CONSULTATION RESPONSES SCHEDULE: SITE CONTEXT
### Chapter 02: Site Context

<table>
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<tr>
<th>ID</th>
<th>First Name</th>
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<th>Organisation Representing</th>
<th>Chapter comments relate to</th>
<th>Section comments relate to</th>
<th>Comment Made</th>
<th>Officer Response</th>
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<tr>
<td>49</td>
<td>Peter</td>
<td>Verity</td>
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<td>Chapter comments relate to</td>
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<td>It is commendable that the RBKC, H&amp;F and the Mayor of London are taking an integrated approach and are preparing a SPD against which to evaluate the development proposals. However, it is fundamental to any systematic planning process that there are clear principles and objectives set for the existing urban context, to ensure that any new development contributes positively to the righting of existing problems, and does not passively add to and aggravate the pre-existing problems.</td>
<td>No change necessary. The SPD sets out the authorities' expectation that development should not aggravate pre-existing problems and where possible, should improve the existing situation.</td>
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<tr>
<td>60</td>
<td>Peter</td>
<td>Verity</td>
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<td>Para 2.15</td>
<td>[bold] All boundary roads [end bold] carry very high levels of traffic and operate at or [bold] at near capacity [end bold] in peak periods.</td>
<td>No change necessary. This quotes existing text within the SPD.</td>
</tr>
<tr>
<td>61</td>
<td>Peter</td>
<td>Verity</td>
<td></td>
<td></td>
<td>Para 2.16</td>
<td>There are a [bold] significant number of traffic delay hot spots [end bold] in and around the Opportunity Area.</td>
<td>No change necessary. This quotes existing text within the SPD.</td>
</tr>
<tr>
<td>62</td>
<td>Peter</td>
<td>Verity</td>
<td></td>
<td></td>
<td>Para 2.17</td>
<td>[bold] Earls Court One way System [end bold] has a [bold] negative impact [end bold] on the ease and attractiveness of pedestrian, amenity, access to bus services and the townscape of the area, as well [italics] as the quality of residential and commercial life in the area [end italic].</td>
<td>No change necessary. The current wording is considered to be clear.</td>
</tr>
<tr>
<td>63</td>
<td>Peter</td>
<td>Verity</td>
<td></td>
<td></td>
<td>Para 2.21</td>
<td>The Opportunity Area currently includes [bold] some areas of poor air quality [bold] which are predominantly located [bold] along roads [bold] surrounding the Opportunity Area.</td>
<td>No change necessary. It is necessary to mention that OA is within an Air Quality Management Area.</td>
</tr>
<tr>
<td>346</td>
<td>Christine</td>
<td>Powell</td>
<td></td>
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<td>Para 2.31</td>
<td>Brompton Cemetery should not be included as an accessible open space. The influx of many more people would detract from the ambience which it provides.</td>
<td>No change necessary. It is acknowledged in paragraph 2.31 that whilst Brompton Cemetery is a public open space, it should not be regarded as recreational space.</td>
</tr>
<tr>
<td>426</td>
<td>Nicholas</td>
<td>Fernley</td>
<td>Hammermsmith &amp; Fulham Historic Buildings Group</td>
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<td>Proposal: Please add cross-references to the relevant Conservation Area Profiles.</td>
<td>Change proposed. The borough boundary line will not be added to the drawing because it is the authorities' aspiration to ensure that the site is treated as a whole. One of the drivers behind regeneration is to overcome severance and divisions, not reinstate them. The authorities therefore expect both sides of the site to be treated in the same manner, regardless of the borough in which they can be found. A new paragraph will be added to page 39 referencing both the Conservation Area Profiles and PPS5.</td>
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<tr>
<td>427</td>
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<td>Fernley</td>
<td>Hammermsmith &amp; Fulham Historic Buildings Group</td>
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<td>There should be a reference to the possibility of [italics] 'hidden heritage' [end italics] eg Railway heritage (as was found at the CrossRail site) and at Earl's Court exhibition centres and the need to evaluate and record anything that is found to the appropriate level.</td>
<td>No change necessary. Any application(s) will be expected to demonstrate compliance with both the letter and spirit of PPS5 and each case will be judged on its own merits. It is therefore not deemed necessary to restate this in the SPD.</td>
</tr>
</tbody>
</table>
revised draft SPD. PPS5 is clear on the need for such investigation and evaluation.

Proposal: Please add reference to the possibility of 'hidden heritage', and refer to PPS5.

Reason: We consider that the SPD needs to provide this in order that it gives the attention to heritage issues that should be given, not merely because of our concerns but in order to take full account of both the letter and the spirit of PPS5.

Friends of Brompton Cemetery 02  Add reference in it to PPS5. Change proposed. A reference to PPS5 has been added to page 39.

Earl's Court Society 02  Fig 2.25 correction should be “Longridge Road” not “Longbridge” Change proposed.

Open Spaces Society 02  While garden squares and communal gardens often provide public visual amenity, this is not invariable. For example, Philbeach Gardens is entirely enclosed by buildings. But it is regretted that there is no mention of the complete absence of any real public open space.

Open Spaces Society 02  No change necessary. The authorities feel that as an illustrative tool, the plan clearly shows the area of deficiency, which is the entire blue shaded area, not just the sites of local nature conservation importance (as on Figure 2.10) as being the only area of open space deficiency instead of all of the area coloured blue. Even that is less than it is in practice. The white area, presumably intended to be 400m from Normand Park, takes no account of the street pattern which makes about half of this white part more than 400m walking distance from any entry to the park.

Open Spaces Society 02  No change necessary. The SPD deals specifically with the OA itself and it is therefore important to describe the site itself. However, the figure that is referred to in paragraph 2.30 (figure 2.11) clearly shows that the open space deficiency extends beyond the boundary of the OA.

Open Spaces Society 02  Change proposed. The authorities feel that the plan clearly shows the area of deficiency, which is the entire blue shaded area, not just the sites of local nature conservation importance. However, in order to avoid further confusion, annotations will be added to the plan to make this even clearer. Whilst we accept that measuring the street pattern is a more accurate way of measuring the distance from the park, the authorities feel that as an illustrative tool, demonstrating a serious deficiency of open space in the local area, the plan is sufficient.

Open Spaces Society 02  4. [bold] Para 2.30 [end bold] This should have drawn attention to the significant deficiency of publicly accessible open space also in all the surrounding areas.

Open Spaces Society 02  No change necessary. The SPD deals specifically with the OA itself and it is therefore important to describe the site itself. However, the figure that is referred to in paragraph 2.30 (figure 2.11) clearly shows that the open space deficiency extends beyond the boundary of the OA.

Open Spaces Society 02  5. [bold] Figure 2.11 [end bold] This is a reasonably accurate statement but is not illustrated by Figure 2.11. It would have been a truer picture if there had been a map showing at least the area of Figure 9 extended north and north-eastward and more of the earl's Court side.

Open Spaces Society 02  No change necessary. The authorities feel that as an illustrative tool, demonstrating a serious deficiency of open space in the local area, the plan in figure 2.11, when viewed along with the text that accompanies it, is sufficient.

Cllr Linda Wade 02  2.10 Severance is caused not only by the railway lines, but also by the volume and speed of traffic caused by Warwick Road, which in itself causes ‘separation’ for Kempsford Gardens, Eardley Crescent and Philbeach Gardens from the rest of the earl’s Court community. The present pedestrian crossings are already a matter of local concern and there is an existing demand for their re-assessment, and so this should be considered.

Change proposed. Paragraph 2.10 acknowledges that there are problems created for pedestrians by other factors than the physical severance caused by the railway lines and exhibition centre. The SPD is a high level document and is not the appropriate location to consider issues at specific crossings. Where relevant such issues will be picked up at the application stage and improvements secured as necessary.
have been dealt with in any road transport plans. There are no references to Cycle Lanes or routes external to the site, but within the immediate area of development.

2.13 It would be useful to have a clearer indication of the date that the upgrades on the Piccadilly line would be completed, but it is considered that 2 additional trains per hour mentioned at the Consultation meeting at St Cuthbert’s Hall will not address the existing capacity problems at Earl’s Court station AMPM peaks, let alone the indicated 10% background increase due to ‘population and employment’, the developments north of Cromwell Road and south of High Street Kensington and the anticipated increase of residential and employment population within the site. The findings of the forthcoming TfL strategic assessment from the River to Kensal Rise OA should be considered, just evaluating the impact on traffic for Cromwell Road, Warwick Road, North End Road, and Lillie/Old Brompton Road is ultimately flawed by not taking account of the other developments in the wider area.

[footnote]  ‘TfL is also currently considering the sensitivity of the future year transport network to more intensive growth in Opportunity and West Kensington, White City and Kensal Canalside OAs in line with London Plan/OAPF targets. This analysis will provide background evidence for the updated Sub-Regional Transport Plans, which are due to be published in January/February 2012. The conclusions of the work will also be shared with London boroughs as part of TfL’s sub-regional engagement programme. ‘(TfL Response to queries raised on the Earl’s Court & West Kensington JSPD transport chapter by Cllr. Wade, 1 December 2011) [end footnote]

845 Cllr Linda Wade 02 Para 2.13

There is some evidence that Cycle lanes and dedicated routes are more dangerous than making bikes mingle with the traffic, but this research is mainly about overseas countries and Milton Keynes, and the recently increasing death and serious accident rates in London, would make it worthwhile revisiting the issue as Warwick Road is already considered to be dangerous by experienced cyclists.

846 Cllr Linda Wade 02 Para 2.13

2.15 The boundary roads are already at maximum capacity: the Warwick Road will still, despite the north-south route within the site, take the majority of HTV traffic. (10.59) The limitations of the ability of HTV to ‘banning vehicle movements from North End Road into Lillie Road and vice versa’ is likely to place more HTV traffic onto Warwick Road.

849 Cllr Linda Wade 02 Para 2.15

2.16 These junctions are also some of the most polluted junctions in the Capital.

850 Cllr Linda Wade 02 Para 2.16

2.18 There needs to be consideration of where the additional residential car parking will be contained given the allocation of 0.4 car parking spaces available to residents needs to be considered. This is an area where resident parking is at a premium and that all available pay and displays are used by existing residents before 9.30am and after 5.30pm, as well as use of the single yellow lines. In the Core Strategy it states there would be no garages for new build residences in RBKC or RBKC parking permits for their residents, apart for disabled residents.

851 Cllr Linda Wade 02 Para 2.18

[italics]Correction: Fig. 2.25 The view along Longbridge Road should read Longridge. [end italics]

853 Cllr Linda Wade 02 2.25

The application site also comprises the Empress State Building (hereafter ESB) which functions as the MPS’ operational headquarters.
Mindful that strategic and pan-London policing and essential back up services are co-ordinated from this location, the MPA/S wish to highlight its importance and the existing planning policy supporting retention of policing at this location and within ESB.

Section 2.34 notes that ESB is currently occupied by the Metropolitan Police. This is also noted on Figure 2.12 which highlights ESB’s office use. This is supported by the MPA/S.

The roads and railways surrounding the site create huge severance between the site and the surrounding communities - see Key Principle UF1.

Figure 2.17 shows retail centres. Should the Tesco store not be shown since, although not a retail centre it undoubtedly will provide a lot of convenience shopping for residents and office workers on the site and the pedestrian access will need considerable improvement?

The figure 2.21 incorrectly omits the identification of the Whiteleys Cottages as locally listed; the seven former stables are situated along on the north side of the West Cromwell Road, just behind the pavement. The envisaged 12 storey buildings in the "Metropolitan Face" directly opposite would be detrimental to their setting.

In addition, English Heritage: - Requests the recognition of the significant surrounding heritage assets in the Urban Form section on page 20.;

This section of the chapter would benefit from additional information relating to, for example, the current high house prices and affordability in the area.
| Group | Table 2.3 |   |