammersmith Society is the overarching conservation and amenity group for the northern part of the London Borough of Hammersmith & Fulham, and was founded in 1962.

General Comments

We support the overall aims of “good growth” in the London Plan and appreciate the layout and arrangement of subject matter, which is an improvement over the existing Plan.

However, we have serious concerns about the Plan’s provisions on **design, density and height**. The housing quanta proposed by the draft Plan are considerably higher than in the existing Plan. Delivering these development quanta across London (Chapter 2, including in the OAs, e.g. in fig 2.10 and elsewhere in the plan) risks excessive density and height to an extent which will adversely affect Londoners’ quality of life. The existing London Plan had a target of 42,000 homes a year. The present draft has a target of 65,000 homes per year. In the interim some land has been built on – therefore the only way of fitting in the increased numbers is to build higher and denser. We propose:

- Before normalising super-densities and very high rise, the GLA should commission a study of the long-term effects of greater density, to establish whether it creates satisfactory environments for lifetime communities, and to ensure that social and economic problems are not being created for the future.
- The GLA should study and publish data on the efficiency of high-rise as a way of achieving more occupied homes throughout a development, as dwellings at higher storeys are normally let or sold at premium rates to occupants whose density per apartment is low – or they are not occupied at all.

In respect of Plan policies on Design, Housing and Tall Buildings we consider that the London Plan should contain clear guidance on **complete transparency for all viability assessments**. This should be added to **Policy DF1** which should not be restricted to viability in terms of affordable housing, but to density in general on development sites.

Chapter 3 - DESIGN

D2 Delivering Good design and D6 Housing Density: These two policies are the focus of our concerns. Grant of planning permission for sites will hinge on **D6 A** “*Development proposals must make the most efficient use of land and be developed at optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site.*” The draft Plan does not include the density matrix of the existing Plan. GLA officers have stated at consultation events that the matrix did not serve its stated purpose. We say, in this “*design-led approach*” there is implicit encouragement for developers to seek ever-higher density on a site, which in turn will ratchet up land values. There are no corresponding Plan provisions which Boroughs and residents can call on to support excessive and inappropriate densities. The draft Plan does not envisage development being rejected. **We therefore urge consideration is given to reintroduction of a new Density Matrix.**

The Plan could usefully include examples of exemplar design from London and elsewhere.

Although surrounding infrastructure is cited in Policy D6 Introduction, elsewhere the draft Plan specifies that density should be based on future, not existing, levels of planned infrastructure. (D6 B). **We propose that D6 B 30 be amended** to delete (line 5-6) *“in exceptional circumstances”* and reads: *This may mean that development is contingent on the provision of the necessary infrastructure and public services and that the development is phased accordingly.* The need for infrastructure to keep pace with development is paramount and should be made explicit in all circumstances, not “exceptional” ones.

D2G 1) Amend to read *“Design reviews are carried out transparently by independent experts in relevant disciplines and representatives of the local community or amenity groups”*. Reason: While we support the reference to Design Review, it is frequently the case that Design Review groups are exclusively chosen from among architects. While the presence of some architects is essential, they may often be from practices which may themselves hope to benefit from work on a similar scale and so may not be entirely objective. The input of people who will live with the finished development is necessary to ensure a fully rounded assessment of the scheme.

D2H Maintaining Design Quality: we welcome these provisions, especially H 3) on architect retention clauses, as proliferation of Design & Build has been responsible for a deterioration in the quality of London’s new build.

Tall buildings D8

We have particular concerns about this policy as it is explicitly part of the Plan’s programme of densification (see Justification 3.8.1).

We repeat our earlier points:

- Before normalising super-densities and very high rise, the GLA should commission a study of the long-term effects of greater density, to establish whether it creates satisfactory environments for lifetime communities and that social and economic problems are not being created for the future.
- The GLA should study and publish data on the efficiency of high-rise as a way of achieving density throughout a development, as dwellings at higher storeys are normally let or sold at premium rates to occupants whose density per apartment is low – or they are not occupied at all.

Policy introduction: delete *“as well as supporting legibility across the city to enable people to navigate to key destinations”*. This is a spurious rationalisation regularly offered by developers justifying an over-tall building. Londoners navigate by street-level landmarks, tube lines and bus routes and mobile phones. In any case as taller buildings proliferate, their temporary claim to “legibility” value on a skyline diminishes.

The provisions of Policy D8 contain an assumption that tall buildings are appropriate in all circumstances providing their impact has been assessed. It does not envisage rejecting tall buildings. **We propose: add to D8 C 1) d) *Proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings, and to areas that will be particularly sensitive to their impact****. Reason: There are areas which are not specifically heritage assets but to which tall buildings may be inappropriate and inflict damage to the setting and streetscape. This is the only point in the policy which allows for the possibility of rejecting a tall building and should not be

restricted to a location involving heritage assets. (*Wording taken from existing London Plan Policy 7.7 supporting text para 7.25.)

Chapter 4 Housing

The priority given in the draft Plan to delivering large volumes of housing by “*optimising the potential for housing delivery*” risks sweeping changes to our street scene without sufficient checks and balances. For that reason, **we propose Policy H1 2) a)** (sites within PTAL 3-6 or within 800m of a Tube Station) **is deleted**. It is hardly an exaggeration to say most of Zones 1-2 are within 800 m of a tube station, thus a development proposal which has not got justification from any other part of this draft Plan can draw on this provision, regardless of whether it is appropriate for the location.

We welcome the recognition of the economic and social value of green infrastructure in **Policy G1 8.1.2** but these issues risk being subsumed by other priorities and need to be firmly embedded into overall **Design** and **Housing** policies

Chapter 12 Monitoring

We welcome the introduction of regular reporting of KPIs with particular regard to what is referred to as Heritage and Cultural Infrastructure (i.e. documenting any loss of community amenities such as pubs, cinemas etc) in Table 12.1.

Annex 1 Town Centre Network and Future Potential Network Classification, fig A1,1 “Future Potential Changes to The Town Centre Network”

Shepherds Bush is shown as an International Town Centre. On p84 fig 2.18 international Centres are described as *High-order comparison and specialist retail / flagship stores/office headquarters/government buildings/international culture, leisure and entertainment destinations/international tourism function.*

While the ongoing development of Shepherds Bush/Westfield/Imperial includes specialist retail / flagship stores it is otherwise focussed on residential intensification and academic/research activity. The majority of the criteria for International Town Centre do not feature at Shepherds Bush and this future classification for the area should be suspended pending further study as it would put undue strain on the local infrastructure.

Method of Consultation

In general - though there is much reference to communication to the public, public participation in planning and of 'informing and engaging Londoners in this Plan' - consulting on a 500+ page document is hardly the best way of doing this. Another form of document - possibly an illustrated paperback book summary of the policies with examples of successful projects, and including references back to the full Plan should be considered, that might be usefully referred to by local groups and maybe discussed in schools - in other words, accessible.

(end)