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By email only

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Dear Mayor

REPRESENTATIONS TO THE DRAFT LONDON PLAN

Thank you for allowing HammersmithLondon the opportunity to participate in the consultation on the draft New London Plan.

HammersmithLondon is an independent, not for profit organisation tasked with running the Business Improvement District (BID) for Hammersmith Town Centre. First established in 2006, the BID is one of the oldest in the country and had its mandate successfully renewed in 2011 and 2016. Led by member businesses, the BID represents c. 350 local organisations and, since 2006, has invested more than £7.4m in Hammersmith Town Centre.

Overview

- The draft Plan takes a significantly more prescriptive approach than its predecessor, with policies intended to be applied directly in determining planning applications. HammersmithLondon understands that the Plan should, according to the legislation, deal with strategic matters only. HammersmithLondon is concerned that this prescriptive approach would alter the hierarchical relationship intended to exist between the GLA and Local Planning Authorities (LPA), and may adversely affect an authority's ability to effectively manage and shape the future prosperity of their administrative area.
- HammersmithLondon is disappointed that the possibility of replacing the elevated section of road servicing the A4, a project also known as the Hammersmith Flyover, is not referred to within the draft Plan. Within a few years, the existing structure will reach the end of its usable life and a succession plan (namely the Hammersmith Flyunder) should be shaped over the plan period.
- The national, regional and sub-regional significance of the A4 should be recognised, and the Mayor should oversee its regeneration as a key infrastructure project.
- Hammersmith Town Centre is well established and offers a good opportunity for future growth. Key infrastructure projects, such as the Flyunder have the potential to release large amounts of land which could accommodate future growth.
- With the right investment, Hammersmith Town Centre has the potential to be upgraded from a Major to Metropolitan Centre. This potential future change should be recognised within the Plan.

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- New homes can be provided within Hammersmith town centre but this should not be at the expense of its retail, commercial or leisure functions. It is possible that the release of land provided by the Flyunder scheme would allow space for new houses to be built upon.
- The function of the town centre is changing and planning policies must provide a greater degree of flexibility offering a diverse and engaging mix of town centre uses.

Supporting good growth

HammersmithLondon strongly supports the Good Growth initiative. The key to Good Growth is to establish and support commercial centres as a focus for strong and inclusive communities. HammersmithLondon therefore supports draft Policy GG1 and the focus it draws towards town centre environments.

With careful investment and infrastructure, we believe that Hammersmith Town Centre has the potential to be upgraded from 'major' to 'metropolitan' centre. The centre already benefits from a high level of access to public transport (PTAL 6b and 6a), and acts as a major hub between inner and outer London.

Hammersmith Town Centre already meets many of the qualifying aspects of a Metropolitan Town Centre, as listed in Figure 2.18, and continues to grow. This growth should be carefully managed in line with draft Policy SD7 and the future potential of the centre recognised as a potential future change, and noted in Table A1.1.

In addition to this, Table A1.1 should also be amended to recognise the full growth potential and capacity. HammersmithLondon supports the 'high' level of residential development expected within the centre, but is disappointed that only a 'medium' level of commercial growth is anticipated. Whilst Hammersmith is a well-established centre with a large amount of existing commercial premises, it has strong potential for future growth in this area, particularly given the large amount of land that could be released through infrastructure projects, as outlined below. We therefore ask that the 'commercial growth' category for Hammersmith is amended to 'high'.

Supporting sustainable infrastructure

It is clear from the draft Plan that to support growth, major investment in infrastructure is required. Hammersmith Town Centre supports a wide variety of uses and is, as a result, a very healthy town centre. There is demand for future growth, but this should be supported by a number of infrastructure investments.

Infrastructure projects which are uncommitted at this time, such as Crossrail 2, are having a major influence upon the Plan. HammersmithLondon does not object to such an approach, but is extremely disappointed that plans for replacing the Hammersmith Flyover have not been referred to within the plan.

The project would see the stretch of elevated roadway, which serves the A4 and tears through Hammersmith Town Centre, replaced with a new subterranean road.

The case for such infrastructure has been made clear. For over a decade it has been apparent that the ageing 1960s structure is becoming increasingly dilapidated, due primarily to water eroding and weakening the concrete and steel structure. In December 2011 Transport for London (TfL) closed the flyover for emergency repair works, and later, in 2013, further works were carried out.

It is apparent that the flyover is reaching the end of its useful life, and that repair works are only a temporary fix to the problem.

HammersmithLondon strongly advocates plans to replace the flyover with a new subterranean tunnel. Hammersmith and Fulham Council have researched this possibility at length, in partnership with HammersmithLondon, and produced a detailed feasibility study in March 2014. Since then, the Council has produced a replacement Local Plan which is expected to be adopted this year.

The Council's spatial vision, together with Policy HRA clearly states that they will pursue options for replacing the flyover with a tunnel, working closely with the GLA and TfL.

The development of the flyunder will offer a wide range of public benefits. This letter will summarise the benefits it presents for Hammersmith Town Centre, and for London.

Accommodating growth

HammersmithLondon is conscious of the increasing need to accommodate growth within the borough. Draft Policy H1 sets an ambitious target for new homes across London. For Hammersmith, it sets a target of 1,648 new homes per year. This represents a 60% increase over the previous target. Whilst HammersmithLondon is unable to comment on whether such a target is realistic or achievable, it is clear that delivering the target would require a substantial amount of new development.

The draft Plan supports taller buildings in appropriate locations, which are likely to include locations in and around existing clusters of tall buildings, within town centres, and surrounding major transport interchanges. These characteristics are true of Hammersmith Town Centre, but developable land is at a premium.

Setting aside the public realm and accessibility improvements which could be addressed by the new road tunnel, the development would also unlock a substantial area of land which, when coupled with its suitability for more dense development and taller buildings, offers a substantial development opportunity which could make a significant contribution to the supply of new homes, offices, retail, leisure and community uses. Such an approach would secure the best use of the land, and would be consistent with draft Policy GG2.

The flyunder should therefore be a major consideration within the draft Plan. It should be noted within draft Policy T3 as a way of upgrading and safeguarding this major road link and, given its national and regional significance, should be noted within draft Policy SD3 and Figure 2.15 as a strategic infrastructure priority to be addressed over the plan period.

Improving linkages and open space

The regeneration of the Hammersmith Flyover represents the opportunity not only to provide new homes and employment opportunities but also to establish, improve and enhance green space within the town centre. Such an approach is consistent with draft Policies G1 and G4 of the Plan. Upon removing the flyover, Hammersmith Town Centre could make better use of its riverside setting. The Thames acts as a linear open space providing convenient access to major green spaces and cycle routes.

It would be beneficial for the management of the River Thames and the Thames Walkway if their role in the public realm was acknowledged more explicitly within the Plan. The River Thames is a defining landscape, historic and natural feature of London. As a member of the Cross River Partnership (CRP), HammersmithLondon believes that it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes along it, and the positive economic, social and environmental contribution it makes.

Hammersmith currently lacks good quality public squares and green spaces. The development of

Lyric Square has been highly successful and has only emphasised the need for more spaces such as this. Improving access to the riverside provides a good opportunity for this but, with developable land at a premium HammersmithLondon strongly supports draft Policy G5 and the concept of urban greening to improve the quality of the environment. The scoring system set out within Table 8.2 will go some way to promoting the greening of urban spaces, however the wording of draft Policy G5 should encourage developers to exceed the target score wherever possible.

Supporting sustainable transport

In addition to supporting growth, the redevelopment of the flyover will also help to promote more sustainable means of travel. The environmental and public realm improvements which will occur through the removal of the flyover will improve links to the underground and bus interchanges, and offer improved access to the river. This presents a major opportunity to connect Hammersmith Town Centre more successfully to the riverside path, which acts as a major cycle link through the area and may help reduce car dependency.

Improved access to the riverbank also presents an opportunity to explore the potential for new freight and passenger boat services. HammersmithLondon therefore supports the continued promotion of the River Thames and other linked watercourses as a strategic route for freight and passenger transport throughout London, as set out in draft Policies S114, S115 and S116.

Supporting existing infrastructure

It is clear that the flyover will soon be reaching the end of its useful life. Appropriate levels of funding should be secured for its maintenance in the short term, whilst a more long-term proposal for redevelopment is explored and approved.

In addition to the flyover, Hammersmith Bridge is another piece of infrastructure which is funded by TfL and is desperately in need of attention. A long programme of repairs has been scheduled with the bridge being closed for days at a time. This has a significant impact upon links across the river, affecting numerous bus routes.

A more long-term strategy is needed to maintain this ageing structure, protecting its significance as a heritage asset, but also its function as a key piece of transport infrastructure.

Supporting the town centre

HammersmithLondon supports draft Policies SD6, SD7, SD8 and SD9, which relate to the role of neighbourhood, district, major, metropolitan and international town centres. Hammersmith is an established major centre with the potential to be upgraded to a metropolitan centre. Future investment should reflect this potential.

In addition to growth, the ability to diversify is also important. The role and function of the high street is changing and town centres must adapt to meet evolving consumer expectations. It is clear that town centres must provide a range of services and opportunities which support and complement its traditional function as a retail hub. Cultural venues are of increasing importance throughout the capital. The support and protection for such facilities, as set out in draft Policy HC5, is supported.

Diversification will strengthen the town centre network and support its viability. Traditional planning policies have sought to protect retail use but draft Policy SD6 is clear in that a greater degree of flexibility is required. These changes may include better infrastructure to support the logistics involved in 'Click and Collect' shopping and greater support for any leisure facilities which would support and promote this behaviour, rather than have goods delivered to the home.

Similarly, the measures to provide more low-cost business space and affordable workspace, as set out in draft Policies E2 and E3 are supported. Small and Medium Enterprises are a key driver of the local economy. Such measures should also extend to retail uses. Smaller, and more flexible floor plans and the benefits of retail diversity could be further highlighted within the Plan.

The wording of draft Policy HC6 also supports later operating hours, with a focus on the evening and night-time economy. Hammersmith Town Centre already benefits from a healthy evening economy, and any policy which supports this growth is welcomed. That said the Policy should be amended to reflect the differences between the local impact of individual night-time venues and activities. The Policy should allow for more discretion at local level.

As a Business Improvement District (BID), HammersmithLondon is well placed to work with the Local Planning Authority to identify the constraints and opportunities in improving the evening and night time economy of Hammersmith Town Centre, and can work with them to develop a vision and management plan for this, achieving a night-time economy which is accessible and safe for all to use.

Monitoring and reviewing the Plan

HammersmithLondon commends the GLA in keeping the London Plan regularly updated and fully supports the commitment set out within draft Policy M1. This means that those policy measures devised to address specific issues can be reviewed, adopted and dropped if needs be, based upon their effectiveness. Similarly, if an important strategic matter emerges over the plan period, it is important that there is a mechanism which allows it to be incorporated into the Plan at the earliest opportunity.

The GLA should set a clear timetable in which the plan will be reviewed, and the opportunity to call a review at any time, should circumstances require one.

Summary

Hammersmith Town Centre plays an important role for residents, workers, tourists and commuters. There is scope for further development and improvements to accommodate growth within the town centre, and support growth elsewhere.

We trust that these representations will be given due consideration and are helpful in the next stage of plan preparation.

Yours sincerely

Patricia Bench, HammersmithLondon BID Director

cc: Board Members of HammersmithLondon