

**Notting Hill Gate Draft SPD – consultation comments
[4 Buildings and architecture]**

Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
Caroline Rayman		<p>I would like to protest in the strongest possible terms to the proposed towers at Notting Hill Gate. We already have two hideous buildings and just as Notting Hill Gate thanks to your efforts is becoming a much more pleasant place to shop with excellent facilities; it will not become windy, lacking in light and thoroughly unpleasant for local people just like Edgware Road. This is entirely inappropriate for this area. The character of Portobello Road has been ruined by the developers and with the endless excavations, I urge the Council to take a strong line on any further tall buildings being erected particularly where Waterstones is placed on a pleasant corner of Kensington Church Street. I also hope that our two local cinemas will be preserved as the excellent places they are. Surely, the Council wants to make Notting Hill a more pleasant place rather than a wind tunnel. You should also have circulated the area as we are all affected, not just people living within 800 yards of the development. This very special area must be protected by our excellent Council.</p>	<p>Concerns about tall buildings noted, the SPD has been amended to remove references to tall buildings.</p> <p>The cinemas are under private ownership and not in the Council's direct control although Core Strategy Policy CF7 protects arts and cultural uses, including cinemas. In addition 5.12 of the SPD acknowledges the role of the cinemas in making</p>	<p>SPD amended to remove references to tall buildings.</p>

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				<p>Notting Hill gate a focus of cultural activities.</p> <p>In addition to the 12,000 leaflets distributed in the local area, the Council uses a variety of communication channels to publicise public consultations, which are open to everyone.</p>	
	Yashmin and Alex Jeffries		<p>Section 4: Buildings and Architecture The Supplementary Planning Document has rightly identified that the 1950s and redevelopment of Notting Hill Gate and 1950s buildings are the key reason for the lack of beauty and the cold, uninviting and utilitarian atmosphere of the Gate. However, these proposals do not address in any way rectifying these eyesores in a way I could support. I am vehemently opposed to increasing the height of ANY of the buildings at Notting Hill Gate. The Gate should be composed of low-rise attractive buildings, not high, anonymous, faceless concrete blocks. There are no proposals in this document to 'beautify' these (in my view) hideous existing buildings. I would support the owners of - for instance - David Game House, Astley House removing the ghastly coloured slabs and refacing the buildings in more attractive materials. This does not appear to have been considered an option in making the area more pleasant. I have commented separately on the eyesores of Newcombe House and Campden Hill Towers which have blighted the Gate for years.</p>	<p>Concerns about tall buildings noted, the SPD has been amended to remove references to tall buildings.</p> <p>The design of facades is considered to be a matter for detailed discussion through the planning application process, it would not be appropriate to include this in a SPD.</p>	SPD has been amended to remove references to tall buildings.
	Irving		Redeveloped buildings, excluding Newcombe	Concerns about tall buildings noted,	SPD has been amended to remove

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			<p>House, should be no more than 4 stories high, so they remain in scale with the existing streetscapes and preserve the conservation areas. Proposals are unacceptable unless they satisfy this condition. All options are unacceptable because of the massive blocks of new buildings at the north end of Kensington Church Street and on the south side of Notting Hill Gate. Such tall new buildings are significantly higher than the average height of other nearby buildings on the main streets and will lead to a looming effect. They will be a detriment to the conservation areas. When other buildings are generally 3 to 5 stories high, new buildings of 6 to 8 stories high will be out of proportion. 4.26 refers to additional set back stories. These should only be permitted within a total of no more than 4 stories.</p>	<p>the SPD has been amended to remove references to tall buildings.</p>	<p>references to tall buildings.</p>
	<p>Donald Cameron</p>		<p>(ii) There is much talk of ugly 1960's architecture. Some of the properties are run down because landlords have neglected them as part of the campaign to knock down and rebuild. But Notting hill Gate is a centre of 1960's architectural significance (maybe unique on this scale) and it can be spruced up to look very good. Just look at the two large buildings at the start of Kensington Palace Gardens which sit well alongside the older Barry buildings. (iii) Campden Hill Towers is the centrepiece of Notting hill Gate and this will remain forever. (It is in private sectional ownership and impossible for developers to acquire). This is an iconic 1960's building that is placed in context alongside the matching buildings to East and West. If these are knocked down or redeveloped, the Towers will stand out like a sore thumb. The new Jamie Oliver building is very smart. But it is totally inappropriate (and looks ridiculous)</p>	<p>Potential to spruce up existing buildings and the importance of Notting Hill Gate as a centre of 1960s buildings is noted. The SPD has been amended to remove references to tall buildings.</p> <p>The design of facades is and the</p>	

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			stuck on the end of a 1960's block. Officers should visit South beach, Miami, and take a Master class on what restoration can produce. Two miles of magnificent Art Deco architecture that was a rundown hovel in the 1960's.	detailed design of buildings is considered to be a matter for detailed discussion through the planning application process, not an SPD.	
	Elizabeth Shaw		Buildings need to be very high rise possibly in addition with a cantilevered overhang at first floor level to allow for increased width of pavements, roadway and privately owned, but publicly assessable, piazzas. Cantilevered overhangs have the dual advantage of increasing pavement space, providing shelter from the rain and making space for underground exits.	Support very high rise buildings, with a cantilevered overhang to allow increase width of pavements noted but the SPD has been amended to remove reference to tall buildings.	SPD has been amended to remove references to tall buildings.
	Joan Granger		Important that Newcombe House will be designed by a leading architect (perhaps a competition process) be ultra modern with maximum impact. - not just another square box or flat tower	Support for Newcombe House to be designed by a leading architect noted, but the SPD has been amended to remove references to tall buildings.	SPD has been amended to remove references to tall buildings.
	Michael St. J. Wright		D) You write that "some buildings overhang pavements or present blank facades". I think that "overhangs" are a blessing in the rain, provide wider footpaths and even has reduced the wind. Blank facades are better than a mess of materials, let alone advertising, being visible through the windows, as it now is on Newcombe House - though I quite like the gay coloured panels. E) In spite of some clever propaganda when they put on an exhibition, I dislike the proposal to destroy the three tallish old buildings and the existing art deco angled bookshop on the north side.	Support for existing buildings, cantilevered overhang as sheltered pedestrian space, plain blank facades and coloured panels noted. The SPD has been amended to remove references to tall buildings.	SPD has been amended to remove references to tall buildings.
	Stephen		Section 4.16: I strongly support the no tower option	Support for no tower option noted.	SPD has been amended to remove

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	Crompton		mentioned in this section.	The SPD has been amended to remove references to tall buildings.	references to tall buildings.
	Peter Thompson		<p>Section 4.5: I do not see that a single relatively thin relatively short tall building would have that impact and would appreciate seeing the evidence for this assertion. I do understand that a general height increase along NHG and Ken Church St may have this impact, however. Section 4.6: Don't agree; making the buildings either side of NHG taller will hem in noise and pollution more than it currently is and make the E-W aligned road much more likely to act as a wind tunnel. I would object to a general height increase of the buildings along NHG as described because of loss of light and impact on Hillgate Village, seeming to hem it in. The higher buildings will overlook the Village. Higher buildings would increase the local population, requiring additional parking provision that doesn't appear to have been addressed in the SPD. Resident's parking in the area is fully utilised already in the evenings. Section 4.12: Don't agree; these tall buildings ARE the views. When considered from Verified View 3 (junct Jameson St & Hillgate Place) without the tower the only view would be the terraces either side of Jameson St ending in the extremely ugly rear view of David Game House. Take Newcombe House out and the view could be anywhere in Victorian urban London or any other city in the UK. The issue is not the fact of the tall building; it is its design and look. Section 4.16: More weight should be given to the opinion of residents of the immediate area. I would object to a general increase in building heights on and near the Newcombe House site because of the</p>	<p>The Council recognises that development in Notting Hill Gate could have significant implications for designated heritage assets and their settings. The SPD is supplemented by a Views study which identifies these in detail and planning applications that come forward in the area will be required to provide verified views demonstrating the impact of proposals on these views, compared with the current situation. The SPD has been amended to remove references to tall buildings.</p> <p>Any additional residential development would be permit free and have off street parking provision in line with the car parking policy and standards contained in the Transport SPD.</p> <p>The architectural style and quality of</p>	SPD has been amended to remove references to tall buildings.

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			canyon effect, the sense of closing in the busy streets in the area, and the impact on light and a sense of enclosure in Hillgate Village that would result. Section 4.23: It is poorly designed but could be replaced by another tall building with a better design and continue to be a landmark. Section 4.24: I would object to the general height increase that would result from reducing the height of the tower. Section 4.30: Much of the SPD seems to contradict this stated objective.	individual developments will be the subject of planning applications.	
	G. Keating		Para 4.6 states "... there is scope for increasing the height of some of the buildings". I would comment that such scope should be strictly limited so as to retain the open aspect of the street, in particular I recommend that for sites with existing buildings at 4 stories or more, no additional height should be permitted.	The SPD has been amended to remove references to tall buildings.	SPD has been amended to remove references to tall buildings.
	Michele Hillgarth		There is sadly a mish mash of modern buildings and old fashioned shop fronts - which should be kept but improved as much as possible. For example, the Lloyds Bank building which has a beautiful window and facade but a ghastly sign underneath which looks so ordinary. The material of the potential new development should be very carefully selected, as well as on colour, and should have the ability to be cleaned regularly. There should definitely not be any new developments at higher levels than the present; if anything it should be reduced, to maintain a village feel. Avoidance of facades like those above Marks and Spencers should be maintained. All the heritage assets such as the Gate and the Coronet should be well preserved but having better modern signs outside which conflict with the nature of the	<p>Facades need to be considered as individual planning applications, they cannot be specified in an SPD. The SPD has been amended to remove references to tall buildings.</p> <p>The architectural style and detailed design of individual developments will be the subject of planning applications and the impacts on heritage assets will be assessed against the views set out in the Views study that accompanies the SPD.</p>	SPD has been amended to remove references to tall buildings.

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			<p>buildings. Campden Hill Towers and Newcombe House will obviously never be removed, but perhaps some clever architect could try to improve the surrounding of it. The potential new development in Notting Hill Gate should avoid having too many windows, which is more of a city rather than a residential approach. Apart from the potential area that is outlined in Figure 2, the surrounding houses within half a mile of the borders should not be given planning permission for alterations to their historic architecture. So far too many consents have been given for modernising the houses, windows etc. and this is not in keeping with the heritage.</p>	<p>Core Strategy Policy CF7 protects arts and cultural uses, including cinemas.</p> <p>This SPD is dealing with a specific area, it cannot deal with concerns about alteration to the historic architecture of residential properties in the wider area.</p>	
	Dickson		<p>4.13 not a prime office location currently but as with Old St roundabout with high quality space and transport links it could attract many more small businesses along the lines of hubs. NZ house (Westminster hub) is full to bursting including many people who commute from NHG.</p> <p>4.16 renewal option without a new tower would be the least negative, although all the options lose the wider pavement outside Waterstones.</p> <p>4.24. Given no other landmark buildings (except the Coronet) I'm not sure why this is needed provided it looks better than the current building.</p>	<p>The Council recognises NHG's role as an office location and the Development Guidelines: General Points encourage development of at least one 'business hub' providing flexible office space.</p> <p>Support for renewal option noted. The SPD has been amended to remove references to tall buildings.</p>	<p>SPD has been amended to remove references to tall buildings and other options.</p>

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Bulmer Mews Management Limited (J Gardner)	Bulmer Mews Management Limited	<p>4.3 add in the final line "mid way down" before the words "Kensington Park Road", as the Pembridge Road end is terraced houses.</p> <p>4.4 - mentions the height of CHT and Newcombe House - please show these later against the proposals!</p> <p>p20 - drawing: perhaps you should shade the area for development. I read this as to be not in a conservation area, but it took a while to understand this from the lines - shading it would assist. Please also check the boundary line for Bulmer Mews/Bulmer Place as the line seems to divide a property or two.</p> <p>4.17 - unless a planning application has been received, delete 2013 ref.</p> <p>4.26 - why are we encouraging height through additional set back storeys? Living in a Mews which is at the rear of buildings fronting Notting Hill Gate, I find the principal of additional height to be a great concern - in terms of height and loss of light and wind effect. Even if set back, you then give me another headache of overlooking e.g. a balcony around a setback floor. Floor heights should include setbacks, not encourage them on top as we have seen along Warwick Rd.</p>	<p>'Mid way down' has been inserted as requested.</p> <p>The other renew and rethink options have been removed so this is not necessary.</p> <p>We have shaded the Conservation Areas to make this clearer.</p> <p>The boundary has been checked.</p> <p>4.17 this text has been removed.</p> <p>Concerns noted issues like overlooking would be considered at the planning application stage.</p>	
English Heritage (Richard Parish)	English Heritage	<p>As you may recall we provided comments in respect of the Notting Hill Gate photographic and views study. Our principal concern lay in the potential for a harmful and accumulative impact on the wider setting of heritage assets resulting from taller buildings, particularly in respect of the redevelopment of Newcombe House and Campden Hill Towers. The advice set out in our joint guidance with CABE on tall buildings recommends the need to</p>	<p>The SPD has been amended to remove references to tall buildings.</p>	<p>SPD has been amended to remove references to tall buildings.</p>

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			<p>assess the appropriateness of tall buildings regardless of whether a tall building already exists in this location, and particularly where the existing building is identified as causing harm. We are therefore pleased to note the addition of a further lower-scale option as recommended in our advice of 24th September 2013, and acknowledgement in the text that a landmark building does not have to be tall. This is particularly appropriate in this instance; the existing tall buildings at Newcombe House and Campden Hill being identified as having a negative impact on local views and character. In our view, taller buildings in these locations would potentially cause greater harm in background views of Kensington Palace, and from Hillgate Village. In respect of views of Kensington Palace increased height would cause harm to the setting regardless of any perceived improvements in architectural style.</p>		
	Jeremy Amos		<p>1. The site wrapping round from Farmer St to Kensington Place on Notting Hill Gate & Kensington Church offers a unique opportunity for a comprehensive redevelopment with all the uses and facilities that you suggest, hinging on the pivot of a corner tower (circular or at least rounded for the first two floors to create more public space at the corner) with the wings stepping down to meet existing levels at Farmer St & Kensington Place. Intelligent design could create diversity in the facades to prevent monolithic architecture. I realise that the sites straddle different ownerships but a co-operation should benefit all. This comment applies to sections 5 & 6 of the SPD also.</p>	<p>Support for the comprehensive redevelopment option noted but this option is unlikely to come forward and has been removed from the final version of the document.</p>	<p>Changes to SPD as per Council response</p>
	White		<p>I support the proposals of the Kensington</p>	<p>Support for the Kensington Society</p>	<p>SPD has been amended to remove</p>

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			Society/Malcolm Reading Consultants. 4.23 It reads as if the developers of Newcombe House site have been given carte blanche to do what they want. Totally unacceptable	proposals noted. The SPD has been amended to remove references to tall buildings.	references to tall buildings.
	Alessandra Masoero		I support the idea of improving the look but not increasing the height of the buildings. It's vital to protect the Gate and Coronet cinemas which are a piece of history	<p>Opposition to height of buildings noted. The SPD has been amended to remove references to tall buildings.</p> <p>Core Strategy Policy CF7 protects arts and cultural uses, including cinemas.</p> <p>The Coronet Cinema has recently been taken over by a new owner the Council understands who intends to re-open it as a theatre and cinema.</p>	<p>SPD has been amended to remove references to tall buildings.</p> <p>Noted.</p>
	St Helens Residents Association (Henry Peterson)	St Helens Residents Association	Buildings and Architecture The issue of building heights for Camden Hill Towers, the redeveloped Newcombe House, and the Book Warehouse site, is a key element of the SPD and one on which the council has to opportunity to apply more precise policy guidance than that already set out in its Core Strategy and its adopted SPD on Building Heights. We recognise the commercial pressures to build higher, and the increased S106 contributions that result. We also greatly value the council's longstanding stance that this is not a borough for tall buildings, and its continued efforts to resist pressures to build tall in unsuitable settings. We assume that the council has established with the developers of Newcombe House that there is no realistic scope for re-cladding and refurbishing this	<p>Support for increased height on Newcombe House in order to provide a new square noted.</p> <p>The SPD has been amended to remove references to tall buildings.</p>	<p>Noted</p> <p>SPD has been amended to remove references to tall buildings.</p>

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			<p>building and that the case for a building of significantly greater height is justified? This would be a 'refurbishment and extend' option. In relation to Campden Hill Towers, we would have thought that the owners of this building would have derived more than sufficient profit from this building, in an era of rapidly rising residential values, to meet the costs of re-cladding without the addition of two further floors? The height of this building, and of Newcombe House, contributes to already serious problems of wind turbulence at Notting Hill Gate and makes it a less attractive place for the public to linger. We suggest that the council undertakes wind tunnel tests on any proposals for either building, to see what remedial measures (canopies, balconies) could be introduced. On the Newcombe House site, we feel that some increase in height would be an acceptable trade-off to finance a new public square as suggested above, but that the built form would need to be of the highest quality in terms of architectural design. Constraints on building height on the west side of Kensington Church Street should also be maintained. The draft SPD refers to a 'mid-rise' development at this location, falling from 8 to 6 stories at the southern end. This would be significantly taller than the current buildings and should be seen as an absolute maximum.</p>	<p>Wind tunnel tests would be required for any proposals likely to impact the microclimate that come forward in this area.</p> <p>The SPD has been amended to remove references to tall buildings.</p> <p>This option has been removed from the SPD.</p>	<p>SPD has been amended to remove references to tall buildings.</p> <p>Mid rise option has been removed from the SPD.</p>
	J E Outtrim		<p>The number of buildings marked in the SPD to allow multi-storey rises in height is not acceptable, giving the overwhelming effect of less space and over-</p>	<p>Concerns about over-development noted. The impact of population growth would be considered as part</p>	<p>Noted. References to tall buildings removed from SPD</p>

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			development. Overall, to raise the height of the buildings and cram more people in is only to aggravate the shortcomings of the area: more pollution, more road traffic, more strain on services. Notting Hill Gate infrastructure must not be allowed to be throttled by a clutch of higher buildings: one, two or even three storeys in some places, and the number of extra people accommodated adding to the issues of inadequate road space and facilities. I look forward to improvement of the area - not just more clutter - and believe a seminar to cover questions would be appropriate.	of any planning application. The SPD has been amended to remove references to tall buildings.	
	Eileen Strathnaver		There is also a serious danger of such developments leading to large corporate headquarters or major single occupier office buildings taking over, trading on the reputation of the Notting Hill name, in spite of what the document says. We are blessed in Notting Hill with a sense of sky and space. Please can we work to keep it that way?	The Council's research suggests that demand in this area is for smaller businesses but the Council cannot control which business occupies a building. Comment noted the SPD has been amended to remove references to tall buildings.	Noted SPD has been amended to remove references to tall buildings.
	Eileen Strathnaver		In the plans I viewed last Autumn it seemed to me that height was, again, a threat to the scale of the architecture of surrounding buildings. Equally important, it seems to me, is the preservation of the facades of the existing buildings along Notting Hill Gate itself. They may never have been listed (a pity but they are elegant, to scale and in keeping with the area).	Comments noted as above and concern about preserving facades of buildings. The existing buildings would only be replaced if the Council was convinced they would be replaced with buildings of higher quality.	Noted
	E M Pedraz-Estevez		4. Heritage Assets & Significant Views; Newcombe House: Very much welcome to offer some flexibility as these buildings are known as "EYESORE" to community. The Coronet Cinema and The Gate	Support for development which would improve Newcombe House noted but the SPD has been amended to remove references to	SPD has been amended to remove references to tall buildings.

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			Cinema, do need action and observation to the proposal/s.	tall buildings. The cinemas are under private ownership and not in the Council's direct control although Core Strategy Policy CF7 protects arts and cultural uses, including cinemas. The Coronet Cinema has recently been taken over by a new owner the Council understands who intends to re-open it as a theatre and cinema.	Reference to cultural facility removed from SPD.
	W. M. and D. L. Gabitass		7. Newcombe House clearly needs replacing, but apart from insistence on a high quality building neither it nor any other redeveloped site should be high rise	Support for a low rise replacement for Newcombe House noted. The SPD has been amended to remove references to tall buildings.	SPD has been amended to remove references to tall buildings.
	Estelle Beverley Hilton		4. BUILDINGS & ARCHITECTURE 4.4 talks about the 'fine grain (?) and strong sense of enclosure found in the surrounding streets'. But these are residential streets, with less traffic. It's a relief to see the sky at NHG, and not to have the traffic fumes, noise and busyness trapped by high buildings all along the south side. The streets running off NHG mostly run north to south, so are light all day: NHG runs E-W, so the south side is in shadow most of the day. The higher the buildings on the south side, the gloomier the road. And I'd be sorry to see the Coronet cupola overwhelmed by its new neighbours. The two towers were an aberration at the time: we're stuck with them, but they shouldn't be increased in height. They wreck views and outlooks from all the surrounding residential areas, cast long shadows, create wind turbulence. It seems as if the developer?	Comments noted, 4.4 was a statement relating to the effects of the road realignment in the 1950s. Notting Hill Gate is, and will remain, a wide road that accommodates a lot of traffic so there is no intention to replicate the surrounding residential streets. The SPD has been amended to remove references to tall buildings. Wind modelling and daylight/sunlight assessment will be required as part of the assessment of the	No change SPD has been amended to remove references to tall buildings. Noted

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			RBKC? Wants a glorious monument, rather than a graceful building that fits in with the surrounding residential areas. Everything should be done to reduce the wind turbulence all along NHG - not just around the Elephant.	<p>acceptability of any proposed building that is likely to have an impact on the microclimate.</p> <p>At this stage the Council is considering the scale and massing that would be appropriate in Notting Hill Gate not the design of any building.</p>	Noted
	Tsu Woodhull		I write on behalf of Mrs Sharabany and myself to object to the proposed height increase for buildings in Notting hill. Our main concern is as follows: the increased height proposed for Camden Hill Towers and all along row of shops are the rear of our houses and in particular the extra 2 on the top of Camden Hill Towers will cause an even worse wind tunnel and loss of light/sunlight.	Wind modelling and daylight/sunlight assessment will be required as part of the assessment of the acceptability of any proposed building that is likely to have an impact on the microclimate.	Noted
	Savills Planning (Round)	Savills Planning	4. Buildings and Architecture. Comments: David Game House, Newcombe House, the Czech Embassy, and Camden Hill Towers are all large, looming buildings. The document acknowledges that Newcombe House and Camden Hill Towers are district landmarks and rare examples of tall buildings in the borough. In our view these buildings are poor landmarks for the Borough; indeed they are referred to as having a negative impact on a number of views from the surrounding conservation area. In our view there is considerable scope in this location to create some exceptional landmark buildings and a more radical scheme should be explored which could introduce new towers around the junction of Notting Hill Gate and Pembridge Road, creating a new	<p>The Council considered a number of options in producing this SPD and concluded that new towers around the junction of Notting Hill Gate and Pembridge Road would not be appropriate.</p> <p>The SPD has been amended to remove references to the opportunity for taller buildings.</p>	SPD has been amended to remove references to tall buildings.

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			focus for the area. A significant investment in public realm, generated by large scale but elegant and intelligent development could provide a central point for this part of the Borough, drawing significant investment and opportunity to the area. Our clients support the 're-think' option and considers that figure 8 as shown lacks ambition and imagination in terms of kick-starting regeneration and place making in this location. In reference to paragraph 4.27 the potential diversity of design in discussed. Whilst our client is supportive in principle of this approach, they consider it extremely important that a cohesive approach is employed in relation to the public spaces and the integration of new buildings into these.	<p>Figures 6, 7 and 8 have been removed from the SPD.</p> <p>The public realm improvement scheme would be financed by contributions from developers but implemented by the Council.</p>	Noted
	Deborah Collinson and Associates (Deborah Collinson)	Deborah Collinson and Associates	It is important that the buildings are not any higher than currently as we would suffer loss of amenity, light and privacy.	The SPD has been amended to remove references to tall buildings.	SPD has been amended to remove references to tall buildings.
	Marion Gettleson		8. The minutae of whether to have a single tower or a small group of high rise flats is beyond me. The second seems more in keeping with the area. Modest sized apartments for modest citizens.	Comments noted, but the Council is not able to control who occupies apartments.	Noted.
	Deborah Collinson and Associates (Deborah Collinson)	Deborah Collinson and Associates	The refurbishment idea is the best and the least unfriendly to those who live nearby. Buildings can be re-clad and repainted. This is a thriving community and this development will destroy the uniqueness of Hillgate Village. My other concern is that if this does go ahead scaffolding will be shrouded with advertisements on the south of the buildings which would be an eyesore for the residents and should not be allowed. A condition should be put on to this	<p>Support for refurbishment noted as above the SPD has been amended to remove references to tall buildings.</p> <p>If a developer wanted to shroud</p>	SPD has been amended to remove references to tall buildings.

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			effect.	scaffolding with advertisements they would have to apply for consent to do this.	
	N. Lindsay-Fynn		Section 4: Buildings and Architecture The Supplementary Planning Document has described the 1950s redevelopment of Notting Hill Gate and 1950s buildings as ugly and utilitarian. However, these proposals do not in any way address and rectify these eyesores. We strongly oppose increasing the height of ANY of the buildings at Notting Hill Gate. The Gate should be composed of low-rise attractive buildings, it is intimidating enough in its current state. It would make it far more cold in atmosphere and create shade which is undesirable. Let the sun in, don't block it out with high rise. Your proposal does not appear to have considered the option of making the area more pleasant, only more dreary.	Opposition to increase in height noted the SPD has been amended to remove references to tall buildings. Wind modelling and daylight/sunlight assessment will be required as part of the assessment of the acceptability of any proposed building that is likely to have an impact on the microclimate.	SPD has been amended to remove references to tall buildings.
	Elizabeth Clarke		Building Heights The London view photographs on pages 38 and 53 of the document show the proper heights for buildings in residential London: generally four to five storeys, maximum 6 storeys. It should be the aim of the redevelopment to restore these civilised dimensions to N.H.G. - see the attractive historic streetscape on p. 11. By all means add a storey or two to Astley House, Ivy Lodge and the West Block. This would be an improvement. NO extra storey on the Book Warehouse - out of keeping with the rest of Pembridge Gardens.	Support for a maximum of six storeys and no increase on the Book Warehouse site noted. The SPD has been amended to remove references to tall buildings.	SPD has been amended to remove references to tall buildings.
	Elizabeth Clarke		Campden Hill Tower Alas, we seem to be saddled with this - but in the future, no additional height.	Concern over increasing height of Camden Hill Towers noted. This option is unlikely to come forward and has been removed from the	SPD has been amended to remove references to tall buildings.

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				SPD.	
	Marion Gettleson		<p>14. It's time RBKC stopped denying the right for architects to be creative. I'm reminded of the extraordinary proposed extension to the V&A Museum. Truly magnificent - and DIFFERENT! So RBKC listened to the dinosaurs and rejected it. As a result there's yet another lump of mid-19th century building on the site. A terrible lost opportunity. Deeply depressing but typical of the Council. We got the ghastly Exhibitionist Road instead. Whatever is done, Notting Hill Gate can never be beautiful. So it has to be exciting. I suggest that RBKC allows architects and engineers to create and that the Council accepts the most the most radical solution.</p> <p>15. The entire matter is urgent for several reasons - not least that the new developers have already begun to doubt that RBKC ever intends to grant them permission for any development that doesn't included stucco and lead flashings. This is the 21st century and the area must reflect that fact. RBKC must take the opportunity be bold, before the developers walk away yet again.</p>	<p>This SPD is concerned with the height and massing that would be appropriate in Notting Hill Gate. The architectural style and quality of individual developments will be the subject of planning applications and all projects within the SPD area will be presented to the Council's Architecture Appraisal Panel as part of the planning process.</p>	Noted.
	David Devore		<p>I have read through much of the document you prepared about the Notting hill gate area, and feel reassured that you are considering the right factors in arriving at a decision. I have, in principle, no objection to the redevelopment of either The Book Warehouse Corner nor Newcombe House. My concern is that buildings have some character! The proposals made by the developer were terribly bland and not worthy of the architectural heritage of the area.</p>	<p>Support noted. This SPD is concerned with the height and massing that would be appropriate in Notting Hill Gate. The architectural style and quality of individual developments will be the subject of planning applications and all projects within the SPD area will be presented to the Council's Architecture Appraisal Panel as part of the planning process.</p>	Noted.

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
	Norland Conservation Society (Georgiana Lebus)	Norland Conservation Society	<p>* Visitors. There is little incentive for visitors emerging from the Underground to remain in the immediate area of Notting Hill Gate - unless they are going to one of the eateries or cinema. I would endorse proposals to replace the key buildings with high quality architecture (although I do not believe a landmark building necessarily has to be a tall building and am not convinced that this is the appropriate place to locate a tall building - even at 81m. I would go further and suggest that one of the charms of this area is that it actually does not feature any tall buildings, and is very much human in scale and close to the street life that animates it. I wholly support the replacement of Newcombe House Much of the architecture, dating from the 1960s, is ugly, run down and I believe actively a deterrent to * Public Access to the buildings at street level is really important and the street life could be retained and improved by a judicious mix of retail and amenity, designed to accommodate the needs of residents as well as visitors. Clearly, the retail offering cannot be specified by RBKC, but the Council does have an intimate knowledge of the local demography and the importance of not driving away the street life cannot be over-stressed.</p>	<p>This SPD is concerned with the height and massing that would be appropriate in Notting Hill Gate. The architectural style and quality of individual developments will be the subject of planning applications and all projects within the SPD area will be presented to the Council's Architecture Appraisal Panel as part of the planning process.</p> <p>Support for replacement of Newcombe House and a mix of uses noted. The SPD has been amended to remove references to tall buildings.</p>	Noted.
	Gillian Day		<p>Having read the November 2013 Supplementary Planning Document as a resident of the neighbourhood on Bedford Gardens for the last 12 years, I wish to state the following. The main problem with Notting Hill Gate is the presence of several dominant, oppressive concrete tower blocks (Campden Towers, Newcombe House). These are</p>	<p>Support for low rise development noted, however, it is not viable to demolish these buildings and replace them with lower ones. The SPD has been amended to remove references to tall buildings.</p>	<p>SPD has been amended to remove references to tall buildings.</p>

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
			<p>an architectural anomaly, are out of place with the historic nature of most of the buildings and detract from the street scape. Their height and style are threatening and they are of an impersonal and inhuman scale as well as of construction ugly in style and poor in quality. The best course of action in any redevelopment is to demolish them. Under no account should they be made taller by adding storeys. I am extremely concerned to read that this is under consideration. These buildings, due to their height can be seen many street away and totally spoil the charm and feel of this historic neighbourhood. I therefore vehemently oppose any proposal to add more storeys to these towers.</p>		
	John Learmonth		<p>· New Buildings. As Jameson Street residents we were absolutely horrified to read that the Council is proposing to permit an extra six to eight stories to be added to David Game and Hobson Houses and potentially the substation as well – this would destroy the environment in our street and be an unbelievably horrible blight on our properties. This, combined with the Council's seeming suggestion that it will use legislation to override residents' "rights to light" (see below) is most worrying. As stated below in Views, new tall or taller buildings are to be avoided as they will damage our heritage, largely Victorian streetscape and local environment – also we don't want canyons in NHG. New buildings must match their surroundings. The initial proposed designs by Stranton Properties for 66-74 NHG were most unencouraging in this regard – any new building here must only be as tall as the houses on the east side of Pembridge Gardens, not matching the ugly RBS building across the road. The Council must</p>	<p>The Newcombe House Option 2: comprehensive approach is unlikely to come forward and has been removed from this SPD and it has been amended to remove references to tall buildings.</p>	<p>SPD has been amended to remove references to tall buildings.</p>

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
			<p>remember its commitment in The RBKC Core Strategy document to “encourage the refurbishment of the Georgian properties along the north-eastern side of Notting Hill Gate, and explore opportunities to improve their Victorian shop fronts and/or create wide pavement” (RBKC CSD section 16.3.10, p204). This implies any re-development should retain existing facades not completely demolish as proposed by Stranton. - Rights to Light. There are extremely worrying sections of the draft SPD regarding rights to light, the Council’s attitude to this and potential action it can take - see sections 4.7, p19, and 6.5, p39. These parts of the draft SPD seem to imply that the Council might take advantage of legislation to help developers’ over-rule residents’ “rights to light.” The fact that the Council should even seem to be considering treating residents in this fashion is extremely worrying. The Council must provide clarity on this issue as a matter of urgency and give firm undertakings that legislation will not be used to overrule residents’ “rights to light” and other privileges. This issue was not discussed or mentioned at the public meetings organised by the Council.</p>	<p>Comments noted, the SPD suggests a small increase in height on the Book Warehouse site may be appropriate.</p> <p>The existing buildings would only be replaced if the Council was convinced they would be replaced with buildings of higher quality.</p> <p>As above this option has been removed from the SPD.</p> <p>These options have now been removed from the SPD.</p>	<p>Noted</p> <p>Noted</p> <p>Comprehensive approach removed from the SPD.</p> <p>Changes as per Council response.</p>
	John Learmonth		<p>Lack of Clarity. We are very unclear what is being proposed or what will be permitted for many of the buildings, e.g. David Game House, Hobson House, Gate Cinema, Jameson Street substation. Residential? Office? Both? In the main body of the draft SPD there is general mention of new residential development being permitted but nothing we can see in specific relation to any of these buildings individually; however, in section 7 (Developer contributions) the affordable housing box is ticked</p>	<p>Chapter 5 of the SPD, Identity of Notting Hill Gate, sets out land use principles and 5.53 specifies retaining or increasing overall office floorspace in the centre. Detailed building by building land use cannot be specified until the planning application stage when the building has been designed.</p> <p>The table in section 7 has been</p>	<p>Table 7 removed from SPD.</p>

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			<p>next to them all except the substation, suggesting expected residential content in all buildings and thus, by implication, commensurate loss of office and retail space. We accept that the substation can only be redeveloped as residential as it's at the end of a row of terraced, residential houses. · Views. Section 4.11, p21, says that there are "40 views" which will need to be considered when "assessing the impact of any future development on the surrounding landscape." These views almost universally identify the existing modern buildings as being "disruptive", "harmful", "incongruous", "detracting" to the "heritage assets" and predominantly "Victorian character" of the environment and street scene in the neighbourhood (see Notting Hill Gate Views Study, Draft November 2013, pp1-23). And yet the draft SPD is proposing to replace these modern buildings with even bigger modern buildings which would be more harmful to the views!</p>	<p>removed.</p> <p>Newcombe House Option 2: comprehensive approach, which includes the substation, is now considered unlikely to come forward and has been removed from the SPD.</p> <p>The SPD has been amended to remove reference to taller buildings.</p>	<p>Comprehensive approach removed from the SPD.</p> <p>SPD has been amended to remove references to tall buildings.</p>
	John Learmonth		<p>· Combined Cooling Heating and Power (CCHP) network. Referred to in section 2.13, page 7 but then not mentioned elsewhere in the document or in relation to any specific area or building. Delivery of this is identified as one of the key "Visions" in The RBKC Core Strategy document (section 16.4.7.7, p206). The Council needs to provide clarity on this issue and what it means in practical terms.</p>	<p>2.13 refers to the Core Strategy 16.3.19</p> <p>The Council will encourage proposals and design solutions which improve air quality and reduce noise along Notting Hill Gate Major redevelopment of the centre will also offer an opportunity for a low pollution strategy and district heat and energy source, which will be especially efficient as energy loads can be shared between the mix of uses.</p> <p>This district heat source might be</p>	<p>Changes as per Council response</p>

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
				located in the basement of Newcombe House. The Council will also encourage the planting of street trees and living roofs, which will seek to meet the green infrastructure requirements in the centre.' The SPD is supplementary to the Core Strategy so it is not necessary to repeat the text.	
	Morven Hutchison		Anything that can be done to eliminate the 'wind tunnel' would also be useful.	Wind modelling will be required as part of the assessment of the acceptability of any proposed building.	Noted
	Iain Milligan		Shadow created by increasing the height of buildings on the south side of Notting Hill Gate needs to be addressed. Sunlight is critical to the character of the place which the Council is trying to preserve and enhance. 3. Towers are incompatible with the character of the place, they obstruct sunlight and they create wind (design against the latter being hit and miss). On any view the Newcombe House development should be without a tower. 4. Although the lease structure of Campden Hill Towers may pose a problem for the redevelopment of the site, the Council should consider the carrots and sticks available to it and the possibility of requiring adjoining developments to be made conditional on the redevelopment of Campden Hill Towers, i.e. forcing adjoining landlords to find a commercial solution to the lease problem. 5. The Council should consider the desirability of preserving the façade of	Wind daylight/sunlight assessment will be required as part of the assessment of the acceptability of any proposed building. Concern over towers noted, the SPD has been amended to remove reference to taller buildings. The flats in Camden Hill Towers are owned individually on long leases	Noted SPD has been amended to remove references to tall buildings.

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			the four storey brick building adjoining the Book Warehouse.	and have no obligation to agree to any form of redevelopment so this would not be practical. Reference to demolition of these buildings has been removed from the SPD.	
	Penelope Laughton		Buildings, architecture and sustainability Regarding the built environment, the SPD is premised on a negative view of the post war buildings and on a support of architectural diversity, but both premises should be re-examined. Referring to the additions by the LCC in the post war period the SPD states that 'the quality of the development was not particularly high' (4.1, p19). The post war buildings are designated an 'eyesore' (4.23, p 25), as 'unattractive' (5.30, p31), and as a 'mistake' (6.13, p 43). Elsewhere, the SPD states that various views of Newcombe and Campden are detrimental to the area (4.12, p21). It needs to be remembered that the post war buildings were completed at a period when Notting Hill was becoming known for the market on Portobello Road, and as part of a renewal after the social disruptions of the 1950s. Thus they form a distinctive part of the history of the place, one that should not be effaced without considerable thought. In particular, the buildings on the north side, from the west block to United House, are of good quality in terms of overall design, sophisticated massing, proportion and detailing, giving a coherence and visual continuity to the street. Indeed, the SPD does go as far to describe the two taller buildings (Campden and Newcombe) as local 'landmarks'	Support for the post-war heritage of the existing buildings and that refurbishment is much more green that rebuilding noted. The SPD has been amended to remove references to taller buildings. Need to respect existing massing of northern part of the NHG and not allow additional storeys West block to United House, noted. The Council considers some modest increase in height of these buildings may be acceptable.	SPD has been amended to remove references to tall buildings. Changes to SPD as per Council response.

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
			<p>(4.4, p19). The SPD proposes in general to promote 'diversity' of design (4.27, p25) which is likely to result in a hodgepodge built environment, contradicting the overall aim of a 'coordinated approach' (1.3, p1) potentially pandering to the current fashion, in a place that is currently dominated by two styles – post war modernist and classical nineteenth century. These complementary heritages that should be valued and preserved, rather than only considering the pre twentieth century buildings as worthy of retaining. Indeed, other London boroughs are respecting their post war heritage, adopting the sensible and successful policy refurbishment as opposed to destruction and redevelopment. Walking east-west along NHG, the roof line of the lower of the post war buildings follows that of the adjacent or opposite buildings. Thus whilst, according to the SPD, the 'fine grain' of the surrounding streets was lost during this development, the continuity of the massing of the nineteenth buildings along NHG was preserved. The SPD's sensitive to massing and height of the 1950s buildings is revealed in its proposals for the West Block (6.26, p 49) and I suggest that RBKC is consistent and is similarly sensitive to the massing in the entirety of the north range of buildings and not allow additional stories to any of the north range of buildings, from West block to United House, and including Campden tower. It is also worrying to read that RBKC is welcoming proposals to 'improve' the 'external appearance' of Campden (4.25, p25). I fail to see how superficial changes to this finely proportioned and sensitively detailed building will bring advantages. Sensitive repair is all that is required. The Czech and Slovak embassies are</p>		

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		<p>within the boundary covered by the SPD (p IV) but no development proposals are included. These buildings are of very high quality and indeed featured in 2013's London Open House – they are obviously valued by the occupants who wish to share their pride with visitors. I would recommend that they should be protected by whatever means the Council has available. The SPD states that the dominance of 1950s buildings act as deterrent to 'shopping and lingering' (2.8, p 7) but, as far as I can ascertain by my own use and observation of others, this is without base. Indeed, aspects of the buildings' design are a positive advantage. The canopies along buildings both north and south of the road positively encourage 'shopping and lingering', offering a shelter from both sunshine and rain. To better promote a more pleasing architectural environment, RBKC could have already requested that the 3 dominant landlords (5.8, p27) adopt strict policies on shop facades, on the size and type of fascia and the materials used. But this has not been done. It is therefore welcome that the SPD includes proposals to coordinate the street frontages. However, given that RBKC allowed the destruction of the fenestration of United House by Jamie Oliver and Itsu, I am concerned that appropriate and effective measures will not be taken by the Council in this regard in the future. Concerning sustainability, I recently heard the highly experienced John Allan of Avanti Architects, convincingly argue that refurbishment is less energy intensive than destruction and rebuild (lecture 12 November 2013, DOCOMOMO, the refurbishment of Haggerston School). Given that refurbishment is more 'green' than destruction and new-build, surely this should be</p>	<p>Need to protect the Czech and Slovak embassies noted.</p> <p>4.29 notes that the Council's policies dealing with high quality design of new buildings are set out in the Core Strategy. The architectural style and quality of individual developments will be the subject of planning applications and all projects within the SPD area will be presented to the Council's Architecture Appraisal Panel as part of the planning process.</p> <p>The Council respects the borough's post war heritage but these buildings are not considered to be particularly high quality.</p> <p>Concerns about additional storeys on the north side of Notting Hill Gate noted, these have been developed after careful analysis of the townscape impact.</p> <p>This was an issue raised during consultation and has been identified</p>	

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			considered seriously and proactively as a planning guideline by the council, rather than merely calling for new buildings to be 'constructed and maintained with carbon reduction and water management in mind.' (2.13, p 7). In addition, as I understand, refurbishment in the case of Haggerston School, was a cheaper option than destruction and rebuild: better for our environment, better for the developer's pocket. This supports the option of repairing the north range of post war buildings, and not adding stories to or changing the fenestration or details of this distinctive local landmark.	as an opportunity, it is not for the Council to prejudge a solution that might come forward. The previous points relating to architectural quality would apply. Comment noted. Benefits of canopies noted, these were comments that came from consultation. It would be too prescriptive for an SPD to specify these kinds of design details.	
	Peter Barnes		The council must insist that it will not approve any proposals for the development for high rise buildings in the area unless they are of high architectural merit. Unfortunately previously built high rise buildings in the borough have not been of any quality.	The Council has Core Strategy policies dealing with high quality design of new buildings. The architectural style and quality of individual developments will be the subject of planning applications and all projects within the SPD area will be presented to the Council's Architecture Appraisal Panel as part of the planning process.	Noted
	Patricia M Rees		Thank you for your letter dated 8 January, 2014. I object to the Supplementary Planning Document for Notting Hill Gate. My objection is based particularly/primarily on the height of the building. But also on its depth, which will reduce the width of the vehicle passage next to the Gate Cinema	Objection to increasing building height noted, the SPD has been amended as shown in the next column. There is no proposal to reduce the width of Farmer Street next to the Gate Cinema.	SPD has been amended to remove references to tall buildings.
	Alan and Diane Goslar		1. We strenuously object to any increase in height of any of the buildings on the Newcombe House site	Objection to increasing building height noted, the SPD has been	SPD has been amended to remove references to tall buildings.

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
			<p>(Newcombe House is already too high). This site includes Newcombe House, David Game House, Hobson House, and the Jameson Street substation. Increasing the height of these buildings is simply not in keeping with the character of Notting Hill Gate, isn't aesthetically pleasing, creates wind-tunnel effects (already an issue in NHG thanks to the introduction of high buildings), and adversely affects the light availability for the residents in Jameson Street and Uxbridge Street. An increase in height to the Jameson Street substation would also be catastrophic for the light availability for Jameson Street residents nearby. As you are aware light is a precious commodity in central London and to reduce it any further would not be acceptable. 2. We strongly object to any increase in building density in Notting Hill Gate in general and, more particularly, in the Newcombe House site (including all the various buildings mentioned above). This would adversely affect the remaining character of Notting Hill Gate and the residential ambiance of Hillgate Village, destroying the "village-like" feel of the area. This would turn the area into just another part of soulless built-up London. Currently there are lots of tourists who come to look at Hillgate Village as they have heard of its well-known peacefulness despite it being right at Notting Hill Gate.</p>	<p>amended to remove references to taller buildings. Newcombe House Option 2: comprehensive approach which includes the substation is unlikely to come forward and has been removed from the SPD.</p> <p>Wind modelling and daylight/sunlight assessment will be required as part of the assessment of the acceptability of any proposed building.</p>	Noted
	Alan and Diane Goslar		Hillgate Village is a very famous and sought-after area – why ruin this with out-of-place over-development?	See above	
	Roger Hudson		4.16 As is revealed in 4.23, Newcombe House has been identified as an eyesore by the Council. This should reinforce efforts to trade off a considerable	Support for the renewal option without a tower noted. The SPD has been amended to remove the	SPD has been amended to remove references to tall buildings.

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
			lowering of the height of any replacement against a six-storey development along Church St next to it (though five-storey would be better). 4.24 also reinforces this point.	options shown in Figures 6,7 and 8 have been removed from the SPD.	
	Penelope Laughton		Pollution is not only concerned with sustainable building and maintenance techniques (2.13, p 7), but also to light, air pollution and sound. I was thus concerned to read that RBKC would consider having buildings in NHG lit at night (4.36, p25) and that this has found its way into the planning guidelines (5.61, p35).	4.36 recognises the issue of light pollution and the need to strike a balance with security, 5.61 recognises that light might have a role to play as has already been demonstrated with the ring stack installation.	Noted
	Sally Young		4.4 Newcombe House and Campden Hill Towers may be district landmarks, but they are certainly not attractive enough to copy. 4.6/4.16 Please do not succumb to the temptation of taller buildings. Part of the attraction of NHG is its low cityscape. Kensington High Street will become more 'canyon-like' at its Western end, due to the development of Charles House into higher-rise (7-storey) residential apartments and the future developments of residential/office space above the new Design Museum and the southern side of the street where the old Post Office is located, next door to the Odeon Cinema. As the Council is aware, many of these developments are marketed abroad and - apart from a welcome influx of council tax - provide nothing to the local area. Once taller buildings are permitted within this area, adjoining properties - even in the longer, rather than the shorter term - will use the height as a precedent. This is quite clear in the Western end developments of Kensington High Street. 4.27 The idea of diversity within architects is appealing - provided the outcome has some	Support for the renewal option without a tower noted. The SPD has been amended to remove references to taller buildings. The options shown in Figures 6,7 and 8 have been removed from the SPD. The Council is unable to influence where and to whom property is marketed.	References to tall buildings removed from SPD. No change

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			cohesion and flow to it, without individual architects wanting only to 'make a statement'.	The architectural style and quality of individual developments will be the subject of planning applications and all projects within the SPD area will be presented to the Council's Architecture Appraisal Panel as part of the planning process.	Noted
	Gerald Eve LLP (Samuel Palmer)	Gerald Eve LLP	Chapter 4 – Buildings and Architecture Paragraph 4.19 to 4.20 – Development Timescales Paragraph 4.19 states that the sites on the corner of Notting Hill Gate and Kensington Church Street (Newcombe House, the substations, and David Games House / Hobson House) may achieve greater public benefits if they are developed comprehensively. Indeed Paragraph 4.20 notes that a viability assessment has been undertaken to support the SPD to assess this 'comprehensive' approach. As you will be aware, these sites are in different land ownerships and there is no realistic prospect of them falling within the same ownership. In addition, the existing lease structure for David Game House exacerbates the complexities of them being considered as a group of buildings to be developed together. We therefore consider that it is not credible to refer to the comprehensive development of Newcombe House / Hobson House with David Game House. It is requested that reference to this as an option should either be removed, or it noted that this would be an unlikely at this stage due to land ownerships.	Paragraphs 4.19 and 4.20 have been removed to reflect the fact that these sites are unlikely to come forward as a comprehensive approach.	The comprehensive approach has been removed from the SPD.
	Mr. Roome		4.5 may conflict with 4.6 Cosmetically awful and perhaps plain dangerous externally, Newcombe House holds a fond local acceptance due to its	Wind modelling will be required as part of the assessment of the acceptability of any proposed	Noted

Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
		<p>worthy use a rabbit-warren of small businesses, a major socio-economic contribution to NHG. Land secs were indulgent: well done them. A heightened tower will assume that use (of no use to man or beast), absentee- owned empty market residential. There is too much of that already nearby, in Wycombe Square, Thornwood Gardens, and Academy Buildings. This "use" any assist "viability"; per contra, the Core Strategy holds Policies. G.L. Hearn are commissioned by BKC, not by the developers. 4.2 Despite the merits of, and a reference nowadays for, a localised citizen-engaged approach to redevelopment, there is an argument for a master plan. Earl's Court as Terry Farrel, e.g. Might RBKC consider putting to the RITP brief of producing a short-list from whom to select a masterplan firm whic can lurch heads together, ringmaster parties, address timescales, quanlity, viabilities, etc. etc.? The present jigsaw may become very fractured - timescales. Comings and goings of RBKC individuals, inability to stand up to one of the named developers who is " of a certain reputation, etc." 4.27, 4.28, 4.29 RBKC will need to be less bromidic than with these platitudes. The recent new builds by he presently named developers are unworkman like, competent of finish and utilitarian in "maxing" their sites. But no more than that. 4.31 and 6.26-6.27 154-164 NHG ("M&S Block") has been referred to English Heritage (London) for listing or designation. It is Rick Mather's first building in London "first buildings" are important if they survive in the architect's canon (itself of merit, of course) and retain both their purpose and their architect's own regard. Mather always said this was one of his best.</p>	<p>building.</p> <p>Unoccupied residential property, but this is not something the Council can control.</p> <p>This SPD has been produced to identify the parameters for development in the area. The Council does not own any property in the area and development will only come forward as a result of individual applications from landowners so a masterplan would be undeliverable and inappropriate.</p> <p>This would be a matter for English Heritage.</p>	<p>No change</p> <p>Noted.</p>

Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
Tanya Alfille		<p>I live on Jameson Street, and my comments are therefore focused on the proposals for the Newcombe House Site, covered in Section 6 of the SPD. However, I have a few preliminary, more general points to make: * There appears to be some inconsistency over the results of the last public consultation (in September 2013). It is difficult to reconcile the claim in 1.17 that more people were in favour of the "rethink" option with the statement in 4.16 that around one third of residents supported each of the 3 options put forward. My concern is that it is the council, not local residents, that favours the more comprehensive, rethink proposals. * It is of further concern that the new, more radical proposals for the Newcombe House site were not the subject of that initial consultation, but have since emerged as a result of revisiting the scheme because "some residents were frustrated that there was no option without a tower." * The reference to the Council taking a more pro-active role in relation to right of light issues (6.5) is of grave concern, all the more so since the SPD document fails to spell out exactly what this means. Hidden away in a footnote to 4.7 is the answer: "If there is significant public benefit from bringing forward development, the Council has powers under Section 237 of the Town and Country Planning Act 1990 to acquire the site, which removes the potential for an injunction."</p>	<p>1.17 is correct. The overall findings showed that for buildings and architecture there was close to equal support for all three options, for streets and public spaces the majority supported 'Re-think', and on strengthening the identity of Notting Hill Gate support for 'Refurbish' and 'Refresh' was roughly equal to 'Re-think'. References to the consultation process and findings have now been removed from the SPD.</p> <p>The renewal option without a tower was developed in response to concerns raised during the public consultation. The SPD has been amended to remove references to taller buildings. Figures 6,7 and 8 have been removed and 4.15 re-worded as shown in the next column.</p>	<p>Changes as per the Council's response.</p> <p>SPD has been amended to remove references to tall buildings.</p>
Savills (Matt Richards (Representations on NHG SPD on behalf of Stranton	Savills	<p>Para 4.16 Comment: The GL Herne viability appraisal also assessed no. 66-74 Notting Hill Gate, however this is not referenced. Suggestion: This should be expanded to provide conclusions in respect of the development potential at 66-74 Notting Hill Gate.</p>	<p>This section has been removed from the SPD.</p>	<p>Changes to SPD as per Council response</p>

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
	Prope...				
	Way West Press (Tim Burke)	NHIG	<p>III. BUILDINGS AND ARCHITECTURE ?</p> <p>Redevelopment offers a unique opportunity to introduce "wow" architecture to the area. The Group feels that the public will be more accepting of architectural boldness precisely because the Gate is known for its bad buildings. This "wow" factor, expected in an area known for its quiriness is lacking from the SPD and from the developers? Proposals we have seen to date. ? The Group finds that the Council approach is weak, "welcoming" (e.g. improvement proposals to Campden Hill Towers appearance) when it should be prescribing. Such an approach may result in more eyesores for Notting Hill Gate. ? The Group has no objection per se to tall buildings, so long as they are signature works. ? The Council must truly seek to generate world-class signature architecture. ? As such the SPD lacks overall architectural vision and presents few if any architectural guidelines ? RBKC should use its AAP to get a better scheme out of the architects. ? Architects must be presented with the opportunity, to develop, to present to R.B.K.C and the wider public what they consider to be their best creative endeavour.</p>	<p>Support for wow factor noted. The SPD is concerned with height and massing not architectural design this is a matter to be considered through individual planning applications.</p> <p>The Council does not own these properties and cannot prescribe what will happen.</p> <p>4.29 notes that the Council's policies dealing with high quality design of new buildings are set out in the Core Strategy and all projects within the SPD area will be presented to the Council's Architecture Appraisal Panel as part of the planning process.</p>	<p>Noted</p> <p>No change</p> <p>Noted</p>
	The Ladbroke Association (Robina Rose)	The Ladbroke Association	<p>The "master plan" refereed to at Waterstones is of course no such thing. It is a map. An ACTUAL Masterplan... proactively approaching the owners of the bank opposite Book Warehouse and estate agents opposite Jamie Oliver, as well as including possibility presented by the substation to the maximum. page 1 of draft spd correctly states "ENSURE a coordinated approach". Unfortunately in</p>	<p>This SPD has been produced to identify the parameters for development in the area, and 'ensure a co-ordinated approach to building form, land use and public realm proposals'. The Council does not own any property in the area and development will only come forward</p>	<p>No change</p>

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			direct contradiction with this is n page 25 "different architects will be engaged by each landowner" to develop designs for their sites. The Council "welcomes this diversity, as it will help to provide variety and a difference of approach" (!!!!!!!) Where clearly what is needed to rescue this sows ear of a Town Centre is a co-ordinated "vision"...	as a result of individual applications from landowners so a masterplan would be undeliverable and inappropriate.	
	The Ladbroke Association (Robina Rose)	The Ladbroke Association	Overhanging pavements (Ivy lodge, United House) Good shelter from rain. Think of it all as if the whole space were one LIKE WESTFIELD. Photocopy of p.4 of NHG SPD enclosed with a spherical 'approach and include' drawn on building area opposite David Game House on the corner of Pembridge Road.	Support for overhangs noted.	Noted
	Penelope Laughton		The north range of post war buildings should be preserved in their form, size, proportion and detail, and any changes should be confined to sensitive repair and coordination of retail facades. Sustainability policies should address the proven benefits of sensitive refurbishment rather than only pertain to destruction and re-build. Pollution does not refer to vehicle emissions alone, but also to light and sound; all should be addressed.	Support for retaining buildings on north side of Notting Hill Gate noted. Support for refurbishment and concern about light pollution noted.	Noted
	GVA (Fred Drabble)	GVA	4. Buildings and Architecture Layout, Height and Massing 4.1 In Paragraph 4.7 and footnote 9, the SPD begins to set out how Rights of Light and daylight / sunlight issues can constrain new development and what opportunities there are to mitigate this, stating that where there is "significant public benefit from bringing forward development, the Council has powers under Section 237 of the Town and Country Planning Act 1990 to acquire the site, which	Figures 6,7 and 8 have been removed from the SPD, Newcombe House Option 2: comprehensive approach is now considered unlikely to come forward and has been removed and the text under. 4.15 and 4.16 have been removed from the SPD.	Changes to SPD as per Council response

	Respondent name	Respondent company / organisation	Comment	Council response	Recommended change to draft SPD
			<p>removes the potential for injunction".</p> <p>4.2 However, we consider that this explanation is too simplistic and does not sufficiently describe the consequences associated with the use of Section 237 powers. Given that the Council is endorsing the use of Section 237 powers to justify 'Option 2' at Newcombe House (Comprehensive Approach (Chapter 6)), we consider it essential that a fuller explanation is provided to property owners who may be affected by such powers.</p> <p>4.3 As we have been advised by GVA Schatunowski Brooks (specialist Rights of Light and daylight / sunlight advisors) Section 237 powers can be used by the Council to override the established rights of a property owner which could otherwise prevent development from proceeding. This will prevent the property owner from frustrating the development by way of an injunction. The use of these powers can be challenged in court and therefore the Council should be satisfied that there is a clear policy basis in support of the works, and that the works would deliver economic, environmental or social 'wellbeing' benefit in the public interest.</p> <p>4.4 To withstand a legal challenge on the basis of human rights, the public interest element of the development must outweigh any adverse effect on the human rights of those affected. The Council should be able to sufficiently demonstrate such public benefit in a robust Statement of Reasons that could withstand a legal challenge.</p> <p>4.5 To date, we do not consider that the Council has</p>	All comments noted.	Noted.

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			<p>indicated any benefits associated with the comprehensive scheme to justify the use of Section 237 powers. We challenge whether there could be sufficient justification, when an alternative scheme can deliver equal, if not better, public benefit. Furthermore, we consider that the Council should focus efforts on reaching a negotiated solution with willing landowners, without having to pursue the use of Section 237 powers. We consider that this is achievable given our commitment. to delivering the Newcombe House site and willingness to engage with the Council and other key stakeholders.</p> <p>4.6 Recommendation: On the basis of the above, we request that a fuller explanation of the use of Section 237 is included within the SPD. Further detail should be provided on:</p> <ul style="list-style-type: none"> a) the situations in which the Council consider the use of Section 237 powers appropriate, especially in the view of the impact on habitable rooms in residential dwellings; b) the extent of properties that may be affected; c) the justification for using Section 237 powers when alternative options for the site are available; and d) the risks associated with the use of Section 237 powers Heritage Assets and Significant Views <p>4.7 We note that Paragraph 4.12 recognises the negative impact that Newcombe House has on a number of key views. This assessment is in accordance with the studies undertaken by Donald Insall Associates during the design development stage for works to Newcombe House, in which the existing building has been assessed to be</p>		

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			<p>'monolithic' in nature and harmful to the surrounding conservation areas. Refurbish or Rebuild?</p> <p>4.8 We broadly support the assessment of market context and in particular at Paragraph 4.13 the acknowledgement that the area is not an established office location, albeit we note that there is a desire for a qualitative improvement. Rethink (Figure 7)</p> <p>4.9 Paragraph 4.5 describes a 'rethink' option for the redevelopment of Newcombe House, which includes a "taller tower". The diagrammatic sketch of this option (represented at Figure 7) shows a uniform tower element directly over the corner of Notting Hill Gate and Kensington Church Street.</p> <p>4.10 It should be noted that this 'uniform' tower typology is not technically feasible. This is due to a number of factors, notably the below ground constraints and environmental factors including wind. The below ground constraints in relation to this development scenario are described and assessed in detail by ARUP at Appendix 2. With regard to wind, due to the height, orientation and exposure of an uninterrupted building such as that represented at Figure 7, upper-level winds will be deflected by the building to ground-level. The uninterrupted building form will have a significant harmful effect on the new public realm below, as it accentuates the down drafting and accelerates winds at ground level.</p> <p>4.12 ARUP has previously assessed such a scenario and notes that two areas were identified as being adversely affected; the first being immediately to the east of the corner high rise block, and the</p>		

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			<p>second along the building frontages on the northern side of the site. Conditions in these two areas with an uninterrupted building form would be expected to exceed the required Lawson criteria for entrances and retail/shopping use.</p> <p>4.13 Without substantial mitigation the wind conditions generated by the uninterrupted building form would create frequent discomfort for the large number of pedestrians expected to use the tube station entrance and bus stop near the site.</p> <p>4.14 Notwithstanding the above, this typology could not viably accommodate a mix of uses as is required by the Council on this site. Namely, a viable office space would need to be located on the corner of Notting Hill Gate and Kensington Church Street (i.e. within the tower) however, the tower does not provide sufficient size floor plates for viable office use. Furthermore, an appropriate office floor plate is considerably larger than a residential floor plate, preventing a mix of uses being accommodated within the same building without a change in form.</p> <p>4.15 Recommendation: On the basis of the below ground and wind constraints, we recommend that Paragraph 4.15 acknowledges that the uninterrupted building form represented at Figure 7 may not be feasible. 'Renewal Option Without a Tower' (Figure 8)</p> <p>4.16 Paragraph 4.16 states that, in response to some residents' comments, an option without a tower for the redevelopment at Newcombe House has been "revisited". Paragraph 4.16 goes on to</p>		

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		<p>state that "a viability assessment undertaken to support the SPD indicated that a development of 8 storeys on the Newcombe Site, and 6 storeys along Kensington Church Street may be achievable [<u>underlined for emphasis</u>], so long as the Council was flexible on s.106 requirements". Paragraph 4.16 refers to Figure 8 ('Renewal option without a tower').</p> <p>4.17 The statement in Paragraph 4.16, that such an option "may be achievable", is completely misleading and ignores a number of very constraining and limiting site specific factors that have been assessed and considered in detail by our client in developing its significantly advanced proposals for the Newcombe House Site. These factors can be broken down into the following heads: 1) Rights of Light and Daylight / Sunlight; 2) structural considerations; 3) design; and 4) viability and deliverability. We consider each of these in turn below.</p> <p>1 – Rights of Light and Daylight / Sunlight</p> <p>4.18 The statement that such an option may be 'achievable' refers to viability advice received by the Council from GL Hearn, notably in its letter of 7 November 2013. We note that GL Hearn was asked to assess an indicative massing concept for the Newcombe House site without a tower but spreading additional massing at the rear along Kensington Church Street. The indicative massing at the corner of Notting Hill Gate and Kensington Church Street shows a building of eight storeys with six storeys at the rear along the Kensington Church Street frontage. GL Hearn concludes that such a scheme is</p>		

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			<p>not viable at 50% affordable housing but may be viable at 25% affordable housing.</p> <p>4.19 As the Council is aware, our client has commissioned its own extensive Rights of Light and daylight / sunlight analysis informed by detailed site surveys to consider a massing solution that has regard to these constraints. As detailed previously, the rear of the site in particular along Kensington Church Street and adjacent to the listed Notting Hill Gate station roof is heavily constrained by Rights of Light and daylight / sunlight factors. Working with GVA Schatunowski Brooks (specialist Rights of Light and daylight / sunlight advisors), our client has considered a scheme that has lower massing along the Kensington Church Street frontage (ground plus three storeys – i.e. four storeys) albeit offset by the inclusion of a tower element at the corner of Notting Hill Gate and Kensington Church Street.</p> <p>4.20 There are significant Rights of Light and daylight / sunlight constraints that limit the feasibility of achieving six storeys along Kensington Church Street and therefore the overall feasibility of the 'renewal option without a tower'. GL Hearn acknowledges itself in its letter of 7 November 2013 that "given the potential impact of development in this form on day lighting for surrounding buildings" the Council should attempt to assess the potential compensation that would arise from developing a building of this form. It should not however be taken for granted that compensation is the appropriate remedy by overlooking the genuine risk of an injunction where a six storey massing is proposed.</p>		

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			<p>4.21 GVA Schatunowski Brooks has carried out its own analysis of the 'renewal option without a tower'. With regard to the feasibility of this option from a Rights of Light and sunlight / daylight perspective, GVA Schatunowski Brooks analysis and commentary can be summarised as follows:</p> <p>Rights of Light</p> <ul style="list-style-type: none"> • The established legal standard for a Claimant to secure an injunction is 50% for commercial properties and 55% for residential properties (these percentages refer to the percentage area within each room that is capable of receiving more than 0.2% sky factor – i.e. the recognised standard used for measuring daylight for the purpose of Rights of Light and correlates with the percentages quoted in the GL Hearn Report commissioned by RBKC). • With regard to the 'renewal without a tower option', Rights of Light analysis has identified significant losses below these legal thresholds at: <ul style="list-style-type: none"> o 206 Kensington Church Street o 190 – 204 Kensington Church Street o 182 – 188 Kensington Church Street o 174 – 180 Kensington Church Street o Bethesda Baptist Chapel o A number of the houses along Jameson Street • The Court of Appeal has affirmed the precedent that an injunction is the primary remedy for an actionable interference with a right to light and that damages/compensation are purely discretionary and subject to special conditions – It is therefore ill-advised to assume that damages / compensation would be deemed as an appropriate remedy, especially where the loss of light will result in conditions significantly below the recognised legal 		

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			<p>minimum, as is the case with the Council's 'renewal without a tower option'. All or any one of the owners affected could frustrate the development of such a form by way of an injunction if this massing option were to be pursued.</p> <ul style="list-style-type: none"> • The Council has indicated that these Rights of Light constraints could be addressed by the use of the Council's 'Section 237 powers' (i.e. granted by Section 237 of the Town and Country Planning Act 1990 – see footer 9 on page 19 of the draft SPD). However, appropriation under Section 237 needs to be justified and is open to challenge where its use is deemed unsuitable or inappropriate. • If a form of development / massing can be demonstrated without the need to override neighbouring owners established property rights through appropriation, especially if that form already exists, it is extremely questionable whether Section 237 could be justified. Such a scheme exists in this situation – i.e. the scheme proposed by our client. • In examples where Section 237 powers have been used, the properties affected have predominantly been commercial and non-domestic buildings where the amenity provided by daylight is not considered to be of high importance due to a greater reliance on supplementary artificial lighting – e.g. office development in the City of London. The use of the power to override rights where existing neighbouring residential properties are affected is uncommon due to the potential challenge arising from Human Rights Legislation where the living conditions of a potential Claimant will be reduced below the recognised legal 		

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			<p>minimum. Daylight / Sunlight</p> <ul style="list-style-type: none"> • As a Borough, RBKC has historically taken the amenity of existing neighbouring residents very seriously and rigorously applied the BRE Guidelines to safeguard daylight and sunlight. Where they have exercised flexibility, the margins have usually been relatively modest, especially in this part of the Borough. There is a considerable amount of existing well-established residential property around the site, and that residential property, especially on the east side of Kensington Church Street, will suffer losses of light well in excess of anything previously consented by the Council as a result of the 'renewal option without a tower' and would therefore be unacceptable in planning terms. Very significant and unacceptable breaches of the BRE Guidelines will occur at: 206 Kensington High Street o 182-188 Kensington High Street o 174-180 Kensington High Street o A number of houses along Jameson Street <p>Conclusion 4.22 In conclusion, the 'renewal option without a tower' will result in significant potentially injunctable losses to a considerable number of neighbouring residential properties. Even if Section 237 were to be considered, it is highly questionable whether there are sufficient benefits to the 'renewal option without a tower' to override a challenge in respect of Human Rights legislation. Such an option is therefore not feasible within a commercial degree of risk and also exceeds any reasonable degree of planning risk. In this regard, it is misleading to state that such an option may be 'achievable' and we do not consider that this position can be resolved in the medium term</p>		

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		<p>(i.e. the delivery period of the SPD). Having regard to our further comment below on the financial viability assumptions adopted by GL Hearn, we strongly question whether it is financially viable to deliver a scheme that both 'removes' the tower at the corner of Kensington Church Street and Notting Hill Gate and that is also feasible having regard to the Rights of Light and daylight / sunlight constraints of the site.</p> <p>4.23 We note from Paragraph 6.2 that the Council has partially recognised this, stating that additional height on Kensington Church Street will place "severe constraints" on any future scheme. However it has inappropriately concluded that the use of Section 237 powers to secure development is feasible and that there is any commercial appetite to burden such risk.</p> <p>2 – Structural Constraints 4.24 Not only do we consider that the 'renewal option without a tower' underestimates the reality of the Rights of Light and daylight / sunlight constraints but it also ignores the abnormal structural constraints, which also limit the deliverability of such an option. 1.1 ARUP has reviewed the feasibility of a 'renewal option without a tower' having regard to the structural constraints of the site. This analysis is attached in full at Appendix 2. In summary however, such an option would require massing to be placed immediately on the corner of Notting Hill Gate and Kensington Church Street. This increases the loading locally (as the existing Newcombe House is set back from this corner) and this will require additional foundations. As detailed by ARUP, this is</p>		

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			<p>problematic in this corner of the site due to the pedestrian interchange tunnel directly below. A highly engineered solution possibly including cantilevering structures, in conjunction with transfer structures, would be required to achieve this at considerable 'abnormal' and exceptional costs.</p> <p>4.25 As in the case of the refresh option, any central lift core to the corner building could not effectively be located over the pedestrian interchange tunnel. As the pedestrian interchange tunnel prevents the formation of piled foundations in this area of the site, either very significant transfer structures would be required or the stability system of the building frame would need to be configured in an unconventional fashion.</p> <p>4.26 Servicing of the building from the basement would be difficult to achieve given the limitations on the basement extent imposed by the pedestrian interchange tunnel alignment.</p> <p>4.27 Whilst the Council recognise in Paragraph 6.3 that the site is subject to significant constraints, we question whether the full degree of abnormal costs has been allowed for in coming to the view that such an option may be 'achievable'. We would expect that the high degree of abnormal costs associated with the buried infrastructure at the intersection of Notting Hill Gate and Kensington Church Street would have a significant impact on viability of a 'renewal option without a tower', given the loss of area associated with the tower element.</p> <p>4.28 Arup conclude that the proposals presented</p>		

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			<p>would appear to involve a major element of abnormal costs in order to accommodate the buried infrastructure. Given the expected associated loss of lettable / saleable space previously provided within the tower element, this would be expected to have a significant impact on the viability of the development. Furthermore, any works to the pedestrian interchange would require a third party agreement with LUL/ TfL to agree a wider methodology as these would have a significant impact on pedestrian movement, which is likely to cause considerable delays to the works.</p> <p>3 – Design Considerations 4.29 Further to the structural constraints associated with the ‘renewal option without a tower’ set out above, consideration must also be given to the impact of a medium rise option on the legibility of Notting Hill Gate. As set out in the Core Strategy Vision for Notting Hill Gate, the area is seeking a clear function and identity. However, as set out by Donald Insall Associates in Appendix 4, it is considered unlikely that a medium rise option could successfully contribute towards city legibility and would struggle to define the significant corner on which it stands. Furthermore, the removal of a tall building from the Newcombe House site, would result in Campden Hill Towers remaining as the only tall building within Notting Hill Gate. As noted by the Council, this building will not be coming forward for redevelopment and therefore is expected to remain in its existing form in the future. Given that the existing building has a negative impact on views of the area, we consider it inappropriate for this to become the only landmark building in Notting Hill</p>		

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		<p>Gate, by which the area is defined.</p> <p>4.30 The proposed option spreads height across the site, considerably increasing the massing and height along Kensington Church Street. This removes the graduation in height away from Notting Hill Gate, requiring taller buildings in close proximity to the surrounding conservation areas which may have a negative effect on their setting. There is also the potential for this to create a harmful sense of enclosure within the new public realm.</p> <p>4.31 Furthermore, the internal uses are likely to be compromised by this form, with a bulky, medium rise residential building potentially resulting in lengthy internal corridors without natural light and north facing single aspect homes. 4 – Viability and Deliverability 4.32 GL Hearn has carried out a viability assessment of the 'renewal option without a tower' as part of the evidence base for the SPD. This scenario was considered within a letter from GL Hearn dated 7 November 2013. We understand that the SPD refers to this letter when it states at Paragraph 4.16 that this scenario "may be achievable". As stated, we consider this to be misleading, as such a statement should be heavily caveated.</p> <p>4.33 Our valuation and viability advisors have carried out a review of the GL Hearn viability assessments that sit behind the SPD. This is attached as a memo at Appendix 3. As you will note from the conclusion of the attached note, there are a number of factors that cause us to seriously doubt the summary of GL Hearn that such a scenario may be viable at 25%</p>		

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		<p>affordable housing (the letter accepts that such a scenario could never be viable at 50% affordable housing). Notably, we question</p> <ol style="list-style-type: none"> 1) the assumptions behind the baseline site value; 2) the reliance on BCIS build costs; 3) the floor areas and net to gross ratios used in the assessment; 4) whether a realistic assumption has been made with regard to the unit sizes that may be marketable at the site; and <p>4) in light of the analysis from ARUP detailed above, that there will be significant abnormal build costs or significant delays if the Owners are required to make a 3rd party agreement with LUL/TfL for works relating to the pedestrian interchange, that cannot have been taken into account in reaching this conclusion.</p> <p>Conclusion</p> <p>4.34 In summary, we consider that, left uncaveated, Paragraph 4.16 of the SPD is misleading by stating that a renewal option without a tower (referring to Figure 8 of the SPD) may be achievable. It is considered that Paragraph 4.16: 1. Underestimates the reality of the Rights of Light and daylight / sunlight constraints of the site – Such an option results in significant losses of daylight below legal thresholds that could not necessarily be overcome by assuming financial compensation or the justified use of Section 237 powers. It equally results in very significant and unacceptable breaches of the BRE Guidelines, which are unlikely to be acceptable from a planning perspective. As we are advised by GVA Schatunowski Brooks, such an option is therefore not feasible within a commercial degree of risk and also exceeds any reasonable degree of planning</p>		

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			<p>risk;</p> <p>2. Ignores very significant structural constraints and therefore abnormal costs, and/or the potential for delays if the Owner is required to enter into a third party agreement; and 3. Is therefore misleading in respect of financial viability and deliverability – having regard to the above, we disagree with the GL Hearn conclusion that such an option would be ‘viable’, even with a reduced affordable housing contribution.</p> <p>4.35 Grantham (development managers for the Newcombe House site) has considered the deliverability of such a scenario from a development perspective. Grantham comments that as part of the extensive site analysis and design feasibility work undertaken since we the site, we have gained a full understanding of the site constraints and development opportunities. The design feasibility work included the assessment of a medium rise development option (submitted to the Council on December 2012) and led to the conclusion that given the constraints of the site, such an approach was not viable.</p> <p>4.36 A key objective of the client brief and the Council’s aspirations for the redevelopment of the site set out in the Core Strategy is to deliver high quality new office floor space and maintain the current provision. In order to maximise the potential and quality of the office space, it will need to have a prominent entrance close to the corner of Notting Hill Gate and provide large, flexible floor plates. It is unclear how this can be achieved in the site layout suggested for the renewal option without a tower.</p>		

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			<p>Furthermore, the section height of 3.3m (floor to floor) is significantly short of the dimension required for quality, modern office floor space which requires sufficient space for building services.</p> <p>4.37 ARUP and GVA Schatunowski Brooks have reviewed the 'renewal option without a tower' and in light of their findings it is clear that to pursue this option would not be appropriate or represent a commercially acceptable degree of risk in relation to the potential injunctable Rights of Light impacts, planning risk associated with daylight / sunlight impacts and exposure to abnormal costs associated with the required structural solution.</p> <p>4.38 Recommendation: On the basis of the above, we request that Paragraph 4.16 is amended to delete reference to the renewal option without a tower being 'achievable' and suggest that it is amended to read as follows: 4.39 "Roughly a third of residents favoured each option. However, some residents were frustrated that there was no option without a tower. In the response to the consultation, this option was revisited (as shown at Figure 8) however, having regard to Rights of Light and daylight constraints, structural constraints and the likely implications of these on financial viability, programme and deliverability, it is considered that such an option is not feasible". [We request that the Council expands on the following points in reference to the above:</p> <ul style="list-style-type: none"> a) Rights of Light and daylight constraints; b) structural constraints; c) viability constraints; c) feasibility constraint including the impact on 		

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			programming and deliverability].		
	C Pinder		The Supplementary Planning Document has rightly identified that the 1950s and redevelopment of Notting Hill Gate and 1950s buildings are the key reason for the lack of beauty and the cold, uninviting and utilitarian atmosphere of the Gate. However, these proposals do not address in any way rectifying these eyesores in a way I could support. I am vehemently opposed to increasing the height of ANY of the buildings at Notting Hill Gate. The Gate should be composed of low-rise attractive buildings, not high, anonymous, faceless concrete blocks. There are no proposals in this document to 'beautify' these (in my view) hideous existing buildings. I would support the owners of - for instance - David Game House, Astley House removing the ghastly coloured slabs and refacing the buildings in more attractive materials. This does not appear to have been considered an option in making the area more pleasant. I have commented separately on the eyesores of Newcombe House and Campden Hill Towers which have blighted the Gate for years.	Concern over increasing height of any building noted. The SPD has been amended to remove figures 6, 7 and 8 and the text has been amended to remove references to taller buildings. This SPD has been produced to identify the parameters for development in the area, it does not consider opportunities to beautify individual buildings as this would only come forward as a result of individual applications from landowners.	SPD has been amended to remove references to tall buildings.
	Architects Appraisal Panel AAP (Alfred Munkenbeck)	Architects Appraisal Panel AAP	The Panel questions the extent of the public realm improvements and whether they could not be more ambitious in tackling how the traffic arrangements dominate and divide Notting Hill Gate into two sides. It supports the approach of extending pavement space on the north and reducing the southern pavement in front of Newcombe house. The current proposals could go further to rebalance the public realm in favour of pedestrians and cyclists. It would favour the development of a new sizeable public	The Council will investigate the opportunity for a more ambitious public realm improvement scheme.	Noted

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			<p>square, but acknowledges the space limitations. Kensington Church Street could offer some potential for a new piazza. It agrees that Notting Hill Gate is not the location for new tall buildings. Its character is not defined by a cluster of tall buildings . Currently Newcombe House and Campden Hill towers work as a pair and define the town centre. Additional tall building(s) would detract from this. The Panel debated the development scenarios for replacing Newcombe House and overall is not convinced of the merits of an even taller building on the site . It highlights the implications of not addressing Campden Hill tower within the SPD in the light of the visual dialogue and townscape balance of the current two tall buildings.</p>	<p>Potential for a plaza on Kensington Church street noted.</p> <p>Lack of support for additional tall buildings and the fact that Newcombe House and Campden Hill Towers work as a pair noted.</p>	<p>Noted</p> <p>SPD has been amended to remove references to tall buildings.</p>
	Knox-Peebles		<p>I keep losing this document - I am supposed to be kept logged in - but every time I send a comment I have to back to the beginning...</p> <p>4.1 Yes - terrible - please take this opportunity to make NHG a worthy architectural part of RBK&C</p> <p>4.2 It's important to keep the original street patterns as it keeps the area unique and not bland as so many new places are</p> <p>4.4 It is good to have a few tall buildings, as landmarks or markers of specific places, but not if they are as architecturally indifferent as the ones mentioned - the Czech looks as if it is fortified which is ridiculous now</p> <p>4.5 Again, the wind - this must be dealt with</p> <p>4.9 Listed buildings - the more the better,</p>	<p>We are sorry you experienced difficulties responding to this consultation.</p> <p>Support for development which improves the architectural quality of the area noted.</p> <p>There are no plans to alter the street pattern in the surrounding area.</p> <p>Support for Tall buildings if well designed noted, but the SPD has been amended to remove references to tall buildings.</p>	<p>SPD has been amended to remove references to tall buildings.</p>

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			<p>particularly ones as varied as these. I understand the Coronet is for sale - as an aside, I hope it remains a cinema</p> <p>4.12 these two buildings spoil views - Newcombe house, as you say, from Hillgate Village and looking up Church Street (which otherwise is mainly attractive and varied (except at the top end which is dull and clunky. Also Campden Hill Towers looms over Hillgate Village - but I understand nothing can be done about this except possibly making it appear less extreme by raising the height of other buildings to each side</p> <p>4.14 2020 is not very distant when you think of the time it takes to get proposals through planning - relevant sites could be thought about in the context of changes that come sooner</p> <p>4.19 -yes - make every effort for these to be developed comprehensively</p> <p>4.23 good - it is an eyesore</p> <p>4.24 - again yes. it is a very important site and must not be wasted - it is at one of the entry points and should be striking and welcoming and at the same time not destroy the feel of Church Street with its Georgia houses and small intimate shops with their varied fronts</p> <p>4.27 - I agree, as long as they consult and do not produce buildings at odds with each other at street level or on the skyline</p>	<p>Wind modelling will be required as part of the assessment of the acceptability of any proposed building.</p> <p>Support for retention of the Coronet noted.</p> <p>Comment noted</p> <p>This comprehensive development is unlikely so 4.19 and 4.20 have been removed from the SPD.</p>	<p>Noted.</p>

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			4.30 definitely - the areas surrounding conservation areas are just as important visually and must support, not negate their protected neighbours	All projects within the SPD area will be presented to the Council's Architecture Appraisal Panel as part of the planning process.	
	Jeffrey Manton		The three options all envisage tall buildings and yet consultation clearly shows residents do not want these. There is a leaning towards increasing the height of Newcombe House due to the conditions on other buildings on Notting Hill Gate. A taller building will not address concerns and only add to the eyesore of the area and not improve it. Consultation was against taller buildings. In addition, the term 'Winter Garden' signals a Westfield style retail development and is not what was envisaged in consultation. In time this will not improve the area which has a desire for small retail akin to Marylebone High Street. A glassed-in retail development will not be an improvement but drive away local users of these shops.	The SPD has been amended to remove references to taller buildings. The term 'Winter Garden' was used to describe a glazed internal space not a retail mall.	SPD has been amended to remove references to tall buildings.