

Earl's Court Opportunity Area DRAFT Placemaking Framework

Schedule of consultation responses to the formal consultation

27 October to 22 December 2022



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Planning and Place

March 2023

Responder	Representation	RBKC response
Anthony Hunter	The former Qatar office building on Cluny Mews is NOT suitable for a taller building. It is squeezed in at the back of the residential philbeach gardens. It is already the same height as the neighbouring new urbanista development itself- higher than the adjoining philbeach gardens conservation area - any higher would be totally out of proportion. It was reduced to this height during its original planning permission for this reason - I spoke at that hearing. If it is to be changed to residential ok but it has been deliberately left to lie empty without being marketed for years and this should not be used as a reason for change in use. If it does get replaced any new building should fit within the same envelope both for reasons of scale and to fit in with the neighbouring building. Please can the plan be updated ti make this clear. Thank you.	The maximum building height parameter plan is included within the site allocation in the New Local Plan Review and does not form part of the Framework.
Canal and River Trust	I can confirm that the Canal & River Trust have no comments to make as we have no land or waterspace near the opportunity area.	Noted
Christiane Pratsch	Very supportive of garden and green spaces that give reasons for being there and going through them. For example, areas with actual grass for picnic/sitting, and including hardy grasses such as in Battersea Power Station development that do not need extensive maintenance or protective fencing .	Noted.
Christiane Pratsch	An idea for inclusion of fixed outdoor mounted placards for photography exhibitions, which could be curated by rotating series of curators could link with Priority 4 cultural delivery.	Noted. The use of the public realm for cultural activities including exhibitions will be encouraged, in line with criterion 4.3e.
Christiane Pratsch	Please use solar panels absolutely everywhere possible.	To comply with Priority 2, we expect a variety of sustainable energy generation technologies to be proposed, and this is likely to include solar panels.
Christiane Pratsch	I am strongly not in favour of very tall apartment building the type of which are populating White City / Westfield area, with the resultant alienation of life at ground level and wind tunnels for the public space around. I believe that the rumoured 40 floor tower block sounds not appropriate for the Earls Court area.	Noted. Building height maximum parameters are controlled via the site allocation rather than the Placemaking Framework. The Council agrees that the quality of the ground level experience and the public realm should be a key design principle in the development of a scheme here, and this is included in the Placemaking Framework, notably in 3.1d.

Responder	Representation	RBKC response
Christiane Pratsch	Please include free-entry visual arts venue that is accessible in the daytime for parents and carers for example. Just having ticketed performing arts venues, cinemas or bowling alleys does not cater to many people who will use the communal space here where they live next door. For example, attracting a charitable foundation seeking home for its art collection, photography or art gallery with free entry to view and including a publicly funded young people's programme. As mentioned earlier, incorporation of public art outdoors, such as a changing photography panel installation or permanent sculpture walk like The Line / Olympic Park would be very welcome as a cultural attraction accessible to all. A small bandstand with flat area can be used as outdoor dance location, performance stand or market stall area.	Noted. These suggestions will be fed into pre-application discussions as relevant. They would align with principle 4.3 of the Placemaking Framework.
Christiane Pratsch	I am most interested in what will be offered in the way of green spaces that include freely accessible visual cultural offerings. As a professional working in the arts, I will watch for future opportunities to help, pitch or and /or develop any such plans.	Noted
Christophe NOBLET	Overall, priority 1 makes sense but there is a significant gap and missing component which is the connectivity to West Kensington. We absolutely need an active travel route to go from Earl's Court station (Warwick side) to West Ken station by bike or foot. This will provide access direct to North End Road high street, to Olympia (incl new cultural venues) and will facilitate connectivity with the Hammersmith & Fulham cycling routes/network on Hammersmith road. There should also be a way for pedestrians to cross the railtracks north of the 'Table' to avoid having to go down to the Table when coming from Philbeach (north end), St Cuthberts or Tesco and going to the H&S part of the site.	Noted. Connections into land in Hammersmith and Fulham are beyond the scope of the document. However, the aspiration for an East - West link through the wider OA would tie in with the network of streets and spaces in the western part of the OA.

Responder	Representation	RBKC response
Christophe NOBLET	<p>This part looks fine on paper but cannot be considered on a stand alone basis. How likely are we to get trees, plants, biodiversity in K&C on a site surrounded north and west by 40-storey buildings (even in H&S)? How likely are we to have lasting greening on a concrete table which height is already considered to be an issue for the developers? Rather than stating we want to re-use existing structures, we should look at the impact of doing so. I would for instance prefer to not re-use the train depot if it frees us space for more buildings/constructions and thus lowers the max height of tall buildings to acceptable levels (ie 20'ish stores).</p> <p>There is talks of connectivity in 3.2 and an open site but there is nothing to enable connections from St Cuthbert or Earl's Court station to the West Kensington tube station area and what it provides access to ie North End Road high street, cultural venues (Olympia, The Bhavan) or cycling route (Hammersmith Rd). The TfL depot has recently been bought the ECDC so no reason why it should not be developed and factored in from the start.</p>	<p>Noted. The train depot is on the LBHF part of the Opportunity Area and therefore outside RBKC's administrative area. The retention of the WLL deck is supported because to demolish and rebuild a similar structure would be less sustainable. Criterion 1.2c covers the need to plant and maintain trees in a way that ensures they can thrive; however similar wording will be added to cover the same point but for other planting.</p>
Christophe NOBLET	<p>In total agreement that the scheme should include measures to have a positive impact on Earl's Court Road including physical connectivity. There is no indication of what and how the site will not just kill entirely Earl's Court Road commercially if only physical connectivity is delivered. What is the plan to avoid the ECDC site ends up competing with Earl's' Court and North End roads if the ground floor is open to shops and/or commercial activities? Unless EC Rd is re-built before the site opens creating there a positive pedestrian experience, it will be dead and empty for ever.</p>	<p>Noted. This will in part be dealt with through the planning application process looking at impact on existing town centres. Principle 4.2f deals with requirements in relation to Earl's Court Road.</p>
Christophe NOBLET	<p>There is no mention of the impact on traffic and the overall infrastructure of this development projects, both during the development phase and after. There is high levels of worry around the fact that all construction lorries will get into the site through Warwick Road or the entry below the bridge reaching from behind Tesco which will create very significant disruptions, vibrations, pollutions on an already saturated 3 lane road.</p>	<p>This will be dealt with through the planning process; a transport assessment will be submitted with a planning application and there will be construction traffic management controls imposed should planning permission be granted.</p>
Christophe NOBLET	<p>What about traffic projections once the site is developed on the K&C site for deliveries, maintenance, commercial activities?</p>	<p>This will be dealt with through the planning process; a transport assessment will be submitted with a planning application. 3.2d covers the principles for servicing that the development should comply with.</p>

Responder	Representation	RBKC response
Christophe NOBLET	What about impact on water management (and sustained pressure), waste management (when the Council is already struggling today), flooding,...?	While the developer would need to engage with Thames Water, the Placemaking Framework sets out the Council's priority for an integrated water management system in 1.2b. Waste management is covered in 2.2b.
Cllr Hamish Adourian	<p>I think the Earl's Court Placemaking Framework is overall a good document that captures a great deal of aspiration for the site—however, there is room for improvement and we should sit down in the New Year to talk about some of the key areas.</p> <p>The first thing to fully pin down is the formal status of this document. Is it a statement of aspiration by the Council that can guide discussions with the developer? That's fine in and of itself, but if that is the case, it means that there will be no detailed formally adopted planning policy alongside the allocation in the NLPR (which is very high level). Can we, or should we, convert the Framework into an SPD? It will be good to discuss this, especially if we are anticipating an application from the developer later next year, or early in 2024.</p>	Noted. It is anticipated that the document will be adopted as a supplementary planning document. It is intended that the document guides the development of the scheme and is used to assess future planning applications for the site.
Cllr Hamish Adourian	<p>Coming back to the present document itself, there are a number of areas that could do with further clarification:</p> <p>-The cultural offering on the site – there are some contradictions in the text about whether we are aspiring to a single large-scale 'anchor' venue or multiple smaller venues across the site. My own view is that we shouldn't once again rely on a single large-scale venue on which all surrounding economic activity will come to depend, e.g. an Earl's Court Exhibition Centre 'Mark II'. Having resilience and depth to the offering is essential. However, we need to be more explicit about what we mean by smaller venues—these should still be buildings where people book tickets to come and see performances; we do not want to end up with an 'open space' approach that is only about street performances (or in the words of the developer, where 'something is happening'). Furthermore, these spaces need to be purpose-built for whatever they are intended for, whether dance, gallery, exhibition space, etc. The Earl's Court Culture Study provides some good examples.</p> <p>These venues should ideally provide both performance and creative space, if not explicitly one or the other. An example approach could be to have three 'cultural hubs' across the site, each being run by a different provider and having a mix of offerings.</p>	Noted. The criteria for the cultural component has been amended to clarify both an anchor tenant and other, complementary facilities should be provided which are in addition to any culture or art within the public realm.

Responder	Representation	RBKC response
Cllr Hamish Adourian	ECDC Culture Plan - ECDC have produced their own 'culture plan' document. I have not yet looked at it in detail, but I suggest we look to see how their approach and findings fits in with this Framework. If there are contradictions, we will need to find ways forward sooner rather than later before ECDC's plans start to crystallise.	Noted. This will form part of pre-application discussions.
Cllr Hamish Adourian	Earl's Court Road - There should be more in the document about how the site links to Earl's Court Road as 'its' high street, both in terms of connectivity and what amenities EC Road will need to serve the population of the site. This can then link to the new document being prepared as a 'prospectus' for Earl's Court Road, which can attract businesses keen to invest for the future.	Noted. This will in part be dealt with through the planning application process looking at impact on existing town centres. Principle 4.2f deals with requirements in relation to Earl's Court Road.
Cllr Hamish Adourian	<p>Tall buildings - I won't repeat my position on tall buildings, but if we are compelled to allow developers to build them for reasons outside the Council's control, the Framework should clarify that we want special attention paid to their design, and for more creativity the taller the building. It is an exceptional challenge, and I of course have my doubts about whether an acceptable design can be found. Any tall building should also be placed sensitively in relation to any park or open space that is being built, in order to make sure the spaces receive sunlight and are usable.</p> <p>Finally, in line with the majority view set out by ward councillors and residents, the Framework should clarify that tall buildings should be the exception and not the rule on the site, and indeed we are encouraging the developer to experiment with other approaches wherever feasible in their designs.</p>	Noted. This aligns with the approach taken in the Placemaking Framework. Note that maximum height parameters are dealt with in the emerging site allocation in the NLPR, and not in the PF.
Cllr Hamish Adourian	Tenures – the document touches on community housing (rental), but we should talk about home ownership as well, including the potential of shared ownership as something that is desirable in helping young professionals and families get on the housing ladder. It should not all be either social rent or full market value purchase. Even a small percentage of shared ownership units would be a good addition to the overall mix on the site.	Community housing (4.1d) also includes intermediate housing such as shared ownership.
Cllr Hamish Adourian	Car-free living – the document makes reference to facilitating car-free living. Are we stipulating that residents living on the site cannot have cars at all? Or that the whole site should essentially be a large low traffic neighbourhood? I think we need more discussion around this and how exactly it can work.	Parking standards are contained within local planning policy. A policy compliant scheme on this site would only have Blue Badge Parking for residents and visitors, as well as facilities such as car clubs. Specific references to car-free living have been removed, in favour of supporting active travel modes.

Responder	Representation	RBKC response
Cllr Linda Wade	<p>This can only be considered a draft and there are elements – important elements – that must be included before this can be considered to be a final document. With ECDC shortly to reveal their Masterplan, there are concerns that the Framework, although well-intentioned will not have the desired impact on their Masterplanning process intended.</p> <p>A “vision plan” or “framework plan” should be a clear vision of what the Council wants to achieve, and more importantly wants to deliver for Earl’s Court, as a ward, and the wider area. This statement lacks clarity and misses opportunities.</p> <p>It is hard to understand how this Framework will sit within the Planning and Masterplan process. That needs clarification. This Placemaking Framework will carry less weight than an SPD, and there are several major changes in direction from the original SPD, so it is hard to see how the developer will have to take consideration of this document in the final development of their Masterplan or its execution. In addition, it is hard to see how the ‘placemaking criteria’ have any influence over what the developers do next. What power does a Framework have over the development of the Masterplan? Is there the capacity to respond to change over the long period of the development as trends or demands change?</p>	<p>The aspirations included in the framework relate to the Opportunity Area site rather than to wider Earl's Court. A vision for Earl's Court is included in PLV14 of the emerging New Local Plan.</p> <p>The document is anticipated to be adopted as a supplementary planning document and so will have weight in the planning process.</p>
Cllr Linda Wade	<p>It is understood that the focus of the Placemaking document is on the impact of Opportunity Area on the area, but the character of the community in Earl’s Court and the two neighbouring wards in LBHF are very different and quite distinct, with Earl’s Court being more akin to a village being defined by three strategy road network roads and the railway. Earl’s Court’s character is also distinct to other wards and areas of the borough and there is some concern over the tone/language used that this unique character might be designed out and that Earl’s Court as an area will be subsumed by the impact of the larger LBHF area and significantly that this document, like the developer, does not detail much vision for Earl’s Court Road.</p>	<p>The unique character of the community and architecture in Earl's Court came through strongly in community engagement and the intention of the Placemaking Framework is to guide the development towards integration with the area, becoming a new part of Earl's Court. The document deals only with the RBKC part of the Opportunity Area and highlights the unique character of the local context, as distinct from the western part of the OA.</p>
Cllr Linda Wade	<p>It is recognised that consultation is hard to reach in a densely populated area, but we are a rich mix demographically both in income and in tenure. The Earl’s Court Business Forum has discovered that businesses in the immediate area have suffered from the closure of the Exhibition Centre have retreated and many not engaged with the process and therefore might not have been as well represented.</p>	<p>Local business owners were targeted and represented in the in-depth interviews carried out.</p>

Responder	Representation	RBKC response
Cllr Linda Wade	<p>It is also important to stress that this is a large development in the centre of the borough, and if not approached with a clear, strategic and robust vision will have a negative and long-lasting impact on an area far larger than just the 15-acres.</p> <p>This document should also tie-in with the work that is being undertaken in the development of a Commercial Strategic Plan for Earl's Court Road as integration and connectivity are key in the creation of an action plan in response to the emerging cultural offer on the site.</p>	Noted.
Cllr Linda Wade	<p>The geography of the site is unique, and of the 15-acres in RBKC much will be over railway tracks, and there are areas that are not load-bearing. So, there is concern about the high level of 40,000 sqm of non-residential floorspace for offices at a time when the concept of the design, space and typology of workspaces are being re-evaluated and undergoing radical change. There must be a guarantee that this is not used a route for transfer into residential accommodation at a later stage which the infrastructure might not be able to support or be planned for.</p>	Noted. This can be controlled through the planning process, such as through land use specifications and outline conditions.
Cllr Linda Wade	<p>The nature of the significant world-class cultural facility will have a direct bearing on the future financial viability of Earl's Court Road and inward investment in the ward. We have over 70 plus hotels, many of which responded to the Exhibition Centre trade, and it is estimated that 50% are now struggling financially. Hotels relied on overnight stays and so the development of the Cultural Offer, or Core theme, is essential for potential new businesses on Earl's Court Road and retention of existing ones.</p>	Noted. Culture is one of the Council's priorities for the site, reflected in the Placemaking Framework.
Cllr Linda Wade	<p>This document has very little detail, or vision, for Earl's Court Road, which is the core artery for the area, and one of the elements that has been underrepresented in this draft.</p>	The references within the framework are proportionate to the scope of the document as it relates to the Opportunity Area.

Responder	Representation	RBKC response
Cllr Linda Wade	<p>The elephant in the room No.1 Transport, traffic, vehicles, pedestrians, and cyclists</p> <p>The Opportunity Area will be 42-acres in total, with the aim of being a vehicle-free-site. The issue of deliveries (small and large), trades and taxis will introduce additional traffic to an already saturated road system, ECOWS. This has already caused community severance, poor air and noise quality to those living on Warwick Road. One of the issues of this site is the narrow entries to the wider site area, with the Warwick Road apron and West Brompton apron feeding onto ECOWS plus the Northern Access Route further north and there is no indication of how this would be addressed. Access to the site via Cluny Mews would always be more restricted given the different surface levels.</p>	<p>Servicing and connections are included in principle 3.2 with air quality dealt with in 1.2d. The Council is also seeking a connection for pedestrians and cycles through Cluny Mews/adjacent St Cuthbert's Church.</p>
Cllr Linda Wade	<p>In the past Capco were asked to produce a report as to how traffic could be managed on ECOWS plus there was a road north south within site to relieve both North End Road and Warwick Road. Was that report ever submitted?</p> <p>With the retention of the Gibbs Green and West Kensington Estates there is no vehicular traffic access on the LBHF side, but increased pedestrian (to Zone 1) and cyclist permeability.</p>	<p>The Capco scheme was not car-free and therefore the impact is not comparable.</p>
Cllr Linda Wade	<p>The proposed increased width of Lillie Bridge will only increase traffic on Old Brompton Road, during the construction and the completion stage, due to issue of limited vehicular access from LBHF to the site during construction and on completion. This also requires an active approach to traffic management on Eardley Crescent and Old Brompton Road both of which are experiencing heavier volumes and routinely with grid lock traffic.</p>	<p>Noted. This would be assessed as part of a planning application.</p>
Cllr Linda Wade	<p>The proposed use of the Northern Access Route for the deliveries to central depots on site for distribution will not work for electricians, engineers, etc. servicing the residents and businesses on site so where will they park? There is also the consideration of the build out of 100 West Cromwell Road development and the dual demands on the Northern Access Route both during construction and on completion.</p>	<p>Noted. A servicing plan will need to be considered as part of a planning application. 3.2d covers the Council's expectations. The development will need to take account of the 100 West Cromwell Road development in the Environmental Statement as this is an implemented permission.</p>

Responder	Representation	RBKC response
Cllr Linda Wade	The lack of cycle routes either along the edge, and through the site, on ECOWS does not promote active or safe travel. There is no indication of any detail on this. We cannot entertain the exit for bikes and pedestrians onto the brow of the A4 bridge as in the Capco plan.	The proposed connections are set out in Principle 3.2
Cllr Linda Wade	The connectivity to the LUT station at Earl's Court whether by the tunnel from the site coming to the mezzanine level of the station, or across from the Warwick Road apron must be reviewed in detail to make Active Travel attractive and interconnected. The station approach will itself have to be designed to be able to accommodate the increased traveller flow of those from the site, 100 West Cromwell Road and from LBHF. This is a station which is Grade II. There is the question of the capacity of the station with increased traveller flow entering the station from the Warwick Road entrance and access to the Piccadilly Line platforms with one escalator up and one escalator down, thereby supporting the need for the increased access via a passageway to entry via the lifts. The suggestion to cover the tracks behind the advertising hoarding at the Warwick Road entrance would enable the opening of a wider frontage to the station, providing a cycle park up area, evacuation point, integrator point, while the present corridor which will be too narrow for increased pedestrian traffic could be made into retail units, ticket office.	The priority diagrams show the council's aspiration for improved connectivity through to the existing district centre. The detail of how this is achieved, which may be in more than one way, and how it is funded is a matter to be agreed with the various stakeholders. Principle 4.2f deals with the particular requirements for the development in relation to Earl's Court Road.
Cllr Linda Wade	Given the concerns raised by residents about the poor pedestrian experience on Earl's Court Road and Warwick Road, no new vision is indicated, and is essential.	Noted. A new criterion for Healthy Streets will be included so that connections from the site to facilities be improved.
Cllr Linda Wade	More attention should be given to the role that the site can play in connecting the two boroughs which remain largely separated for pedestrians and cyclists (Cromwell/Talgarth Road offers an unfriendly and unsafe environment, Lillie Bridge is narrow and dangerous for cyclists). Provisions walking and cycling connectivity across the site are discussed in current plans and there are numerous ties into the street fabric of adjacent areas in LBHF, but how those connections will be linked in with the rest of Earl's Court ward and RBKC is not discussed in enough detail.	The proposed connections are set out in Principle 3.2 and connect into the existing cycle and street networks. A pedestrian route east-west is required.
Cllr Linda Wade	Improvements to pedestrian and cyclist safety Warwick Road, the four dangerous junctions on Warwick Road, Old Brompton Road, Cromwell Road, and Earl's Court Road, and through flow from the rest of the borough must all be discussed as part of these plans. If active travel measures on the site are designed in isolation from the existing, proposed, and desired infrastructure in RBKC then they will serve no purpose, as residents of the site will be unable to access their local amenities on Earl's Court Road owing to poor connectivity.	Noted. A new criterion for Healthy Streets will be included so that connections from the site to facilities be improved.

Responder	Representation	RBKC response
Cllr Linda Wade	<p>The elephant in the room No.2 Connectivity and integration</p> <p>Due to the narrow opening at West Brompton and Warwick Road aprons, plus the issue of level changes at Cluny Mews to the site connectivity and integration must be considered.</p> <p>North-South Creating a 24/7 passageway under the A4 bridge to the Tesco/100 West Cromwell Road site is essential for the safety of pedestrians, cyclists, shoppers and would “open up” the site to the north and to Kensington Primary Academy. You cannot have a landlocked site going north exiting onto a A4 bridge with a narrow pavement or an accident hotspot junction.</p>	<p>The routes northwards are set out in Principle 3.2 and will be further clarified to ensure access under the A4 is specified.</p>
Cllr Linda Wade	<p>Going under the widened Lillie Bridge and “opening up” the pathway along the stream and the railway track to Chelsea Stadium, would create a cycle safe path, providing a cycle park by the Overground station platform. This would also support the maintenance and care of this area which has recently been considered for re-classification by the Ecology Department to SINC.</p>	<p>The priority for cyclists is to continue the cycleway on Kempsford Gardens</p>
Cllr Linda Wade	<p>East-West The reintroduction of a 24/7 public right of way passageway through Earl’s Court station from Warwick Road to Earl’s Court Road with a prominent entrance on the Warwick Road side, a lift from the site to the on-site ticket hall to facilitate step-free access and at the mezzanine level to the District Line. This could be incorporated in the covering of the tracks forecourt in front of the Warwick Road entrance.</p>	<p>Noted. The detail of how this is achieved, which may be in more than one way, and how it is funded is a matter to be agreed with the various stakeholders. Principle 4.2f deals with the particular requirements for the development in relation to Earl's Court Road.</p>
Cllr Linda Wade	<p>Integrator buildings</p> <ul style="list-style-type: none"> • Tesco • West Brompton Station and apron • St Cuthbert Church Complex and Hall • St Cuthbert’s Primary School • Earl’s Court Road • the new cultural site(s) 	<p>Noted, these are featured in the Framework.</p>
Cllr Linda Wade	<p>Without effective connectivity to Earl’s Court Road, this road will be further side-lined from the development that bears its name and face further decline.</p>	<p>Noted. Connectivity to Earl's Court Road is included in the Framework.</p>

Responder	Representation	RBKC response
Cllr Linda Wade	<ul style="list-style-type: none"> The design of the site entrances must be so that they do promote two-way flow and not “enclose”. 	Noted.
Cllr Linda Wade	<ul style="list-style-type: none"> Medium and large-scale housing: heights should respect the local building rooflines; they should not dwarf the existing town and streetscape. 	See criterion 3.3c
Cllr Linda Wade	<ul style="list-style-type: none"> The use of building materials to connect/complement with the existing fabric of the area 	See criterion 3.3c
Cllr Linda Wade	<ul style="list-style-type: none"> This should be an intergenerational site with an opportunity for a range of sizes and tenures. A purpose-built independent living facility designed to be able to respond to the individual’s changing care needs. 	The Placemaking Framework cannot place additional policy requirements and therefore the tenure mix will need to have regard to planning policy.
Cllr Linda Wade	<ul style="list-style-type: none"> No poor doors. 	Noted, see criterion 4.1d
Cllr Linda Wade	<ul style="list-style-type: none"> Buildings of human scale with well-proportioned street width to building height ratios. 	Noted, see criteria 3.1c and d

Responder	Representation	RBKC response
Cllr Linda Wade	<ul style="list-style-type: none"> • The delivery of the central world-class cultural facility on site was a key requirement of the original SPD, should not be undermined by a series of smaller “pebble” centres. The brand Earl’s Court still has a resonance world-wide and the requirement for a suitable replacement was, and remains, considered to be essential as a contributor to the financial health and wellbeing of businesses on Earl’s Court Road, and the area, and as an integrator point for the existing community. • Also, of key importance is the siting of the replacement building within the site so that it remains in RBKC and is Earl’s Court facing. <p>At Kings Cross, Argent determined that they would centre on Learning, Science, IT etc. and courted several anchor tenants Aga Khan Centre, Google, and others so that they would attract others subsidiary support businesses. In the Cultural Offer there is an indication that the change of thought would be towards several medium sized venues, but the size and the “pull” of the offers underpins the support for overnight stays in the hotels, with the trickle down to the restaurants, pubs, cafés, and once on site, there has be an incentive to go to Earl’s Court Road rather than the food court planned in the development. Therefore, there is concern to see the downplaying of the potential replacement, and a change of direction by the Council in the document:</p> <p>“The scheme should offer a variety of cultural experiences to continue the long tradition of this site. The requirement for a world-class cultural facility or facilities need not mean a large-scale venue or world-famous organisation; it is the quality and cultural importance of the work produced or consumed that should be world-class.”</p> <p>The indication from the developers in one presentation was that the pebble cultural offers would be spread across the site to serve the needs of the incoming residents rather than the existing residents or to attract others. To create a destination location that will deliver the 760,000-footfall as set out in the original SPD, it is imperative that a cluster is developed with a single unit with at least 500-seater capacity at its centre with satellite cultural offers</p>	<p>Noted; the requirement for an anchor cultural facility remains and will be reemphasised in the final document. It is recognised that, as a mixed use site allocation, culture needs to be balanced with delivery of homes, open space and workspace and the scale of the Exhibition Centre could not be accommodated alongside these requirements. Principle 4.3 is clear that a 'destination' cultural facility is required, and requires a cultural ecosystem.</p>

Responder	Representation	RBKC response
Cllr Linda Wade	“As people walk through the area, they should experience a lively variety of activity at ground floor at different times of the day. Vacant units detract from this experience.” This needs to be applied to Earl’s Court Road, where the need for integration and connectivity to respond to the cultural offer must be planned, promoted, and secured with joined up thinking across borough departments including planning and licensing.	Noted. Connectivity to Earl's Court Road is included in the Framework.
Cllr Linda Wade	Cultural Offer should not mean actors standing on plinths gilded and acting as automata.	Noted. A cultural strategy is required.
Cllr Linda Wade	Community facilities are in short supply and there has already been a request for the repurposing of two floors of the Qatar Building for community use such as the Earl’s Court Supplementary School, Teaching Older Residents IT, Art Classes, gym and dance classes and resident association meetings when Salboy vacated the property, but there is little detail on this as in Social Infrastructure given the demand and capacity on site and in the area.	Noted. While community facilities are required in the emerging site allocation and their location in the masterplan are set out in criterion 4.1g.
Cllr Linda Wade	Social Infrastructure such a crèche, nursery, GP surgery, Safer Neighbourhood Police hub, dementia hub will be some of the facilities that will be required.	Noted. Social infrastructure is detailed in the site allocation and further facilities will be identified through the pre-application process as a scheme evolves.
Cllr Linda Wade	It is unclear “To support the vitality of the district centre with its range of facilities for the benefit of new and existing local people” actually means when connectivity and integration have not been addressed.	Noted. Connectivity to Earl's Court Road is included in the Framework.
Cllr Linda Wade	<p>The elephant in the room No 3 Earl’s Court Road – detail lacking</p> <p>The decline of Earl’s Court Road, and the impact on businesses since the closure of the Earl’s Court Exhibition Centre, is marked with wide reaching effect not only on businesses but on the way that residents feel about an area that they have considered home for years.</p> <p>This is in part is being/will be addressed by the Commercial Strategy, which it is hoped will be pulling together different elements of policy, research, and department expertise, but the decline is perceived to be a result of neglect, and it is essential that the Council take the lead and set out the agenda and not rely on ECDC to engage or deliver. This needs to feed into the Framework document.</p> <p>Smaller Businesses have said that their business rates are too high and need a review.</p>	Noted. The Council sees Earl's Court Road as the local high street for future residents and therefore Principle 4.2f deals with requirements for the development in relation to Earl's Court Road. There may be other improvements, strategies and work undertaken that are beyond the scope of this framework, which relates to the development site.

Responder	Representation	RBKC response
Cllr Linda Wade	There needs to be a vision, a revised identity for Earl's Court Road, to cater for the incoming demographic and cultural offer coming on site. Do we know what the demographic will look like?	The vision for Earl's Court is set out in the emerging NLPR under PLV14. The aspirations for the OA site only are included in the Placemaking Framework with detail provided by the criteria.
Cllr Linda Wade	In this document, there is insufficient consideration of what is the main thoroughfare in the ward, the outcome and impacts of the new development on Earl's Court Road.	Noted. The Council sees Earl's Court Road as the local high street for future residents and therefore Principle 4.2f deals with requirements for the development in relation to Earl's Court Road. There may be other improvements, strategies and work undertaken that are beyond the scope of this framework, which relates to the development site.
Cllr Linda Wade	There should be a working group as set up in the 1970s by the Council and chaired by David Le Lay, Earl's Court Study Sub Committee Working Group to work on the future of hotels in the area, whether to convert into residential or to be supported to remain in business.	Noted. The question of the loss of hotel use is a matter of local plan policy rather than this Framework document.
Cllr Linda Wade	With no proposed high street on the site, this is a great opportunity with investment to ensure that Earl's Court Road can respond to the demands of the new residents as well as support the existing residents. This cannot be done without investment in properly connecting the site to the Earls Court Road.	Noted. Principle 4.2f deals with requirements for the development in relation to Earl's Court Road including connections.
Cllr Linda Wade	<p>Referring to the Cultural Offer pdf: One of the comments made by Sebastian Conran, some years ago, was that he would not put Earl's Court Station on the map for the Design Museum, despite its better connections due to its poor pedestrian experience. "it's too dirty and too down-market" – does not fit the profile for the Design Museum.</p> <p>The overall scenarios set out in the Cultural Strategies would have to generate activity to match or exceed the 760,000 footfall a year as set out in the original SPD and more emphasis needs to be placed on practical and usable solutions to connect the existing Earl's Court to the new development, and in particular Earl's Court Road.</p> <p>If the siting of the major "pebbles" were like the South Bank and Earl's Court facing within the site, then it might benefit Earl's Court businesses, particularly Old Brompton Road and with the improved permeability to Earl's Court Road. Again, at the Argent development at Kings Cross, they have created a central space area for their keystone clients, with the residential behind or above.</p>	Noted; the requirement for an anchor cultural facility remains and will be reemphasised in the final document. It is recognised that, as a mixed use site allocation, culture needs to be balanced with delivery of homes, open space and workspace and the scale of the Exhibition Centre could not be accommodated alongside these requirements. Principle 4.3 is clear that a 'destination' cultural facility is required, and requires a cultural ecosystem.

Responder	Representation	RBKC response
<p>Cllr Linda Wade</p>	<p>In conclusion: this report is still not ready for publication. There are gaps and there needs to be more insight into the vision of some of these key areas as this report will be sending out a signal to both residents and the developers as to what they can expect from the Council in the negotiations going forward on this very large and important site.</p> <p>Significantly there is no vision or indication in this report of how improvements could be made to Earl's Court Road to restore confidence for both businesses and consumers and take advantage of the potential uplift from the site and this is key for the area and its future financial viability and social coher</p> <p>I would like to thank the officers that took the time in the creation of this worthy report, but it too broad brush. I am concerned that it lacks the status to enable the Council to ensure that the developer takes any of it on board, apart from the increased workspace and the pebble culture concept, which the developer has already introduced.</p> <p>This is a project which will take 20-25 years. The impact on residents' lives will be considerable. The developers use the name Earl's Court, but care must be taken that the existing area does not become subsumed and side-lined by the development and not benefit from it.</p>	<p>Noted.</p>

Responder	Representation	RBKC response
Cllr Tim Verboven	<p>The priority to create green space in an urban area is a very commendable one but needs further details.</p> <p>There seems to be no thought given as to the utility of the green space that the Borough is looking for on the site. The green space needs to attract people from across different communities and across all generations. They use green spaces for different reasons which need to be considered to create a successful green space.</p> <p>Holland Park is a good example where people can come for a picknick, use the open-air gym, play petanque, play in a playground, relax on a bench, enjoy some quiet time in one of the sculpted gardens, and many other activities. It allows people to come together for different reasons and enjoy the public space.</p> <p>Any vision of the Earl's Court site should look into what it hopes people will be able to do. As we live in a very diverse area, the utility of the area will vary significantly which needs to be taken into account.</p>	<p>Noted and agreed. Principle 1.3 deals with the functions needed for the open space and it is felt that these points are covered.</p>
Cllr Tim Verboven	<p>The priority is focused on creating a site that is environmentally sustainable by itself, but a more holistic approach would be to consider the positive impact on the surrounding area and, therefore, look at what could be done to improve sustainability for the wider area, not just the site.</p>	<p>Noted, although the document relates to the Opportunity Area and the development site within in and therefore what is within the control of any planning permission for the site.</p>
Cllr Tim Verboven	<p>One example is flood management which is barely mentioned in the report whilst we have had serious flooding close to the development site in recent years (not in the least when St Cuthbert's Church, adjacent to the site was flooded with sewage). What measures can be taken on the site that doesn't make only the site immune to flooding, but can also assist in flood prevention for the wider area.</p>	<p>Noted. Reference to the recent sewer flooding in the local area has been included, to emphasise the need for the risk of flooding to be carefully considered. The sewer flooding issue at St Cuthbert's is being looked at by Thames Water. Criteria 1.2b is intended to deal with this and a planning application would need to include a flood risk assessment.</p>

Responder	Representation	RBKC response
Cllr Tim Verboven	This section of the Framework amalgamates townscape and transport. Both are huge topics. Both topics spark incredibly lively debates within the local community. Both topics should be well thought out and, therefore, I feel strongly, that both should be considered as separate priorities in any vision for the area.	This is true, although transport/connections is only covered from a placemaking perspective in this document. Technical transport assessments to inform junction upgrades, tube station infrastructure requirements cannot be dealt with here and so it may be misleading to have a whole section about transport since it cannot be comprehensive. Nevertheless, we have reviewed the text in principle 3.2 to ensure all opportunities to clarify our key concerns and aspirations on issues around connectivity.
Cllr Tim Verboven	I have had substantial conversations with local residents and every time building heights came up as a sensitive topic. Residents are worried about the impact on their lives by having so many new residents and offices in their neighbourhood. It is not a matter of just the height of the buildings and the aesthetic impact on their views from their homes, but also their daily lives; their commutes, and their work-life balance. We cannot deny Earl's Court is already a very densely populated area and residents' concerns are valid.	Noted. The approach taken in the Placemaking Framework revolves around the quality of the design of any tall buildings and their impact on the areas around them. Note that maximum height parameters are dealt with in the emerging site allocation in the NLPR, and not in the PF.
Cllr Tim Verboven	On this point, the Borough should take into account the opinions of its residents and how it will look to strike a balance between building heights and public opinion. This should be detailed in its vision. And in its vision, the Borough should also focus on how it will look to accommodate so many new residents in our community. That is a topic that should be core across the priorities being discussed.	The emerging policy on tall buildings has been subject to consultation as part of the New Local Plan review process, which also contains the overall Borough vision for accommodating and fostering sustainable development.
Cllr Tim Verboven	Traffic Management should be a strategic topic in itself. It is a major current issue and a difficult one to untangle. At the same time, a well-thought-out transport strategy for Earl's Court could ensure RBKC leads by example.	Transport/connections is only covered from a placemaking perspective in this document, setting out the Council's priorities. Technical transport assessments to inform junction upgrades, tube station infrastructure requirements cannot be dealt with here because they will need to be underpinned by data and modelling which will come at a later stage, involving multiple stakeholders. This document should set out the principles upon which a transport strategy should be based.

Responder	Representation	RBKC response
Cllr Tim Verboven	<p>But the current situation is not working. We have the Earl's Court One-Way System which acts like a motorway in a residential area. The London Cycling Campaign identified the Warwick Road/West Cromwell Road Junction as one of the most dangerous junctions in London. We have major borough roads without cycle lanes. We have crucial buses taking people to schools, hospitals, and their places of work. Earl's Court Tube station is a grade II listed building and is a crucial interchange for many people traveling from West London to Central London and back. We also have a high level of private car ownership.</p>	<p>The wider road network is outside the scope of the Placemaking framework, which covers what is within the control of a planning application for the site. As part of this, provision of enhanced cycling facilities will be required, the specifics to be developed through the pre-app process and via contribution requirements once a planning application has been submitted, and may include a cycle route on Warwick Road. Improvements to the A4/Warwick Road junction are a matter for TfL because it relates to the TfL network. Figure 61 and principle 3.2 set out the key connections to be prioritised for active travel.</p>
Cllr Tim Verboven	<p>We then need to consider that many homes are being developed very nearby, just north of West Cromwell Road. The current plans for the development site involve a site that would be car-free when it is accommodating new residents, offices, cultural hubs, and many other amenities.</p>	<p>Noted. This would be factored into the Environmental Impact Assessment as part of the planning application because it is an implemented development.</p>
Cllr Tim Verboven	<p>We need to develop an ambitious transport vision that is able to accommodate this increase in human activity, that is sustainable and that provides for a safe environment to travel on whatever form of mobility one decides to take. That is not present in the current framework.</p>	<p>Noted, a principle to require the development to specifically apply the principles of Healthy Streets to routes to and within the site will be included.</p>
Cllr Tim Verboven	<p>Such a vision cannot be just for Earl's Court. It needs to be integrated into a borough-wide plan which again needs to be part of a London-wide strategy.</p>	<p>The vision for wider Earl's Court is set out in the emerging NLPR under PLV14. The aspirations for the OA site only are included in the Placemaking Framework with detail provided by the criteria.</p>
Cllr Tim Verboven	<p>The Warwick Road entrance to the tube station will need to be redesigned to accommodate a major increase in users.</p>	<p>This will be dependent on the projected increase in journeys generated by the development, with additional capacity having to be provided accordingly. This will form part of the package of transport infrastructure improvements as part of the planning application and is a technical matter rather than placemaking.</p>

Responder	Representation	RBKC response
Cllr Tim Verboven	We need to re-design our streetscape to reflect the changing modes of transport we see on our streets whilst ensuring safety first and foremost. Measures will need to be taken to prevent people from visiting the future site by car when there will be no parking facilities on site forcing car users to look for space in the surrounding area. A strategy needs to be developed on how the site needs to be serviced during the building phase and after.	Noted. A planning application would be accompanied by a travel plan which would cover visitors to the site as well as workers and residents. A servicing strategy will also need to be provided and the criteria for this is included in 3.2d.
Cllr Tim Verboven	More attention needs to be given to connecting RBKC streetscape with streetscape from LBHF, especially when it comes to pedestrians and cyclists. Lillie Bridge is narrow and dangerous for cyclists and Cromwell & Talgarth Road offer a very uninviting and dangerous environment. Additionally, how will the connectivity on-site link with the rest of Earl's Court and the rest of RBKC?	Connectivity on site should tie in with the existing network at the key interfaces, and provide an east west route + connection to the north at Cluny Mews - see diagram 61. We understand the developer is looking to widen Lillie Bridge (in LBHF) as part of the development.
Cllr Tim Verboven	Improvements to pedestrian and cyclist safety Warwick Road, the 4 dangerous junctions on Warwick Rd, Old Brompton Rd, Cromwell Rd, and Earls' Court Rd, and through flow from the rest of the borough must all be discussed as part of these plans. If active travel measures on the site are designed in isolation from the existing, proposed, and desired infrastructure in RBKC then they will serve no purpose, as residents of the site will be unable to access their local amenities across Earl's Court owing to poor connectivity.	Noted. An additional criterion is to be included in relation to Healthy Streets in order that routes to key destinations link in with existing active travel routes and are appealing.
Cllr Tim Verboven	The Framework here is simply not sufficient.	Noted.
Cllr Tim Verboven	I am disappointed to see that the integration of Earl's Court Road is reduced here to a minor part of the vision for the neighbourhood. Only 1 paragraph (paragraph 4.2.F.) talks about the integration of the businesses in the surrounding area in the vision of the plan. From this paragraph, it is unclear to me what vision there is for Earl's Court Road.	The vision for wider Earl's Court is set out in the emerging NLPR under PLV14. The aspirations for the OA site only are included in the Placemaking Framework with detail provided by the criteria. 4.2f specifies how the development is expected to contribute to supporting Earl's Court Road.
Cllr Tim Verboven	An additional point to make is that it does not just relate to Earl's Court Road. All the maps show the "Earls Court District Centre" as the Eastern exit of the Earl's Court Tube Station and north of it. We also have restaurants and shops south of 304 Earl's Court Road and also all along Old Brompton Road where we have the famous venue the Troubadour. This street also suffers from vacant units and should be part of the vision and strategy for the integration of the development site with the surrounding areas.	Noted and agreed. The Framework will be updated to include the neighbourhood centre of Old Brompton Road.
Cllr Tim Verboven	Part of the vision should be a strategy to ensure that businesses on site and businesses across Earl's Court complement each other and introduce vitality across the neighbourhood.	Agreed. This will be incorporated into 4.2f)

Responder	Representation	RBKC response
Cllr Tim Verboven	On the topic of putting Earl’s Court back on London’s cultural map, there has been a lot of discussion with ECDC about either one major venue or a series of “pebbles” i.e. smaller cultural venues dotted across the site. It is not one or the other. Both can work together, one major venue supported by a number of smaller venues, which would strengthen the cultural offer and make it competitive with other areas of London.	Noted. The criteria for the cultural component has been amended to clarify both an anchor tenant and other, complementary facilities should be provided which are in addition to any culture or art within the public realm.
Cllr Tim Verboven	The Framework looks at some of the rich cultural history of Earl’s Court, but one aspect certainly has been ignored. Earl’s Court once was an important destination for the LGBT+ community. Many LGBT+ residents still remember the Earl’s Court Gay Heydays. The number of LGBT+ venues across West London is actually extremely low. The Earl’s Court Cultural Use Study from July 2022 actually referred to an interest of Queer Britain to have an interest in a venue in Earl’s Court. Encouraging new LGBT+ businesses in the area could really be a positive and inclusive strategic addition to the Framework.	Noted and agreed. This will be included in the history of the site under 'About Priority 4'
Cllr Tim Verboven	<p>I am pleased to see RBKC is looking at a vision for the future of Earl’s Court and Earl’s Court Exhibition Centre Site. With the developer bringing forward their planning application in 2023, a vision is hugely important to ensure any project fulfilled is led by what is needed by residents. Whilst recognising that any project needs to be profitable for the developer, the two are not mutually exclusive.</p> <p>I hope you will consider my points made.</p>	Noted.
Cllr Tim Verboven	<p>My point relates to the link between the site and the Earls Court Business District. I was interested to see officers are looking at the Earl’s Court tube station to do this and that would indeed be a good solution. As TfL are an important partner in the project, it would be interesting to hear from them what their thoughts are and what would be possible.</p> <p>The alternative could also be Old Brompton Road, where we already have many shops and restaurants. It also connects to the bottom part of Earls Court Road where we have a post office and a number of other commercial space. This could be a more natural link to the Earl’s Court Business District.</p> <p>By creating a link to the site through both the tube station and Old Brompton Road, Earl’s Court Road could really be reinvigorated which is something that local residents would be delighted to see happening.</p>	Noted and agreed. Highlighting the Old Brompton Road connection should be included in the Framework. Facilitating both routes (through the tube station and along Old Brompton Road) will be better than only one.

Responder	Representation	RBKC response
Earls Court Development Company	<p data-bbox="320 209 1413 355">Thank you for providing us with the opportunity to comment on the Royal Borough of Kensington and Chelsea ('RBKC') draft Earls Court Opportunity Area Placemaking Framework ('Draft Framework'). These representations have been prepared by the Earls Court Development Company ('ECDC') on behalf of Earls Court Partnership Limited ('ECPL').</p> <p data-bbox="320 403 1413 627">ECPL is a joint venture between Transport for London ('TfL') and Earls Court (London) LLP ('ECP') (a joint venture between Delancey's client funds DV4 and APG) and the owner of the majority of land covered by the Earls Court and West Kensington Opportunity Area ('the Opportunity Area') that is within RBKC (herein referred to as 'the Site'). ECDC is the Business Manager responsible for the delivery of the Earls Court redevelopment project and has been established as a locally based business.</p> <p data-bbox="320 675 1413 1015">ECDC welcome this opportunity to engage in the evolution of the emerging Placemaking Framework and considers the consultation on the Draft Framework to be an important step in ensuring that the future development of the Site is aligned with the aspirations of key stakeholders, including RBKC and local residents. RBKC have taken a positive approach to engagement throughout the preparation of the Draft Framework and in respect of the emerging masterplan for the Site, and it is evident that ECDC and RBKC share a joint appreciation for the opportunities that the redevelopment of the Site provides. ECDC is committed to delivering a development of outstanding quality at Earls Court, which provides significant benefits to the local community and beyond.</p> <p data-bbox="320 1062 1413 1302">ECDC supports the general approach to the Draft Framework and the vision, priorities, and principles which it expresses. These representations are intended to be read in the context of this supportive position. Matters raised within this letter are intended only to highlight potential areas where physical or technical Site constraints are such that absolute compliance with the Draft Framework is challenging, or where specific clarification or corrections are needed.</p>	Noted

Responder	Representation	RBKC response
Earls Court Development Company	<p>1.General Comments and Potential Areas for Further Investigation Priority 1: Public Realm First Northern Access Road / St Cuthbert’s Pocket Park</p> <p>ECDC supports the principle that high quality landscaping and public realm should be a priority in the redevelopment of the Opportunity Area and generally agrees with the specific measures (identified on page 25 of the Draft Framework) to achieve this. It is important, however, to highlight the significant constraints on the Site, which can be largely typified by the presence of surface level and subterranean public transport infrastructure. These constraints will inevitably play a key role in shaping the nature of the redevelopment and the location and layout of public realm.</p> <p>Set out under Priority 1, and elsewhere throughout the Draft Framework, there is suggestion of a ‘Pocket Park’ adjacent to St Cuthbert’s Church. Various potential means of pedestrian and cyclist access through this part of the Site are also identified throughout the Draft Framework, such as east through Cluny Mews, north across the A4 and west over the railway lines. This part of the Site contains the Northern Access R (NAR) to the Site and is particularly constrained physically, being bound to the west by the West London Line, east by existing development (which is at a much higher level than the Site), and to the north by the A4 overpass.</p> <p>Given the limited opportunities to achieve vehicular access to the Site, it is anticipated that the NAR will be relied upon by construction and service vehicles accessing the development. ECDC has been exploring opportunities to enable safe northern connections for pedestrians and cyclists, consistent with the objective of the Draft Framework. We will continue to look for ways to achieve this, but there are concerns that this may not be practically achievable.</p> <p>ECPL have a right of access to use the Northern Access Road through the basement of the Tesco Superstore at 100 West Cromwell Road for construction and servicing vehicles only.</p>	<p>Access to the site under the A4 using the northern access route, and through to Cluny Mews, have been identified as placemaking priorities for the site's development and are therefore included in the Framework. The Council appreciates there are constraints on the site and would work with ECDC to find solutions to the more challenging parts of the site to achieve high-quality public realm and convenient connections, including in the north of the site.</p>

Responder	Representation	RBKC response
Earls Court Development Company	<p>London Square</p> <p>ECDC shares the ambition of RBKC to provide a high-quality public space at the frontage of the site, opposite Earl’s Court Station in Warwick Road. It is noted that the Council envisages this space as a ‘reinvented’ London Square opposite Earl’s Court Station, however, structural loading limitations associated with the underground lines beneath this part of the Site should be noted, as these are a significant constraint in achieving the ‘green’ space envisaged by the Draft Framework, such as by limiting the ability to provide sustainable drainage systems (SuDS) or mature trees. Whilst proposals for a public square of outstanding quality in this key location are progressing, these structural limitations are such that soft landscaping is not likely to form a dominant feature in this space. Landscaping proposals will be of high quality, but planting must be of an extent and scale which is able to be structurally supported.</p>	<p>The underground constraints (and other constraints) are acknowledged in the PF. The vision for the Warwick Apron 'London square' do not specify any numbers of mature trees or SuDS in this space. The expectation is the space can be green within those constraints, through the use of trees where possible but also lower scale plating such as shrubs and/or grassed areas.</p>
Earls Court Development Company	<p>Warwick Road Crossing</p> <p>A specific query is raised in relation to the green hatched area crossing Warwick Road in the ‘Priority 1 Diagram’ between the Site and Earl’s Court Station. It is unclear what is being suggested in the image and whether there may be potential highways implications which need to be considered.</p> <p>A query is also raised in relation to the thin green lines in the diagram which link the London Square with the West London Line Deck Park. It is unclear what this is intended to suggest, and it is requested that clarification be provided as the Draft Framework progresses.</p>	<p>The hatched area crossing Warwick Road has been included to suggest improvements to the street crossing between the LU station and the site. This is touched upon within Priority 3 and specifically included within Principle 3.2 a Routes to key destinations - which refers to crossings at the site's key interfaces.</p> <p>Regarding the green lines linking the London Square with the West London Deck, these are there to suggest a link between them should be provided. The diagram will be updated to clarify this.</p>

Responder	Representation	RBKC response
Earls Court Development Company	<p>Priority 2: Exemplar of Environmental Sustainability</p> <p>As with comments made above in relation to the reinvented London Square adjacent Warwick Road, references to this part of the Site should avoid referring to it as providing 'green' space (as is suggested in the Priority 2 Diagram). High quality landscaping will be incorporated in any design for this part of the Site, but due to loading constraints it is unlikely that it could ever be delivered as a predominantly 'green' space. Similarly, references elsewhere in the Draft Framework to this space as providing a 'green oasis' may be misleading given the existing constraints.</p>	<p>The underground constraints (and other constraints) are acknowledged in the PF. The vision for the Warwick Apron 'London square' do not specify any numbers of mature trees or SuDS in this space. The expectation is the space can be green within those constraints, through the use of trees where possible but also lower scale plating such as shrubs and/or grassed areas.</p>
Earls Court Development Company	<p>Priority 3: Part of The City</p> <p>Many of the specific features identified in the Priority 3 Diagram reflect those shown on the Priority 1 diagram, so comments raised in relation to Priority 1 again apply in relation to Priority 3.</p> <p>ECDC wishes to highlight references to "relative tranquillity of residential hinterland" moving away from the "busy thoroughfares" of Earl's Court Road, Old Brompton Road, and Warwick Road within this section of the Draft Framework. This reference suggests that the development of the Site would begin to be defined by a quiet, residential character as it moves away from the surrounding highway network. This is then inconsistent with Priority 4, which identifies the southern part of the Opportunity Area as being characterised by its intensity of activity throughout all times of the day and evening. Whilst a new masterplan for the Site is emerging, and there will be areas proposed that are designed to be quieter and more residential in character than others, it is intended it will provide a range of active uses, including a cultural destination and city-scale public open space, consistent with the emerging site allocation and Placemaking Framework. Whilst it is appreciated this is a statement in relation to surrounding development, it should be clarified that it is not intended that the quiet, residential character of the adjoining crescents be reflected within the bounds of the Site, which will differ in terms of intensity and variety of use.</p>	<p>This is understood. The references are to highlight the need for busier and quieter areas within the masterplan, the idea is further explained in Priority 4. Text to be reviewed to ensure clarity.</p>

Responder	Representation	RBKC response
Earls Court Development Company	<p data-bbox="320 209 515 236">Familiar Streets</p> <p data-bbox="320 284 1429 472">References to development being street-based are noted, however, are at odds with a strong policy basis for development being car-free. The removal of cars from the masterplan removes the need to provide vehicular access throughout the Site, other than where needed to facilitate requisite access for services and deliveries, and limited (e.g. blue-badge) car parking provision.</p> <p data-bbox="320 520 1429 703">This presents a unique design challenge and a requirement to rethink urban form and the role and character of “streets”. The emerging masterplan will reimagine how streets appear and function, and it is the objective of the development to ensure that ‘streets’ are recognisable, safe, and vibrant spaces for pedestrians, and also maintain their role of structuring urban form, albeit with limited vehicular traffic.</p>	<p data-bbox="1440 209 2172 507">It is agreed that this presents a design challenge and opportunity. Streets as an urban typology predate motor vehicles and have historically always functioned as thoroughfares for different means of transport. The priority is that streets are recognisable as part of the city, and provide the necessary movement function for pedestrians, cyclists and the required vehicular movement to ensure the development can function and be serviced.</p>
Earls Court Development Company	<p data-bbox="320 711 488 738">Design Codes</p> <p data-bbox="320 786 1429 1358">On page 46 of the Draft Framework, it is suggested that “specific, detailed parameters” should be produced and submitted as part of a planning application. It is requested that this wording be clarified as parameters are to be established through Parameter Plans, but it will be the purpose of the Design Codes for a new masterplan development to establish the principles and design guidance to inform design detail within subsequent reserved matters application(s). There is also a question as to the level of detail that would be appropriate for a development of this scale, given the period of time over which it would be delivered. It may be that it is appropriate for earlier phases of the development to have more detailed, prescriptive design codes, with more flexible, broader design codes relating to later phases, to allow sufficient flexibility to enable the development to adapt to changing requirements over time. It is crucial that any planning control documents appreciate the flexibility needed to ensure that development can evolve and change over time, to respond to different economic conditions and changing market context. Planning controls must not be so prescriptive as to prevent design innovation and adaptability over time, especially for a development and scheme that will be realised over a substantial timeframe.</p>	<p data-bbox="1440 711 2172 938">Noted. Design Codes should include enough detail to ensure they are appropriate and useful tools to ensure the design quality over the implementation period of the scheme. The exact nature and content of the codes submitted with the application will be fully defined in collaboration through the pre application discussions. Text to be revised for clarity.</p>

Responder	Representation	RBKC response
Earls Court Development Company	<p>Tall Buildings</p> <p>To ensure consistency with relevant planning policy, references to buildings above 10-storeys being of “exceptional quality” should apply to “tall buildings” as defined in the draft Local Plan. Emerging Local Plan Policy CD7 defines tall buildings within the Opportunity Area in RBKC as being 30m or more in height from ground floor to the top of the building. These respective thresholds (30m / 10-storeys) relate to buildings of similar height and it would provide greater clarity in the preparation and assessment of future planning applications if provisions relating to design quality are applied consistently.</p>	<p>Noted. The text surrounding exceptional quality in the vision for Priority 3 will be clarified. At this stage, it is premature to reference specific thresholds in connection with emerging NLPR policy.</p>
Earls Court Development Company	<p>Connections North</p> <p>With regard to suggestions of a Cluny Mews link, and connections across the A4, attention should be drawn to comments raised in relation to Priority 1.</p> <p>It is noted that connections to Cluny Mews in the north-east identified in the Draft Framework would rely on access across land outside of the control of ECDC. Given the ownership constraints, ECDC would expect the delivery of these connections to also be potentially challenging. It may be that these connections could be achievable with the assistance of RBKC and engagement with other landowners, but the constraints in this part of the Site previously highlighted under Priority 1 above would remain and as such, it may be that overall pedestrian and cycle connections are undesirable and unachievable.</p> <p>In the event that no pedestrian or cyclist connection is able to be provided to the north of the Site, whether the basement to the north or Cluny Mews, it is unclear whether improvements to the Warwick Road / West Cromwell Road indicated in the Draft Framework would be necessitated.</p>	<p>Access to the site under the A4 using the northern access route, and through to Cluny Mews, have been identified as placemaking priorities for the site's development and are therefore included in the Framework. The Council appreciates there are constraints on the site and would work with ECDC to find solutions here to achieve high-quality public realm and convenient connections. Improvements to the Warwick Road / West Cromwell Road junction are anticipated to take place and therefore improved connections from the site to this junction will create convenient and appealing routes for active travel.</p>

Responder	Representation	RBKC response
Earls Court Development Company	<p>Vehicle Movements and Servicing</p> <p>On page 48 the Draft Framework refers to all non-residential servicing being underground. Whilst ECDC appreciate this is a general statement and the rationale for this is understood, the nature of the Site and below ground infrastructure is a severe constraint on delivery of basement level servicing yards. Where there is scope for this and it is viable to construct, ECDC will give consideration to its implementation.</p>	<p>Noted. Wording to be reviewed to recognise some servicing may be through the street network.</p>
Earls Court Development Company	<p>Response to Conservation Areas</p> <p>The adjoining crescents of the Philbeach Conservation Area (Philbeach Gardens and Eardley Crescent) are themselves a design response to the District and Piccadilly underground lines, which arc towards their convergence in the eastern extent of the Site, opposite Earls Court underground station. The presence of underground lines to the rear of these crescents is such that loading constraints dictate how development in this part of the Site can be designed. While the objective of ensuring that the development stitches into the adjacent Conservation Area is appreciated, it is suggested that references to “back-to-back” development here should reflect the existing constraints and challenges to achieving development of this form. ECDC proposes that more flexible wording should state that development of this nature should be pursued only where it is practically and viably possible to do so, given the existing infrastructure constraints.</p>	<p>Principle 3.3c states that back to back development 'should be pursued' to the rear of the crescents. This wording is deliberate and included to allow for any relevant constraints to be assessed during pre-application discussions, upon evidence being provided.</p>

Responder	Representation	RBKC response
Earls Court Development Company	<p data-bbox="320 209 763 236">Priority 4: Varied and Rich Urban Life</p> <p data-bbox="320 288 1429 395">The principles set out under Priority 4 are broadly agreed by ECDC and the emerging masterplan continues to explore how the vision for varied urban life within the development can be delivered through a range of uses and densities across the Site.</p> <p data-bbox="320 443 667 470">Supporting Earl's Court Road</p> <p data-bbox="320 518 1429 783">Reference is made on page 61 to how development could support the existing District Centre at Earl's Court Road. It is not clear how the Draft Framework envisages this being achieved, given the suggested measures (such as physical connections or meanwhile uses within the District Centre) relate to land outside of the control of ECDC. If it is to be suggested that the development would be expected to make contributions towards such measures through planning obligations, it is essential that any such obligations meet the relevant tests at Paragraph 57 of the NPPF, being that they are:</p> <p data-bbox="320 831 1149 938">(a)necessary to make the development acceptable in planning terms; (b)directly related to the development; and (c)fairly and reasonably related in scale and kind to the development.</p> <p data-bbox="320 986 1429 1241">At this stage, it is not clear how the interventions identified would meet these tests, given the development would not be reliant upon enhanced physical connections between it and the existing District Centre, and because the meanwhile use of vacant retail units in the District Centre appears to be in relation to existing concerns. ECDC is investigating ways in which a new masterplan development could connect to, and benefit the local area, but the nature and extent of any such initiatives, if included in a future planning application, will be subject to the above tests.</p>	<p data-bbox="1440 288 1518 316">Noted</p> <p data-bbox="1440 480 2179 667">The expectations for how the scheme should strengthen links to Earl's Court Road are set out in criterion 4.2f). This improved connectivity will benefit the residents of the new development since access to local facilities off site will be needed.</p>

Responder	Representation	RBKC response
<p>Earls Court Development Company</p>	<p>Cultural Use Criteria</p> <p>The cultural strategy for the masterplan is being developed and may take the form of several cultural facilities, as suggested within the Priority 4 Diagram, which can broadly align with the recommendations of the Council’s Earl’s Court Cultural Use Study (July 2022). The cultural use criteria set out on page 62 of the document should anticipate and reflect this approach, such as by referring to the cultural offer, rather than “A new cultural facility”. It is not clear why a narrower focus is being applied on achieving a singular cultural facility and it is suggested that the approach should be broader and more flexible. These comments are also made in relation to the emerging site allocation.</p> <p>In reference to the emerging site allocation, the cultural offer of the scheme should be referred to as such, given it may be that it could be provided across multiple facilities rather than in a single facility. Further, references to ‘world-class’ should relate to quality and not quantity. The size of any cultural facility will be based on the relative need for cultural facilities within the borough, its compatibility with the wider cultural offer for a new masterplan and is the subject of ongoing engagement with key stakeholders.</p>	<p>Noted. An anchor cultural facility is expected, however this may form part of a wider cultural offer. Text to be amended accordingly.</p> <p>Comments on the emerging site allocation are dealt with within the relevant documentation as part of the NLPR</p>

Responder	Representation	RBKC response
<p>Earls Court Development Company</p>	<p>Public Art Strategy</p> <p>ECDC anticipates that a Public Art Strategy will be submitted and maintained in accordance with any relevant obligations associated with a new masterplan planning permission. It is apparent that references to public art being provided as part of each phase of the development is intended to apply broadly to the various stages in the process of bringing forward the Earls Court development, however, may be interpreted as requiring that public art be provided as part of each phase of the masterplan itself. It would be pre-emptive at this stage to suggest that public art need be provided as part of each phase of the development, as the strategy to be agreed with RBKC as part of, or following, a masterplan approval may instead look to focus public art in key locations throughout the Site. The masterplan approach provides the benefit of enabling a holistic approach to public art and so suggestions at this early stage that art need be physically distributed evenly throughout the Site should be avoided, as this may eventually undermine the quality of art that could be provided.</p> <p>It is in any case noted that ECDC continues to pursue public art initiatives as part of the meanwhile uses on the Site, such as the installation currently in place opposite the entrance to Earl’s Court underground station and sees public art as an important aspect of the development moving forward.</p>	<p>Principle 4.3 g) states that "a public art strategy shall set out how public art will influence each phase of the development". This does not refer to the physical distribution of public art throughout the site, rather to the fact public art can play a role at each stage of the process. Public art and how it contributes to placemaking, from the masterplanning/design stages through to meanwhile and implementation is a priority.</p>

Responder	Representation	RBKC response
Earls Court Development Company	<p>Clarifications and Corrections</p> <p>Extent of Site Boundary</p> <p>It is suggested that the boundary of the Site for the purposes of the Placemaking Framework could be extended to incorporate the adjoining highway in Old Brompton Road and Warwick Road. This is to reflect that the arrival experience from Earl's Court and Old Brompton Underground Stations is a key part of the 'place' being created and ECDC therefore seeks to ensure that a significantly enhanced environment within the adjacent highway is created. Submitted with this letter is a plan produced by Hawkins Brown which presents this illustratively, with suggested inclusions shown within the hatched red outline on the plan.</p>	<p>The site boundary in the PF is as per the land within the control of the developer that is anticipated to form part of a planning application. Any works outside of this line which are associated with/necessary in connection with the development can be included within a planning application boundary and do not need to be included in the site allocation or the PF. It is recognised, however, that there is a greater area of influence, beyond the site boundary, which should be considered throughout the process and during pre-application discussions.</p>
Earls Court Development Company	<p>Existing Permissions</p> <p>Reference is made to the extant Outline Planning Permission (LPA Ref. PP/11/01937) on page 8 of the Draft Framework. This reference incorrectly states that the permission allows for up to 920 residential dwellings. This should be corrected to state 930 dwellings. For ease of reference, it is also suggested that the planning permission reference number could be included where reference is made to the planning permission.</p>	<p>Error noted. To be corrected.</p>
Earls Court Development Company	<p>The final sentence of the first paragraph under 'Introduction to the Site and Context' refers to the Lillie Square development to the south-west of West Brompton Station. This sentence reads as if this development was undertaken as a phase of the extant masterplan permission, but this development has been undertaken under a separate planning permission. It is a wholly separate and standalone development. This should be clarified.</p>	<p>Noted. To be corrected.</p>

Responder	Representation	RBKC response
Earls Court Development Company	<p>Land Ownership</p> <p>On Page 8 of the Draft Framework, it is stated that the Earls Court Development Company (ECDC) is the owner of the Site. As stated at the top of this letter, ECDC is the Business Manager responsible for the delivery of the Earl’s Court redevelopment project on behalf of the landowner ECPL. The supporting text to Figure 15 (Site Boundary and Context) also refers to ECDC ownership. Reference to land ownership should be amended to refer to ECPL, not ECDC.</p>	Noted. To be corrected.
Earls Court Development Company	<p>A Choice of Homes</p> <p>On page 57 of the Draft Framework, a reference is made to a range of housing typologies being provided within each “cluster” of homes. It is unclear what is meant by “cluster” in this context and ECDC request that this be clarified.</p>	Noted. Principle 4.1a seeks to ensure a choice and variety of home types are provided. These should be distributed across the site and phases of the development. Text to be clarified accordingly.
Earls Court Development Company	<p>Consistent References to Site Allocation</p> <p>It is noted that ECDC is also making representations to the emerging RBKC New Local Plan Review (NLPR) Regulation 19 consultation. The focus of these representations relates to the emerging Earls Court Exhibition Centre site allocation (SA2). Should the site allocation, or any relevant emerging Local Plan policy be amended as a result of consultation of the NLPR consultation, ECDC would expect that these amendments will be also reflected within Placemaking Framework, so as to remain consistent.</p> <p>ECDC trusts that the above representations are clear and that proposed amendments will be incorporated through the development of the Placemaking Framework, prior to its adoption, and welcomes the opportunity to continue to work with RBKC throughout this process.</p>	<p>The Council will seek to ensure the Placemaking Framework is consistent with the emerging NLPR site allocation SA2 and any changes made to this as the plan proceeds through Examination.</p> <p>As written, the Framework focuses on placemaking and is applicable to both the adopted local plan and emerging allocation.</p>
Earl's Court Society	<p>We support much of the general description in the introduction to Priority 1, in particular, tree-lined streets and richly planted open spaces.</p> <p>This section needs to be “beefed up” with more comprehensive detail on what these pleasant words mean in practice. What is the intended use for the document after approval? Guidance on policy structure and outcomes is lacking. How does the Framework fit in within the planning process and what weight will it carry?</p>	The document is anticipated to be adopted as a supplementary planning document, giving it weight in the assessment of a planning application. A proposal will be expected to set out how it responds to each of the criteria in the Placemaking Framework.

Responder	Representation	RBKC response
Earl's Court Society	<p>It is essential to resolve issues with active travel in the centre of the Borough. Safe, segregated north – south cycle routes are desperately needed and could easily be incorporated into the design of this permit-free site. To avoid a missed opportunity which could widely benefit promoting active travel, further detail needs to go into the Framework document to specify deliverable cycle routes to accommodate many users, not just those who live or work or visit the site, but to take advantage of this opportunity to relieve the pressure on the ECOWS and to give all cyclists a safe alternative to using the dangerous Red Route. For example, a safe cycle route link to the north would promote cycling to the Kensington Primary Academy. This should be a Borough priority. Photo 35 is a good starting point, but this appears to be a much quieter area and as such is not a suitable example. A busy cycle highway is very difficult to safely share between Lyra-clad commuters, Just Eat electric cyclists, fast moving and silent E-scooters, toddling youngsters and slower-moving elderly grandparents using canes. We strongly believe these need to be separate or segregated routes to ensure everyone’s safety and to encourage broad conversion to active travel options.</p>	<p>Criteria 3.2a and 3.2c and the diagram of routes in figure 61 set out the expectations for north-south cycle routes. The development should connect into the existing pedestrian and cycle network as detailed in figure 61. While routes within the site should be cyclable, it is not desirable for a cycle highway to run through the site, because of the conflicts highlighted. Additional clarity will be added to 3.2a.</p>
Earl's Court Society	<p>The West London Line deck can be creatively used as a public space, but this will require a large investment to ensure genuine accessibility. Planting will be limited due to the lack of soil and will be restricted to plants and trees that can grow in an exposed environment. What will be done to ensure that this essential open space is genuinely accessible and useable? Basic services such as public restrooms and step free access needs to be designed and delivered as a part of the Masterplan if this is to be accepted as “Open Space”. Who will be responsible for the maintenance and upkeep of this community resource? These things must be clearly and comprehensively included in the document if residents are to be able to judge whether the development has met requirements.</p>	<p>Noted; we agree that it is challenging to turn the deck into a park and are working with the developer to ensure soil depths can sustain planting; this is supported by criteria 1.2c. Concerns over management and access are noted; although this is covered by the requirements of London Plan Policy D8, specific wording will be included in the Placemaking Framework. Public toilets for a development of this scale would be required by policy S6 of the London Plan.</p>
Earl's Court Society	<p>Will the roads on the site be borough-maintained roads or the responsibility of the developer/management organisation?</p>	<p>It is expected that key routes will be built to adoptable standards but remain within the management of the developer's management company. The Placemaking Framework sets out the design requirements for streets regardless of ownership.</p>

Responder	Representation	RBKC response
Earl's Court Society	The much-overlooked Cluny Mews Pocket Park is omitted from the description. This park must be creatively integrated into the site and used as a placemaking opportunity. It can also be used as a place to showcase cutting edge pollution control planting, to design out anti-social behaviour and become a navigational landmark for visitors entering RBKC and Central London. Also missing is the Community Garden at the junction of Warwick Road, Finborough Road, and Old Brompton Road. These underutilised community assets must be integrated into the Framework with responsibility for delivery delegated and form part of a consolidated strategy for RBKC to promote greening.	Noted. To be included in community consultation map. An aspiration for a link through to Cluny Mews is included in the Placemaking Framework.
Earl's Court Society	The "Community Voices" box has an unedited tone. The comment about the Chelsea Flower Show seems gratuitously discourteous. In fact, perhaps the RHS would like to be invited to use the Deck Park for one of their many shows in future. In summary, the Framework must be fortified and augmented to include these elements – and before a new Masterplan comes forward.	The "Community Voices" boxes are indeed verbatim quotes and not edited.
Earl's Court Society	How will the permeability to Earl's Court Road and the Earl's Court District Centre, indicated with a purple arrow on page 33, be delivered? Who will be responsible for building and delivering this? The Framework document is not clear on who will be accountable for delivering this essential element of the plans.	The indicative purple arrow shows the council's aspiration for improved connectivity through to the existing district centre. The detail of how this is achieved, which may be in more than one way, and how it is funded is a matter to be agreed with the various stakeholders. Principle 4.2f deals with the particular requirements for the development in relation to Earl's Court Road.
Earl's Court Society	The 15-minute city concept should be an aspiration for this permit free site, but to achieve this easy pedestrian access to Earl's Court Road is essential. How do you implement a 15-minute city? A successful 15-minute neighbourhood is 'complete' with core services and amenities that residents can easily walk or cycle to. This includes community-scale education and healthcare, essential retail like grocery shops and pharmacies, parks for recreation, working spaces and more.	Noted. Connections beyond and through the site to existing facilities are covered by the Placemaking Framework, while infrastructure requirements are covered by the site allocation in the Local Plan. A further criteria relating to Healthy Streets 3.2e will be included to reinforce the importance of appealing active travel routes.
Earl's Court Society	In addition to our other comments regarding active travel and servicing, what other measures can be creatively used to reduce the existing community severance caused by the one-way system, which will increase with the build out of the development? Should the brief be led by the selection of the "significant world-class cultural facility" as this will dictate many of the other points?	Noted. Improvements to Warwick Road as noted in principle 3.2, as well as the design of the Warwick Road space detailed in 3.3a, both seek to overcome severance between the new development and the existing community.

Responder	Representation	RBKC response
Earl's Court Society	On page 35, who will be responsible for setting out a tangible, visible, clear, and transparent strategy? This is not clear to residents from the Framework draft document. On pages 37 & 38 the significance of the Commercial Offices and Housing graphics are difficult for a layman to grasp without benchmark data for other new build sites.	The Framework sets out the requirements for the development throughout, including requirements for the developer to set out a 'sustainability charter' for the lifetime of the development. This would be subject to approval through the planning process. It is noted in the introduction to priority 2 that the commitments should be tangible, visible, clear and transparent.
Earl's Court Society	Where will all the thousands of bicycles that will be on the site be parked to avoid creating street clutter and a trip hazard or being piled on balconies creating visual clutter. An estimated number of cycles on the campus (including those of residents and visitors) should be determined by the Council and designated cycle parking areas must be designed and built to house them. Will there be charging points for the electric cycles and scooters?	This is an important consideration which is covered by Local Plan policies.
Earl's Court Society	Waste management including traffic caused by the many waste vehicles that will be servicing the site must be expressly stated. Will there be on-site composting facilities on site? This should be expressly required. Would waste disposal be an opportunity for power generation?	Waste management and servicing is dealt with by criteria 2.2b and 3.2d. The Placemaking Framework sets out overall expectations for an exemplar development in relation to sustainability but is not prescriptive as to how this should be achieved because it needs to be considered in the round - for example, whether the suggestions made here will have adverse environmental impacts. Facilities to deal with on-site landscape management will be included in 2.2b
Earl's Court Society	It is essential that the development is integrated into and sympathetic with the existing Earl's Court neighbourhood. The single most important component to make this a reality is building height. The new streets running nearest to Eardley Crescent and Philbeach Gardens should be no higher than the existing Victorian terraces. Tower blocks simply to not fit in with the existing urban landscape and will appear alien and create an island community disconnected from the surrounding area. Considering Central Government's evolving views on housing targets, there should be no reason to permit or encourage high-rise tower blocks on the site.	Noted. The Placemaking Framework stresses the importance of responding to the context - see principle 3.1. Building height maximum parameters and suitable sites for tall buildings are controlled via the local plan and site allocation rather than the Placemaking Framework.

Responder	Representation	RBKC response
Earl's Court Society	Point 3.1 d states the “design of any building over 10 storeys should be of exceptional quality”. We believe all the buildings on site should be of exceptional quality and that anything 10 storeys or more is simply too tall to knit into the existing low-built neighbourhood. How is “exceptional quality” defined and who will judge this has been delivered?	It is accepted that all buildings are expected to be of exceptional quality, but given the greater complexities in their design, taller buildings will be subject to greater scrutiny. The 'vision' text for priority 3 will be amended to clarify this area, "A sensitive integration of building scale is needed across the scheme, with greater care in the design of buildings over 10 storeys, given their greater visibility and environmental impacts"
Earl's Court Society	Point 3.2 is of the utmost importance. More definition is needed to flesh out the meaning of “convenient and appealing connections”; one of the greatest needs in Earl’s Court is to create safe and clear access to the station and Earl’s Court Road reduce the community severance caused by the ECOWS.	Noted, see comments above. The diagram in figure 61 sets out the anticipated connections and more explicit reference to the diagram will be included in principle 3.2.
Earl's Court Society	Point 3.2a & b should be more specific and express higher aspirations for the redesign of the Warwick Road entrance to the underground station. A clear, easily accessible route to use creating permeability to Earl’s Court Road (outside of the fare paying passenger route) needs to be created and the station entrance must be expanded to accommodate many more commuters.	Noted. This is to be explored with stakeholders, with the aspiration set out in 4.2f)
Earl's Court Society	Point 3.2c currently suggests a 2-way cycle route on Warwick Road. The plans for a safe cycle route should be much more ambitious if all the residents of the site and the surrounding areas are to be encouraged to move to active travel. The cycle route needs to be on the ECDC site where it can be designed and built for safe and segregated use separate from the vehicle traffic on Warwick Road and the dangerous junction with the A4. This will make it more appealing to users such as parents and children on the school run to Kensington Primary Academy and St Cuthbert with St Matthias Primary School.	Noted. Improvements to the A4/Warwick Road junction are a matter for TfL because it relates to the TfL network. Figure 61 and principle 3.2 set out the key connections to be prioritised for active travel.
Earl's Court Society	How will a “green square” be created on the Warwick Road apron in the place that is also a narrow and busy main thoroughfare and portal to the site? With this guidance the most likely result will be a paved plaza with cyclists and electric delivery bikes racing through. Without adequate and useable servicing areas designed on the site this will become a congested space where delivery drivers and taxis idle.	It is noted that this is a challenging space to design for a variety of reasons. The guidance in 3.3a sets out the Council's priority for this to be a high-quality 'London square' and a space in its own right, and that it should not simply be a thoroughfare or wide pavement. It is for the developer and their designers to respond creatively.
Earl's Court Society	Section 4.1 should be expanded to include wind effects in addition to point c. Acoustic Design.	Wind effects are dealt with in 3.1d and would be assessed as part of any tall building proposals.

Responder	Representation	RBKC response
Earl's Court Society	Point 4.3 a. Why has this been so drastically watered down from the SPD? “Attract audiences from beyond the local area” seems vastly out of step with “A significant world-class cultural facility”.	Noted. This is not the intention; the expectation remains for world-class culture. 4.3a) to be amended to include 'world-class'
Earl's Court Society	We welcome the creation of this well-intentioned document and its aspirations to develop and add detail to the Council’s vision for Earl’s Court. While the draft states in the Introduction that it is “not intended to be a comprehensive brief for the site”, the criteria that are included are not described with enough specificity to provide a developer with sufficient guidance on what and how various elements are to be delivered, or to allow residents and other stakeholders to evaluate if this has been done. It is a difficult document for a layman to interpret in terms of specific deliverables or weight in the planning process. This draft needs further work to include key elements that have been omitted in this draft and to buttress it.	The document seeks to strike a balance between setting clear objectives for a scheme but without being prescriptive as to the design. It sets out the Council's priorities for placemaking as so many other aspects of the development will be covered by national, London and local planning policy. In reviewing the comments received through consultation, we will seek to be more precise in the requirements as we finalise this document. The text on page 3 will be clarified accordingly.

Responder	Representation	RBKC response
Earl's Court Society	<p>In preparing our response to the Consultation we have referred to the World Bank's definition of a Framework Plan to understand the purpose and significance of this document. It states:</p> <p>Framework plan. Often called a "strategic plan" or a "vision plan," this document articulates a clear vision for the regeneration project based on the findings of the scoping phase. It has a long-term horizon, explicates the context and rationale for why the regeneration project is important to the city and region, and provides comprehensive goals for the area. It also addresses the interrelationship between the economic, physical, social, and institutional dimensions of the regeneration program.</p> <p>The document understandably focuses on the EC Exhibition Centre site; however the success of the site will be greatly impacted by how it is knitted into the existing fabric of Earl's Court. This urban village with a high street that has suffered greatly from the closure of the Exhibition Centre however it has great potential to provide essential community resources to both new and existing residents if it is nurtured during the development and if that development includes a successful strategy for building permeability from the site to the east. A bold strategic vision must be set out in the Earl's Court Placemaking Framework to guide the developer in how this should be achieved. For example, the Framework should include specific details about how to provide a pedestrian link from the Warwick Road Apron to Earl's Court Road. The purple arrows in the Framework Draft are too vague and too easy to ignore. Measuring the success of the Framework ex-post will be impossible without more robust policy.</p>	<p>The document is a Placemaking Framework for the Earl's Court Opportunity Area and so focuses on the development site, albeit looking at connections beyond as relevant. Principle 4.2f deals with the particular requirements for the development in relation to Earl's Court Road. A wider vision for Earl's Court is included in the emerging local plan PLV14.</p>
Earl's Court Society	<p>The need for social infrastructure must be addressed more comprehensively in the document. If a minimum of 1,050 new homes are to be built on the site there will need to be a purpose-built GP surgery with step-free access, crèches, and schools. These requirements seem plainly obvious to those who live in Earl's Court; however, the developer may not realise our local resources are already oversubscribed and cannot stretch to accommodate the thousands of new residents who will be moving into the new homes. The exact needs of course depend on the mix of housing to be built, which must be carefully considered and guided by the Council and this document.</p>	<p>These are matters that are dealt with in the local plan through the site allocation. The infrastructure requirements reflect local need and projections at the time of drafting the site allocation. Criterion 4.1g covers community facilities.</p>

Responder	Representation	RBKC response
Earl's Court Society	Earl's Court already has an unbalanced mix of housing overweighted to bedsits and 1-bedroom flats so this imbalance should be corrected to the RBKC averages via the new-build units. Gaps in the housing stock should be addressed, for example by building intergenerational units and lifelong units which can be designed and built to address accessibility needs.	Noted. The mix of homes will be considered against relevant planning policy and this cannot be altered through a supplementary planning document such as this. Principle 4.1 provides additional guidance on adaptable homes.
Earl's Court Society	We all support the move to greener forms of transportation; however, it is simply unrealistic and disingenuous to build a development by promoting it as "green" when in fact this will lead to a major increase in traffic and congestion in the adjoining roads. The thousands of residents living in the new homes will take taxis, Ubers, hire removal vans, have visits from plumbers and electricians, there will be gardeners bringing in planting and removing garden waste. Without significant, easily accessible servicing areas closely located to the individual units, the Warwick Road Apron and the West Brompton Square will become de facto servicing areas with vans and other vehicles loading and setting down or picking up from there. The surrounding streets will be overburdened with traffic and white vans. This in turn will restrict site permeability at the key juncture where the site stitches into the exiting context and place additional burdens on streets and squares outside the Opportunity Area. It will exacerbate an unwelcome pedestrian experience, quite the opposite of the "London Square" envisaged as a "Green oasis" in the document.	Noted. A servicing plan will need to be considered as part of a planning application. 3.2d covers the Council's expectations.
Earl's Court Society	Finally, enforceability must be achieved, particularly in the case of the public realm improvements. Elements such as tree planting and greening and other key pieces of overall success come at the end of the development and are easily forgotten or omitted by stealth. A few trees in pots is not what residents think "greening" should mean.	Noted, this is dealt with in Priority 1 including long term health and maintenance of landscape (1.2c)

Responder	Representation	RBKC response
Earl's Court Society	<p>While we appreciate that complexities of drafting a document that is both forward looking and flexible in a time when Central Government's planning policies are changing, this document must be further developed and strengthened to avoid valuable missed opportunities in this gateway to Central London and keystone area of Kensington.</p> <p>The concepts in this document are welcomed, but the detail is insufficient to understand the vision for the future of Earl's Court. Further work must be urgently done to rectify this deficit and to make the document one that residents, current and future, can use to hold the Council accountable for the outcome.</p> <p>It is also unclear as to the status of the Framework within the Planning process, and what powers the Framework has in fact, the document falls short of the validity of a SPD which has some legal standing.</p>	<p>Noted. It is anticipated that the document will be adopted as a supplementary planning document.</p>
Elvira Arteaga	<p>The landscape strategy should also consider Earl's Court Road as an integral part of the area. I'm worried about the impact on this side of the tube station.</p>	<p>Connections from the Opportunity Area to Earl's Court Road District Centre as well as measures to have a positive impact on the District Centre are included are requirements in the Framework. The Council sees the District Centre as continuing to serve the day-to-day needs of existing local people as well as those who will occupy the new development. A clear physical connection between the OA site and Earl's Court Road should ensure the high street is an integral part of the area.</p>

Responder	Representation	RBKC response
Elvira Arteaga	<p>Really important to focus on traffic - in Warwick Road and Earl's Court Road. Given how bad traffic actually is, how is it going to be impacted when many more people are travelling to the area?</p> <p>1. Key factor here is the traffic impact on Warwick Road and Earl's Court Road. Traffic needs to be reduced in these 2 streets. NOT INCREASED. More bike lanes, pedestrian streets and reduce car usage to the minimum.</p> <p>2. Always take into account impact on Earl's Court Road</p>	<p>Noted. A planning application will be accompanied by a Transport Assessment which will enable the Council to assess the impact of the development and inform what new or upgraded transport infrastructure is required. Existing national, London and local planning policy prioritises sustainable modes of transport such as walking, cycling and public transport. In addition, the Framework sets some specific objectives for the site to ensure good connectivity into the surrounding transport network (see Principle 3.3). The impact on traffic will be assessed in detail at the planning application stage. The site allocation includes requirements for improvements to transport infrastructure.</p>
Elvira Arteaga	<p>Agree. Inclusivity and openness to the public are key</p>	<p>Noted</p>
Environment Agency	<p>Introduction to the site and context</p> <p>We recommend that the Earls Court OAPF is placed in the context of the climate emergency, as a motivation for its vision, and objectives. The Royal Borough of Kensington and Chelsea (RBKC) have declared a climate emergency and have adopted a RBKC Climate Emergency Action Plan 2022-2027 which we suggest is referred to in introduction, with an aim for the OAPF's provisions to drive actions in the Action Plan.</p>	<p>Noted. Reference to climate emergency declaration and Climate Emergency Action Plan 2022-2027 is included under 'priority 2'.</p>
Environment Agency	<p>Constraints</p> <p>The following list of environmental constraints on the site fall within our statutory remit:</p> <ul style="list-style-type: none"> • Flood Zones 3 and 2 • Thames Tidal Breach Extent (modelled May 2019) • Area benefiting from flood defences • Boreholes (Earl's Court OBH) • Water management area • Superficial Aquifer (Secondary A) <p>As mentioned above, the site is within Flood Zones 2 and 3, and within the tidal breach flood extent. We recommend that this is mentioned as one of the sites constraints, along with the residual risk of the defences protecting the area to be identified.</p>	<p>Flooding is included in the site analysis - Appendix A</p>

Responder	Representation	RBKC response
Environment Agency	We are pleased to see the acknowledgement of the associated flood risk located near St Cuthbert Church (whereby the connecting building named Philbeach Hall is located partially within Flood Zone 3). We would advise future development to consider the overlap between the flood zone boundaries while submitting a Flood Risk Assessment (FRA) incorporated within any future planning application.	Noted
Environment Agency	We note that the Surface Water Management Plan (SWMP) for the RBKC identifies that the Opportunity Area faces flooding due to a sewer that has limited capacity to take anymore storm and sewer water. We believe there is an opportunity to manage surface water and water quality issues generated by road and building run-off, and from planned development.	Noted. Criterion 1.2b covers this
Environment Agency	In reference to London Plan Policy SI 5, it is recognised that London is under severe water supply stress. Therefore, we recommend that the OAPF supports the London Plan, and ambition to address the area's water challenges.	The development will need to meet the requirements in the London Plan, and the PF requires an Integrated water management strategy.
Environment Agency	<p>Opportunities</p> <p>We welcome the commitment to creating new open space, as part of a site-wide green infrastructure strategy, and the reference made to connectivity through green corridors. However, we feel there may be further opportunities to deliver green infrastructure by employing Sustainable Urban Drainage Systems (SuDs) to address surface water management and other climate resilience measures.</p>	SuDs are already referred to in the PF as one of the tools to optimise green infrastructure and water management in the site
Environment Agency	<p>In reference to the 'Infrastructure and Planning Contributions section for the Earl's Court Exhibition Centre on page 71, it is stated that 'The overall water infrastructure need...will be informed by an Integrated Water Management Strategy...'</p> <p>We recommend that a commitment to an area-wide Integrated Water Management Study (IWMS) is included under the 'Opportunities' section of the OAPF, to address the water challenges, and improve climate resilience e.g., strategic SuDS. IWMS's have worked well in other Opportunity Areas, such as the Isle of Dogs OA, and the Old Oak and Park Royal OA, to evidence the growth ambitions in these areas. Therefore, we recommend the OAPF encourages developer collaborations for delivering the options which an IWMS identifies, for example, de-culverting opportunities in the area.</p>	Noted. This is beyond the scope of this document, which only covers the opportunity area. The Council will continue to look at opportunities to improve climate resilience in relation to flooding and drainage including via updates to the local flood risk management strategy.

Responder	Representation	RBKC response
Environment Agency	<p>Diagram 24: Priority 1</p> <p>We are pleased to see that water management has been mentioned in the ‘Working with nature’ section of this diagram. We advise that Blue Ribbon Networks are also identified here, along with historic flooding.</p>	<p>Noted. There are no Blue Ribbon Networks in or in the immediate vicinity of the site. Reference to the more recent historic flooding and Counters Creek shall be referred to in the constraints section.</p>
Environment Agency	<p>About Priority 1</p> <p>We are pleased to see that the OAPF identifies that water management is important in safeguarding the site against climate change and support this statement. The current wording is rather general, and we would like to see specific ways that this will be done within this area. Specifically, we recommend consideration is given to which impacts of climate change will need to be mitigated for and how this will be achieved. We encourage a more in-depth assessment into the impact of climate change and whether it may lead to changes in flood zones/risk as this may pose additional constraints on development plans.</p>	<p>Noted. The PF sets out principles - whilst the development will also need to respond to policy. A planning application for the site will need to provide further detail in due course.</p>
Environment Agency	<p>Secondly, there is no mention of development in the OA meeting Kensington and Chelsea’s forthcoming Local Plan Policy GB15: Green Infrastructure requirements for an Urban Greening Factor (supporting the London Plan’s Policy G5). We recommend that the OAPF ties into the draft Local Plan’s urban greening requirement.</p>	<p>It is understood that the development will be assessed against current and emerging policy, weighting to be dependant on the timing of a planning application / decision.</p>
Environment Agency	<p>1.2: Working with natural systems and the inherited landscape</p> <p>Figure 32</p> <p>Regarding green walls / roofs as depicted in Figure 32 on page 29, please note that London Plan Fire Safety Guidance seeks that major development commit to exclude combustible materials on buildings’ external walls. We suggest that the OAPF may want to caveat its otherwise welcome approach. Please see paragraph 5.3.4 of the draft London Plan Guidance on Fire Safety.</p>	<p>Noted. The reference to a green wall in this instance is illustrative only. Image to be replaced.</p>
Environment Agency	<p>a) Maximising biodiversity</p> <p>We are pleased to see the commitment to maximising biodiversity within the area. However, we recommend reference is made to ‘biodiversity net gain’, in line with the requirements of the Environment Act (2021) which mandates a minimum of 10% net gain and comes into force in November 2023. The OAPF should link in with the draft Local Plan’s biodiversity commitments and the borough’s Biodiversity Action Plan.</p>	<p>Noted. Reference to Biodiversity Action Plan to be included.</p>

Responder	Representation	RBKC response
Environment Agency	<p>b) Integrated water management</p> <p>We are pleased to see that the OAPF looks to incorporate sustainable urban drainage systems (SuDS). Whilst we encourage the use of these sustainable drainage methods, we would also like to see specific reference regarding the need to ensure that surface water runoff does not increase elsewhere as a result of development. The ambition should be for this, along with the incorporation of sustainable drainage systems, to result in a net reduction in surface water flooding in the borough. Furthermore, we recommend that reference is made to the water quality benefits of SuDS, as well as surface water flooding alleviation, thus improving climate change resilience</p>	<p>Noted. However, the PF is focused on placemaking issues, and proposals will be assessed against policy requirements, which deal with water runoff issues.</p>
Environment Agency	<p>We recommend that stronger wording in given this section of the OAPF to demonstrate the Council's commitment to managing flood risk, to ensure that the requirements of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are adhered to. Any development must remain safe for its' lifetime and flood risk must not be increased elsewhere.</p>	<p>Noted. However, the PF is focused on placemaking issues, and proposals will be assessed against policy requirements.</p>
Environment Agency	<p>Whilst we note there is currently no Flood Zone 3b (functional floodplain) in the area, we strongly encourage that Flood Zone 3b is defined and safeguarded in this document in case the flood zone designations change. We recommend that this is done in accordance with the updated PPG which recommends that the starting point for Flood Zone 3b is defined at areas within the 1 in 30 annual probability occurrence event. We would also like to see a stronger commitment to exploring and taking advantage of opportunities to achieve betterment and reduce flood risk overall, including discussion of this in other policies throughout the plan.</p>	<p>Noted. The NLPF and SFRA looks at flood zones. However, as noted, none of the site falls within FZ3b . Proposals will be assessed against policy requirements.</p>
Environment Agency	<p>The potential impact to sewer and surface water network in the area has not been referenced in the OAPF. Development plans should include consideration of the potential impact on the network and propose appropriate mitigation. This could be incorporated under b) Integrated water management.</p>	<p>Noted. However, the PF is focused on placemaking issues, and proposals will be assessed against policy requirements. Impact on the sewer network to be highlighted in 1.2b</p>
Environment Agency	<p>d) Air quality positive</p> <p>We support the OAPF's commitment to achieving air quality positivity. We recommend this expanded upon to indicate how planned development will contribute to the implementation of Kensington and Chelsea's Air Quality Action Plan 2022-2027, and well as the requirements for London Plan Policy SI1.</p>	<p>Noted. The PF sets out principles - whilst the development will also need to respond to policy. A planning application for the site will need to provide further detail in due course.</p>

Responder	Representation	RBKC response
Environment Agency	Diagram 37: Priority 2 diagram In reference to the comments relating to ‘Sustainable use of soils and other materials’, and the need to minimise waste material take off site, we recommend reference is made to London Plan Policy SI7 and the Mayor’s Circular Economy Statement Guidance.	Noted. Proposals will be assessed against all relevant policy, which will not be comprehensively listed in the PF.
Environment Agency	Secondly, the OAPF could be strengthened by more clearly setting out developer expectations, for example the need to produce materials management plans. Additionally, the use of the Definition of Waste: Code of Practice (DoW:CoP) could be used for appropriate materials. Care should be taken when procuring materials, drafting construction contracts, and managing contractors during development. This will ensure that the materials removed from site are recorded properly, and that the developer’s fully discharge their duties under the duty of care regulations. This would avoid materials being subject to illegal waste activities e.g., being deposited at unregulated sites, or waste misdescription.	Noted. However, the PF is focused on placemaking issues, and proposals will be assessed against policy requirements.
Environment Agency	Furthermore, ‘London Square’, ‘Green Streets’ and ‘Threshold Strategies’ do not mention improving water quality and minimising surface water flood risk in the area, which would make the area more resilient to climate change.	Noted. However the PF is focused on placemaking - as are the specific principles identified for each of those spaces - the PF makes reference to Integrated water management throughout.
Environment Agency	About Priority 2 We are pleased to see reference is made to a range of RBKC’s action plans, such as those for biodiversity, greening, air quality and for the climate emergency. In relation to the climate emergency, it would be useful for the OAPF to reference the Mayor’s ‘Net Zero By 2030’ aims for London, and the RBKC’s Climate Emergency Action Plan as drivers for sustainable and resilient development in the OA.	Noted. The council plans have been referred to in 'About priority 2', although a specific reference to the Green Plan to be added. A reference to the Mayor's Net Zero by 2030 aim also added.
Environment Agency	2.1 Vision for sustainability c) Building design We recommend that building and design performance expectations are identified in the OAPF, linked to accredited standards such as BREEAM (which the London Plan refers to for water efficiency), and during construction the Civil Engineering Environmental Quality Assessment & Award Scheme (CEEQUAL) standards.	The PF requires development to demonstrate commitment to 'best practice' at the time of implementation. It also requires a planning application to go beyond policy requirement with regards to sustainability - the scheme proposed will be assessed against relevant policy.

Responder	Representation	RBKC response
Environment Agency	For waste, the use of a vacuum system for waste collection from development could be considered. Additionally, it is vital that waste vehicle access and egress is considered in the design and layout of residential development, particularly for flats where bins may be stored at basement level. We recommend engagement with the Local Authority's contractors on the receptacles and vehicles to be used the OA.	Noted.
Environment Agency	c) Building design & d) Housing design We encourage that greater emphasis is placed on how development can exacerbate flood risk, as well as the importance of considering risk to property and life when planning new developments. We recommend that flood resilience measures are implemented in areas where there is flood risk. This could look like physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage.	Noted. This level of detail will emerge as a result of the Flood Risk Assessment associated with the development and any measures that need to be implemented.
Environment Agency	We also recommend that flood warning and emergency response (includes proposals for evacuation/ safe refuge) are implemented across the area, to increase the resilience of individuals and communities.	Noted. This level of detail will emerge as a result of the Flood Risk Assessment associated with the development and any measures that need to be implemented.
Environment Agency	In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the PPG.	Noted. However this is a policy issue.
Environment Agency	We note that integrated SuDS for the housing/building designs has not been mentioned in reference to building and housing designs. This is a missed opportunity as reducing runoff from the buildings. Retrofit SuDS are being explored in various projects led by RBKC, for example SuDS in Portobello Court, and the SuDS opportunity mapping project.	Noted. See Priority 2 diagram for reference to "Working with nature". Amendment to be made to clarify that SuDS can be included in buildings as well as landscape.
Environment Agency	In reference to the 'Royal Borough of Kensington and Chelsea Section 19 Flood Investigation: 12 July 2021', a key recommendation to homeowners was to disconnect their roof drainage and include property level SuDS. This should be included in the OAPF and encouragement should be given for any new development where there is known surface water and sewer flood risk. This also connects to Priority 1 to provide substantial trees and urban greening.	Noted. This document applies to development within the Opportunity Area site allocation and there are therefore no existing properties on site. An integrated water management system is required for the new development in 1.2c.

Responder	Representation	RBKC response
Environment Agency	<p>2.2 Site-wide strategies for managing environmental impacts</p> <p>b) Waste management</p> <p>We support the recommendation that a strategy for waste management should deal with waste on site and waste arising from the development. The waste management strategy should consider the whole life cycle of the development, the GLA's policies on circular economy statements (London Plan, Policy SI 7), and the London Plan's circular economy statement guidance.</p>	Noted. The proposals will be assessed against all relevant policy.
Environment Agency	<p>About Priority 3</p> <p>c) Familiar streets</p> <p>We note the plans for new development to retain lower and ground floor accommodation. In the first instance, no sleeping accommodation should be located below the modelled tidal breach flood level. If unavoidable, any sleeping accommodation below the modelled tidal breach flood level must be protected by a fixed, permanent barrier that prevents ingress of water up to the breach flood level.</p>	Noted.
Environment Agency	<p>4.1 A place for people to settle</p> <p>Image 84. on page 57, states 'A range of dwelling types where most homes have double aspect'.</p> <p>We strongly recommend design plans proposing lower and ground floor usage to attain a 'less vulnerable' vulnerability classification. We encourage flood risk reduction through flood proofing and resilience measures to new properties and their inhabitants. All new developments will need to adhere to Chapter 14 of the NPPF regarding flood risk, the PPG for flood risk and coastal change, and the planning framework. Any developments housing vulnerable people must be safe for the lifetime of the development, and not increase flood risk elsewhere.</p>	Noted. The proposals will be assessed against all relevant policy.

Responder	Representation	RBKC response
Environment Agency	<p>Phasing</p> <p>On page 67, it is stated that ‘Phasing should also accommodate the need for onsite treatment areas for contaminated materials and waste.’</p> <p>A waste management strategy for the Opportunity Area would support this aim. We strongly encourage that the planned increase in the area’s population been considered in strategic waste plans, if not done so already.</p>	<p>Noted. This is covered by the emerging local plan Policy GB19 requires the following:</p> <p>F. On-site waste management facilities will be sought as part of development at the Kensal Canalside and Earl’s Court Opportunity Areas’ to handle waste arising from the new uses on the sites (this could include facilities such as recycling facilities, anaerobic digestion and other innovative waste management facilities which are fully enclosed).</p> <p>H. Require applicants for major developments to prepare and implement Circular Economy Statements as required by Policy GB2 and Site Waste Management Plans.</p>
Exhibition comment	Holland Park [is a good precedent] - themed, with places for infomal sports etc.	Noted, although the difference in scale should also be taken into account. Holland Park is larger than the site within K&C. A variety of activities are included in principle 1.3 which echo those available in Holland Park.
Exhibition comment	Create a wide entrance to the new site so it is not an enclosed space.	Noted.
Exhibition comment	Freeform space is needed - where you don't have to buy a coffee to be there	Noted, this is already within priority 1, public realm to fulfil this function. This could be supplemented by indoor space associated with cultural facilities.
Exhibition comment	Holland Park is a better precedent than East London examples.	Noted, although the difference in scale should also be taken into account. Holland Park is larger than the site within K&C. A variety of activities are included in principle 1.3 which echo those available in Holland Park.
Exhibition comment	Cluny Park - should be consolidated/integrated/included in plans to improve	Noted. To be included in community consultation map. An aspiration for a link through to Cluny Mews is included in the Placemaking Framework.
Exhibition comment	Warwick Road Apron - imporantce of trees, not hard landscaped. You need trees, not a pavillion: and people will come. It should be an open inviting space - it alwas has been a welcoming space.	Please note there are significant underground constraints in this part of the site which will limit the number/size of trees that can be provided. Nevertheless, it is the council's priority that every effort is made to ensure this space is green and welcoming, using trees where possible and other planting.

Responder	Representation	RBKC response
Exhibition comment	Be aware of wind impact on public space from tall buildings.	Noted. This will be assessed in line with current guidance to ensure wind levels are within appropriate levels that allow people to be comfortable in the public realm
Exhibition comment	As many trees as possible with space around their trunks.	Noted. Reference to maximising the potential for tree planting to be added to Principle 1.2 a)
Exhibition comment	Construction disturbance - minimise for neighbours.	Noted. The council will require the developer to submit a Construction Management Plan to ensure disruption is minimised.
Exhibition comment	Architecture has to have something to do with the Victorian buildings around.	Noted. An adequate response to context, including the character of the architecture, is required by Local Plan policy. The PF requires the new development to respond to the rich architectural variety in the neighbouring Conservation Areas.
Exhibition comment	Celebrating St Cuthbert's as an entry area to the site - create community meeting area around it - perhaps with a café and space around.	An aspiration for a public space and connection, with surrounding active uses, is included in the Placemaking Framework.
Exhibition comment	Link to HS2, Westway, WLL, link to Picadilly Line on site	This is outside of the scope of the Placemaking Framework and the site allocation.
Exhibition comment	Use stock brick - London Bridge precedents. The bronze windows on Barkers development [positive precedent]	Noted. An adequate response to context, including the character of the architecture, is required by Local Plan policy. The PF requires the new development to respond to the rich architectural variety in the neighbouring Conservation Areas.
Exhibition comment	Indoor community space next to St Cuthbert's pocket park.	Noted. This remains an ambition, subject to deliverability and design development by the developers' team.
Exhibition comment	27 storeys is not ok for social housing.	Noted. The emerging site allocation has been informed by a comprehensive townscape impact analysis to determine the appropriate maximum building heights within the site. These vary across the site, with the maximum acceptable height approximately 20 storeys toward the western edge of the site

Responder	Representation	RBKC response
Exhibition comment	Max height of tower block 15 storeys of stock brick - not glass and steel.	Noted. The emerging site allocation has been informed by a comprehensive townscape impact analysis to determine the appropriate maximum building heights within the site. These vary across the site, with the maximum acceptable height approximately 20 storeys toward the western edge of the site. In addition, An adequate response to context, including the character of the architecture and the materiality, is required by Local Plan policy.
Exhibition comment	Please limit the height of buildings - provide lines of sight!	Noted. The emerging site allocation has been informed by a comprehensive townscape impact analysis to determine the appropriate maximum building heights within the site. These vary across the site, with lower buildings where closer to existing properties.
Exhibition comment	Cultural venue with an international appeal (200-500 seats) with rehearsal spaces	The placemaking framework requires the development to include a cultural facility of 'world class' quality. It does not specify the size of the facility however as this will be determined by the actual tenant which would occupy the space(s)
Exhibition comment	<p>Crucial to fix traffic on Warwick Road</p> <p>Need large cultural venue - not pop-ups</p> <p>Max height = Empress building</p> <p>Brick construction - in-keeping</p>	<p>Warwick Rd - it is the council's ambition to secure improvements to the quality of the environment on WR.</p> <p>The placemaking framework requires the development to include a cultural facility of 'world class' quality.</p> <p>The emerging site allocation has been informed by a comprehensive townscape impact analysis to determine the appropriate maximum building heights within the site. These vary across the site, with the maximum acceptable height approximately 20 storeys toward the western edge of the site.</p> <p>An adequate response to context, including the character of the architecture and the materiality, is required by Local Plan policy.</p>
Exhibition comment	Imperial Wharf excluded local residents - community	

Responder	Representation	RBKC response
Exhibition comment	Highlight the section of Old Brompton Road - neighbourhood centre. Very lively - Troubadour	Noted. To be amended
Exhibition comment	Great to have the early years provision	Noted
Exhibition comment	Keeping/bringing back the uniqueness of Earl's Court - food, culture, retail, individual not corporate	Noted. Priorities 3 & 4 highlight the need to build on the existing character of the Earl's Court neighbourhood
Exhibition comment	Regenerate Earls Court Road as high street. Tube station renovation Warwick Road	The site allocation requires the develop to contribute to enhancing the Earl's Court Road district centre. It may be applicable that the development contributes to improvements to Earl's Court Station, including the Warwick Road entrance - this is subject to needs and priorities being established in due course.
Exhibition comment	What success has there been of other developments - analyse these	Noted. The council makes extensive use of precedent projects to inform the planning process.
Exhibition comment	Fire safety - 2 means of escape - not one stair	Noted. This issue is currently under consultation by the government's DLUHC. Pending on the outcome of this consultation this may be a requirement on buildings above 30m in height.
Exhibition comment	Discounted rent is not affordable - get rid of it!	Noted. This is outside of the scope of this document to address this.
Exhibition comment	Coordination with Thames Water for water supply and usage and water sewer capacity	Noted. Water Management Strategy will be required as part of any planning application submitted to develop the site, as well appropriate engagement with utility providers to ensure adequate capacity
Exhibition comment	No comment for Counters Creek - & min flooding!	Noted. Reference to the more recent historic flooding and Counters Creek shall be referred to in the constraints section.
Exhibition comment	Height > 10 stories changes character of area. Monetary value of tourists etc visiting Earl's Court area because it doesn't have > 10 stories. Why visit if it looks like other places. Previous plans from 60s to change e.g. Picadilly Circus, Regent Street. Requirement to cope with cars - incorrect estimates on car traffice. Imagine if that plan of William Molford had been implemented!!!	Noted.

Responder	Representation	RBKC response
Exhibition comment	<p>Big concern - infrastructure capacity. Population 2022 10k. Population post development +7-11k = 17-21k</p> <ol style="list-style-type: none"> 1. How can government push such growth on a dense area. 2. Has infrastructure requirement capacity been thought out. No point in building homes and meeting that target if infrastructure can't be expanded. <ol style="list-style-type: none"> i. Tube overcrowded pre covid - how will it be expanded. New homes have no cars so people dependent on tube. ii. water infrastructure in UK already stretched. Can towers actually be built? <ul style="list-style-type: none"> - what about flooding? - what about drought? - what about already hot city area getting hotter with 7-11k more people 	<p>Noted. Population figures are unclear, however, this is a highly sustainable location for development as identified in the London Plan - a designated Opportunity Area (see Policy SD1 of the London Plan 2021). Policy and regulations are in place to ensure the risk of flooding is minimised and a Water Management Strategy will be required as part of any planning application submitted to develop the site.</p>
Exhibition comment (David Trodden PRA)	<p>Not too tall - aim for maximum 9 floors. In Philbeach we are 5 floors.</p>	<p>Noted. The emerging site allocation has been informed by a comprehensive townscape impact analysis to determine the appropriate maximum building heights within the site. These vary across the site, with lower buildings where closer to existing properties.</p>

Responder	Representation	RBKC response
<p>Francis Catley</p>	<p>Earls Court was internationally renowned for its exhibition centre. There is an opportunity here to bring back a multi purpose cultural building for music, exhibitions, theatre, with cinema, and rooftop restaurants. A carbon neutral, environmentally friendly construction with solar technology, glass, resembling the Art Deco (art moderne) style of the original front. Bringing back the famous Earls Court red neons (in storage) and the decorative facade motifs (plaster copies taken). Bringing back the dedicated underground escalator with protected status. There should be a wow factor, with a strong reference to the original building. Remembering C Howard Crane at least with a street name.</p>	<p>The Framework, adopted and emerging site allocation support a significant cultural building as part of the redevelopment, and Priority 2 of the Framework promotes environmental sustainability, and therefore the idea suggested would accord with the Framework. However, it is important that the Framework does not overly prescribe a solution on the developers but rather provides the key objectives for the cultural use.</p> <p>It is useful to note that elements of the demolished building were recorded or retained and this information will be passed to the developers.</p> <p>The suggestion to remember C Howard Crane is noted and will be passed to the Council's Street Naming team.</p> <p>The reuse of the former exhibition centre entrance to Earl's Court underground station is being considered; it has not been included in the Framework because it is not considered crucial for placemaking and needs to be considered in the round alongside other infrastructure requirements.</p>

Responder	Representation	RBKC response
GLA	<p>Thank you for consulting the Mayor of London on the draft Earls Court Opportunity Area Placemaking Framework. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under Section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. While the draft document is not a Development Plan Document, it is of strategic importance and therefore worthy of the GLA's input.</p> <p>As set out in London Plan Policy SD1, the Mayor supports the collaborative preparation of planning frameworks within Opportunity Areas to ensure these areas fully realise their growth and regeneration potential and to set out a clear vision and strategy for accommodating development and ensuring this contributes towards achieving good growth. The London Plan identifies the Earl's Court opportunity area as having an indicative development capacity potential to provide approximately 6,500 homes and 5,000 jobs. As one of London's largest opportunity area sites, the mixed use redevelopment of the Earl's Court site should seek to optimise the potential housing and employment provision and make a significant contribution towards achieving the London Plan objectives for opportunity areas in terms of placemaking and design quality, affordable housing provision, wider regeneration, sustainable transport and climate change.</p> <p>GLA officers therefore welcome the preparation of the draft Earl's Court Opportunity Area Placemaking Framework. The draft document sets out a clear and robust set of urban design and placemaking priorities and principles for the RBKC side of the Earl's Court site. These are strongly supported in strategic planning terms and respond appropriately to the opportunities and constraints associated with the site's comprehensive redevelopment and the emerging Local Plan context.</p> <p>Whilst it is noted that the draft Framework only spans the RBKC administrative planning boundary, GLA officers note that both local planning authorities are working collaboratively with GLA officers as part of the ongoing pre-application and design review process.</p>	Noted
GLA	<p>The Framework sets out a clear expectation that the starting point for any masterplan for the site should be the public realm focused with a strong landscape-led approach. This is strongly supported.</p>	Noted

Responder	Representation	RBKC response
GLA	<p>The Framework requires development to incorporate a range of well-defined and integrated network of streets and generously sized, inclusive and multi-functional public open spaces. This should include a new central public park as well as two new squares at key entrances to the site on Warwick Road and opposite West Brompton Station, as well as a smaller pocket park next to the Grade I listed St Cuthbert’s Church. This is supported. The opportunities to link green open spaces and networks into the wider surrounding green infrastructure and adjacent SINCs is recognised which is welcomed.</p>	Noted
GLA	<p>In terms of pedestrian movement and connectivity, the Framework sets out a clear desire to re-integrate what is currently a large inaccessible and impenetrable vacant brownfield site with the surrounding areas. This would be achieved through the provision of convenient and welcoming routes, including in particular a new car-free east-west route linking from Earl’s Court Station through to the Hammersmith and Fulham side of the Opportunity Area via the proposed new public park and the retained deck over the West London Line. This is strongly supported.</p>	Noted
GLA	<p>Given the challenging site levels across the site and changes in height created by the retained deck, it is recommended that this is more explicitly highlighted as a physical constraint in the Framework preamble and a clear objective included to ensure that this is appropriately addressed through the comprehensive redevelopment of the site and through the design and layout approach, in line with the inclusive design principles in the London Plan.</p>	Noted
GLA	<p>The design principles relating to active uses and ground floor activity are welcomed. It is recommended that design criteria is added to require active frontages to be maximised and inactive frontages minimised in line with the London Plan. Visually permeable ground floor elevations should be required for all land uses to help generate street activity and provide natural surveillance. For the same reason, a good distribution of communal residential entrances serving residential homes on upper floors should be provided on all blocks. Where there are opportunities for individual front door residential entrances these should also be required. For example, where residential uses are proposed at ground floor level along the crescents and residential side-streets.</p>	Noted, and accepted that these are good suggestions and good practice. As such, these are included in policy and best practice guidance - therefore not to be repeated in the PF.

Responder	Representation	RBKC response
GLA	<p>As a general point, GLA officers consider that the overall vision and narrative of the Framework as a whole could be enhanced by more explicitly conveying the level of transformation envisaged and the scale of the development opportunity noting the existing site circumstances and history. For example, the Framework could include a short section briefly outlining the following:</p> <ul style="list-style-type: none"> • the history of the former Exhibition Centre use; • the underutilised nature of the existing site and its significant size and scale in terms of the wider London context and public transport connections; and • a brief section more clearly set out the ambition for the site’s transformation into a thriving high density mixed use new urban district and new piece of the city. This could link the priority for the redevelopment of the site to provide an exemplar in environmental sustainability with it being an exemplar in large scale regeneration, urban design, placemaking, public realm and landscaping. 	<p>Noted. The PF aims to be brief, hence the site analysis has been included as an appendix, and the significance of the site for London included in section 'opportunities'. However, a brief paragraph will be added to more clearly set out the ambition for the site’s transformation into a thriving high density mixed use new urban district and new piece of the city</p>
GLA	<p>The Framework seeks an active and vibrant mix of land uses, including a significant network / ecosystem of cultural facilities and creative enterprises with the Council aspiring to attract an anchor cultural tenant of world class renown. The vision for the site is to put Earl’s Court back on London’s cultural map. This aspiration is strongly supported in accordance with London Plan Policy HC5 and HC6. The need for an appropriate degree of flexibility to accommodate the layout and functional requirements of different cultural uses of varying sizes is noted which is welcomed.</p>	<p>Noted</p>
GLA	<p>In strategic transport terms, the Framework is strongly supported and aligns well with the relevant London Plan policies and Mayor’s Transport Strategy. The Framework makes reference to the strategic transport infrastructure surrounding and below the site. It would be helpful if the framework more explicitly referenced the need for infrastructure protection, safeguarding transport capacity and the provision of necessary upgrades.</p>	<p>Noted. These are already referred to in policy and not repeated in the PF.</p>
GLA	<p>The ambition for a public realm-led approach with the creation of safe walking and cycling links and active ground floor uses is strongly supported; alongside blue badge parking and facilitating car-free living. It is recommended that in line with London Plan Policy T2, the Healthy Streets approach is used in the development of proposals to provide a high quality, pleasant and attractive environment. The proposals should also meet the highest standards of inclusive and accessible design, as required by London Plan Policy D5.</p>	<p>The Healthy Streets approached is referred to in principle 3.2. An additional criteria for Healthy Streets will be added to strengthen this point.</p>

Responder	Representation	RBKC response
GLA	<p>The Framework identifies a number of specific interventions e.g., enhancements to A4 crossing facilities, new underpasses and linking the Opportunity Area to the Earls Court Road District Centre via Earls Court Station. Before supporting the principle of these interventions, and any other interventions on TfL’s transport network, a full technical impact assessment would need to be undertaken to ensure that they can be accommodated in safety and operational terms. Given that no assessment has been undertaken to date, it is requested that reference to specific schemes such as the above is removed; with a broader focus retained on enhancing connectivity and reducing severance.</p>	<p>Specific interventions have been identified as they would benefit the development and the wider area. These are all subject to feasibility- which will be explored by the developer as part of the preapp process and within the documentation submitted as part of a planning application.</p>
Kensington Society	<p>As we understand, the Council has worked on the preparation of this document with the aim of providing guidance to landowners/developers at the Earls Court Opportunity Area, to add to the content of the new Local Plan.</p> <p>While this ‘placemaking framework’ is a useful vehicle for assembling the results of a number of workshops and consultations, we feel that it falls short of giving clear policy guidance on the how the range of questions and challenges involved in the regeneration of this large development site should best be addressed.</p> <p>As a ‘placemaking framework’ the document will not have the force of a SPD in acting as a material consideration in the determination of an outline masterplan for the Opportunity Area, or on individual applications. Nor (as we understand) will it be examined by an Inspector as part of the Local plan EIP. At most it will for a supporting study to the Local Plan.</p> <p>The introduction to the document makes various statements on its aims:</p> <ul style="list-style-type: none"> • it will develop and add detail to the Council’s vision for the Earl’s Court Opportunity Area. We are not clear why the Council is not proposing to adopt this document as a SPD, as done for Kensal Canalside? The document has been the subject of a public consultation. • it will create a tool that reconciles varying ambitions for the site. Not clear how it will achieve this aim as it will carry less material weight than an SPD. Ultimately ECDC will not be required to pay much heed to placemaking suggestions. The content on Earls Court in the Local Plan will be more significant in dealing with 'varying ambitions'. • the framework is not intended to be a comprehensive brief for the site; rather, it sets out the placemaking criteria to shape the development so that it meets the priorities of the Council, local residents and businesses. Our primary concern with the document is that these ‘priorities’ are not assigned any relative priority, one to another. 	<p>Noted. It is anticipated that the document will be adopted as a supplementary planning document. The priorities have equal weight. This will be clarified in the introduction.</p>

Responder	Representation	RBKC response
Kensington Society	<p>Opportunities: This section includes aspirational statements on creating a new part of London. These are similar to those for other Opportunity Areas (Kensal Canalside, OPDC). There are some themes which it would be helpful for an EIP session to explore, with involvement of the developers and local amenity societies/residents groups.</p> <ul style="list-style-type: none"> • do a majority of local people want to see the restoration of Earls Court as a London-wide destination? Does this conflict with what immediate neighbours would like to see? 	<p>We feel that the approach to a cultural use set out in the draft document is reflective of the community and Council's views.</p>
Kensington Society	<ul style="list-style-type: none"> • on the 'integration' of the LBHF and RBKC parts of the site and addressing the 'severance' created by the railway infrastructure and a link route, we await comments from LBHF. At a 2021 site visit, the Society's planning committee gained an impression that LBHF residents were not keen on 'integration' and the removal of barriers to this. Views may since have changed. 	<p>We recognise that there is an opportunity to improve connectivity through this large site and have not had any feedback resisting this from LBHF.</p>
Kensington Society	<ul style="list-style-type: none"> • plans for a significant 'park'. For a developer to provide this as part of a masterplan involves trade-offs on how a park is to be paid for and the land value involved – a larger park brings with it more density, less affordable housing, and more building height. 	<p>This will need to be assessed in the round as part of a planning application. Public open space would always be a requirement of a site and development of this scale.</p>
Kensington Society	<p>Community Engagement this section reads as though the consultation has been genuine. The public comments sound 'real' but become something of a 'wish-list' which extends well beyond what can be delivered through CIL and S109 receipts (e.g., underpasses are high cost infrastructure).</p>	<p>Noted. We have sought to reflect the aspirations and reasons for the items raised in public consultation so that, if there are less expensive but equally effective ways to deliver, say, connections, this can still be achieved.</p>
Kensington Society	<p>An adopted 'placemaking framework' needs to avoid the risk of raising expectations amongst local people that expensive infrastructure can be delivered as part of a regeneration strategy for Earls Court. As we understand, there is no government funding to underpin the next stages of regeneration activity.</p>	<p>Noted. The Council has involved the developer in the evolution of this document to help ensure its requirements are deliverable. The developer's response to the draft document will be considered.</p>

Responder	Representation	RBKC response
Mark Macleod	<p>Public realm can be both generous and thrilling. An expanse of open space need not be restricted to a single level and could include gardens not only at ground level but also higher up, taking inspiration from the borough's extraordinary Kensington Roof Gardens on High Street Kensington or Gaudi's Park Guell in Barcelona.</p> <p>Also, by considering buildings as pieces of landscape in themselves that frame a park, whereby the view of buildings near and far are shaped, composed and coloured like extraordinary geological formations, meadows, forests, hills and plateaux which inspire us to explore, climb up and through them along winding gently-sloped paths, architecture could be more like an experience of entering a traditional painting of an idyllic country setting. That such buildings could also be tall or massive would be an essential element of their wonder. Form still follows function, but perhaps inspiring an emotional response in us is a forgotten function of architecture that the new Earl's Court could remind us of.</p>	<p>Noted. Setting a high bar for the quality of public realm and building design is included in the Placemaking Framework and a response such as this could be compatible. The Council should not, however, overprescribe a solution but rather allow scope for such creative responses within the Framework.</p>
Mark Macleod	<p>As part of unlocking as much public realm and viable real estate as possible as well as contributing to linking the site with the city's existing fabric and opening up access within the site itself, revisiting the possibility of enclosing the West London Line rail corridor and London underground lines could be further explored, perhaps with significantly lighter structures than the existing concrete deck of the Table.</p> <p>Could we take the structural technology of the Eden Project in Cornwall's intersecting domes, whose weight is less than the air that they enclose beneath them to create enclosures that appear to float above the railway lines, a hybrid of bridge, greenhouse and airship?</p> <p>Public realm first, yes, but Earl's Court should be creating a number of firsts.</p>	<p>The Framework is not prescriptive with regard to building over the railway or tube lines because the cost and benefits of doing so would need to be considered as part of an overall proposal. Building over the railway has not been identified as a priority in itself.</p>

Responder	Representation	RBKC response
Mark Macleod	<p>The climate emergency is the defining crisis of our era and as much a priority and integrally linked with public realm. Opportunity Areas like Earl’s Court offer possibilities to create new pieces of city that actively protect the future of the natural ecosystem we depend on, unhindered by the constraints of the legacy architecture that characterises our borough, as important as it is.</p> <p>This protection of the future must be taken into account when discussing the height, mass and form of buildings. The site’s constraints and limitations may require building taller to provide the functionality that will deliver on the Local Plan’s principles of Green, Liveable and Inclusive as well as commit to the Climate Emergency.</p> <p>If we take cues only from the architecture and urban planning of the past, whose design was shaped by an industrial age with very different priorities, we may miss a once-in-a-generation chance to design an even better piece of city, one that is uniquely relevant to our time and to the crises we face.</p>	<p>Noted. Sustainability, and in particular environmental sustainability, is a priority in the Framework. Building height maximum parameters are controlled via the emerging site allocation rather than the Placemaking Framework.</p>
Mark Macleod	<p>It is encouraging to see the community roof gardens with fruit orchard of Grimshaw’s Via Verde project. Perhaps this can be taken further at Earl’s Court. Perhaps the opportunity is here to pioneer communal and commercial growing of food with state-of-the-art hydroponics and aeroponics. Technologies like these will benefit the environment by shortening the supply chain for certain fragile products like leaves, herbs, mushrooms and berries, resulting in better value, higher quality and increased variety than our existing system, using a fraction of the water consumed by traditional farming.</p> <p>Could Earl’s Court commit to an idea of evolving innovation hub of urban agriculture, a continuous project of showcasing this technology and other ecological innovations, as a living eco-centric extension of Albertopolis?</p>	<p>Noted. These suggestions will be fed into pre-application discussions as relevant.</p>
Mark Macleod	<p>A balance may have to be struck to fulfil the site’s potential. If a piece of city like Earl’s Court can deliver architecture that performs above and beyond on Climate Change and delivers on a broad range of shared benefits, then building above and beyond the Local Plan height parameters and placements must be given due consideration. It stands to reason that the scrutiny of exceptions must be robust and justification compelling. But it also stands to reason that objections to those exceptions should be equally justified.</p> <p>This Placemaking Framework should acknowledge the need to be flexible with regard to height and placement parameters for the sake of achieving a greater good and enable this opportunity area to fulfil its potential.</p>	<p>Building height maximum parameters are controlled via the emerging site allocation rather than the Placemaking Framework.</p>

Responder	Representation	RBKC response
Mark Macleod	<p>The emphasis and over-reliance existing architecture should not outweigh a need to create new typologies that would enable the site to accommodate everything it aspires to efficiently. New typologies could be created to satisfy edge conditions as well as communicate the aspiration of Earl’s Court as a central destination. The Framework should remain open to options.</p> <p>The reassurance of the familiar is acknowledged as having a positive emotional effect, but so too is the inspiration that the less familiar and innovative can offer; it can add another character to the rich architectural variety that exists.</p>	<p>Noted. The Placemaking Framework deals with sensitive integration (3.3) as well as guidance on housing typologies (4.1).</p>
Mark Macleod	<p>Overcoming the challenges of severance created by the railway infrastructure, not least to help unlock the problematic 30% of the site south of the A4 is welcomed. Connectivity with existing parts of the city is key, especially the less often mentioned entry points from the north of Kensington under on or over the A4 (in cooperation with 100/100A West Cromwell Road) as well as and through Cluny Gardens.</p>	<p>Noted. This is included in 3.2 of the Framework.</p>
Mark Macleod	<p>Buildings different to and taller than their surroundings are understandably controversial in our borough. Any proposals for new ones must certainly justify their height and be subject to scrutiny and quality control.</p> <p>However, to place tall and bulky buildings in historical context, it may be worth considering London’s domes and steeples, as well as Christopher Wren’s St Paul’s Cathedral which was particularly massive and high relative to its neighbours (see an engraving by Canaletto from 1747 and numerous other depictions from the 19th century) in discussions on relative scale, mass and height, and how appropriate they might be and what we might consider acceptable.</p> <p>Prescribing acceptable tall building shapes and features, as section d) on page 45 does, seems to close off a world of possibilities. The framework must remain open to new ideas and the form they could take.</p>	<p>Noted. Building height maximum parameters are controlled via the emerging site allocation rather than the Placemaking Framework. The principles in 4.1d allow scope for creative responses and new typologies.</p>

Responder	Representation	RBKC response
Mark Macleod	<p>Further to extolling the virtues of urban agriculture in answer to Question 2 is the suggestion of an ecological theme that could anchor Earl’s Court’s creative ecosystem described in Priority 4 to create a varied and rich urban life on the development.</p> <p>If the aim, as it ought to be, is to exceed the green standards and expectations of National Policy, the London Plan and the Local Plan, then urban agriculture, as a collection small food growing enterprises, research and development labs, controlled environment technicians, equipment manufacturers, software developers and others, acting in symbiosis with each other within a circular economy framework, could be considered.</p> <p>These activities could underpin a unique cultural offer of hyper-locally grown and produced food and beverage, that supplement and improve the quality and variety of the cultural offer described in Priority 4.</p> <p>It is suggested that the future of a sustainable and high quality urban lifestyle for everyone will be predicated on seeking opportunities to create sets of circular economies.</p> <p>A simple example might be this: A restaurant’s used coffee grounds, rather than being disposed of as refuse, are mixed with sawdust, perhaps from a local furniture maker, to form a substrate on which to grow mushrooms. The circle is completed by supplying these mushrooms back to the restaurant.</p> <p>A controlled environment urban mushroom farm of this type by GroCycle was exhibited at the V&A in 2019 and there are many other examples of this circular economy principle in operation.</p> <p>This interconnectivity of programmes, use of resources, byproducts and waste will be key to a thriving economy of the future.</p>	<p>Noted. This idea, in principle, would be consistent with the priorities in the Placemaking Framework.</p>

Responder	Representation	RBKC response
Mark Macleod	<p>Priorities have and will shift. The multiple channels of engagement within RBKC and LBHF via the NLPR, ECDC, PRIP and many more, will continue to add even more insight on aspirations for the site. The Framework should be considered a malleable document that is open to change and take on more diverse and wide-ranging influences, even those from abroad, who, given they are a target demographic to visit the Earl's Court of the future, should also be enabled to provide input.</p> <p>This level of public consultation is perhaps unprecedented in the UK, presenting a unique challenge for the developers and the design teams to collate, consider, and reconcile the inputs from them in a way that can be accommodated on a site with so many constraints, challenges and limitations.</p> <p>A bold and ambitious approach to bring wonder on a world class scale to Earl's Court has been their mission from the outset. It is an inspirational mission, and one that our borough's policies should support.</p>	Noted.
Mr Burnett	<p>If you ask what differentiates London as a great global city - the green spaces come top. This is a once in century opportunity to create a new large park in central London. I realise the economics are difficult. I would be open to the idea of Kensington and Chelsea raising a one-off tax for residents in order to buy a chunk of the land to turn it into a park.</p> <p>Kensington and Chelsea has a population of 140,000. If we assume an adult population of 100,000, with each paying a fee of £300 spread over 3 years (£8.33 per month) means raising £30m. With the council and the government each matching that, gives you £90m. Given falling property prices, £90m could ensure the area gets a much larger park, and by that, create a profoundly positive legacy to the city.</p>	A public park is included in the Framework and in the emerging site allocation to be delivered as part of the redevelopment of the Opportunity Area. It is therefore not necessary or expedient for the Council to explore delivering or funding the delivery of a park.
Mr Burnett	Agree	Noted
Mr Burnett	Agree	Noted
Mr Burnett	Main point included under Q2. This is a once in a century opportunity to create a new park in the middle of London. This is something that the residents may be willing to pay for, as outlined above.	A public park is included in the Framework and in the emerging site allocation to be delivered as part of the redevelopment of the Opportunity Area. It is therefore not necessary or expedient for the Council to explore delivering or funding the delivery of a park.

Responder	Representation	RBKC response
Natural England	<p>Natural England has no comments to make on the Earl's Court Opportunity Area Draft Placemaking Framework</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	Noted
Neil McPherson, Finborough Theatre	Just a reminder please to correct the spelling of the "Finborough Theatre" on the map of page 17 of the consultation document - it's the "Finborough Theatre" not the "Finsborough".	Noted and will be corrected.
Omar Majid	<p>I think this is absolutely correct, the new area should be a public realm first.</p> <p>However, one thing that has been missed out is the possibility of a multi faith space. West Kensington and Earlr Court is home to large muslim population, and there is no mosque/place of worship for them in the area.</p> <p>I would propose an open to the public multi faith centre which would meet the needs of the muslim community, but would also be open to other faith communities to use. This could be an exemplar centre/site.</p>	Noted. This will be considered as part of discussions about suitable social infrastructure for the development.
Omar Majid	There should be a body of water to increase biodiversity	Noted.
Omar Majid	Some thought must be given to how existing transport infrastructure will be uplifted to cope with the new area (i.e. increase in frequency of routes or creation of new routes)	Noted. Connections beyond and through the site are covered to a certain extent by the Placemaking Framework, while infrastructure requirements are covered by the site allocation in the Local Plan.
Omar Majid	There must be sufficient provision for social housing	Noted. The requirements for social housing are set out in the Local Plan with design guidance on housing covered in the Placemaking Framework in 4.1

Responder	Representation	RBKC response
Omar Majid	Nothing more to add. To summarise the above: <ul style="list-style-type: none"> - considerations for a multi faith centre - creation of a body of water - sufficient provisions for social housing - increase frequency of public transport 	Noted
Port of London Authority (Michael Atkins)	Thank you for consulting the Port of London Authority (PLA) on the Earl's Court Opportunity Area draft placemaking framework. Give the location of the OA in proximity to the Tidal Thames the PLA has no comments to make.	Noted
Simon Fisher	The Framework should support gentrification, not social inclusivity. There is alrerady too much "social" housing in the Earl's Courtt area, with resultant crime and antisocial behaviour impacts..	This would be contrary to national, London and local planning policy. The Council's vision for the site is for it to be inclusive.
Simon Fisher	The Framwork should support traffic calming initiatives to ensure that the Earl's Court development does not adversely affect traffic conditions in adjoining residential streets. Specifically, it should support measures to tackle rat-running traffic in Eardley Crescent.	Noted. A planning application will be accompanied by a Transport Assessment which will enable the Council to assess the impact of the development and inform what new or upgraded transport infrastructure is required. The impact on traffic will be assessed in detail at the planning application stage. The site allocation in the emerging New Local Plan Review (Published Policies) SA2 includes the requirement: "V: New and improved cycleways to connect to existing cycleways and keydestinations to the north, south, east and west of the site. A contribution to the enhancement of the Earl's Court One Way System in line with the Healthy Streets Approach, including safety measures, greening, increased space for active travel and buses, and lower speed limits."

Responder	Representation	RBKC response
Simon Fisher	I support the proposed new north entrance and full step-free access at West Brompton Station, but the framework should also support a more extensive upgrade to the station including more shelter and state of the art ticketing.	The emerging site allocation includes a requirement for the developer to contribute to step-free access at West Brompton Station (part T) as well as improvements to underground access (part S) but no new north entrance to West Brompton Station is proposed in the Framework or site allocation. The specific improvements will be determined through the planning application process based on the transport impact of the development.
Simon Fisher	I support the West Brompton highline deck green walkway.	Support for the use of the West London Line deck as a park/public space is noted.
Simon Fisher	I support the green pedestrian walkway through the site between West Brompton and Earl's Court Stations.	Noted.
Sport England	<p>Active Design</p> <p>Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England and Public Health England launched guidance called Active Design which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has some synergy with elements of the draft document, particularly in relation to providing interlinked green/multi-functional spaces, applying the Healthy Streets Approach and ensuring appropriate infrastructure is installed to facilitate active travel modes. Sport England recommend that the links between the draft document and Active Design are developed further and are really drawn out by having clear references to Active Design, its principles and the Active Design Checklist. Active Design principles and the checklist, for example, could be added to design requirements for any proposal submitted for planning permission within the Opportunity Area. More information on Active Design, including the guidance, can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</p>	Noted. The principles of active design are interweaved in the principles and it is considered this is sufficiently covered within the PF

Responder	Representation	RBKC response
Sport England	<p data-bbox="320 204 568 236">Sport Facility Impact</p> <p data-bbox="320 284 1413 778">The document indicates that 1,500 new homes would be created within the Opportunity Area. The occupiers of these homes will generate demand for sporting provision but the existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as up-to-date and robust Playing Pitch and Indoor/Built Sport Facility Strategies. It is not clear if the draft Framework considers the sport facility implications and, unfortunately, the Council currently do not have the aforementioned strategies therefore Sport England strongly recommends that these are developed to ensure that the Council can positively plan for sport and, consequently, ensuring that any policies in this Framework or any other Development Plan Document are sound.</p>	<p data-bbox="1424 204 2172 475">Noted. We will continue to work with colleagues within the Council's Sports and Leisure team to ensure appropriate sports facilities are provided on the site. Part G of the site allocation requires "Social and community uses to meet the needs of new residents and to improve health, social and cultural well-being for all sections of the community." This will be secured through the planning application process.</p>
Thames Water	<p data-bbox="320 794 1413 978">Thames Water support the proposed requirement for an integrated water management plan for the area. As set out in comments made in relation to the Regulation 19 Local Plan the scale of development in this catchment is likely to require upgrades of the water supply network infrastructure and the wastewater network capacity in this area may be unable to support the demand anticipated from this development.</p> <p data-bbox="320 986 1413 1090">Developing an integrated water management plan for the area would assist to reduce the need for upgrades to existing network infrastructure to support growth within the area or delay when any upgrades require to be delivered.</p> <p data-bbox="320 1098 1413 1209">As set out in the Regulation 19 Local Plan, developers are encouraged to engage with Thames Water at an early stage to discuss water and wastewater infrastructure requirements for the area.</p>	<p data-bbox="1424 794 2172 898">Noted. The Council has previously shared with the developer a Thames Water representation on the NLPR encouraging early engagement between the two parties.</p>
Theatres Trust (Tom Clarke MRTPI)	<p data-bbox="320 1225 1413 1402">The Trust's interest in this framework is primarily linked to cultural provision, with 4.3 setting out cultural criteria. We would strongly encourage the nature and scale of such provision to be defined and designed around the needs of an operator to help ensure it meets an identified need and will be viable and sustainable. We also urge consultation with Theatres Trust or other relevant stakeholders at an early stage.</p>	<p data-bbox="1424 1225 2172 1369">Noted, the Council has encouraged the developer to engage with an anchor tenant but design for flexibility where this is not possible. The Council will consult the Theatre's Trust if the planning application includes a theatre.</p>

Responder	Representation	RBKC response
Transport for London as Railway Infrastructure Manager	<p>We have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015.</p> <p>Also, where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.</p> <p>This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.</p>	Noted
West London Line Group	<p>The desirability of a new WLL station at West Cromwell Road to provide interchange between the WLL and the Piccadilly Line and with the District Line at West Kensington to serve the Earls Court redevelopment and environs and provide an out-of-centre single-change link between Heathrow and Gatwick and intervening centres. This would take pressure off Earl's Court station and could be an additional or alternative HS2-HS1 station to Kensington Olympia, as well as being a hub for small-to-medium-sized rail freight for West London businesses.</p>	As an infrastructure requirement, this lies beyond the scope of the Placemaking Framework.
West London Line Group	<p>Lillie Bridge Depot to become an extension to or replacement site for the LT Museum's Acton Depot with good access to other electrified lines to showcase other electric trains to provide a cultural attraction sought for the Earls Court redevelopment.</p>	Lillie Bridge Depot is outside the Council's administrative boundary. The vision for cultural infrastructure is included within the draft placemaking framework and allows for a variety of offers to come forward.