

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
8.2.16	We would be against any plans that meant that St Anne's Nursery was resited away from its current site. This is a highly valued local facility, and with the number of 3+ bedroom homes on the new site there will surely be increased demand for local nursery school facilities.	Trustees of the Latymer Christian Fellowship	Simon Blanchflower
1.1.1	While appreciating the intention to provide regeneration benefits for both residents and the wider area we find it difficult to see from the document what these are, other than short term benefits of employment during the construction stage. Additional information would be appreciated particularly in response to the Residents' Associations original response in 2008 that regeneration should include replacing one of the tower blocks on the estate rather than increasing the number of units (and therefore population density) on the estate even further. This document does not seem to respond to the specific concerns raised during the original application process or indeed subsequent consultation.		Martha Keogh
1.2.1	We are not sure of the context of this statement. It appears to imply the Council were forced to build social housing on the Silchester Garages Site rather than elected to do so. Surely given there is a housing estate being constructed on part of the Holland Park School site it would have been in keeping with national policy (see section 3.2.1) that the social housing was included there?		Martha Keogh
1.3.2	Why are there no plans to demolish Frinstead House? This was raised by the Residents' Association in response to earlier consultations and would be in keeping with your stated policy (further comments elsewhere in this response on this matter). The Council should state why it does not intend to include Frinstead House in the regeneration of the area		Martha Keogh

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
1.3.3	<p>1-27 Shalfleet Drive (odd numbers only) are one bedroom properties at ground and first floor. Some of the flats are already adapted for the elderly or those with restricted mobility. The original plans for the Silchester Garage Site do not show any one bedroom properties at ground floor and most on third floor or above. How does the Council expect to support those needing adapted accommodation?</p> <p>There is no reference to the community that exist here already and who are to be dispersed by this process. From personal knowledge I can say it is a strong community who do much to support each other and add positively to the wider community. We trust that their removal will be managed with due care and sensitivity and with the minimal amount of stress and inconvenience, given; in most cases their age, health and personal circumstances will not make relocation easy.</p>		Martha Keogh
1.3.7	<p>Clarification needed on the matter of communal open space. This space is surrounded by a fence preventing public access and therefore for the benefit of residents in 1-27 Shalfleet Drive (odd numbers only). Has the Council planned to remove the fence and make it an open space even if this block is not demolished? This was not part of the original planning approval as the area was not part of the planning application.</p>		Martha Keogh
2.1.1	<p>Does this mean that the Housing Association will not be building the new residential units only “let and manage them”? Please clarify.</p>		Martha Keogh
2.2.1	<p>It seems a contradiction in terms that a document seeks to give a ‘clear sense of potential for future changes’ in the Latimer area but then goes on to give little guidance as to what these are other than mention potential development of educational sites for which there is almost no chance of finding an alternative site.</p>		Martha Keogh
2.2.3	<p>Further clarification is needed. The original outline application approval stated that there had to be an application to deal with the Reserved Matters by 30 June 2011. If we have understood the timetable now given it seems the Council is prepared to allow the planning approval gained three years ago (at significant cost to the public purse) to lapse as it is no longer included in the timetable. Could further clarification be given to the reason why it has taken so long to get to this stage and why the planning consent originally obtained is to be allowed to lapse in favour of a new application in September 2011 which will add further costs?</p>		Martha Keogh

Para No.	Submitted Comments	Organisation Name	Consultee Name
2.3.4	<p>The reported findings from the March 2010 Consultation seem flawed. Unlike the verbal assurance given at the public meeting on 29 November the number of respondents was not over 50% but closer to 20% assuming that the 79 respondents were all residents and that only one adult per household were eligible to submit a response. The confidence interval needed to rely on the data is so high that most of the answers could not be relied on with any confidence. It is disappointing that many questions were formed in such a way that there appears to be bias see next point below.</p>		Martha Keogh
2.3.4	<p>2nd Bullet point: 37% of respondents is not statistically significant given the sample size. In fact given the confidence interval needed is 12.44 any of the four prescribed answers by the Council could be statistical significant. In terms of the response it seems axiomatic to conclude that an answer with 37% could be conclusive when two of the other answers were very close in definition (a and c) and together gave a majority of 39% of respondents who felt that the existing homes should be either rebuilt or maintained but no new houses built.</p>		Martha Keogh
2.3.4	<p>6th Bullet point: It is not clear if this is in order of priority – If it is we are deeply concerned that it is misleading. In the consultation two people were in favour of an area for dog walking and two against. Yet the report gives the impression here and elsewhere that an area for dogs is much more important than, for example, a play area for children. Such interpretation of the consultation is deeply worrying. Moreover, given you have only just removed the dog walking/excrement area located across the road (outside Markland House) from this site a few years ago we find it difficult to understand why you would now re-introduce it – in addition the Council has removed the dog areas at local parks recently giving a clear indication that such areas are not in accordance with Council policy and, furthermore, to the best of our knowledge there is no right for dogs to be kept on the estate by Council tenants; or has the tenancy agreement been changed?</p>		Martha Keogh
2.3.4	<p>8th Bullet point: We note with interest that the most popular responses in the consultation response for an open space related to improved entrance to the Railway Station and a place to sit – and yet the plans put forward deal exclusively with removing the garden area away from 1-27 Shalfleet Drive (odd numbers) which has hitherto been for the exclusive use of those residents only.</p>		Martha Keogh

Para No.	Submitted Comments	Organisation Name	Consultee Name
3.2.1	It appears a contradiction in terms that the Council could believe that a good mix of tenure is a good thing but then take action not to build these units in Holland Park as originally intended.		Martha Keogh
3.4.5	It appears to be a contradiction to strive for a traditional street pattern when there is no intention to remove the tower block which is not in keeping with the vision you are describing.		Martha Keogh
4.2.2	The author of this document seems to be providing inaccurate information which gives rise to concern over the accuracy of other statements contained within, for example, the Borough informed us on 9 December that there were 461 households on the estate but the report says 453 (369 units plus 84 leases). Moreover it says there are four tower blocks on Silchester Estate – but there are only three shown on the plans - where is the fourth?		Martha Keogh
4.4.10	An opportunity does exist but creating an annex from Frinstead house will only block the pedestrian routes to the Harrow Club etc. and restrict routes further.		Martha Keogh
4.4.11	We are not clear what open space you refer to. The Gardens of 1-27 Shalfleet Drive (odd numbers) is clearly a defensible space as it has a locked gate and fence all around the perimeter. Please clarify.		Martha Keogh
4.5.2	You have neglected to include the 316 bus route.		Martha Keogh
7.1.5	The photo shows the communal garden of the residents of 1-27 Shalfleet Drive (odd numbers) – is this to be taken away from them to make space for a dog walking area as indicated in this paragraph - irrespective of whether the extended plans go ahead?		Martha Keogh
8.2.1	Why not look at the area as a whole? Why retain Frinstead house and all the tower blocks when they are not in keeping with your philosophy on the design of the area?		Martha Keogh
SP57	Units in addition to the 63 residential units required by the Outline Planning Approval should be social housing that meets the Eco-Homes 'very good' standard and be made available to people on the social housing register.  Local groups and organisation must be resourced to support the successful integration of new residents into the local community. Extra RBKC funding for these groups and organisations would allow the provision of Welcome packs for new residents and the provision of events to build community spirit and cohesion.	KCSC	Patrick Little

Para No.	Submitted Comments	Organisation Name	Consultee Name
1.3.3	<p>KCSC agrees that 'If the option to demolish 1-27 Shalfleet Drive is pursued, residents of 1-27 Shalfleet Drive would be offered new homes within the redevelopment that would meet their housing needs or else the option of other alternative suitable housing should this be their preference.'</p> <p>These residents should also be given the same tenancy/lease holding rights in their new properties as they currently hold now.</p>	KCSC	Patrick Little
7.1.6	<p>KCSC believe this facility should be a multiple use facility that is open to people of all ages and needs from the estate. The facility should be developed in close consultation with residents and existing nearby community organisations. The management of this facility needs to be built into the plans for the estate.</p> <p>We agree that 'The design and location of any such facility should have street presence and be well-integrated into the scheme.'</p>	KCSC	Patrick Little
8.5	<p>KCSC strongly believes the new public open space should be of equal size to the existing communal garden. In an area where green space is so limited, it is important that any existing green space is protected. These spaces are important for people's well being and mental health and they help create a pleasant and enjoyable environment in which to live. As the Supplementary Planning Document (SPD) states under 2.3.4</p> <p>'At the March 2010 consultation event, residents were invited to provide feedback on what they would like to see provided or improved as part of any redevelopment at Silchester Garages. The highest scoring priorities for regeneration at Silchester were: improving street lighting; creating routes which feel safer; creating green spaces; providing landscaped gardens with secure dog walking areas and improved play areas and multi-use games areas.'</p> <p>Residents should be closely involved in the design of this space. At the 29th November KCSC Community Discussion event there were a number of suggestions about what this space could include. These were: a child play area, park benches and a picnic area.</p>	KCSC	Patrick Little

Para No.	Submitted Comments	Organisation Name	Consultee Name
5.6	<p>KCSC would emphasise the importance of close engagement with local residents, community organisations and local businesses throughout the whole process of redevelopment.</p> <p>The accessibility of the consultation process was highlighted as an issue during the KCSC Community Discussion. The length of the SPD, and the language and acronyms used in it make it difficult for residents to engage in the consultation process. KCSC proposes RBKC produce short summaries of documents such as SPDs so that residents are able to understand what changes are potentially taking place. We encourage RBKC to engage with a small group of Silchester residents in the form of a working group to look further at the issue of the accessibility of consultations.</p>	KCSC	Patrick Little
GEN	<p>Car parking and storage space: This was an important issue for a number of residents at the KCSC Community Discussion on the 29th November. There will be approximately a 2 year period between the closure of the car garages and the provision of new parking spaces. There should be free, convenient and safe residents parking made available by RBKC during this transition period. This should also apply to those residents who use the parking bays. People who use the garages for storage should be supported to find a nearby alternative by RBKC.</p> <p>New underground car parks need to be safe, well lit and accessible.</p>	KCSC	Patrick Little
8.2.16	<p>KCSC believe Latimer Education Centre should remain as it is currently.</p>	KCSC	Patrick Little
GEN	<p>Other: It is important the redeveloped estate is well lit, safe and child friendly.</p> <p>Disruption, noise and dust created by building work needs to be kept to a minimum and the management of these issues should be a factor in deciding who the Registered Provider for the site is.</p> <p>Road safety is also an important consideration for the redevelopment considering there is a Youth Club opposite the estate.</p>	KCSC	Patrick Little

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
4.4.12	<p>English Heritage welcomes the discussion about conservation areas and listed buildings on page 30, however, some elements of this would benefit from a little more clarity. For example, it is not entirely clear what paragraphs 4.4.12 and 4.4.13 mean when they refer to “changes outside the boundary”. Is this is a reference to change beyond the Silchester Garages Development Site or beyond the conservation areas’ boundaries?</p> <p>In addition, it would be helpful if all of the neighbouring conservation areas could be listed in paragraph 4.4.12 as the reference to the Avondale Park Gardens Conservation Area in the next paragraph (4.4.13) currently seems incongruous.</p>	English Heritage	Claire Craig
4.4.14	<p>An examination of our records shows that there are six distinctly listed buildings within the Silchester Garages Site. These are:</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> The Harrow Club;</li> <li>• <input type="checkbox"/> The building adjoining to the west of the Harrow Club;</li> <li>• <input type="checkbox"/> 189 Freston Road;</li> <li>• <input type="checkbox"/> The Latimer Education Centre (known as the Thomas Jones Primary School in our listing);</li> <li>• <input type="checkbox"/> The Thomas Jones Primary School Caretaker’s House; and</li> <li>• <input type="checkbox"/> A Thomas Jones Primary School room.</li> </ul> <p>English Heritage recommends that paragraph 4.4.14 is amended to reflect these listings more accurately.</p>	English Heritage	Claire Craig
4.4.15	<p>Similarly, our records show that the Grade II listed Silchester Leisure Centre is a similar distance from the development site to the two listed buildings referred to in paragraph 4.4.15. Consequently, we request that it is included in that paragraph with them. In addition, we recommend that a little more detail be given as to their location in relation to the site, for example, the Silchester Leisure Centre is about a block to the northern part of the west of the site. Alternatively, and preferably, all of the heritage assets that relate to the site could be represented on an appropriate map.</p>	English Heritage	Claire Craig

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
8.2.16	In respect of the stated possibility of refurbishing the Latimer Education Centre at pages 45, 47 and 65 (SP36), English Heritage notes that this will need to comply with PPS 5 Planning for the Historic Environment (PPS 5). In particular, if such an adaptive re-use is to be pursued, we strongly recommend that redevelopment is secured before the existing use vacates the building in accordance with PPS 5 HE.7.7. One of the key ingredients in listed buildings being placed on our Heritage at Risk Register is loss of an active use and consequently we urge the Royal Borough to avoid this eventuality for this building. Furthermore, we note that there could be a little more clarity in the introduction of this topic perhaps by referring to the 'existing facility' in the bullet point on page 45 as "its existing use". Also is the Latimer Education Centre the same thing as the Latymer Day Centre? It would be useful to understand the relationship between the two.	English Heritage	Claire Craig
GEN	Just as this consideration is given to the role of the Latimer Education Centre, it would be helpful, in English Heritage's view, to have some coverage of the role the other listed buildings are envisaged as playing within the development, even if a continuation is envisaged.	English Heritage	Claire Craig
4.4.16	Support consideration of the local vistas and their contribution to the area on page 32;	English Heritage	Claire Craig
6.1.1	Support analysis of the listed buildings' proximity and the character of the railway arches as strengths of the area in the SWOT analysis on page 42;	English Heritage	Claire Craig
4.5	Transport should be improved in terms of more buses that have better destinations i.e central london. Pedestrian access should be of high importance to the Westfield area and Latimer road station should be made a more pleasant and safe environment as opposed to its current ugly state. Pedestrian links should also be improved and enhance to ladbroke grove as currently they are hidden away and unsafe. There is an opportunity to make the walk way via maxilla walk more pleasant and safe and include some form of public art, possibly related to sports that leads people from ladbroke grove to the sports facilities of the Westway sport centre.		Marvin Woodyatt



Para No.	Sumbitted Comments	Organisation Name	Consultee Name
7	The design of buildings and the area in general should be of a standard that impresses rather than being just acceptable. High standard design that is visually attractive and contemporary, even cutting edge so that the previous mish mash of unattractive cheap property built over recent 40 years can be counteracted. Make the area more of a destination rather than a hidden away ghetto.		Marvin Woodyatt
8.3	Local amenities, leisure retail and local business is paramount to improving safety and living standards of the people in the area. Currently it is very difficult for locals who many of which are elderly to buy their weekly shop and the local stores currently in the area offer little in healthy options and at a very high price. There is also an opportunity to utilize the area underneath the Westway on Bramley road to improve on local business, leisure and amenities. Currently underneath the Westway is a trap for unattractiveness and criminality. Utilizing the rail arches is an excellent idea, the area outside Latimer road station should include a cafe culture. The Nottingdale village development should be capitalised on and built upon to generate more retail leisure facilities.		Marvin Woodyatt
8.2.8	The corner site is a perfect opportunity to include a small supermarket which would be highly valued by locals.		Marvin Woodyatt
GEN	I am welcoming the new planning concerning silchester estate.  I am kensington and chelsea resident for 19 years and would like that to benefits that you are offering.		Kacem Bejaoui
7.1.5	Regarding the open space, the Centre holds a community barbeque each year on Wayneflete Square in partnership with the Residents Association and the Square is always covered in dog faeces. It would enable better community use of open space on the estate if there were a secure dog exercising area somewhere on the estate. (LISTED ON LDF DATABASE AS A LOCAL RESIDENT)	Trustees of the Latymer Christian Fellowship	Simon Blanchflower
7.1.6	As the Garages site is very close to the Harrow Club, the Latymer Christian Centre and St Clement and St James Community Centre it seems sensible to retain the Latimer Day Centre as the facility on the site as this is complementary to the other community facilities rather than duplicating what else is available.	Trustees of the Latymer Christian Fellowship	Simon Blanchflower
8.2.4	Support consideration of building heights with a focus on the relevant listed building on page 54	English Heritage	Claire Craig

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
SP29	Support •□exceptionally good acknowledgement of the link between the area’s historical uses and potential for using clay and ceramic materials as SP29 on page 62;	English Heritage	Claire Craig
SP41	Support •□ recommendation to actively use the railway arches while acknowledging their heritage characteristics on pages 46 and 69 (SP41) – although this could be improved by stating that their heritage character should be protected and enhanced in accordance with PPS 5;	English Heritage	Claire Craig
SP44	Support •□consideration of appropriate ‘mews’ scale residential development opposite the railway arches in SP44 on page 70; and the	English Heritage	Claire Craig
SP45	Support •recognition, in SP45 on page 72, of the need to provide open space and for the landscaping of such space to support the identity and character of the area. To this end, the SPD would benefit from a cross-reference to SP29 concerning the use of clay and ceramic materials.	English Heritage	Claire Craig
9.1.2	English Heritage requests that, in the section on ‘Material and information to be submitted’ on pages 78 – 80, there be more explicitly included the need for a statement about how affected heritage assets are to be protected and enhanced.	English Heritage	Claire Craig
10.1.4	English Heritage would also welcome specific reference to heritage assets as potential beneficiaries of the planning obligations in the list at paragraph 10.1.4 on page 81. Where appropriate, types of contribution can include; repair, restoration or maintenance of a heritage asset(s) and their setting; increased public access and improved signage to and from heritage assets; interpretation panels/ historical information and public open days; production and implementation of up-to-date Conservation Area management plans and appraisals; measures for preservation or investigation and recovery of archaeological remains and sites; display of archaeological sites and dissemination of information for public/ school education and research; and sustainability improvements (such as loft insulation) for historic buildings. This list is by no means exhaustive but provides an indication of the type of planning obligations that are used.	English Heritage	Claire Craig

GEN	<p>We are in favour of the redevelopments that affect 1-27 Shalfleet Drive. As the garages site has to have the new homes on it related to the redevelopment of Holland Park School, it makes sense to make best use of the site and develop it in a way that enhances the area and provides extra community facility as opposed to just increasing the housing density. We would like to see these measures in place to minimise the disruption to those residents:</p> <ol style="list-style-type: none"> <li>1. That the development be phased in such a way that the residents who wish to move into a new home on the site can move straight from their old home to a new home.</li> <li>2. For all residents to be offered financial assistance with their removal expenses</li> <li>3. For resident leaseholders to be offered a home on the new site or a generous package for moving elsewhere.</li> <li>4. For these residents in particular, and for residents in general, to be kept very well informed as to progress and to have a named contact within the council to handle any queries or complaints</li> <li>5. For a housing association to be chosen who have an excellent track record of delivering their projects on time and with minimal disruption to residents during the process.</li> </ol>		Mary White
-----	--	--	------------

7.1.5	<p>7.1.5</p> <p>Regarding the open space, we don't think it's important that it's the same size as the current space as the current space is not open for access to all. What is important is that it is landscaped in such a way and contains mature planting so that it immediately feels like an established feature of the area. Waynelete Square is currently used primarily as a dog walking area and is covered in dog's faeces. It would be good to have a secure dog walking area and improved children's play facilities on the estate, but as we already have two play facilities on the estate it might be better to improve those and put the secure dog walking facility elsewhere on the estate and ensure that there is sufficient time and funding for maintaining/cleaning the dog walking area.</p> <p>We would prefer the area in front of the new development to be planted up with flowerbeds and mature planting and benches could be put around it. We would like to be involved in plans to develop the green areas in the estate.</p>		Mary White
-------	---	--	------------

Para No.	Submitted Comments	Organisation Name	Consultee Name
7.1.6	<p>7.1.6</p> <p>The Garages site is very close to the Harrow Club, the Latymer Christian Centre and St Clement and St James Community Centre. Therefore it seems sensible to retain the Latimer Day Centre as the facility on the site. Again, consideration should be given by the housing association as to how to minimise the disruption to the Day Centre, and the council should make every effort to keep staff, parents and interested groups informed as to what is happening.</p>		Mary White
8.2.16	<p>8.2.16</p> <p>There should be no issues with resiting the Pupil referral unit to elsewhere in the Borough as this is a Borough wide facility. However, it is very important that the plans would ensure that St Anne's is resited somewhere on or very near the site. This is a highly valued local facility, and with the number of 3+ bedroom homes on the new site there will surely be increased demand for local nursery facilities.</p>		Mary White
8.3.1	<p>8.3.1</p> <p>We are in favour of boosting the local shopping facilities, in particular we lack opportunity to buy really fresh meat and fruit and vegetables locally. Everything possible should be done to try to ensure that the shop is of benefit to local residents although we understand that the Council cannot prescribe what that store would be.</p>		Mary White
8.4.2	<p>8.4.2</p> <p>We are in favour of the rail viaduct being used to accommodate small businesses. It would be great if these also were able to offer employment to local people and opportunities to buy items locally. This would also increase the vibrancy of the area. It would be good if the existing commercial tenants at Soft Options were offered to move into one of these units.</p>		Mary White
GEN	<p>Consideration should certainly be given to ensuring that the site opens up the sight lines towards the Harrow Club and around the bottom of Frinstead House as currently it's very difficult for people to see how to reach Freston Road from Bramley Road.</p>		Mary White
GEN	<p>We would like to see secure bike storage provided somewhere on the estate as part of this plan. Many people could benefit from this facility in a relatively small area, and it would encourage local people to use bikes. It's a major disincentive to us to have to carry a bicycle through our flat and down two flights of stairs before taking it out.</p>		Mary White

Para No.	Submitted Comments	Organisation Name	Consultee Name
GEN	Terms of reference of SPD are very clear. The PCT support the positive approach taken. PCT welcomes the phased regeneration to support balanced, sustainable and socially inclusive community.	NHS K&C	Bernard Moran
5.1	The Silchester estate is in a very deprived part of the Borough. The PCT encourages a multi-faceted approach to improve the environmental quality of the estate, which would attract investment and support social and economic initiatives.	NHS K&C	Bernard Moran
8.6.1	The PCT believe there is a real opportunity to provide a new primary healthcare centre which would accommodate possibly three local GP practices. The facility would allow more integrated and accessible healthcare with modern premises. Spatially this would be 750 sq M, based on the principle of 1,800 patients per GP. The design should be DDA compliant, and refer to DoH Primary and Community Care Health Building note 11.01 principles.	NHS K&C	Bernard Moran
9.1.2	<p>Where funding has been provided it takes 1-3 years for minor works, 3-5 years for major upgrades and 5-10 years plus for the provision of complete new water or sewerage treatment works. New development may therefore need to be phased to allow the prior completion of the necessary infrastructure. Phasing of development is even more critical where we have not been funded to provide extra capacity. In terms of waste water we have significant concerns particularly as this development will drain to Counters Creek. It is therefore essential the developer demonstrates that this development will not exacerbate existing issues.</p> <p>Page 78 - Section 9 - Materials &amp; Information to be submitted.</p> <p>It will be important for developers to submit a drainage strategy to demonstrate adequate capacity exists both on and off site to serve the development and that it will not lead to problems for existing and/or new customers. It may be necessary for the developer to fund a study in order to ascertain whether the proposed development will lead to overloading of the existing infrastructure. The detail above should be set out in this section of the final version of the SPD.</p>	Thames Water	Mark Matthews

Para No.	Submitted Comments	Organisation Name	Consultee Name
8.7.4	There was concern that the dimensions of the proposed new homes do not conform to requirements laid out in the RBKC Access Design Guide or the Core Strategy and also the fact that no mention is made to these documents. We appreciate that the Access Design Guide had yet to be adopted but that it now has. There should be explicit reference to these key documents as they concisely describe good practice in terms of accessibility.	ADKC	Kate Pieroudis
8.7	A question was also raised about how many of the new units would be classed as 'affordable'. Property in the Borough is extremely expensive and as disabled people are three times more likely to live in poverty and/or have less of an income than their non-disabled counterparts, they have less likelihood of being home owners. It is vital that affordable properties are constructed to at least provide an opportunity of home ownership. There is also not an agreed definition of what constitutes 'affordable'- affordable and social housing are not always the same thing. It would be useful to have this definition included here for purposes of clarity.	ADKC	Kate Pieroudis
8.7.7	<p>We welcome the fact that 100% of the new homes will conform to lifetime homes standards. It is vital that all new developments meet these standards in order to be easily adapted for an ageing population and to allow adaptation to be easily made for disabled residents.</p> <p>We were also pleased to hear that 10% of the total of the new homes would conform to Wheelchair Accessible standards. This is good news considering that following the London Accessible Housing Register being piloted in the Royal Borough, it was found that there was not a single dwelling that met the highest levels of wheelchair accessibility. This takes some steps towards rectifying this.</p> <p>1.1 Lifts The new homes should have at least 2 lifts if they provide access to wheelchair standard dwellings</p>	ADKC	Kate Pieroudis

Para No.	Submitted Comments	Organisation Name	Consultee Name
GEN	<p>Wheelchair accessible homes should be given to wheelchair users, this doesn't always happen but given the shortage of accessible housing stock in Kensington &amp; Chelsea, emphasis needs to be placed on this. There should also be a mix of different sized houses. Often the assumption is that wheelchair users will live alone, but due regard needs to be given to disabled wheelchair users who have children and/or have personal assistants who may live in with the resident. Also a family may have a child who is a wheelchair user. It is vital that RBKC staff in Occupational Therapy services (Stan Logan and Linda-Louise Perry) are involved as soon as possible to ensure that the right people are allocated these units.</p>	ADKC	Kate Pieroudis
8.5.1	<p>The concept of creating a 'village green' type of open space was welcome. It was felt that any area which encourages all members of the community to congregate together rather than separate private gardens only accessed by key holders was a more inclusive approach to green space.</p> <p>There were questions about who would maintain this. It was explained that if a housing association develops the area, they have responsibility for maintaining this.</p>	ADKC	Kate Pieroudis
GEN	<p>It was stated that the mews will be altered to include a shared surface- there was concern over this. If these surfaces are similar to those on Exhibition Road, there are safety concerns that blind and visually impaired people will not be able to negotiate the space with motorists as the assumption is that they can make eye contact. A maximum speed should be imposed and additional awareness raising should be done with motorists to ensure that they consider disabled people and vulnerable road users.</p> <p>We would urge developers and highways control staff to ensure there is level access to the mews houses to conform to Lifetime Homes and Part M of the Building Regulations.</p>	ADKC	Kate Pieroudis

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
GEN	An ADKC member who was not present but left comments via telephone to Kate Pieroudis said that due care must be paid to careful planning in terms of finances, The current economic situation means that many developers have gone into administration. The ADKC member said “Is the Council and/ or Housing Association sure they can finish if they start? What we don’t want is for work to start only for the money to run out. This may result in either the building work ceasing- leaving it half finished, or the need for investment from private companies who may not have the interests of residents as a priority”.	ADKC	Kate Pieroudis
9.1.2	There should be wheelchair accessible bays meeting minimum requirements. If possible, there should be accessible parking spaces on the road and visitor parking for carers to able to reach their disabled clients.	ADKC	Kate Pieroudis
GEN	There will be a more in depth consultation with residents, including a questionnaire. We request that a representative from the ADKC Access Group be present for this. This is to ensure independent feedback from trained individuals so that access continues to be a key consideration.	ADKC	Kate Pieroudis
8.6.3	This should be accessible and available for use by all members of the community. It should be more than just a club’ as there are other services that cater for this. There should be proper, well resourced and timely consultation on this in future by the local authority and/ or those managing it. As one member stated “it should be open to everyone”	ADKC	Kate Pieroudis
3.4.6	3.4.6 The Access design guide should also be referenced here	ADKC	Kate Pieroudis
8.0.5	8.0.5 There is no mention of lifetime homes in this section, it would be useful to include them in this clause to reinforce the commitment to the correct unit sizes and standards.	ADKC	Kate Pieroudis
8.2	8.2 Some reference to accessibility in this section would show a commitment to inclusive design in the architecture.	ADKC	Kate Pieroudis
8.2.15	8.2.15 There should be a reference to The Access Design Guide here.	ADKC	Kate Pieroudis
8.7.4	8.7.4 The housing sizes do not conform to the Access Design Guide the corrections are as follows: 3 Bedroom should read 96 1 Bedroom should read 48 2 Bedroom should read 70	ADKC	Kate Pieroudis



Para No.	Sumbitted Comments	Organisation Name	Consultee Name
SP3	While it is correct that the permeability of the site needs to be improved, this should be for pedestrian and bicycle traffic and for purposes of passive surveillance only. Residents of this area value the fact that there is little traffic and opening up any through routes to vehicles would damage the tranquillity of this peaceful oasis.	Notting Barns Ward Councillors	Cllr Blakeman
SP12	The tallest massed blocks should be at the Bramley Road end of Shalfleet Drive in order to reduce the adverse impact on sunlight and daylight for the flats on the lower floors of Frinstead House.	Notting Barns Ward Councillors	Cllr Blakeman
SP13	We welcome the proposal to include a retail component at the corner of Bramley Road and Shalfleet Drive. However, planners must be aware of the damaging impact of a “small scale store from a national supermarket chain” on Buggsi’s Supermarket, which is successful and very popular with the local community. Mr. Patel provides more than just a shop, he also provides an informal social and community service for residents. His long-standing commitment to local people should not be disregarded. The Council is also committed to supporting small scale independent retailers, such as Buggsi’s. The social and community uses should be provided in the block at the Bramley Road/Shalfleet Drive corner to provide the best access to them for the residents of the whole Estate (which includes Silchester East in Silchester Road) and the wider area. These social and community facilities should also include a primary health care centre, given the anticipated significant increase in the resident population of the Estate.	Notting Barns Ward Councillors	Cllr Blakeman
SP22	The tallest massed blocks should be at the Bramley Road end of Shalfleet Drive in order to reduce the adverse impact on sunlight and daylight for the flats on the lower floors of Frinstead House (see SP 12 above).	Notting Barns Ward Councillors	Cllr Blakeman
SP23	There is resident concern that private open space will be lost. All units of housing of whatever tenure should have access to private open space, be it a garden, a patio or a balcony large enough for a table and chairs for four people, or more where the units are designed for more than four occupants. A study of the local wildlife should be undertaken to ensure that no bird species are displaced by the development.	Notting Barns Ward Councillors	Cllr Blakeman

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
SP29	We note the suggestion that there are innovative opportunities to use clay and ceramic materials as part of the buildings. However, this should be done with care. This opportunity was accepted for the recent Colvin House development in Kingsdown Close and has led to the building unfortunately being nicknamed the "Toilet Block" by some neighbouring residents	Notting Barns Ward Councillors	Cllr Blakeman
SP36	We are disappointed, but not surprised, that the prime part of the site, including the listed buildings, is to be earmarked for market housing. However, given the Council's commitment to diversity in housing provision, these buildings must also offer some affordable and social rented units. The listed buildings must contain affordable units that are tenure blind, to prevent the identifiable segregation of the rich in the listed buildings and the poor in the blocks along the railway line. The Council must clarify what form any intermediate housing will take to ensure that it is genuinely affordable for local residents.	Notting Barns Ward Councillors	Cllr Blakeman
SP45	There is resident concern that private open space will be lost. All units of housing of whatever tenure should have access to private open space, be it a garden, a patio or a balcony large enough for a table and chairs for four people, or more where the units are designed for more than four occupants. (See SP 23).	Notting Barns Ward Councillors	Cllr Blakeman
SP48	The proposal to put the entrance of the underground car park at the western end of the Mews requires further thought in case this inadvertently creates a safety and security hazard. In any case, underground parking is well-known to attract anti-social behaviour and crime, so it must be well-lit, well designed and very secure to address these problems.	Notting Barns Ward Councillors	Cllr Blakeman
SP50	The re-provision for Early Years children must be at least as comprehensive as at present and ideally improved and extended to serve the expanded community that will live on the Estate.	Notting Barns Ward Councillors	Cllr Blakeman
SP51	The 63 affordable units to be provided by 2014 must be funded in full from the obligations set out in the unilateral planning obligation relating to the permission for the Holland Park School site development.	Notting Barns Ward Councillors	Cllr Blakeman

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
SP57	<p>We disagree. We are content with the guidelines for the market housing, but believe that the affordable housing provision should be family sized accommodation for social rent. This is the form of affordable housing that is most needed in the Borough. The Council persistently claims there is no land to provide such homes, so the opportunity that this site provides should be grasped. The fact that intermediate housing of the type suggested in SP 57 is also widely available in various other parts of North Kensington and remains unoccupied should act as a pointer for the Council with regard to the regeneration of this site</p>	Notting Barns Ward Councillors	Cllr Blakeman
SP58	<p>The re-provision of any housing in Shalfleet Drive that is demolished should include a similar number of new units of accommodation for social rent of at least equivalent size. All these units should have some external open space such as a garden, a patio or a balcony large enough for a table and chairs for four people. Ground floor residential units should be re-provided for any resident displaced from the ground floor of Shalfleet Drive. These units should include an individual front door, any aids and adaptations that were previously provided and all these units should have their own private open space in the form of a small garden.</p> <p>The residents of Shalfleet Drive comprise a discrete community that offers support to its members as well as social activities and care should be taken to ensure that members of this community have the opportunity to remain together where this is their wish.</p>	Notting Barns Ward Councillors	Cllr Blakeman
SP59	<p>We disagree. The Council should prioritise family sized social rented accommodation.</p>	Notting Barns Ward Councillors	Cllr Blakeman
SP60	<p>All the housing should be built to the "lifetime homes" standard.</p>	Notting Barns Ward Councillors	Cllr Blakeman
GEN	<p>Residents who had attended the meeting arranged by the Kensington and Chelsea Social Council found the whole experience very confusing and said they were unable to understand much of what was being said because they did not understand the terminology. Having seen the response sent by the Social Council they are also very concerned that this does not represent their views. They would like to know whether this response nevertheless purports to come from them, when they had no chance to comment on it before it was submitted. They are particularly incensed at the suggestion that residents had prioritised a dog-walking area.</p>	Notting Barns Ward Councillors	Cllr Blakeman

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
GEN	Residents are very concerned that this community will be broken up. They want to know why their homes are to be sacrificed just because residents of Campden Hill would not allow the Holland Park School affordable housing development to be built on site – despite it being a condition of The London Plan and re-affirmed by the Council’s commitment to promote diverse communities. They point out that they do not have the resources to hire architects and lawyers to fight the proposals to demolish their homes and suggest that the Council is treating them less fairly because they are not wealthy and influential.	Notting Barns Ward Councillors	Cllr Blakeman
GEN	<p>1. <input type="checkbox"/> Displaced residents should have first refusal of the newly provided social housing. In this regard they make the point that most of them are elderly, some are disabled and have adapted homes on the ground floor. All these residents will need new homes on the ground floor. They do not trust developments with lifts as they fear being trapped when lifts break down – a fairly common experience for their neighbours in the Silchester tower blocks. The current degree of accessibility should be replicated in their new homes, including any adaptations for those with disabilities. They also wish to have their own individual front doors as now.</p> <p>2. <input type="checkbox"/> Residents require cast iron guarantees about their security of tenure and level of rents. Councillors pointed out that the new homes will be developed and run by a Registered Provider (housing association) not the TMO and will circulate e-mails from Laura Johnson, RBKC Director of Housing, that guarantee the Council’s commitment to them on rent levels and security of tenure.</p>	Notting Barns Ward Councillors	Cllr Blakeman
SPI8	They would like all the rooms in their new homes to be of at least the same size as they currently enjoy.	Notting Barns Ward Councillors	Cllr Blakeman
GEN	Some residents have spent a great deal of money improving their homes - indeed some were refused new kitchens under the Decent Homes programme as a result – and feel that they should receive some compensation.	Notting Barns Ward Councillors	Cllr Blakeman
GEN	<p>Many residents took a considered decision when they moved into Shalfleet Drive specifically to be close to family, friends and support networks. They do not wish to be dispersed throughout the area and want to stay close to where they live now, with their current neighbours.</p> <p>They are worried about the decanting process and will vigorously oppose any attempt to decant them temporarily. They are adamant that they must only be moved once.</p>	Notting Barns Ward Councillors	Cllr Blakeman

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
7.1.5	The plans do not show the re-provided open space. Residents made the point that at the moment they have their own private open space and this is not re-provided in the proposed development. They wish to see their mature trees retained and they have concerns about the future of the local wildlife. They enjoy watching the activities of the local foxes and squirrels and point out that they have over 10 species of birds nesting on the site. They have invested a huge amount of their own time and money into making their private open space look lovely and are heartbroken that all this is to be lost. They fear that both the public space and the underground parking facilities will promote an increase in crime and anti-social behaviour in what in recent years has been a relatively crime-free area.	Notting Barns Ward Councillors	Cllr Blakeman
GEN	Residents would like to know how many additional residents will be housed on this very small site and why no community facilities, such as health care, will be provided to serve their extra needs.	Notting Barns Ward Councillors	Cllr Blakeman
GEN	Residents have a concern that, given the nature and location of the site, any market housing will swiftly become buy-to-let and run down, damaging both the environment and the local community spirit.	Notting Barns Ward Councillors	Cllr Blakeman
GEN	There is a short term concern about how their homes will be heated, given that the boiler house will be knocked down during the construction process.	Notting Barns Ward Councillors	Cllr Blakeman
GEN	Residents are concerned that easier accessibility to the new homes will lead to unacceptable increases in vehicular traffic.	Notting Barns Ward Councillors	Cllr Blakeman
7.1.3	The local residents are sceptical about the value of new shops in the railway arches.	Notting Barns Ward Councillors	Cllr Blakeman
GEN	Overall the supplementary Planning Document appears to be in accordance with relevant legislation and therefore Natural England does not wish to offer any substantive comments on the document. However, we note that the site is within an Area of deficiency for access to nature and green space and we would therefore encourage the Council to consider the provision of suitable and appropriate green infrastructure as an integral part of any proposed redevelopment of the site.	Natural England	David Hammond

Para No.	Submitted Comments	Organisation Name	Consultee Name
GEN	<p>It is important that, in line with 'Planning Policy Statement: Planning and Climate Change ', your Council takes account of the contribution to be made from existing and new opportunities for green infrastructure to urban cooling, sustainable drainage systems, and conserving and enhancing biodiversity.</p> <p>Policy 4A.9 of the London Plan also states that "The Mayor will, and other agencies should, promote and support the most effective adaptation to climate change, including protecting and enhancing green infrastructure."</p>	Natural England	David Hammond

GEN	<p>Scale of the proposed development</p> <p>The Society is very concerned by scale of the proposals being suggested in the planning brief, in particular the mass and volume encouraged will produce high-density and poor design as developers seek to maximise the development. This approach promotes high-density development in an area of moderate to poor public transport accessibility.</p> <p>You have to start with the understanding that a developer will take the easiest route. To ask an architect to come up with a concept will cost the developer money. And if the "package" (meaning the outline of the buildings, the heights and locations are specified) effectively establishes the maximum that would be allowed, the developer will go for the maximum size. No reduction or variation in height if it means either questioning the SPD or creating less space. The developer will be encouraged to maximise the space/volume within the envelope proposed in the brief.</p>	Kensington Society	Michael Bach
-----	---	--------------------	--------------

Para No.	Submitted Comments	Organisation Name	Consultee Name
GEN	<p>Failure to address problem of street pattern and permeability</p> <p>So if the plan is set in this document that is what will be built. It is our opinion that the plan is lacking in many aspects and does not meet the requirements as set out in the guideline: the traditional street pattern is not re-established, Frinstead House will be more isolated than it currently is, there is no increase in open space with more occupants, the facades are long and unrelenting relaying architectural texture to create relief.</p> <p>So why have a plan? The statements and guidelines in most cases are very clear and do not require the plan. It may have been helpful to have the plan in mind when writing the draft but now remove it. Force the developer to think and allow his/her architect to be creative.</p> <p>We therefore propose that:</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> all proposed plans and isometrics be removed; and</li> <li>• <input type="checkbox"/> the guideline provide general guidance for potential developers and allow the Borough to select the base developer based upon the concept design that the best architect has created.</li> </ul>	Kensington Society	Michael Bach
I.2.1	.....A unilateral undertaking is a planning (spelling correction) obligation offered in support of a planning application.	Kensington Society	Michael Bach
I.3	SITE: Figure 3 should be here and not buried in the text.	Kensington Society	Michael Bach
I.3.5	Where will the replacement car parking spaces be located? Or is it proposed not to replace them?	Kensington Society	Michael Bach
I.3.7	<p>It would be helpful if the number of existing units and their composition (i.e. 1 bed, 2 bed, etc) were noted. This is the case for all buildings with flats.</p> <ul style="list-style-type: none"> <li>• Shalfleet Drive Flats (Nos 1-27 Shalfleet Drive).</li> </ul>	Kensington Society	Michael Bach
I.3.7	<p>We understand that there is a community room or facility for the building occupants in the base of this building. Is this so? It is important to mention and to not disregard it in planning. This is to be re-provided.</p> <p>Frinstead House, .... There is a very limited relationship at the ground floor (spelling correction) level of this building with adjoining spaces.</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
I.4.1	<p>As the Core Strategy was adopted by the Full Council Meeting on 8 December 2010 the reference here be to the Core Strategy and not the “Submission” Core Strategy? CP 8 is Westway. CP 9 is Latimer and should be the reference here.</p> <p>I.4.1 The vision for redevelopment stems from the wider Latimer vision set out in Chapter 9 of the Submission Core Strategy. It is also consistent with Policy CP8 of the Core Strategy which addresses the Latimer ‘Place’.</p> <p>Full stop needed at end of sentence. In fact, full stops are omitted thorough the document, so many that we have not noted them all.</p>	Kensington Society	Michael Bach
I.4.2	<p>We are unable to find on the RBKC website the Statement of Community Involvement. Can it be provided or ensure that it is easily found on the website?</p>	Kensington Society	Michael Bach
I.4.3	<p>I.4.3 and I.4.4... This is CP 8 as taken from the Core Strategy:</p> <p>Policy CP 8 Westway The Council will ensure the negative impacts of the Westway are ameliorated by requiring development to include appropriate measures to improve the quality of the environment.</p> <p>What is referred to in the statement: Core Strategy Latimer Policy CP8 I.4.4 The Council will ensure the long-term regeneration of Latimer by requiring....</p> <p>Is it not: CV 9 Vision for Latimer in 2028</p>	Kensington Society	Michael Bach
I.4.4	<p>Whose quotation is this? Is it from the planning application and a statement made by the applicant?</p> <p>Vision for Redevelopment at the Silchester Garage Site (Outline Approval Site &amp; Wider Southern Silchester Estate Area):</p> <p>““A well-designed and safe redevelopment that is fully integrated with its surroundings. It will provide high-quality, attractive homes set within traditional street patterns and include a new green space. Opportunities for small businesses and the creative sector will be facilitated by the renovation and re-use of the railway arches”.</p>	Kensington Society	Michael Bach



Para No.	Submitted Comments	Organisation Name	Consultee Name
2.1.1	<p>Part 1.3 does not address the dividing of the site. It defines the site area but does not mention, as this statement implies, that the division of the site is addressed in Part 1.3.</p> <p>This SPD addresses development at the Silchester Garage Site at two scales of the redevelopment, one involving only the Silchester Garages Site and the other including this site with the southern portion of Silchester Estate. This has been described in Part 1.3 of this document...</p>	Kensington Society	Michael Bach
2.2.1	<p>The format of this SPD is structured to provide an understanding of the site, including its physical, planning and social and economic considerations. It sets out the broad time frames (spelling correction)...</p>	Kensington Society	Michael Bach
Figure 5	<p>Spelling Correction....What is RP?</p> <p>April 2011 RP/Developer selected with input from local residents and tenants</p> <p>By Sep 2011 Selected RP/Developer design concept is agreed between RP, local residents and tenants</p>	Kensington Society	Michael Bach
Figure 5	<p>Spelling Correction...The Provisional Project Time Frame is not for the large option. A time frame for the 2nd option should be provided.</p>	Kensington Society	Michael Bach
Figure 5	<p>Spelling Correction....The outline planning permission granted in 2008 included the replacement nursery and offices. The intention is that these existing facilities will be re-provided at the same time as the affordable housing is completed. One more year without these facilities is not acceptable.</p> <p>2015 Completion of the social and community or education facility</p>	Kensington Society	Michael Bach
Figure 6	<p>There is no mention of consultation within the chart and there must be.</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
2.3.4	<p>Without seeing the questions, this statement appears to present an option which is not a majority opinion. Can this be explained?</p> <p>Should redevelopment go ahead, 37% of respondents indicated that they preferred the replacement of some existing homes with new high-quality homes for rent to residents and for private sale at the same time as investment and improvement on the wider Southern Silchester Estate area. (emphasis within original text and not Kensington Society)</p> <p>This represented the most popular response to this question. What does “for rent to residents” mean? Is this social-rented? If so, say so.</p>	Kensington Society	Michael Bach
3.1.1	<p>National, regional and local planning policies are of vital importance to the delivery of sustainable development and mixed and balanced communities. These policies have guided the way in which this SPD has</p>	Kensington Society	Michael Bach
3.4.5	<p>This statement is a huge jump from the statements within the Core Strategy and leaves out many of the CV 9 requirements.</p> <p>The priority is therefore to provide a traditional urban street pattern, which balances residential accommodation with new retail and employment opportunities</p>	Kensington Society	Michael Bach
4.2.2	<p>Silchester Estate (both East and West)... (the Westway/A40 and Hammersmith &amp; City Line viaduct)...</p> <p>Add close bracket</p>	Kensington Society	Michael Bach
4.2	<p>The map only indicates the land owned by RBKC. There is one site within the enclosed area and several on the edge whose ownership is not noted. It would be helpful to know the ownership.</p>	Kensington Society	Michael Bach
4.3.1	<p>The geology of North Kensington is typified by London clay, with seasonally wet loam to clay (spelling correction, clayey is an adjective) over shale soils. There are no identified flood risk areas in the vicinity of the Site.</p> <p>This area is within the Counter Creek sewer line and as such the Council should be requiring any developer to ensure no surface water run-off is increased, the water supply is adequate and the sewer capacity available for the development. The SPD should require that Thames Water be a consultee for any development.</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
4.4.1	<p>On first map on page 26 the towers are in yellow but barely visible...colour should stronger.</p> <p>Whilst the townscape character of the surrounding area is typified by housing estates constructed in the 1970s (correction remove apostrophes in 1970's), there are areas of latent character (see opposite).</p>	Kensington Society	Michael Bach
4.4.5	<p>Examples of this type of arrangement and configuration of buildings are the (delete second "the") Lancaster West site, the North Kensington Leisure Centre, Waynflete Square and Verity Close....</p> <p>It would help that the map has the name of the streets referred to in the text.</p>	Kensington Society	Michael Bach
4.4.12	<p>The Southern Silchester Garages Sites is not located within a Conservation Area. There are a number of conservation areas .... These Conservation Areas include: Ladbroke, Norland, and Avondale Park Gardens and north of the Westway Oxford Gardens which includes St Quintin and St Charles.</p> <p>4.4.13 The closest conservation area is Avondale Park Gardens, located approximately 280 metres to the southeast of the site. Avondale Park Gardens is a small self-contained inter-war development of simple artisan cottages set around a garden square. It is important that any changes to the area outside the boundary do not have a detrimental impact on the character or appearance of this area or the adjoining streets, which are currently seeking conservation status.</p>	Kensington Society	Michael Bach
4.5.1	<p>Across Bramley Road from the Site is Latimer Road Underground Station, providing access to the Hammersmith &amp; City and Circle Lines.</p> <p>Why is not the Underground station located on the other maps? It would be helpful.</p>	Kensington Society	Michael Bach
4.5.5	<p>PTAL Levels</p> <p>This map has the colours completely opposite to the map in the Core Strategy, Chapter 32 Better Travel choices. The colours should be the same in both maps.</p> <p>There should be a conclusion about the low level of PTAL. This is missing. The policy implications of areas of moderate or poor public transport accessibility levels need to be explained (i.e. high trip-generating uses will be resisted, reference CT1a of the Core Strategy).</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
5.1.1	<p>The distance should be actual walking distance not crowflight distances as the map shows. It is a nonsense to talk about reinstating the traditional urban street pattern as the priority (refer para 3.4.5) because of the longer walking distances that result from the post-war redevelopment, and then to proceed to use crowflight distances on the map.</p> <p>The map should be redrawn with actual walking distances to reflect the statement in para 5.1.1 that “maximum one should have to walk to local facilities should be 5 minutes”. The map should also reflect the barriers such as the West Cross Route, Westway, West London Line and Hammersmith and City Line.</p> <p>Same comment as 4.5.5. It is difficult to pinpoint the site. Why not show the site as was done on the map on page 36 Bus Connections &amp; Tube Stations?</p>	Kensington Society	Michael Bach
5.1.2	The map to the right shows the relationship between the Latimer and other retail centres in relatively close proximity. (words missing?)	Kensington Society	Michael Bach
5.2.3	First time this (Lancaster West) estate has been mentioned. Where is it, why is not it on any of the maps and how does it relate to this SPD?	Kensington Society	Michael Bach
5.3.1	<p>Correction as noted:</p> <p>Within the local area, there are one primary school and two nurseries. At secondary school level, part of the Kensington Leisure Centre site (as set out in the Core Strategy and subject of a separate SPD)</p>	Kensington Society	Michael Bach
5.5.2	Where is the evidence to support this statement? The SHMA never got to this level of detail. Where is the evidence to support the statement specifically for the Silchester Area? Nowhere is the “Silchester Area” defined.	Kensington Society	Michael Bach
5.6	<p>No mention of Thames Water - it is imperative that Thames Water is involved in the planning from the beginning.</p> <p>It is noted that the stakeholders are invited to comment. Has Thames Water been consulted on the Draft SPD and if not, why?</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
6.1	<p>1) Though “Proximity to White City Opportunity Area” is noted as a strength; the inability to get to White City, however, is not noted as a weakness.</p> <p>2) A strength is “Proximity to green space”; however, the report does not state where these green spaces are or the distances to them. They should be shown on a map.</p> <p>3) The weakness “Proximity to rail viaduct” should note resulting in noise and vibration.</p>	Kensington Society	Michael Bach
6.1	<p>OPPORTUNITIES: There is an assumption in the statement “Employment opportunities within the rail arches” (Spelling correct: remove A from arches) that the rail arches will be developed for commercial use; however, this is not stated anywhere within the report.</p> <p>Where did “Potential to convert the Latimer Education Centre to residential use” become an opportunity”? If the centre was lost to housing how the loss be made up for within the area. The facility’s website states that “The Latimer Education Centre is the Royal Borough of Kensington and Chelsea’s Pupil Referral Unit. We provide full-time education for boys and girls aged from 11 to 16. We offer a secure and welcoming environment for our pupils to learn and achieve”. The facility should be sacrosanct; change of use to residential should not be encouraged as this statement implies.</p> <p>Have The Latimer Parents' Network which is part of the centre been consulted?</p> <p>Why is “Potential for basement parking” an opportunity when the existing space within the Latymer Day Centre for 28 car park spaces are currently unused. It appears that additional car parking is not required if existing spaces are not used.</p>	Kensington Society	Michael Bach
6.1	<p>Threats/Constraints: There is nothing “perceived” about the noise, vibration and nuisance effects of the rail line. It is real...not “perceived”. The word “perceived” implies that it really is not a problem.</p> <p>Proximity of the Site to rail viaduct and its effect on perceived noise, vibration and nuisance effects</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
7.1.2	<p>(1) We agree with the beginning of the following statement; however, improve what? It does not state what is to be improved. Is it the entrance, the service area, the clubroom or what? This needs further development.</p> <p>The relationship of Frinstead House to the Southern Silchester Estate is poor. There is little activity at ground floor level apart from a single entrance and service area with the clubroom being locked up for large parts of the day and night. The redevelopment should improve this.</p> <p>(2) The following statement implies that basement parking, below ground without natural light and with restricted visibility into the park area, is not acceptable. We disagree. Car parking which is not enclosed and is visible to others is safer. Why is “existing basement car park raises half a level above ground floor” not acceptable?</p> <p>The existing basement car park raises half a level above ground floor. Reconfiguration of the basement car park will need to address this.</p> <p>(3) As noted above we do not consider the Latymer Educational Centre as an opportunity for redevelopment. The Borough struggled to find an acceptable location for the North Kensington Academy; where would an acceptable location be for the replacement of this facility?</p> <p>Potential exists to refurbish the Grade II listed Latimer Education Centre so that it contributes further to the regeneration and housing mix of the Southern (should not be capital) Silchester Estate if an alternative location for the existing facility is found.</p>	Kensington Society	Michael Bach

7.1.2	<p>Commercial elements may benefit from the residential development but not the opposite. The commercial element if not services for the community (i.e. shops) but services for the wider community (i.e. NuLine timber) will be a negative to the residents.</p> <p>Residential development opposite the rail arches will help add value to the commercial mews and should provide the incentive for the landowner to engage with the project.</p>	Kensington Society	Michael Bach
-------	--	--------------------	--------------

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
7.1.5	<p>There is no reference to the London Plan which highlights the need for proper community facilities and the assessment of the additional needs imposed upon the local community by new developments. The London Plan section on Community Services 3A.18 Protection and enhancement of social infrastructure and community facilities states that, when reviewing new developments, ‘the need for social infrastructure and community facilities in their area, and ensure that they are capable of being met wherever possible. These needs include primary healthcare facilities, children's play and recreation facilities, services for young people, older people and disabled people, as well as libraries, sports and leisure facilities, open space, schools, nurseries and other childcare provision, training facilities, fire and policing facilities, community halls, meeting rooms, places of worship, public toilets, facilities for cyclists, convenience shops, banking facilities and post offices (see Chapter 3D)’. The plan provides for clear guidance on calculating the spaces required in direct relationship to the number and mix of housing units. This plan must be referred to and calculations of the uses required.</p> <p>The following statement is too light on context and guidance:  “Open space will need to be located so that it continues to provide visual and residential amenity value for residents. Opportunities for providing open space with secure dog walking areas should also be considered (as identified by residents)”.</p>	Kensington Society	Michael Bach
CONCEPT DIAGRAM	<p>There is no relationship between this “CONCEPT DIAGRAM” and the requirements stated within this document. Where is the “traditional street patterns and include a new green space”? It appears to be totally residential and slammed up against the “perceived” nuisance of the rail viaduct. This is not creativity!</p> <p>It is apparent that nothing has been learned from the Warwick Road planning brief. Though veiled in such words as CONCEPT and “is for illustrative purposes only”, we all know what is placed in this document will steer the developer. This CONCEPT DIAGRAM is not acceptable.</p> <p>We strongly disagree with the statement that the CONCEPT DIAGRAM is “a manner that may be acceptable from a planning perspective”.</p>	Kensington Society	Michael Bach
8.1	<p>Agree.  Minor punctuation corrections needed.</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
SP4	Both SP4 and SP5 are too specific with the location too exact. The implication as stated in our opening is that the developer will not think beyond the specifics outlined in the SPD. SP4 and SP5 should clear state the requirements for the basement entrance and the consistent frontage without defining the exact location.	Kensington Society	Michael Bach
SP5	Both SP4 and SP5 are too specific with the location too exact. The implication as stated in our opening is that the developer will not think beyond the specifics outlined in the SPD. SP4 and SP5 should clear state the requirements for the basement entrance and the consistent frontage without defining the exact location.	Kensington Society	Michael Bach
SP9	<p>The London Plan section on Community Services 3A.18 Protection and enhancement of social infrastructure and community facilities is important as is other areas within the plan. It should be included in SP6</p> <p>SP9 Work or improvements to the public realm should be carried out in accordance with the requirements of the following Council documents:</p> <ul style="list-style-type: none"> <li>- RBKC Streetscape Policies</li> <li>- RBKC Access Design Guide SPD</li> <li>- RBKC Transportation Policies</li> <li>- RBKC Designing Out Crime SPD</li> <li>- The London Plan section on Community Services 3A.18 Protection and enhancement of social infrastructure and community facilities</li> </ul>	Kensington Society	Michael Bach
Connections (p.53)	<p>We disagree with the “Possible future extension of Shalfleet Drive” in the left hand map. The area, which encompasses the Latimer Educational Centre, should not be compromised for the sake of a road!</p> <p>The proposed plan totally isolates Frinstead House (tower block), which is contrary to the previous statement on page 45. How can the placing road all around the tower improve the relationship of the building to the site? It will isolate it even more!</p> <p>From page 45: The relationship of Frinstead House to the Southern Silchester Estate is poor. There is little activity at ground floor level apart from a single entrance and service area with the club room being locked up for large parts of the day and night. The redevelopment should improve this.</p>	Kensington Society	Michael Bach



Para No.	Submitted Comments	Organisation Name	Consultee Name
8.2.4	<p>We agree in part with this statement however, as the Warwick Road planning brief demonstrated by setting to define a height it restricts creativity. By being so specific any developer will go for the highest building and the largest volume. This restricts the possibility of height variation and contextual interest within the site.</p> <p>We would prefer the Latimer Education Centre be set as an “acceptable height” with site variations allowed.</p> <p>8.2.4 Building heights are driven by the existing context with the exception of the group of 21-storey residential towers currently located within Silchester (as well as nearby Grenfell Tower). Building heights typically range from 1-5 storeys otherwise, and the general rationale for the SPD area is that building height (as well as architecture) should complement existing notable features and characteristics of the area.</p> <p>As a result, the Grade II listed Latimer Education Centre is used as a starting point to establish a ‘height hierarchy’.</p>	Kensington Society	Michael Bach

8.2.5	<p>Statements such as this limit creativity. There are taller buildings in the Employment Zone, but they (Monsoon and TalkTalk) are along the motorway and not within the reference of the site. These are unsuitable precedents and ignore the Building Height SPD. We would remove this statement.</p> <p>Remove:</p> <p>There is scope for taller buildings at the Freston Road end of the Silchester Garages Site, closer to the rail viaduct. This is due to its interface with taller buildings in the Employment Zone, and it is considered there may be opportunity to also define this part of the site as it could provide an interesting urban focal point that is highly visible from the railway line.</p>	Kensington Society	Michael Bach
-------	---	--------------------	--------------

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
7.1.2	<p>Agree with all with the exception of the 5th point, the basement car parking statement. It is not necessary and too directive. The developer might find that the existing basement car parking in Frinstead House is acceptable or too expensive to change.</p> <p>Remove: The existing basement car park raises (spelling correction) half a level above ground floor. Reconfiguration of the basement car park will need to acknowledge this.</p> <p>Disagree the last point on page 55. By building a road around Frinstead House it will not integrate into the site. It will isolate it!</p> <p>Remove: An opportunity exists to integrate Frinstead House into part of a street network by building around the base of the tower.</p>	Kensington Society	Michael Bach
8.2.7	We disagree with stating the maximum heights. To a developer maximum means minimum expectation; remember Warwick Road. Statements which define the intent are needed but not the drawing and not the set dimensions. This page should be removed.	Kensington Society	Michael Bach
8.2.8	The basis of these statements we agree with however we disagree with providing the isometric.	Kensington Society	Michael Bach
SP18	<p>This should be stated as the minimum.</p> <p>Internal space requirements for new residential units shall be minimum in accordance with table 4.1.1 of the GLA's Interim London Housing Design Guide (August 2010):</p>	Kensington Society	Michael Bach
SP19	Agree but do not understand the statement "In addition, keeping the numbers of homes from any one stairway to a minimum helps neighbours get to know one another more easily"	Kensington Society	Michael Bach
SP20	Agree and agree with drawing on page 60.	Kensington Society	Michael Bach
SP21	Agree and agree with drawing on page 60.	Kensington Society	Michael Bach
SP22	Agree and agree with drawing on page 60.	Kensington Society	Michael Bach
SP23	Agree and agree with drawing on page 60.	Kensington Society	Michael Bach
SP24	Agree and agree with drawing on page 60.	Kensington Society	Michael Bach

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
SP25	<p>Where in the world did the 20 windows come from? This is too detailed, specific and restrictive.</p> <p>Façade design should incorporate the following:</p> <ul style="list-style-type: none"> <li>• A rhythm of more than 20 windows and doors per 100 metres should be attained</li> </ul>	Kensington Society	Michael Bach
SP25	<p>Page 62 2nd bullet: The last statement “Any consistent and established building lines should be continued” contradicts the desire to re-establish the traditional street pattern.</p>	Kensington Society	Michael Bach
SP26	<p>Why is the SP26 “• Buildings opposite the rail arches (residential)” restricted to residential?</p> <p>We disagree that this restriction is define at this stage.</p>	Kensington Society	Michael Bach
SP30	<p>If you read the entire statement it would appear that ground floor residential should not be in the vicinity of the arches. We doubt that is the intent of the statement.</p> <p>Buildings that abut the Employment Zone (i.e. along Freston Road and in the vicinity of the arches) should be considerably designed... There is also scope for the ground floor to be employment uses (most likely Class B1 offices) providing that the social and community use is located elsewhere on site. Ground floor residential uses are not considered appropriate in this location.</p>	Kensington Society	Michael Bach
8.2.15	<p>As it is an anticipated that all the development, other than Frinstead House and the listed buildings, will be new, and the Core Strategy requirements for sustainable development as outlined in the Core Strategy and the Code for Sustainable Homes, applies. The report only mentions once (within the statement on refurbishing the Grade II Listed building of the Latymer Education Centre) the requirement and it should for all new construction.</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
8.2.16	<p>We have no problem with the refurbishment of the Latymer Educational Centre as long as it remains an education centre. We strongly oppose the loss of this facility in this location. It has been here since the 1879 and we oppose any revision to its uses. As stated elsewhere, the Council has struggled to find an acceptable location for the North Kensington Academy. We doubt that an alternative location for the fine facilities of the Latymer Educational Centre can be found in the Borough. The loss will be strongly opposed. The loss of the facility for the gain of market housing is not acceptable. How greedy! Delete SP36.</p> <p>SP36 A high-quality residential conversion of the Latimer Education Centre building could take place providing residential units.</p>	Kensington Society	Michael Bach
8.2.17	<p>What is “ street-based architecture”? If it is the isolation of Frinstead Tower and a road system around the building, it is not the solution for the problem. It will further isolate the building from the area especially as the new construction is developed. This is again an area which the Council should not be directing the solution. The problem should be stated, and actually has been stated, and then allow the developer and the consultants come forward with a solution. This one is not the solution.</p> <p>Has anyone considered what double aspect units will mean to the units which face the rail viaduct? The statement in the map with 8.2.17 needs careful consideration since there is no way the units that face the rail viaduct can have double aspect and meet the EU environmental standards.</p> <p>Provide double aspect units throughout the Site to enable legible ‘front and backs’ to buildings</p>	Kensington Society	Michael Bach
7.1.3	<ul style="list-style-type: none"> <li>• The location of the rail viaduct represents a break in the existing retail frontage for the Latimer shops (spelling correction)</li> </ul>	Kensington Society	Michael Bach
8.4.2	<p>Due to the “perceived“ nuisance of noise and, most importantly, vibration we doubt whether a knowledge-based business (i.e. ones which are IT intense) can function properly within the arches.</p> <p>The rail viaduct represents ..... an opportunity for accommodating creative and/or knowledge-based businesses,</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
8.4	<p>As previously opposed, we do not agree that the commercial element will benefit the housing. Tree planting along Bramley Road and through the roads within the development should be encouraged.</p> <p>Residential development opposite the rail arches will help add value to the commercial mews and should provide the incentive for the landowner to engage with the project.</p>	Kensington Society	Michael Bach
SP4I	<p>The Employment Zone referred to throughout is on the south west most edge of the site and not within the area which should direct planning policies for the site. This is yet another barrier.</p> <p>Supplementary Guidance Commercial Mews SP4I Construct a commercial mews street to formalise uses in the Victorian rail arches of the rail viaduct. These commercial mews shall function as a transition between the Employment Zone and the predominantly residential uses on the Silchester Estate.</p>	Kensington Society	Michael Bach
8.4.3	<p>We do not disagree with the idea of a street which access the arches, we disagree with the mews house opposite. How does a mews which appears to be for residential uses relate to the new commercial arches? This is another example of directing the developer and limiting the options the developer will consider.</p> <p>Develop an appropriately scaled 'mews block' to relate to new uses in the commercial arches</p>	Kensington Society	Michael Bach
8.5	<p>No reference to the policies directing the amount of open space and the uses. This is a major omission in the Draft SPD.</p> <p>And additional units will require additional open space. There seems to be assumption that the triangular space is enough for any expansion. It is not.</p> <p>Any new layout or modification to the existing triangular open space must demonstrate how the new configuration maintains or improves residential amenity.</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
SP46	<p>Trees located above subterranean construction (i.e. car parking) need to have space for sufficient root growth and not tree pits, which will be prone to water retention and roof rot.</p> <p>Planting of trees along Bramley Road and throughout the estate should be encouraged.</p> <p>Trees are an important part of the public realm and should be semi-mature when planted, well protected and irrigated in their early years.</p>	Kensington Society	Michael Bach
8.6	<p>There is no mention of the clubroom in Frinstead House. Though it is locked for security reasons, if located in a more accessible place and easily secured, it would be used. It should not be totally disregarded as it is in the Draft.</p> <p>If as is anticipated that the population of the area will increase so too will the requirement for additional community and education uses. The Draft SPD does not recognise the need for additional facilities.</p> <p>8.6.3 This SPD requires no less than 600sqm of floorspace for social and community and education (spelling, no need for capital) use in a location with sufficient street presence.</p> <p>SP50 A new community and education use should occupy no less than 600sqm and have ground floor presence</p>	Kensington Society	Michael Bach

Para No.	Submitted Comments	Organisation Name	Consultee Name
8.7.3	<p>One does not need to read between the lines to see that there is an assumption that market housing will get the best Grade II building, the Latymer Education Centre, and the required affordable housing will be sent across the street in the enclave of affordable housing in the Silchester site. We disagree with the redevelopment of the Latymer Educational Centre and particular if the result is market housing in the best area at the loss for the greater community.</p> <p>In terms of the wider Southern Silchester Estate, an opportunity exists to provide additional residential units as well as refurbish the Grade II Listed Latimer Education Centre at Freston Road. Refurbishing the Latimer Education Centre can provide a richer housing mix within the immediate area, particularly if there is a commitment to higher end, larger market residential units making the most of the character features of the building (and its ancillary buildings and grounds). There exists the possibility for any affordable housing contribution associated with the refurbishment of the Latimer Education Centre to be accommodated within the Southern Silchester Estate of this SPD</p>	Kensington Society	Michael Bach
SP55	<p>It may be a pure arithmetic calculation that the Silchester Garage site could according to the London Plan accommodate more housing but the proximately to the rail viaduct the resulting “perceived” nuisance of noise and vibration which effect the environmental affectability of the site should be considered. The site should not be considered for any additional living accommodations. In fact, it should not have been approved in the first place. We disagree with SP55 and strongly recommend that it is removed. It will give any developer to open door to propose and not be opposed to increasing the density of the site. This statement is especially concerning considering the increase housing and the LDF implication on Native Land. This statement would provide them with the location for their possible needed increase in housing.</p> <p>There is the potential to accommodate additional residential units over and above the required 63 units. The layout of additional residential units must be underpinned by good design and townscape considerations. Additional units must have regard to London Plan (Consolidated with Alterations since 2004) policies (Policy 3A.2 and Table 3A.2). These policies provide guidance on potential development density, which approximate to 13-27 additional residential units on the Silchester Garages Site or a total of 102-120 for the Wider Site.</p>	Kensington Society	Michael Bach

Para No.	Sumbitted Comments	Organisation Name	Consultee Name
9.1.2	Thames Water consultation should be added to the list. This has resulted in a drainage assessment being required as supporting information to any planning application.	Kensington Society	Michael Bach
SP57	Is it usual to use such consultations as a mechanism for lobbying for additional funds as you describe?		Steven Keogh
1.3.3	Surely this is a matter for individual tenants and leaseholders to decide? Certainly I am sure you would not subscribe to tenants being forced to agree anything other than a continuation of their existing tenancy rather than a new tenancy (which may contain new or revised terms)		Steven Keogh
8.5	The only way of achieving this is to demolish 1-27 Shalfleet Drive (odd numbers) and to remove the communal gardens which they have exclusive use of and which is currently securely fenced off from all other users. In terms of the March 2010 consultation I said at the meeting that the response rate was so low and the confidence interval so high as to be able to rely on any of the answers given to many of the questions that they were not statistically significant and therefore should not be relied on as evidence of a particular need. I gave the example of a dog walking area as an example – the survey actually had four comments on a dog area – two for and two against – it seems axiomatic that it would therefore be given such prominence in the document (it is mentioned three times!). There are other examples I could have given.		Steven Keogh
8.2.16	You have given explanations to all the points you have raised. It is not clear why you believe this to be so.		Steven Keogh
8.6.1	Included within the consultation is the proposal that the former Latymer Road School building should be the subject of a change of use from education (D1) to residential. Given the scarcity of buildings within and suitable for educational use within the Borough, I suggest that the proposed change of use should be resisted. The building is a fine example of a late Victorian board school and it is consistent with English Heritage guidance that the best use for an historic building is the use for which was built. There is pressing demand from the independent and potentially, voluntary sector, for buildings to accommodate educational use – there is therefore a strong chance of an economically viable proposal being brought forward.		Gail Mayhew



Para No.	Submitted Comments	Organisation Name	Consultee Name
8.3	<p>A further, more strategic point, is that the Silchester Road brief does not, in my opinion, fully take account of how the site might work to stimulate the wider regeneration of the Freston Road area. Given the concentration of employment uses within the immediate area and the presence of the tube station, I would like to suggest that further consideration be given in briefing the site, as to how the mixture of uses within the site might operate as a generator of new activity and regeneration of the wider area.</p>		Gail Mayhew