CONSULTATION RESPONSES SCHEDULE: URBAN FORM STRATEGY
### Chapter 04: Urban Form Strategy

<table>
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<tr>
<th>ID</th>
<th>First Name</th>
<th>Surname</th>
<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>3</td>
<td>Jane</td>
<td>Chaston</td>
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<td>it will change the landscape for the worse - buildings too high</td>
<td>No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for any applicant(s) to analyse and submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities’ analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document.</td>
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<td>8</td>
<td>Jane</td>
<td>Chaston</td>
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<td>the buildings will be too tall for the area and over-shadow many of the surrounding streets</td>
<td>No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for any applicant(s) to analyse and submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities’ analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, in the Edges section of the Urban Form chapter, Key Principle UF26 states that the height and massing of new buildings on the edges of the OA will be expected to respect the scale and massing of neighbouring buildings and Key Principle UF28 states that the privacy, daylight and sunlight</td>
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<tr>
<td>15</td>
<td>Linda</td>
<td>Chasten</td>
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<tr>
<td>20</td>
<td>Patricia</td>
<td>Rowley</td>
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<td>No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for any applicant(s) to submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities’ analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.</td>
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<tr>
<td>25</td>
<td>Dany</td>
<td>BuBois</td>
<td></td>
<td>UF21, Para 4.64</td>
<td></td>
<td>I am not happy with the proposed plans set out on pages 64 - 65 of the Revised Draft for Public Consultation regarding the proposed changes to the skyline visible from the Brompton Cemetery. In Key principle UF21 it states that &quot;All proposals will be expected to demonstrate that they do not have a negative impact on the views identified and analysed in the Townscape and Views analysis.&quot; And in 4.64 &quot;However, for the majority of the views, the authorities may accept some new visible buildings if acceptable urban design</td>
<td>No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principle UF20 specifically addresses the importance and sensitivity of Brompton Cemetery, requiring any application(s) to preserve or enhance its character, appearance and setting. The Skyline section of the Urban Form chapter should be read in conjunction with the Townscape and Visual Analysis SPD Supporting Evidence Document. This contains a number of views that any applicant(s) will be</td>
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It is my belief that any visible buildings viewed from the Brompton Cemetery will necessarily have a strongly negative impact for all local residents. The Brompton Cemetery is one of the few open spaces in the area and largely enjoys a wide skyline. The buildings which are currently visible from this location, including the Stamford Bridge football stadium and the Empress State building already greatly decrease the aesthetic pleasure of the open space, so to purpose.

No change necessary. Paragraph 4.59 states that "the location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape". The Skyline section of the Urban Form chapter also goes on to detail how the skyline could be enhanced through the design of new buildings within the vicinity of the Empress State Building in Key Principles UF22 and UF23.

No change necessary. The production of this SPD was constructively informed by a thorough analysis of the character and urban fabric of the surrounding area. The results of this can be seen in SPD Supporting Evidence Documents including the Character Area Analysis, Townscape and Visual Analysis and Edges Studies. The Character Area Analysis Supporting Evidence Document presents detailed analysis of the heights of surrounding buildings and their relationships with the streets on which they sit. During the production of the Urban Form Chapter in the SPD, this analysis was used to inform the sections on Skyline, Edges and Streets. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. In the Edges section, the Key Objective states that all new buildings on the edges of the OA should be sensitively integrated into and enhance the existing context and Key Principle.

No change necessary. The Skyline section of the Urban Form chapter seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which application(s) will be assessed in this regard, including Key Principle UF20 which specifically identifies the sensitivities of Brompton Cemetery and states that its character, appearance and setting must be preserved or enhanced. This is complimented by Key Principle UF21 which requires any applicant(s) to analyse and submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. In this SPD Supporting Evidence Document, views 31, 32 and 35 are taken from the cemetery.

No change necessary. This arrow indicates an access point into the OA. It is likely to be an access route to the Opportunity Area via Cluny Mews (at the junction of

Figure 4.1 - this indicates potential use of the through-route to Tesco. While this is acceptable for pedestrian / cycle access, this would cause significantly increased traffic congestion at what is already one of the busiest and most polluted junctions in Europe (namely the junction of Warwick Road and West Cromwell Road). Nothing should be done that generates any increase in congestion at that junction in particular, or on the Earls Court One Way System in general.

Figure 4.1 - there appears to be a faint arrow indicating an access route to the Opportunity Area via Cluny Mews (at the junction of

No change necessary. This arrow indicates an access point into the OA. It is likely that it would only serve the development within this small part of the site and would...
| Anonymous | 04 | Figure 4.1 | Warwick Road and West Cromwell Road. Nothing should be done that generates any increase in congestion at that junction in particular, or on the Earls Court One Way System in general, and with that in mind there should be no access to the Opportunity Area whatsoever permitted via Cluny Mews. It would be preferable to close Cluny Mews completely and facilitate access via the new roads to be built within the Opportunity Area.|
| Anonymous | 04 | Para 4.80 | Figure 4.1 - it appears to suggest that there would be vehicular access to and from the Opportunity Area at the Warwick Road entrance of Earls Court tube station. This should not be permitted because i) it will create significant risk to pedestrians accessing the tube station, and ii) nothing should be done that generates any increase in traffic on Warwick Road.|
| M.M. Deyes | 04 | UF20, UF21 | The Strategy refers to [underline] new buildings on the skyline [end underline] (section 02 in Equality Impact Assessment) saying they have a positive impact; the Revised Planning Document says [underline] no [end underline] new building should have a [underline] negative [end underline] impact; this seems to be watering down? I am concerned that there should not be intrusion into the skyline by high-rise development where viewed from Brompton Cemetery (if you have the time, go there and see how the effect of a "haven" is created by the fact that one can see nothing but trees when looking from inside the cemetery towards the west...)

| Simon Fisher | 04 | UF19, UF20 | support these objectives but protection and enhancement of Conservation Areas and Listed Buildings requires planning standards to prevent overdevelopment. However, any attempt at prescribing density parameters has been omitted from the document, thereby giving developers a carte blanche to build too much too high. Given the sensitivity of the site's location, an absolute maximum residential density of 800 hph is essential in order to comply with the SPD's urban form objectives. |
| Simon Fisher | 04 | UF26 | again too vague re building heights. No new buildings over 20 storeys should be permitted within the Regeneration Area. Without this parameter, overdevelopment, damage to skylines, outlook and setting of existing townscape is inevitable. |

No change necessary. The arrows referred to simply show potential access to the OA and do not specify whether they will be for vehicular transport or not. As Key Principle TRN23 in the Transport Chapter states, "All junctions from the OA onto the existing road network... should be assessed to ensure they have no unacceptable impacts on the existing road network in terms of vehicle capacity, road safety and urban design". Paragraph 10.71 goes on to say that "An east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, though not for vehicles" and goes on to state that if a vehicular connection were to be included at this junction "the road safety and urban design impacts would need to be carefully assessed in a detailed transport assessment and it would need to be demonstrated that vehicular access is acceptable". No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to specify particular building heights. Instead, it would be too prescriptive for a strategic planning framework like the SPD to set such stringent restrictions. However, Key Principle UF28 clearly states that the "privacy, daylight and sunlight of all existing and future buildings must be respected". Furthermore, residential amenities like outlook and privacy are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85. Any application(s) will be judged on its own merits against these standards and nothing deemed to be harmful will be approved. Change proposed. The EQIA will be updated to match the objective set out in the SPD to ensure that "no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape." This is not to water the objective down, but rather to ensure that it accurately reflects the statutory duties of the planning officers who will be responsible for using the SPD to assess any application(s) submitted. Key Principle UF20 specifically requires the preservation or enhancement of the character, appearance and setting of Brompton Cemetery. Furthermore, views from Brompton Cemetery will be subject to Key Principle UF21 which expects any application(s) to demonstrate that their proposals do not have a negative impacts on any of the views analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Views 31, 32 and 35 in the Townscape and Visual Analysis SPD Supporting Evidence Document are all taken from Brompton Cemetery (please note that in the final draft of Mayor's London Plan. The Development Capacity Scenarios SPD Supporting Evidence Document sets out in para 1.6 that the Opportunity Area is considered to have a predominantly 'central' setting. Any scheme would have to satisfy the Key Principles set out in the Urban Form chapter, which look to control the scale of development and the relation of any new building to the existing context. No change necessary. Density is dealt with within Policy 3.4 and Table 3.2 of the Mayor's London Plan. The Development Capacity Scenarios SPD Supporting Evidence Document sets out in para 1.6 that the Opportunity Area is considered to have a predominantly 'central' setting. Any scheme would have to satisfy the Key Principles set out in the Urban Form chapter, which look to control the scale of development and the relation of any new building to the existing context. No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to specify particular building heights. Instead, it establishes a framework against which the heights of the buildings in any application(s) submitted can be assessed. This framework is set out in the sections on Skyline, Edges and Streets in the Urban Form chapter. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. In the Edges section, the Key Objective...
states that all new buildings on the edges of the OA should be sensitively integrated into and enhance the existing context and Key Principle UF26 states that the height and massing of new buildings on the edges of the OA will be expected to respect the scale and massing of neighbouring buildings. In the Streets section, the Key Objective states that the design of new streets should respond to those in the su

No change necessary. The SPD does not preclude this from happening.

Surveyor's comments that the Empress state building was out of character with the surrounding area (correct) and that it might benefit from some other high and modern buildings beside it in the sky line.

I strongly disagree, the Earls court area is popular for people to live in for many reasons, mainly because of it character and looks. The Empress building is striking and stands out, a bit like the Eiffel tower in Paris: unattractive when considered alone but very impressive in it's setting and mainly because of it's stand alone status.

However I am concerned that the high rises will not only be unpopular to live in but this will also impact on the immediate vicinity as potential buyers for the surrounding new build low rise buildings will be put off as they are over shadowed by the higher buildings.

The construction of tower blocks up to 16 stories will seek to change, distort and contradict the low development height of the surrounding area and radically change the character of this part of London for ever.

The height of the blocks will create a high rise sky line and turn a traditional residential area into a 'High Rise Metropolis'.

It must be remembered that traditional forms of housing i.e. houses with gardens are favoured within British culture and have been for many centuries. The high rise experiments of the 60's and 70's must not be forgotten and despite alleged housing shortages, high density and high rise living is not desirable aesthetically or socially.

Despite the developers claims about the layout of the buildings and the 'grid systems' synergy with the surrounding area, this
development in its proposed format will not be in sympathy or character with the surrounding area. This development will destroy the culture, nature and appearance of this part of London.

Most concerning is the impact of the development on the Brompton Cemetery. This historically, socially and environmentally significant green space is unique within a dense inner city area and to the local area. The sky line and views from the cemetery will be ruined by the Earls Court development which locates some of the tallest and densest developments, particularly the tower blocks, close to the cemetery side of the site. The value of the open space and the views it provides should not be compromised by this development. It is also not acceptable for people visiting the cemetery or attending funerals to be overlooked by people in their flats or on their balconies.

No change necessary. The Key Objective for the Skyline section of the Urban Form chapter states that no new buildings should have a negative impact on the quality and character of the surrounding townscape and Key Principle UF20 specifically addresses the importance of Brompton Cemetery, stating that its character, appearance and setting must be preserved or enhanced. The Skyline section of the Urban Form chapter, particularly Key Principle UF21, should be read in conjunction with the Townscape and Visual Analysis SPD Supporting Evidence Document. In this supporting evidence document, views 31, 32 and 35 (please note that numbers allocated to these views may change in the final draft of the SPD) are taken from the cemetery and specific guidance is provided for any buildings that may be visible in them. All three clearly identify the sensitivity of the cemetery, but also highlight the opportunity to enhance its setting. The identified opportunities to enhance the setting of the cemetery include the potential for

| 122 | Alex Parker | Natural England | 04 | UF5 | Key Principle UF 5 - New Green Public Open Spaces - welcomed and encouraged. | Noted |
| 137 | David Hammond | Natural England | 04 | UF11 | Key Principle UF 11 - Provide good quality public open space welcomed and encouraged also, especially in references to Nature Conservation. | Noted |
| 138 | David Hammond | Natural England | 04 | UF12 | Key Principle UF 12 - Local Park, the provision of a new accessible local park is welcomed and supported at a minimum of 2 hectares, helping to alleviate deficiency of open access in the area. The park should also seek to link and connect with other green/open spaces as part of the development proposals. | Noted. This aspiration is reflected in paragraph 4.47 which quotes the RBKC's Core Strategy (2010), requiring any application(s) to "create opportunities to extend or link Green Corridors". |
| 139 | David Hammond | Natural England | 04 | UF13 | Key Principle UF 13 - Accessibility of open green spaces is also welcomed and encouraged. | Noted. |
| 140 | David Hammond | Natural England | 04 | UF17 | Key Principle UF 17 - Phasing Strategy, the incorporation of open space and green infrastructure as an inherent aspect of phased development is welcomed and supported. Provision should also be made for connectivity to each subsequent/later phase of the development. | Noted. |
| 141 | David Hammond | Natural England | 04 | UF18 | Key Principle 18 is encouraged. | Noted. |
| 142 | David Hammond | Natural England | 04 | UF19 | No change necessary. The aspirations to increase public space are set out in the Public Open Space section of the Urban Form chapter in the SPD. In particular, Key Principle UF12 requires a local park of at least 2Ha, Key Principle UF13 requires all residential properties to be within 100m walk of a publicly accessible green open space and Key Principle UF14 requires 10sqm of publicly accessible green open space per child within the development. The SPD does not set specific limits on the height of any buildings, as this would be too prescriptive. It does however, establish a framework of Key Objectives and Key Principles against which the height of any proposal(s) can be assessed. This framework is established in the sections on Skyline, Edges and Streets in the Urban Form chapter. Each of these were informed by detailed analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and the Townscape and Visual Analysis SPD Supporting Evidence Documents. The Skyline section |
| 165 | Andres Guevara | | 04 | | It is extremely important that the project 1) increases public spaces, such as parks and squares and 2) firmly limits the height of the new building being projected. By doing density relative to the current plan will decrease therefore limiting all the potential damages and downsides mentioned in the paragraph above. Most importantly it will allow for air quality to improve by simply having more green public spaces in the form of small parks and squares, reduce general congestion and also protect the value of the real estate in the area. | |
| 169 | Andres Guevara | | 04 | | Change proposed. The scale of development and the impacts of tall buildings on the skyline and existing townscape are addressed in the sections on Skyline, Edges and Streets in the Urban Form chapter. Each of these were informed by detailed analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and the Townscape and Visual Analysis SPD Supporting Evidence Documents. The Skyline section |

In summary, by decreasing density in the way proposed above we will make of this area a more human area!
Evidence Documents. The Skyline section sets out a Key Objective and a number of Key Principles that ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. This section should be read in conjunction with the Townscape and Visual Analysis SPD Supporting Evidence Document, which sets out and analyses a number of sensitive or important local views identified by the authorities. Key Principle UF21 requires any application(s) to demonstrate that their proposals will have no negative impact on any of these views. In the Edges section, the Key Objective requires any application(s) to demonstrate that their proposals will have no negative impact on any of these views. In the Edges section, the Key Objective states that none of the new buildings should be more that 3 storeys high, or 4 at the most.

No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to set specific caps on heights. Instead, it establishes a framework of Key Objectives and Key Principles against which the heights of the buildings in any proposals and their impacts on skyline and existing townscape will be assessed. This framework is established in the sections on Skyline, Edges and Streets in the Urban Form chapter. These are all informed by thorough analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and Townscape and Visual Analysis SPP Supporting Evidence Documents. The Character Area Analysis revealed that much of the surrounding area comprises buildings that are over 4 storeys in height. Mansion blocks, for example, tend to be between 5 and 8 storeys tall. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding area of tall and modern buildings would be devastating, not to mention the risks to the trees of the bordering gardens of Philbeach Gardens and Eardley Crescent.

No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to set specific caps on heights. Instead, it establishes a framework of Key Objectives and Key Principles against which the impacts of tall buildings on the skyline and existing townscape are addressed in the section on Skyline in the Urban Form chapter, which was informed by detailed analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and the Townscape and Visual Analysis SPD Supporting Evidence Documents. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. This section should be read in conjunction with the Townscape and Visual Analysis SPD Supporting Evidence Document which sets out a number of views from which developers will be expected to demonstrate that their proposals have no negative impact. In the Edges section, the Key Objective states that all new buildings on the Kensington borough is famous for its gardens squares, very present in the Earl's Court ward; the effect upon the character of the Kensington borough is famous for its gardens squares, very present in the Earl's Court ward; the effect upon the character of the

In a nutshell, I am very happy that the site should be turned into a lovely residential area, meaning it should be in keeping with the nearby streets, preferably with modern Victorian terraces and a central garden, and certainly no buildings over 3 storeys.

No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to set specific caps on heights. Instead, it establishes a framework of Key Objectives and Key Principles against which the heights of the buildings in any proposals and their impacts on skyline and existing townscape will be assessed. This framework is established in the sections on Skyline, Edges and Streets in the Urban Form chapter. These are all informed by thorough analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and Townscape and Visual Analysis SPD Supporting Evidence Documents. The Character Area Analysis revealed that much of the surrounding area comprises buildings that are over 4 storeys in height. Mansion blocks, for example, tend to be between 5 and 8 storeys tall. The Skyline section sets out a Key Objective and a number of Key Principles that ensure that no new buildings will have a negative impact on the quality and character of the surrounding area.

As a long-time resident in the area, I am deeply concerned about the major development proposed for Earl's Court, West Kensington and Seagrave Road which, in its present form, I consider to be totally unacceptable. The shocking scale of the proposed works is excessive to say the least for our mainly residential area, and utterly unsympathetic to its character.

No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to set specific caps on heights. Instead, it establishes a framework of Key Objectives and Key Principles against which the heights of the buildings in any proposals and their impacts on skyline and existing townscape will be assessed. This framework is established in the sections on Skyline, Edges and Streets in the Urban Form chapter. These are all informed by thorough analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and Townscape and Visual Analysis SPD Supporting Evidence Documents. The Character Area Analysis revealed that much of the surrounding area comprises buildings that are over 4 storeys in height. Mansion blocks, for
example, tend to be between 5 and 8 storeys tall. The Skyline section sets out a
Key Objective and a number of Key Principles that ensure that no new buildings
will have a negative impact on the quality and character of the surrounding
population. There are many tall buildings in London that are
usually associated with affordable housing
availability. No change necessary. The SPD does not propose any specific
building heights, but rather establishes a framework of Key Objectives and Key
Principles against which the proposed building heights in any application(s) will be
assessed. The development of this size of buildings would damage the image
of the area, as tall buildings in London that are
aspirational, including the tower at Tabard Square in Bermondsey, Ontario Tower
at Docklands, The Barbican Towers, Knightsbridge Barracks Tower and
Shearsmith House. Please note that the SPD does not propose any specific
building heights, but rather establishes a framework of Key Objectives and Key
Principles against which the proposed building heights in any application(s) will be
assessed. The skyline of the area would be damaged, allowing to build up to
15 storeys will fatally damage the sense of livableness of the areas
No change necessary. Key Principle UF28 requires that the privacy, daylight and
sunlight of all existing and future buildings must be respected. Furthermore,
residential amenities such as outlook and privacy are protected by the UDP and
Core Strategy standards quoted in paragraphs 4.84 and 4.85.

The Illustrative Land Use drawings show a continuously decked
over linear park over the railway lines. The Panel questioned
whether the cost of this provision could be recouped by residential
development at the lower densities now suggested. A strategy of
'pocket' parks with landscaped bridges over the railway lines might
be more viable and could provide adequate provision. It was
important that the SPD was not too prescriptive and that the
guidelines regarding the amount of open space provision were
sufficiently flexible.

No change necessary. As noted in your comment, the land use drawings are
illustrative only and therefore should not be read as proposals for development.
Key Principle UF6 clearly states that if the introduction of a deck over the railway
line proves not to be viable, a series of bridges over the railway line to ensure
sufficient east - west connectivity could be acceptable. If this were the case, any
application(s) would still be expected to meet the public open space requirements
set out in the SPD. The SPD does not require a continuously decked over linear
park over the railway lines. It only suggests that this is one way in which the
authorities' connectivity and public open space aspirations could be met.

The view and access to sunlight from the nearby buildings would be
impaired by such a tall development, although my building in
particular won't be directly affected. I sympathise with people living
close to the redevelopment.

Relative to the SPD, I strongly suggest to increase green areas and
decrease the height of buildings and their residential and
commercial capacity to make it more compatible with living in the
area unless my concerns are addressed in other ways.

The linear park, if retained, would benefit from north and south
connections for cyclists and pedestrians. Is this possible?

Tall buildings were recognised as being those that were significantly
taller than those around them. It was important to differentiate
between tall residential and commercial buildings as they have
differing requirements. Tall residential buildings have more potential
to be slender - but both are difficult to make slender and viable!
Large slab blocks with continuous flat tops are to be discouraged.

Change proposed. "Large slab blocks with continuous flat tops are discouraged" will
be added to the section of the Urban form chapter that deals with the design of
tall buildings. The other principles and guidance on the design of tall buildings are
considered to be flexible enough to apply to either commercial or residential
buildings. The expectations of officers assessing any proposal(s) will be adjusted
depending on the proposed use of any building.
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<th>Document</th>
<th>Page</th>
<th>Content</th>
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<tr>
<td>285</td>
<td>Tom Jestico</td>
<td>DRP</td>
<td>04</td>
<td></td>
<td>The Panel favoured the location of predominantly commercial buildings along the Cromwell Road frontage, where high densities would justify the high costs of building over railway tracks and raising ground levels etc. It was possible that a very tall building might be possible here.</td>
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<td>286</td>
<td>Tom Jestico</td>
<td>DRP</td>
<td>04</td>
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<td>The Panel was wary of locating tall buildings around the Empress State building. There was a tendency that a cluster of tall buildings here would coalesce into an amorphous and bulky silhouette when viewed from a distance. Note should be taken of the starts of clustered tall buildings, with lower sections being mainly solid and upper parts more variable, with plenty of sky between them. This is to avoid a visual merging into a ‘solid wall’ of several buildings of similar form and height.</td>
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<td>287</td>
<td>Tom Jestico</td>
<td>DRP</td>
<td>04</td>
<td></td>
<td>A varied skyline can be achieved at detail level, as in local historic precedents of chimneys, gables etc.</td>
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<td>288</td>
<td>Tom Jestico</td>
<td>DRP</td>
<td>04</td>
<td></td>
<td>Again, the Panel suggested that the SPD was not too prescriptive. It should be left to the developer to make the case for tall buildings.</td>
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<td>289</td>
<td>Tom Jestico</td>
<td>DRP</td>
<td>04</td>
<td></td>
<td>The Urban Form Strategy of the SPD suggests a predominantly 1:1 width/height ratio. Clearly it must allow for some variation to avoid monotony and to create delight. It is also important to recognise the relationship between height and length in relation to street buildings - the surrounding context has quite long blocks, especially east/west, but they are relatively low buildings.</td>
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<td>290</td>
<td>Tom Jestico</td>
<td>DRP</td>
<td>04</td>
<td></td>
<td>The Panel felt that it was almost impossible to predict phasing sequences and suggested that the SPD should concentrate on defining development ‘parcels’. It was essential that East - West routes, particularly pedestrian and cycle connections, are established as soon as possible.</td>
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<tr>
<td>291</td>
<td>Tom Jestico</td>
<td>DRP</td>
<td>04</td>
<td></td>
<td>A proportion of green space needs to accompany the delivery of each parcel in case the development stalls.</td>
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<td>Affiliation</td>
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<td>Notes</td>
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<tr>
<td>Tom Jestico</td>
<td>DRP</td>
<td>04</td>
<td>A study of the street grid, with the usual separation distances for both buildings lining the streets and those within block parcels, would generate a density based on the 1:1 street aspect ratio. This would determine how much tall buildings could be expected and, indeed, whether even the minimum scenario (5500 homes / 12000 jobs) can be achieved within the SPD guidance. No change necessary. The authorities consider that including a design based density study as part of the SPD would be too prescriptive. Instead, the SPD has been written as a framework against which all aspects of any planning application(s) for the OA will be assessed, including the density. The appropriateness of any density that is proposed will be considered against the Urban Form and Transport and Accessibility chapters of the SPD and Policy 3.4 of the Mayor's London Plan.</td>
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<td>Sally Groenedijk-Trigues</td>
<td>04</td>
<td>The development will irrevocably destroy the local skyline. There will not be many places in Earl’s Court that this will not affect, and the most to suffer will be the listed Brompton Cemetery. No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for applicant(s) to analyse and submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities’ analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.</td>
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<td>Sally Groenedijk-Trigues</td>
<td>04</td>
<td>There is insufficient green space proposed in the SPD for community or recreational use. Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified and analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key O.</td>
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<tr>
<td>Sally Groenedijk-Trigues</td>
<td>04</td>
<td>The heights, densities and the use of materials will not link in with either of the communities. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an “elite” standard and for a community hub of 4</td>
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<tr>
<td>Hugh Lalor</td>
<td>04</td>
<td>A woeful lack of adequate recreational and sports facilities in the plan. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to allow at least one sport to be developed to an “elite” standard and for a community hub of 4</td>
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facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an “elite” standard and for a community hub of

Any new developments should be sympathetic to existing buildings. (The new block of flats at 225 Earls Court Rd, Colony Mansions shows just how new projects can be built in harmony to existing buildings - this is the very least any new developments in the area should be aspiring to)

The listed Brompton cemetery will be adversely affected by the high buildings overlooking it. The skyline will suffer and local residents in Earldley Crescent and Philbeach Gardens will be overlooked by buildings that are too high and densely populated, and they will suffer as a result.

There is not enough space for community or recreational use in this plan. There is also insufficient green space.

If understood correctly, the possible addition of an additional N-S road would, in fact, be a series of jigsaws, which would not be a Primary Road and would not alleviate the crush experienced on the Earls Court and Warwick Roads.

The provision of green space is critical and the developers have

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No change necessary. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 requires any application(s) to preserve or enhance its character, appearance and setting. The supporting text sets out the expectation that all applications will demonstrate that they don’t involve any negative changes to the skyline as viewed from the cemetery. Furthermore, Key Principle UF21 requires all applicants to submit a set of verified views taken from points in the local area identified by the authorities. These can be seen in the Townscape and Visual Analysis SPD Supporting Evidence Document. Proposals will be expected to demonstrate that they will have no negative impact on any of these views. Views 31, 32 and 35 are taken form the Cemetery (please note that the numbers allocated to views may be changed in the final draft of the SPD). All three clearly identify the sensitivity of the cemetery, but also highlight the buildings that are too high and densely populated, and they will suffer as a result.

No change necessary. The authorities consider that the minimum requirements for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principle UF21 requires all applicants to submit a set of verified views taken from points in the local area identified by the authorities. These can be seen in the Townscape and Visual Analysis SPD Supporting Evidence Document. Proposals will be expected to demonstrate that they will have no negative impact on any of these views. Views 31, 32 and 35 are taken form the Cemetery (please note that the numbers allocated to views may be changed in the final draft of the SPD). All three clearly identify the sensitivity of the cemetery, but also highlight the buildings that are too high and densely populated, and they will suffer as a result.

Change proposed. As established in the Transport Chapter (paragraph 10.68) the SPD does not seek to achieve significant reductions in the traffic on the Earl’s Court One Way System (which includes Warwick Road). An assessment of the potential for using a new north-south route within the site to relieve the Earl’s Court One Way System of through traffic was undertaken. This found that a north-south route could reduce traffic on Warwick Road by up to 18% and on Earl’s Court Road by up to 10%. However, in order to achieve this, traffic would be diverted along Old Brompton Road and Lillie Road where traffic levels would more than double in the PM peak hour. Accommodating this traffic would require a major new junction on Lillie Road as well as probable road widening along Lillie Road that could not be constructed without third party land acquisition. It is therefore not necessary for the north-south route to be classified as a Primary Road.

Please note that the Urban Grain and Connectivity section of the Urban Form chapter requires development to preserve or enhance the character, appearance and setting of nearby conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified and analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key O

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proposed a miserly amount in less than optimal forms. The Earl's Court Society's suggestion of aggregating space into a 6 ha park would be a healthy and attractive amenity. It would also be consistent with the London Plan's Green Lung concept. The SPD could be more robust on this.

The quantum of public green open space established in the Urban Form chapter to be sufficient and robust. Key Principle UF12 requires a 2 ha local park, Key Principle UF13 requires all residential properties to be within 100 m walking distance of a green open space, Key Principle UF14 requires any regeneration proposal to provide a minimum of 10 sq m of public space per child and Key Principle UF15 requires a minimum of 10 sq m of dedicated play space per child. These principles are consistent with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). Aggregating the open space requirements into one large park would compromise a number of the aspirations set out in the SPD. For example, it would not be in keeping with the existing urban character of the surrounding areas (which are generally punctuated by a series of smaller open spaces) and it could compromise the ability to achieve the desired level of co-

K&C has come a long way in regenerating itself over the years, with the council's efforts to encourage upscaling hostels to hotels, better litter patrol, licensing controls, etc. Consequently, residents feel part of a community and are investing in and restoring the Victorian character.

The London Plan seeks to maintain the character of areas. The SPD should support this trend and consider that the skyline and heights of buildings as well as require that the building materials should be required to be of higher quality than what was shown in the mock-ups. It looked cheap and totally out of keeping with a conservation area and risked virtually overhanging some of the surrounding homes and the Brompton Cemetery.

The local skyline will be ruined - and will be visible from almost all parts of the area which is generally low-rise with the exception of Empress State. There is a serious lack of green space in the plan for recreation or community activities.

The SPD has been informed by thorough analysis of the urban character of the surrounding areas. The results of this analysis can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis and the Townscape and Visual Analysis. The Skyline section of the Urban Form Chapter addresses the importance of the skyline and establishes the Key Objective that no new buildings visible on the skyline should have a negative impact on the quality and character of the surrounding townscape. In this regard, any application(s) will be assessed against Key Principle UF19 which requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas, Key Principle UF20 which requires development to preserve or enhance the character, appearance and setting of Brompton Cemetery and Key Principle UF21 which requires all proposals to be accompanied by a verified set of the views identified in the Townscape and Visual Analysis SPD Supporting Evidence Document.

No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100 m walking distance of a public green open space, for 10 sq m of public green open space per child and for 10 sq m of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor facilities and leisure facilities to cater for a range of activities.
to be developed to an "elite" standard and for a community hub of

Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires any application(s) to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective).

The scale, density and materials to be used are totally at variance with the surrounding area. The density especially is beyond acceptable. Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires any application(s) to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective).

Apart from the density of the buildings per square metre, I write because I am most concerned about the proposed heights of the new buildings on the site. I feel that if these are permitted to be over 7 floors - already too high as not in sympathy with the surrounding architecture, this will completely ruin the area. Earls Court has a large number of beautiful, well maintained and imposing period buildings which would sit uneasily with a ghastly series of modern glass and chrome residential and commercial boxes with insufficient green landscaping to break up the concrete jungle. History has proved that people do not like to live in tall buildings in this town. They become ghettos - e.g. the dreadful towers on the West Way and Lily Rd/Rylston Rd in SW6 which have slowly been dismantled and replaced with houses.

We do not have a public park in this area and with the increased density of population, this will become even more apparent as there is nowhere for the new residents to go, not even the odd bench to sit on for the many tourists we have due to the numerous hotels here. The number of casual visitors will also increase which will create its own problems. Generous landscaping and low-built blocks of flats interspersed with some terraces of houses are paramount to the success of the project. This must be a true new village, not a highrise horror story.

The Brompton Cemetery, our only green space in this area will be seriously affected by the altered skyline. It will be overlooked and crowded by buildings which will be too high and out of harmony with the neighbourhood. This is a listed amenity and should be regarded as such. This is our only LUNG. We need to keep it as pristine and unencumbered as possible.

The listed Brompton cemetery will be adversely affected by the high buildings overlooking it. The skyline will suffer and local residents in Eardley Crescent and Philbeach Gardens will be overlooked by buildings that are too high and densely populated, and they will suffer as a result.

No change necessary. The deficit of open space is recognised in the SPD and, as a result, Key Principle UF12 requires a new 2ha local park as part of any redevelopment of the site. Further to this, the other Key Principles in the Public Open Space section of the Urban Form chapter set additional requirements for open space provision, including UF13 which requires all residential properties to be within 100m walking distance of a public open space, UF14 which requires 100sqm of public green open space per child and UF15 which requires a minimum of 100sqm of dedicated play space per child.

No change necessary. The importance and sensitivity of Brompton Cemetery is recognised in the SPD, particularly in Key Principle UF20 which requires the preservation or enhancement of its character, appearance and setting. Furthermore, any new buildings that are visible from Brompton Cemetery will be subject the Key Principle UF21 which requires any application(s) to include a set of verified views, identified by the Authorities, which must be analysed to demonstrate that there will be no negative impact on any of the views identified by the Authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. For Brompton Cemetery in particular, please refer to views 35, 32 and 31 (please note that, in the final draft of the SPD, the numbers allocated to the views may change). All three clearly identify the sensitivity of the cemetery, but also highlight the opportunity to enhance its setting. The identified opportunities to enhance the setting of the cemetery include the potential to create enclosure along its western edge (identified as lacking the Conservation Area Proposal State).
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<th>Comment</th>
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<tr>
<td>344</td>
<td>Barbara Herbin</td>
<td>04</td>
<td>There is not enough space for community or recreational use in this plan. There is also insufficient green space.</td>
</tr>
<tr>
<td>353</td>
<td>Christine Powell</td>
<td>04</td>
<td>The statement that italic mature trees should be encouraged .... but they should not leave open spaces dark and/or overshadowed [end italics], seems to be in opposition to the effect that tall buildings would have.</td>
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<tr>
<td>354</td>
<td>Christine Powell</td>
<td>04</td>
<td>There should be sufficient open space where dog walkers may go.</td>
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<tr>
<td>355</td>
<td>Christine Powell</td>
<td>04</td>
<td>It will be difficult for excessive planting, i.e. trees and shrubs, in the linear park if it is decked over the existing railway line.</td>
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<td>376</td>
<td>Cllrs Buxton and Read</td>
<td>04</td>
<td>A new key objective is required that the Architecture and Design of any development in the OA should be of outstanding quality and be inspired by the surrounding Conservation Areas. It should be of such quality that it would be considered worthy of inclusion in a conservation area.</td>
</tr>
<tr>
<td>377</td>
<td>Cllrs Buxton and Read</td>
<td>04</td>
<td>A New Key Principle that any new building facing Exhibition Square replacing the iconic facade of EC1 should be world class quality building that is inspired by the Art Deco Facade of EC1.</td>
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<td>378</td>
<td>Cllrs Buxton and Read</td>
<td>04</td>
<td>Key Principle UF12</td>
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The authorities consider the offer of a 2 ha local park (that meets the criteria set out in Table 7.2 of the London Plan) to be sufficient to provide for children and young people's play and informal recreation. In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, and for 10 sqm of publicly accessible green open space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. Key Principle UF25 states and proposals for tall buildings will need to demonstrate how their impact on overshadowing of both surrounding buildings and open spaces will be mitigated. The text that follows this Key Principle will be amended to also state that proposals "should demonstrate that they do not have a detrimental effect." The enclosure ratios for open spaces established in paragraphs 4.95 to 4.97 also seek to ensure sufficient light.
We welcome the inclusion of an accessible park, but consider a minimum of 2 hectares as too small. We support the Earl’s Court Society seeking a minimum of 5 Hectares.

The development will irrevocably destroy the local skyline. There will not be many places in Earl’s Court that this will not affect, and the most to suffer will be the listed Brompton Cemetery.

There is insufficient green space proposed in the SPD for community or recreational use.

The heights, densities and the use of materials will not link in with either of the communities. They are still too near the existing Victorian Crescents and the different levels of the land have not been taken into consideration.

The Phasing section of the SPD does not integrate credibly with the transport and accessibility section and the studies by TFL and the councils.
The new north/south route through the OA is worked into these studies and is key to the area coping with north south traffic flows yet it isn’t even scheduled to be built until phase 4b, the penultimate phase of development (see paragraph 4.119). The Piccadilly line upgrade (an essential requirement) doesn’t even have a scheduled date.

This raises three major problems:

(a) In the period between the start of the development and the completion of the north/south road ten years later there will be an increase in surrounding traffic but no new road putting further strain on the overloaded local roads.

(b) The Piccadilly line upgrade must occur before significant new development is allowed in order to avoid an intolerable and dangerous travelling environment in the rush hour.

(c) In the event that the last two stag these plans are clearly labelled as ‘illustrative’ an should not be treated as a design solution for the OA.

we are surprised and disappointed that there is no mention of PPS5 in the latest draft SPD. PPS5 is the Government’s Planning Policy Statement on ‘Planning for the Historic Environment’ and as such should be seen as a driver for consideration of heritage issues in any scheme for the Opportunity Area.

Proposal: Please add reference to PPS5 in the finalised SPD.

Reason: for clarity.

However we are pleased to see reference to the English Heritage / CABE Guidance on Tall Buildings, noted in 4.10, page 53. We look to see its guidance (and that in PPS5) applied in the consideration of planning applications for the Opportunity Area.

Proposal: Please provide such an indication.

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.

we support the provision of adequate public open space in any Opportunity Area redevelopment, and understand the potential attraction of a north-south ‘linear park’ following the route of the West London railway line. At the same time we have reservations over the successful creation of a park set on a continuous raised deck over the railway, as a consequence of such an open space having no ‘natural’ ecology.

We are also concerned at the loss of the current bio-diversity that currently exists in the green corridor along the railway line because of the work proposed. Similar loss has been noted in the past along the railway green corridor in White City as a result of nearby developments.

I recognise the need for improvements to the Earl’s Court and West Kensington Opportunity Area (“the ECWKOA”). However, any such improvements need to be consistent with the character of the area, and the distinct village identity treasured by its residents. This cannot and will not be achieved by the SPD which has clearly been drafted to accommodate the Masterplan and planning applications already submitted by EC Properties Limited (“the Developer”) for the area. The scale of the Developer’s proposals, supported by the London Borough of Hammersmith and Fulham ("the Council"), is clearly inadequate and unsustainable. The volume of the proposed developments simply cannot be accommodated by the area. This is neither the City of London nor Canary Wharf, but a vibrant residential neighbourhood comprising mainly of 2-3 storey terraces.

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<th>Page</th>
<th>Text</th>
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<tbody>
<tr>
<td>448</td>
<td><strong>3. KEY OBJECTIVE ON PAGE 64</strong> -- &quot;Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape&quot;. This is interpreted in the revised draft SPD by:</td>
</tr>
<tr>
<td></td>
<td>3.1. Key Principles UF 19, UF 20 and UF 21 require nearby conservation areas and specifically Brompton Cemetery to be preserved or enhanced, with a note that views from Brompton Cemetery are panoramic and open and new buildings of only moderate height may be visible. Proposals must demonstrate that they do not have a negative impact on the views identified and analysed in the Townscape and Views analysis. Noted.</td>
</tr>
<tr>
<td>449</td>
<td><strong>3. KEY OBJECTIVE ON PAGE 64</strong> -- &quot;Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape&quot;. This is interpreted in the revised draft SPD by:</td>
</tr>
<tr>
<td></td>
<td>3.2. The Cemetery Conservation Area Proposals Statement on page 19 reinforces this by recording that 'the character and appearance of all parts of the Cemetery are at risk from tall or bulky development beyond its boundaries which would impinge on views within or without the Cemetery. Where other buildings are in close proximity to the Cemetery even relatively minor alterations and extensions can have a detrimental effect on views. The likely damaging or enhancing effect of development on a vista in the conservation area will be taken into account by the Council...' Noted.</td>
</tr>
<tr>
<td>450</td>
<td><strong>3. KEY OBJECTIVE ON PAGE 64</strong> -- &quot;Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape&quot;. This is interpreted in the revised draft SPD by:</td>
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<td></td>
<td>3.3. If the argument elsewhere in the Proposals Statement leads to a decision to add extra enclosure to the side of the Cemetery adjacent to the Car Park we argue strongly that up to four storeys in height would well achieve that. They would be much more consistent with the warnings in the Proposals Statement (3.2 above) than the massed six to mainly eight storeys proposed in the Planning Application which would clearly offend substantially against those warnings. No change necessary. The SPD does restate the opportunity to improve the enclosure of the cemetery presented by the redevelopment of the OA. However, it does not prescribe any building heights that would be suitable to achieve this. Any buildings along this edge of the cemetery will be subject to Key Principles UF20 (to preserve or enhance the character, appearance and setting of the cemetery) and Key Principle UF21 (to demonstrate that views from the cemetery, identified in the Townscape and Visual Analysis SPD Supporting Evidence Document, will not be negatively impacted upon).</td>
</tr>
<tr>
<td>451</td>
<td><strong>3. KEY OBJECTIVE ON PAGE 64</strong> -- &quot;Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape&quot;. This is interpreted in the revised draft SPD by:</td>
</tr>
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<td></td>
<td>3.4. 4.62 states that 'regeneration of the OA presents the opportunity to improve the enclosure of the Cemetery'. If this controversial view prevails it does NOT (as argued in 3.3) support massed buildings as high as six to mainly eight storeys, where four No change necessary. The SPD does not prescribe any building heights that would be suitable to achieve this. Any buildings along this edge of the cemetery will be subject to Key Principles UF20 (to preserve or enhance the character, appearance and setting of the cemetery) and Key Principle UF21 (to demonstrate that views from the cemetery, identified in the Townscape and Visual Analysis SPD Supporting Evidence Document, will not be negatively impacted upon).</td>
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</table>
storeys would fully achieve that objective and be consistent with the rest of the cemetery’s enclosure. Also, there are several gaps in the enclosure at other parts of the Cemetery which would fully justify a gap in the proposed new enclosure by omitting one of the proposed buildings. This would support the sightline to St Luke’s Church.

3. KEY OBJECTIVE ON PAGE 64 — ‘Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape’. This is interpreted in the revised draft SPD by -

3.5. We agree strongly with the statement in 4.62 that proposed new buildings should ‘not over dominate the western edge of the Cemetery, and should enhance the character of the conservation area’. CapCo’s plans clearly over dominate through height and mass, damaging the skyline and introducing significant overlooking of the burial areas where there is none at present.

4. KEY OBJECTIVE ON PAGE 69 — ‘Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context’.

4.1. Key Principle UF 26 states that ‘the height and massing of new buildings on the edges of the OA will be expected to respect the scale and massing of neighbouring buildings’.

4.2. 4-77 states that ‘the edge conditions along Seagrave Road and the openness of views from Brompton Cemetery are major...'

Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
<table>
<thead>
<tr>
<th>Page</th>
<th>Paragraph</th>
<th>Key Information</th>
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<tbody>
<tr>
<td>69</td>
<td>4.77, Para 4.77</td>
<td>height of nearby buildings between 3 and 5 storeys.</td>
</tr>
<tr>
<td>69</td>
<td>4.77, Para 4.80</td>
<td>4-80 states any proposed buildings in the western and eastern edges of the OA should not rise significantly higher than the prevailing adjoining heights.</td>
</tr>
<tr>
<td>64</td>
<td>6.1, Para 6.1</td>
<td>CapCo's plans for eight storey buildings along the cemetery frontage are by any normal human interpretation of this Objective and Principles UF19 and UF20 very unreasonable at twice the height of existing buildings near the Cemetery. They do not preserve or enhance the character and appearance of Brompton Cemetery and the settings of listed buildings, nor for other nearby conservation areas -- they damage them.</td>
</tr>
<tr>
<td>64</td>
<td>6.2, Para 6.2</td>
<td>4-61 requires demonstration ‘that changes to the skyline will not be negative’. CapCo’s plans are very negative, as anyone standing in the western part of the Cemetery can see.</td>
</tr>
</tbody>
</table>
| 64   | 6.2, Para 6.2 | No change necessary. The SPD does not prescribe any building heights that would be suitable to achieve the desired improvements to the enclosure of the cemetery. Any buildings along this edge of the cemetery will be subject to Key Principles UF20 (to preserve or enhance the character and appearance of the
6.3. We repeat 3.4. above that enclosure required in 4-62 will be comfortably achieved with four storey buildings. Six to mainly eight storeys cannot sensibly be justified. Moreover enclosure compatible with enclosure of other parts of the Cemetery where there are several significant gaps in the building line could readily allow a wider gap than the CapCo plans provide. Removing one of the buildings would also enable a stronger sightline to St Luke’s Church, Redcliffe Square.

6.4. 4-62 states that ‘proposals on the eastern edge of the Seagrave Road site should introduce new buildings that enclose but do not over dominate the western edge of the cemetery and enhance the character of the conservation area’. Eight storey buildings and up to sixteen storeys nearby ‘over dominate’, and are also incompatible with the Conservation Area Proposals Statement as shown above.


7.2. 4-77 states that ‘openness of views from the Brompton Cemetery are major influences on acceptable building heights and massing’. This totally supports our argument for maximum four storeys height and less massing than proposed.

Cemetery) and Key Principle UF21 (to demonstrate that views from the cemetery, identified in the Townscape and Visual Analysis SPD Supporting Evidence Document, will not be negatively impacted upon).

Noted. The SPD does not prescribe specific building heights. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.

Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.

Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.

Noted. The SPD does not prescribe any specific building heights. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
7.3. Key Principle UF27. The eight storey buildings would seriously fail to ‘preserve or enhance’... and the sixteen storey building or any substantial height there would be a dreadful failure to match this Principle.

Chapter 4 of the Urban Form Strategy suggests this narrow site, formerly a mews house, is to become the same “metropolitan face” of the OA onto the A4 as the other side of the railway which is currently waste ground/commercial light industrial with no adjacent houses, never mind a conservation area. This completely ignores that this is the only part of that ‘metropolitan face’ backing on to both a residential conservation area and a listed church. This should be made clear here as the character of the A4 boundary on the other side of the railway is entirely different. The yellow line should either stop at the railway or become dotted with a footnote referring to this part of the boundary having specific sensitivity. Otherwise, the uninformed reader could be forgiven for assuming that the type of building that might be suitable for the LBH&F A4 boundary is automatically suitable for the RBK&C A4 boundary. This has already been partly done on page 36 of the development scenarios. It should now be dealt with.

No change necessary. The SPD is a framework against which any planning application(s) for the OA will be assessed. Figure 4.20 illustrates the authorities’ broad aspirations for the site. No specific characteristics for the ‘Metropolitan Face’ are prescribed that would compromise the existing properties behind it. Indeed, paragraph 4.81 clearly states that buildings in this location “must preserve or enhance the setting of the Baron’s Court Conservation Area and respond to local topography and character”. Any building(s) proposed for this location will be subject to all of the Key Principles in the SPD including Key Principle UF26 which requires the height and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings and Key Principles UF19 and UF27 which require development to preserve or enhance the character, appearance and setting of any conservation areas and listed buildings. There are also a number of views of this area analysed in the Townscape and Vis

<table>
<thead>
<tr>
<th>478</th>
<th>Tony Hunter</th>
<th>04</th>
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<tr>
<td><strong>[bold] 5.Height measurements throughout [end bold]</strong></td>
<td>I think the use of both AOD and storeys above ground level in different parts of the SPD leads to significant confusion and should be harmonised - one measure or the other should be adopted. Otherwise statements of equivalence between AOD and numbers of storeys are misleading. How about “height AOD” and “storeys AOD”? Otherwise any developer is likely to seek to use the more favourable measure of the two; and any lay reader may be left confused.</td>
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Change proposed. There needs to be some clarification of where the terms AOD and AGL are used in the documents to ensure that the approach is consistent. However, both terms will continue to be used as they are needed to describe different circumstances. In the Development Capacity Scenarios the term AGL is used because it describes the illustrative heights of buildings when measured from an illustrative remodelled ground level that would enable inclusive access across the whole OA. In other circumstances throughout the SPD and supporting documentation, the term AOD is more suitable so that a direct comparison between building heights can be made, regardless of where the ground level is.

<table>
<thead>
<tr>
<th>480</th>
<th>Tony Hunter</th>
<th>04</th>
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<tbody>
<tr>
<td><strong>Key Objectives</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Key Objective - after &quot;surrounding pattern” ADD &quot;scale and character of buildings and…&quot;</td>
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</table>

No change necessary. The first key objective is about urban grain, or the pattern of streets and open spaces that make up an urban area. It therefore does not deal with the scale and character of buildings. The scale of buildings is addressed under the Key Objectives on Skyline, Edges and Streets. In relation to the Edges Key Objective, specifying dimensions would be too prescriptive for a strategic planning framework like the SPD. Key Principles UF28 and UF29 and the supporting text that follows them deal specifically with the expectations in terms of the distances between new and existing properties. Paragraphs 4.84 and 4.85 set out the UDP and Core Strategy standards that any application(s) will be expected to meet and paragraph 4.86 sets out the expectation that existing residential boundaries will be sensitively incorporated into new urban blocks with an arrangement of back-to-back gardens. The specific dimensions proposed in any application(s) will be judged on a case by case basis on their own merits.

<table>
<thead>
<tr>
<th>486</th>
<th>Malcolm Spalding</th>
<th>04</th>
<th>Earl's Court Society</th>
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<tbody>
<tr>
<td><strong>Key Objectives</strong></td>
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<td>Key Objectives</td>
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<tr>
<td>After “existing context” ADD “All buildings adjacent to the existing residential boundaries to be set back at least 10m and must be no higher than existing roof line”</td>
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</table>

No change necessary. The key objective is after “surrounding pattern” and before “scale and character of buildings and…” ADD “and…”

<table>
<thead>
<tr>
<th>487</th>
<th>Malcolm Spalding</th>
<th>04</th>
<th>Earl's Court Society</th>
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<tbody>
<tr>
<td><strong>UF3 AMEND to read “in the best of the local context”</strong></td>
<td>Change proposed</td>
<td></td>
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No change necessary. The SPD only suggests that the potential for pedestrian access northwards under the A4 could be explored. This could prove to be undesirable if it cannot be made into a safe, pleasant and attractive environment for pedestrians. The SPD does not preclude a vehicle access into the OA from Warwick Road. However, paragraph 10.17 in the Transport chapter does state that “A vehicle access at Warwick Road has the potential to create conflict with pedestrians using Earl’s Court station and to compromise the quality of the proposed new public space. If such an access is included in development proposals the road safety and urban design impacts would need to be carefully assessed in a detailed Transport Assessment and it would need to be...”

<table>
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<th>Malcolm Spalding</th>
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<th>Earl's Court Society</th>
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<tr>
<td><strong>UF4 ADD “including vehicle and pedestrian access northwards under the A4. No vehicle through- route access to and from Warwick Road Square entrance.”</strong></td>
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No change necessary. The key principle is after “surrounding pattern” ADD “including vehicle and pedestrian access northwards under the A4. No vehicle through- route access to and from Warwick Road Square entrance.”
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<tr>
<th>Page</th>
<th>Author</th>
<th>Organization</th>
<th>Key Principle</th>
<th>Description</th>
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<tbody>
<tr>
<td>489</td>
<td>Malcolm Spalding</td>
<td>Ear's Court Society</td>
<td>UF7 ADD</td>
<td>No change necessary. New development will not have the opportunity to create new view compositions (e.g. well enclosed long views or views deflected around corners) on the existing surrounding streets.</td>
</tr>
<tr>
<td>490</td>
<td>Malcolm Spalding</td>
<td>Ear's Court Society</td>
<td>UF8 ADD</td>
<td>No change necessary. This is already implied by the clause &quot;If this proves not to be viable&quot;. It would be too prescriptive for the SPD to explicitly state the form that these bridges would be expected to take. However, there would not be any lost park area if the bridge approach were taken- the public open space requirements would be expected to be met elsewhere on the site. As paragraph 4.40 states &quot;locating publicly accessible open spaces next to uncovered railway lines may result in unacceptable noise levels and risks to personal safety and should therefore be avoided. It would be too prescriptive for the SPD to specify dimensions. Key Principles UF28 and UF29 and the text that follows them set out the authorities' expectations for how the boundaries of existing properties will be treated. Paragraphs 4.84 and 4.85 highlight the UDP and Core Strategy standards that any application(s) will be expected to meet in this regard. In terms of actual dimensions, any application(s) will be judged on their own merits.</td>
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<td>491</td>
<td>Malcolm Spalding</td>
<td>Ear's Court Society</td>
<td>UF12 CHANGE</td>
<td>No change necessary. Your support is noted. It would however, be too prescriptive for the SPD to specify dimensions. Key Principles UF28 and UF29 and the text that follows them set out the authorities' expectations for how the boundaries of existing properties will be treated. Paragraphs 4.84 and 4.85 highlight the UDP and Core Strategy standards that any application(s) will be expected to meet in this regard. In terms of actual dimensions, any application(s) will be judged on their own merits.</td>
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<tr>
<td>492</td>
<td>Malcolm Spalding</td>
<td>Ear's Court Society</td>
<td>UF19 REPLACE</td>
<td>Change proposed. &quot;Nearby&quot; will be replaced with &quot;surrounding&quot;.</td>
</tr>
<tr>
<td>493</td>
<td>Malcolm Spalding</td>
<td>Ear's Court Society</td>
<td>UF22 A cluster of very tall buildings must be avoided around the Empress State building, since they will take evening sunlight from existing residents in Earls Court.</td>
<td>Change proposed. It is not necessarily the case that tall buildings would be better placed on the West Cromwell Road frontage for two reasons. Firstly, it would be contrary to the LBHF Core Strategy which clearly states that &quot;there may be some scope for tall buildings no higher than, and close to, the existing Empress State Building&quot;. The West Cromwell Road frontage is not considered to be &quot;close to&quot; the Empress State Building. Secondly, tall buildings in this location would be unlikely to meet the criteria set out in Key Principles UF19 and UF21; it is unlikely that they would preserve or enhance the character, appearance and setting of surrounding conservation areas or that they would have no negative impacts on any of the views analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Key Principle UF28 states that the &quot;privacy, daylight and sunlight&quot; of all existing residents must be respected. Key Principle UF25 requires any application(s) to demonstrate how the impact of any tall buildings on existing residents must be respected. Key Principle UF25 requires any application(s) to demonstrate how the impact of any tall buildings on existing and new residents.</td>
</tr>
<tr>
<td>494</td>
<td>Malcolm Spalding</td>
<td>Ear's Court Society</td>
<td>UF23 Tall buildings are better placed along west Cromwell Road, although not in locations where they will take evening sunlight from existing and new residents.</td>
<td>Change proposed. Key Principle UF28 states that the &quot;privacy, daylight and sunlight&quot; of all existing residents must be respected. Key Principle UF25 requires any application(s) to demonstrate how the impact of any tall buildings on existing and new residents.</td>
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<td>495</td>
<td>Malcolm Spalding</td>
<td>Ear's Court Society</td>
<td>UF22</td>
<td>Change proposed. Key Principle UF28 states that the &quot;privacy, daylight and sunlight&quot; of all existing residents must be respected. Key Principle UF25 requires any application(s) to demonstrate how the impact of any tall buildings on existing residents must be respected. Key Principle UF25 requires any application(s) to demonstrate how the impact of any tall buildings on existing and new residents.</td>
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<td>Malcolm Spalding</td>
<td>Ear's Court Society</td>
<td>UF23</td>
<td>Change proposed. Key Principle UF28 states that the &quot;privacy, daylight and sunlight&quot; of all existing residents must be respected. Key Principle UF25 requires any application(s) to demonstrate how the impact of any tall buildings on existing and new residents.</td>
</tr>
</tbody>
</table>
497 Malcolm Spalding 04 Earl's Court Society 04 Key Principle UF25 UF25 REPLACE "tall" with "relevant" AMEND to read "Telecommunications and electromagnetic interference will be mitigated so there are no adverse effects"

No change necessary. This Key Principle is intended to deal with the likely impacts of tall buildings.

498 Malcolm Spalding 04 Earl's Court Society 04 Key Principle UF25 UF25 is wrongly labelled UD25 on page 67.

Change proposed.

499 Malcolm Spalding 04 Earl's Court Society 04 Key Principle UF26 UF26 STRONGLY SUPPORT

No change necessary. It would be too prescriptive for the SPD to preclude anything taller than the existing buildings on the edge of the OA. The word "significantly" sets a framework against which any application(s) can be assessed on a case by case basis. Please note that any application(s) will also be assessed against the other Key Principles in the SPD. For example, they will be assessed against Key Principle UF26 which requires the height and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings and Key Principle UF27 which requires development to preserve or enhance the character and setting of any listed buildings or conservation areas around the edges of the OA.

500 Malcolm Spalding 04 Earl's Court Society 04 Key Principle UF26

4.80 Edges "should not rise significantly higher" DELETE "significantly"

4.80 Edges "should not rise significantly higher" DELETE "significantly"

501 Malcolm Spalding 04 Earl's Court Society 04 Key Principle UF26, Key Principle UF27

UF26/UF27 ADD "Design and architecture should be inspired by surrounding streets and conservation area context - including materials" "architectural expectations in different parts of the site should respect the neighbouring conservation areas with features such as balconies, porticoes, architraves, and pillars etc. in the Victorian neo-classical, neo-Palladian architectural style. Featureless, modern, four-square design will be rejected."

No change necessary. The authorities feel that it would be too prescriptive for the SPD to deal with architectural style and materiality. Any application(s) will be judged on its own merits in these respects.

502 Malcolm Spalding 04 Earl's Court Society 04 Key Principle UF29, Para 4.86

UF29 and 4.86 STRONGLY SUPPORT

503 Malcolm Spalding 04 Earl's Court Society 04 Key Principle UF36

UF 36 AMEND "encourages cyclists and pedestrians" to read "encourages pedestrians, and cyclists in a pattern of integrated cycle lanes which extend into and link with new and existing cycle lanes"

Change proposed. The SPD neither requires nor precludes the use of cycle lanes. However, Urban Design best practice does suggest that for all but the busiest streets, cycle lanes are not required to ensure cyclist safety. Requiring drivers to share the carriageway with cyclists can result in reduced traffic speeds and therefore fewer accidents. See, for example, paragraph 6.4.1 in the Manual for Streets (DTF 2007) which states that "cyclists should generally be accommodated on the carriageway." Paragraph 10.27 in the Transport chapter of the SPD requires "the creation of a network of cycle friendly streets". In light of this, reference to "cycle friendly streets" will be added to paragraph 4.112 of the SPD.

504 Malcolm Spalding 04 Earl's Court Society 04 Para 4.113, Page 77

4.113 p77 DELETE "accommodating cyclists in the carriage way rather than in dedicated cycle lanes"

Change proposed. The SPD neither requires nor precludes the use of cycle lanes. However, Urban Design best practice does suggest that for all but the busiest streets, cycle lanes are not required to ensure cyclist safety. Requiring drivers to share the carriageway with cyclists can result in reduced traffic speeds and therefore fewer accidents. See, for example, paragraph 6.4.1 in the Manual for Streets (DTF 2007) which states that "cyclists should generally be accommodated on the carriageway." Paragraph 10.27 in the Transport chapter of the SPD requires "the creation of a network of cycle friendly streets". In light of this, reference to "cycle friendly streets" will be added to paragraph 4.112.

566 Elizabeth Harrap 04

I consider that there is insufficient green space proposed in the SPD for community and recreational use. There is already insufficient green space for children in Earl's Court and over the years nothing has been done about it. If planning is going to be granted a lack of green space in Earl's Court needs to be taken into consideration and made allowances for in this new build area.

No change necessary. The SPD recognises the existing deficiency in public open space in the OA and its surroundings (paragraph 2.31). It also recognises that existing play provision is limited (paragraph 2.32). This has informed the open space requirements set out in the Urban Form chapter. As a result, the authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPD on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key
If understood correctly, the possible construction of an additional N-S road would, in fact, be a series of jig-jags, and therefore not be a Primary Road that would alleviate the jams experienced on the Earls Court and Warwick Roads.

The provision of green space is critical and the developers have proposed a poor amount in less than optimal forms. The Earl's Court Society suggestion of aggregating space into a 6 ha park would be a healthy and attractive amenity. It would also be consistent with the London Plans Green Lung concept. The SPD could be more robust on this.

The London Plan seeks to maintain the character of areas. The SPD should support this trend and consider that the skyline/heights of buildings as well as require that the building materials should be of higher quality than what was shown in the mock-ups. It looked cheap and totally out of keeping with a conservation area and risked virtually overhanging some of the surrounding homes and the Brompton Cemetery.

No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child. These principles are consistent with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). Aggregating the open space requirements into one large park could compromise a number of the aspirations set out in the SPD. For example, it would not be in keeping with the existing urban character of the surrounding areas (which are gene

No change necessary. The SPD has been informed by thorough analysis of the urban character of the surrounding areas. The results of this analysis can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis and the Townscape and Visual Analysis. Furthermore, one of the key aspirations for the OA, as set out in the vision of the SPD is to ensure that it is "integrated into the existing urban fabric and character of the area, respecting the local heritage assets and the pattern of streets, buildings and open spaces". In order to achieve this, there is a whole section of the Urban Form Chapter dedicated to streets. This addresses the need for the 'enclosure ratio' (the relationship between the heights of buildings and the widths of streets) to reflect that of the surrounding streets, the need for strong building lines, as observed in the existing context and the ways in which rooftops should be designed to integrate with the OA's surroundings. Furthermore, Key Principle UF3 requires any
Society would be to join the middle accessible garden square to the linear park so as to provide a more substantial open space suitable for a variety of recreational activities for all ages. Therefore should not be treated as a final proposal for the OA. It is intended to demonstrate one way in which the principles against which any application(s) will be assessed in terms of the distribution of open space could be delivered. The authorities feel that the approach that it shows ensures that open space is evenly distributed across the OA, meaning that almost all potential residential units can be within a 100m walk of an open space. It also has the potential to introduce open spaces that are more reminiscent of the pattern of open spaces that already exist in the surrounding area and therefore helps to integrate the OA into the existing urban fabric. Consolidating these well proportioned spaces into one larger open space may compromise the authorities’ aspirations to improve connectivity across the site (both north-south and east-west).

Change proposed. This Key Principle will be revised to read “High quality civic spaces should be well integrated into the proposed urban grain, especially in those locations that are expected to have high levels of movement and activity and appropriate ground floor land uses.”

No change necessary. The authorities feel that the 2ha requirement is sufficient to address the open space deficiency. However, it should be noted that 2ha alone would be very unlikely to meet all of the public open space requirements established in the SPD. For example, it is unlikely to ensure that all residential units are within a 100m walk of an open space and it is unlikely to provide 10sqm of publicly accessible green open space per child. Please note that paragraph 4.49 also makes it clear that the authorities will expect any proposal for a linear park to accommodate a wide range of functions, including full size sports pitches. This paragraph clearly states that land take greater than 2ha may be required to achieve this.

No change necessary. The SPD should not shy away from recommending well over 2 hectares as necessary to contribute towards making good the deficiency in the wider neighbourhood and that this should be the north-south linear park with one or more widened portions suitable for the variety of uses suggested in paras 4.46 onwards.

No change necessary. This paragraph clearly refers to civic spaces and not all open spaces. The SPD should not shy away from recommending well over 2 hectares as necessary to contribute towards making good the deficiency in the wider neighbourhood and that this should be the north-south linear park with one or more widened portions suitable for the variety of uses suggested in paras 4.46 onwards.

The density of housing and the proposed heights and bulk of the new built environment is totally unacceptable in so far as it dwarfs the Victorian residential area that surrounds it. It will destroy the skyline forever. LBHKF have wisely decided a proposed development on King St, one nowhere near as ambitious as this, would wreck the Hammersmith skyline and are rethinking that. The same must happen here. Buildings looming over listed Brompton Cemetery will wreck that valuable asset and space for reflection too.

The height of the buildings should be no greater than the existing terraces on its perimeter.

No change necessary. This would be far too prescriptive a stipulation to put in a strategic planning framework like the SPD. Furthermore, it would not reflect the urban character of the existing urban context. Along with the terraces there are also mansion blocks which are significantly taller, but of no less value in townscape terms. The SPD establishes sufficient parameters against which the heights proposed by any planning application(s) will be assessed. For example, the section on Skyline seeks to ensure that new buildings visible on the skyline would be made as tall as such buildings already exist, so as not to dominate existing views.
A few years ago K&C argued that penthouses were unacceptable additions to Kensington Mansions as it would make the buildings too tall. What is proposed is much much taller as to be grotesque in its scale. Properties will be overlooked and privacy will be compromised. The height of The Empress State Building must be considered as an aberration, the exception to the rule, not some aspirational yardstick to be matched in height and bulk by new buildings.

The ratio of green space to urban is totally unsatisfactory and must be looked at again.

The whole development should be ringed by avenues of green space and trees capable of matching the height of the area's plane trees.

The project in its totality needs to be radically scaled down.

A few years ago K&C argued that penthouses were unacceptable additions to Kensington Mansions as it would make the buildings too tall. What is proposed is much much taller as to be grotesque in its scale. Properties will be overlooked and privacy will be compromised. The height of The Empress State Building must be considered as an aberration, the exception to the rule, not some aspirational yardstick to be matched in height and bulk by new buildings.

Concerns about the overlooking and privacy of existing properties are addressed in the Edges section. For example, Key Principle UF28 states that the "privacy, daylight and sunlight of all existing and future buildings must be respected". In terms of responding to the height and mass of the Empress State building, the SPD explicitly states in paragraph 4.59 that "the location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape."

No change necessary. The SPD makes no specific proposals for the quality of the proposed built environment. Instead it establishes a number of principles and objectives against which any application(s) for the site will be assessed. Each case will be judged on its own merits.

No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. There is nothing in the SPD that precludes trees of the same height as the area's existing plane trees. Indeed paragraph 4.109 notes that "all tree species selected for the new streets within the OA should be demonstrably similar to those found in the existing context" in order to help integrate the new development into its surroundings. Ringing the whole development in avenue width.

No change necessary. The SPD does not prescribe any specific heights, but in terms of building heights and mass can be found in the sections on Skyline, Edges and Streets. In response to your specific concerns about the impact on the skyline, one of the Key Objectives of the SPD is to "ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape". Brompton Cemetery is specifically referenced in Key Principle UF15, which expects any application(s) to preserve or enhance the character, appearance and setting of it and its listed buildings. Furthermore, Key Principle UF21 expects any application(s) to demonstrate that there will be no negative impacts on any of the views in the Townscape and Visual Analysis SPD. In brief, they establish requirements for a 2 ha local park, for all existing residents and making the development less appealing to future residents. Proposed buildings adjacent to Eardley Crescent and Philbeach Gardens are too close and too high and will lead to overlooking and loss of privacy for existing residents.

No change necessary. The authors consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all
surrounding development. Adequate green space and recreational facilities are vital for the physical and psychological health of the populous and this development is a superb opportunity to improve the area for generations to come. More green space could be achieved by reducing the density of the development which is preferable for the reasons given above.

Residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4.5

RBK&C amended their Core Strategy policy CT1 following an appeal and hearing at the Planning Inquiry and a new section was added:

'g.) require improvements to the walking and cycling environment, including securing pedestrian and cycle links through new developments.'

At P.195 of JSPD the Infrastructure and Planning Obligations reads:

'p.) improved pedestrian links from and through the site and the surrounding area to public transport facilities and improved cycle links to enhance north/south cycle accessibility.'

If bridges rather than decking over the railway cutting are the final planning outcome that will not impede west-east cycle routes, but might do away with the north-south route over RBKC land, does this not undermine the projected relief of traffic on ECOWS?

In the plans it is indicated that the Linear Park would be tree-lined, but there are precedents in LBHF where this kind of recommendation within planning applications have been overturned by Network Rail, due to fear of leaves on the tracks. Therefore are trees deliverable?

No change necessary. The plans in the SPD are based on a scheme that decks over the railway line to create a linear park. Therefore, there would be no danger of leaves falling onto the track. However, it should be noted that these plans are illustrative only and should therefore not be treated as proposals for the OA.

No change necessary. The aspiration to achieve north-south connectivity is established in a completely separate Key Principle (UF1). It has nothing to do with the delivery of a linear park, or indeed any open space. Whatever arrangement of open space is proposed, any application(s) will be expected to deliver north-south connectivity as well. Any application(s) will also be subject to the Key Principles in the Transport Chapter.

No change necessary. The Urban Grain and Connectivity section of the Urban Form chapter is intended to set a framework against the design and layout of new streets can be assessed. The aspiration behind these Key Principles is to overcome existing severance in a manner which ensures that the masterplan physically integrates well into its urban context. Key Principle UF3 states that the pattern of new streets should be inspired by the street types identified in the surrounding context. This will be amended to make it clear that the new urban grain should be inspired by both street types and street patterns. In the supporting text it is suggested that this may result in a pattern that includes direct east-west connections and more broken up north-south connections. However, this does not necessarily mean that this is the only approach to a north-south connection that would be appropriate. Development will also be expected to meet the requirements set out in the Transport Chapter. It should be noted that the d

Correction required: Fig 4:1 does not indicate the Philbeach Garden Enclosure.

Fig. 4:1 indicates that a staggered north-south route through the site is being proposed, and this will reduce the efficacy of the route within the site to effectively reduce the north-south traffic on the Warwick Road. See note on north-south Bike path above.

The two roads that will echo the crescents should be for access to residential properties and not as main routes to serve the site.

No change necessary. As established in the Transport Chapter (paragraph 10.68) the SPD does not seek to achieve significant reductions in the traffic on the Earls...
plus be a relief route for the Warwick Road.

Court One Way System (which includes Warwick Road). An assessment of the potential for using a new north-south route within the site to relieve the Earl’s Court One Way System of through traffic was undertaken. This found that a north-south route could reduce traffic on Warwick Road by up to 18% and on Earl's Court Road by up to 10%. However, in order to achieve this, traffic would be diverted along Old Brompton Road and Lillie Road where traffic levels would more than double in the PM peak hour. Accommodating this traffic would require a major new junction on Lillie Road as well as probable road widening along Lillie Road that could not be constructed without third party land acquisition. Furthermore, the Transport Chapter also establishes the need to minimise the impact of freight (Key Principle TRN28), including an on site local delivery centre.

Urban Grain and Connectivity

4.25 It is essential that there is sufficient green space at the centre of the new garden squares that permit sufficient daylight to permit good grass growth, be attractive and increase security and reduce 'Enclosure'. The heights of the proposed garden square buildings, as they appear within the JSPD, will reduce daylight and create 'Enclosure'. No change necessary. The importance of not overshadowing or over-enclosing open spaces is established in a number of places in the SPD. For example, in paragraph 4.26 it is established that mature trees should not leave open spaces dark or overshadowed, Key Principle UF25 and paragraph 4.76 establish that any application(s) should indicate how their impact on overshadowing of surrounding open spaces will be mitigated and paragraphs 4.95 to 4.97 establish what is considered appropriate enclosure of open spaces. It should be noted that a certain level of 'enclosure' is desirable to create a successful sense of place around open spaces.

Key Principle UF8

The proposal of the Linear Park has been central to the provision of active open space for any development on this site; the introduction of the concept of a series of bridges will not only disrupt the Linear Park for recreational purposes but also undermine the north-south cycle routes. Any decision to discount decking should be based on technical feasibility and not on financial viability. No change necessary. The idea of a series of bridges over the railway lines is suggested for circumstances in which decking over the entire railway line is not viable. If this is the case, the linear park would not be created at all, but the 2ha local park would still be expected. Any applicant(s) would be expected to demonstrate that it could be provided in another form elsewhere within the OA. As noted in paragraph 4.50, locating open spaces next to uncovered railway lines may result in unacceptable noise levels and risks to personal safety and should therefore be avoided. Please note that the linear park is only a suggestion in the SPD. The authorities feel that it could achieve a number of their aspirations for the site, but the SPD does not preclude other forms of open space from coming forward.

Para 4.25

Argue for decking:

1. reduced noise to Philbeach and Eardley Crescent residents and the new-build behind them.
2. It can and should be done to eliminate vibration to proximate housing
3. the biodiversity of the green N-S corridor the length of the borough is enhanced 4. it will also provide a safe link in the north south cycle route from the Grand Union canal to the Thames.

The tangible link with the Counter's Creek sewer and sections of fragmented exposed railway line to exude noise is unproven. No change necessary. Many of the advantages of a linear park approach are noted in the SPD (paragraph 4.46). However, it would be too prescriptive for the SPD to state that this must be delivered. Instead, the SPD sets out expectations for the quantum and distribution of open space (Key Principles UF12 to UF14), but does not specify the form that this should take.
4.35 The A4 has a hostile pedestrian environment and no provision for safe cycling. It is hard to see this being achieved due to the increased volume and speed of traffic along this route. The problem is the Key Principle UF9 only refers to pedestrians, but there is room for a safe east-west cycle path within the planning but 4.36 only mentions pedestrians. Picture in Fig 4.9 even shows the space for it and the path the pedestrian should have been walking on. No change necessary. The SPD requires improvements to the pedestrian environment along the A4. However, it is potentially unsuitable as a cycle route and therefore, there is no specific requirement to accommodate cyclists in this location. However, as with the entire OA, any application(s) will be expected to identify cycle routes based on the likely origin and destination of trips through the area and fund appropriate improvements to make these routes as attractive and convenient as possible (paragraph 10.28 in the Transport chapter).

Public Open Space

There is a deficit of public open space within the Earl’s Court Ward, and a loss of public open space if the West Kensington and Gibbs Green Estates are demolished. There is a real need to have sufficient provision of open space for residential and child use in this densely populated area of London. The Earl’s Court Society, in its submission to the Outline Planning Application, has suggested that some of the space is amalgamated so that there is a 6-hectare park, which would become a central part of the development area, and promote healthy living and community, as well as child play spaces for different ages in close proximity to one another so mothers with different age ranged children can permit their children to play safely and under their supervision. This is a better option than segmented areas of open space adding up to the 2-hectares option 4.46. The park would also provide for a ‘Green Lung’ and mitigate urban heat island effects (London Plan 2011 Policy 5.9 Overheating and Co

No change necessary. The SPD identifies the public open space deficiency in the area as well as the limited existing play provision (see paragraphs 2.30 to 2.32 in the Site Context Chapter). This has informed the drafting of the Key Principles for the quantum and distribution of open space and play space set out in the Urban Form Chapter. The authorities consider these minimum standards, established in Key Principles UF12, UF13, UF14 and UF15 to be sufficient. They are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). It is important to note that the 2ha local park alone would be unlikely to meet all of these requirements - for example, it would be unlikely to ensure that all residential properties are within a 100m walk of a public open space (UF13) and depending on child yield calculations would be unlikely to provide 10 sqm of public green open space per child. The Energy Strategy sets out approaches to mitigate the urban heat island effect through

4.38 The sites of Nature Conservation alongside the eastern West Brompton station platform needs not only to preserved but a management plan put in place to maintain this wetland environment and a green corridor connection north and south? TIL who owns the railway land that runs along RBKC’s western boundary could do more to provide both a connecting green corridor from Grand Union Canal to the Thames, and a north-south cycle route from Grand Union Canal to Thames. Key Principle ENV18 requires that the SNCI adjacent to West Brompton Station northbound platform is protected and enhanced. This is shown in figure 4.10 to be retained as a green corridor. Key Principle ENV19 requires major planning applications to be accompanied by an Ecological Impact Assessment that includes an ecological survey and ecological enhancement strategy and an ecological management plan will be required through s106. The SPD cannot require connections from the Thames to the Grand Union Canal as much of the land is outside of the OA boundary.

4.42 Open Square: ‘Introducing a welcoming sense of arrival and vibrant, lively public functions in this location with the emphasis being on external cultural events, this has to be revised, as otherwise there will be in-built issues of noise and nuisance for residents in Eardley Crescent and Philbeach Gardens. No change necessary. External events take place in numerous civic and public spaces across London without causing noise and nuisance. Any application(s) will be expected to demonstrate that the proposed mix of uses is appropriate and each case will be judged on its own merits in this regard.

4.45 SUDS strategy must be extended to paving and walkways as well as open areas. Rainwater run off is better controlled when there is soak through capacity on all hard surfaces. RBKC are currently dealing with this issue in a pilot in a Holland ward associated with Counter’s Creek, are there any results from this pilot? No change necessary. The specific requirements for SUDs in the OA are established in the Environmental Strategy. This includes a list of measures that could be incorporated, including permeable and semi-permeable surface materials (including materials used for pavements, driveways and highway construction) and drainage channels. The SUD pilot schemes in RBKC are yet to be installed, so findings are not yet available.

4.46 It is important that there is sufficient space on either side of the Linear Park, since with tall buildings this could lead to loss of daylight through overshadowing. There needs to be a reasonable width to the Linear Park to enable it to function for its multi-uses. 2-hectares is too small an open space for the size of this building heights in relation to any open space in the OA is established in paragraphs 4.95 to 4.97. The need for the linear park, should this approach be taken, to be wide enough to accommodate multi-uses is established in paragraph.
4.49 This statement is very important to ensure that the “publicly accessible local park of at least 2-hectacres” does not end up as a “string of beads” on a bare 2-hectares of the site. As to be considered is the potential for overshadowing of this open access area, which given its 1 metre depth is likely to require constant maintenance and watering. No change necessary. Overshadowing of open spaces proposed for the OA is addressed in paragraphs 4.95 to 4.97 which set out appropriate enclosure ratios. Issues of maintenance are not addressed in the SPD, but any application(s) would be expected to include an open space maintenance strategy which would be secured through planning conditions or any section 106 agreement made between the authorities and any applicant.

4.50 This might result in unacceptable noise levels from uncovered railway lines impacting on existing residents? No change necessary. The impact of noise levels on existing residents is addressed in the Environment Chapter under Key Principle ENV17.

4.55 Specifications of size and play facilities have been given within the JSPD but there is a need for these facilities to be close to one another for the younger aged groups so that parents can supervise their children of different ages, and it is essential there are sufficient levels of daylight to make these sites attractive. No change necessary. The design of noise levels on existing residents is addressed in the Environment Chapter under Key Principle ENV17.

4.58 It is stated in the JSPD that the Development within the OA will create a new skyline, but this would appear to be contrary to the London Plan 2011, 7.25 (p. 218): “Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline” and London Plan 2011 D. (p 219) ‘Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail’. These are particularly relevant in relation to the sensitive Brompton Cemetery, which has one of the few ‘panoramic’ skylines left in this part of London. No change necessary. The desire to improve the enclosure to the Brompton Cemetery, or the surrounding Conservation Areas. It should be noted that “enclosure” is not the same thing as “crowding”. A certain degree of enclosure is desirable to create successful places. Therefore, although enclosure is desired, any application(s) will also be assessed to ensure that there are no negative impacts on the cemetery (paragraph 4.61 and Key Principle UF21).

4.62 There is no desire to improve the enclosure, just the reverse. There should be no sense of enclosure to the Brompton Cemetery, or the surrounding Conservation Areas. No change necessary. The desire to improve the enclosure of the cemetery is established in the Brompton Cemetery Conservation Area Proposals Statement, dated 1999. The desire to improve enclosure does not contradict with Key Principles UF19 or UF20 as both require proposals to preserve or ENHANCE the settings of the conservation areas and Brompton Cemetery. It is considered that providing enclosure on the western boundary of the cemetery will enhance its setting. It should be noted that “enclosure” is not the same thing as “crowding”. A certain degree of enclosure is desirable to create successful places. Therefore, although enclosure is desired, any application(s) will also be assessed to ensure that there are no negative impacts on the cemetery (paragraph 4.61 and Key Principle UF21).
886 Cllr Linda Wade 04 Figure 4.20

Edges
Fig. 4.20 It is essential that there is provision of new private rear gardens (back-to-back), and that the different topographical levels are considered, so that there will be no ‘boom’ box effect on the proximate existing houses on Philbeach Gardens and Eardley Crescent. See 4.86 comment below on back-to-back gardens.

Noted. This is what the annotations on figure 4.20 describe. Furthermore, the importance of back to back gardens are established in paragraph 4.86 which supports Key Principle UF29.

887 Cllr Linda Wade 04 Figure 4.20

Also of concern is the indication that North End Road market might be relocated onto the south-east section of the site.

Noted. This is what the annotations on figure 4.20 describe. Furthermore, the importance of back to back gardens are established in paragraph 4.86 which supports Key Principle RS8 which states that "any application for comprehensive redevelopment of the OA should allocate land, with a North End Road address, for the potential relocation of the North End Road market".

888 Cllr Linda Wade 04 Key Principle UF25

Key Principle UF25... that there should be zero interference

Noted. The Key Principle requires any application(s) to demonstrate how interference will be mitigated.

889 Cllr Linda Wade 04 Para 4.79

4.79 On the eastern edge of the OA, the terraces of Philbeach Gardens and Eardley Crescent exhibit consistent scale and building typologies, which are characteristic of much of the area further east. However, there are also a number of mansion blocks of a larger scale, which front Warwick Road. The majority of the buildings to the east of the OA are included within conservation areas.

Noted

890 Cllr Linda Wade 04 Para 4.79

4.80 There should also be consideration for the same building materials and heights to be used within the development, when adjacent to existing Conservation Areas. The large-scale use of stone/reconstituted stone, unless maintained tends to discolour with pollution and brick/stucco would be more in keeping with the existing architecture.

No change necessary. The use of materials is considered to be too detailed an issue for inclusion in a strategic framework document like the SPD. Each application that is submitted will be assessed on its own merit in this regard.

891 Cllr Linda Wade 04 Para 4.80

4.80 There should also be consideration for the same building materials and heights to be used within the development, when adjacent to existing Conservation Areas. The large-scale use of stone/reconstituted stone, unless maintained tends to discolour with pollution and brick/stucco would be more in keeping with the existing architecture.

Change proposed. In terms of figure 4.20, there are a number of green spaces shown on the drawing that, as the key suggests, could be either private or communal gardens within new urban blocks. The annotation that you refer to relates specifically to the condition to the rear of Philbeach Gardens and Eardley Crescent where only private rear 'back-to-back' gardens will be appropriate. Figure 4.25 shows a new urban block with a large amount of green space in the centre that is annotated as 'PRIVATE'. This would be either private rear gardens or communal gardens. In order to clarify this further annotations will be added to the drawing.

892 Cllr Linda Wade 04 Para 4.86

4.86 Fig 4.20 has a key and an annotation in conflict. The key states the same as 4.86, but the annotation refers only to rear gardens. The drawing at Figure 4.25 does not make this clear either because there are no rear gardens or communal space in this urban block.

Change proposed. In terms of figure 4.20, there are a number of green spaces shown on the drawing that, as the key suggests, could be either private or communal gardens within new urban blocks. The annotation that you refer to relates specifically to the condition to the rear of Philbeach Gardens and Eardley Crescent where only private rear 'back-to-back' gardens will be appropriate. Figure 4.25 shows a new urban block with a large amount of green space in the centre that is annotated as 'PRIVATE'. This would be either private rear gardens or communal gardens. In order to clarify this further annotations will be added to the drawing.

893 Cllr Linda Wade 04 Key Principle UF29

Key Principle UF29... that there should be zero interference

Noted. The Key Principle requires any application(s) to demonstrate how interference will be mitigated.

894 Cllr Linda Wade 04 Para 4.112 Streets

No change necessary. The importance of the wider cycle network is considered in
### 4.112
In order to encourage cycling, there has to be thought given for the roads immediately outside the area of the development, and include Bike Lanes on Warwick, Lillie/Old Brompton, North End and Old Brompton Roads. There should be an additional point about safe through routes north-south and west-east. The current wording only addresses cycling in relation to the area as a destination not as part of the whole fabric of West London.

The Transport Chapter. For example, Key Principle TRN8 requires new development to "deliver improved onward connections for cyclists into the streets surrounding the OA".

### 4.113
Instead of introducing visually intrusive traffic calming measures, such as speed humps or chicanes...new streets should be designed... to control vehicle speeds. This on the main north-south route will make it less attractive to drivers, and serve only to protect residents in the development area rather than contribute to a traffic reduction on Warwick, North End and Earl's Court Roads.

No change necessary. As established in the Transport Chapter, paragraph 10.68, "This SPD does not seek to achieve significant reductions in traffic on the Earl's Court One Way System via new north-south routes through the OA". It is therefore more important for the design of all streets in the OA to control vehicle speeds and prioritise pedestrians and cyclists rather than attract motorists.

### Change proposed.
Reference to sequential phases will be replaced with "illustrative development parcels" that could, theoretically, be delivered in any order. However, as identified in paragraph 4.46, one of the major advantages of a linear park is the ability to ensure that any development can provide diverse public green space in every phase. In light of this, you will note that the linear park is actually delivered incrementally from the earliest phases to the latest, increasing as the population increases. This is in line with Key Principle UF17 which requires a phasing strategy that demonstrates how all of the public, green, open space requirements will be met to be submitted with any application(s). This will be expected to demonstrate that open space will be delivered incrementally, so that each phase has proportionate public green open space to accommodate the increase in living and working populations. This will be restated in the text that accompanies the "illustrative development parcels".

### Key Principle UF12
A 2 hectare local park is welcome, but small. The Earls Court ward has virtually no public green space and none that can be regarded as playable for children and young people. This is even more important when one considers the number of children living in overcrowded accommodation.

A lot of existing green space is private and there is a need to open up the garden squares; some local residents report having to go to Hyde Park. More publicly accessible green space is needed within the area of benefit and there is a London Plan requirement that play space is provided within 100 metres of all residential properties.

No change necessary. The local deficiency of open space and the limited play space facilities are identified in the SPD (see paragraphs 2.30 to 2.32). These have informed the production of the Public Open Space section of the Urban Form chapter. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space (as you reference in your comment), for 10sqm of public green open space per child and for 10 sqm of dedicated play space per child. Please note that a 2ha park alone would be unlikely to meet all of these requirements. It is beyond the scope of the

### Key Principle UF16
Youth facilities for young people (as required by London Plan policy 3.6 and paragraph 3.40) need to be added to the policy. The text should include a schedule showing the existing severe lack of youth

Change proposed. "Youth space" will be added to Key Principle SC6 which can be found under the heading Community Space, in the chapter of the SPD that deals with Social and Community Facilities.
facilities. Current youth clubs have inadequate opening times and the Feathers youth club closed.

The change we are seeking is for the addition of:-

**Appropriate provision will include youth facilities and youth space, where young people can hang out and take part in informal activity** (as defined in the London Plan Providing for Children and Young People’s Play and Informal Recreation SPG).

GREEN SPACE - There is still insufficient green space proposed in the SPD for families, communities and visitors. The elderly, children, local wildlife and pets will also suffer unless a proper, large park is created to accommodate the needs of one and all.

**HEIGHT, DENSITY, MASS and MATERIALS** - The visual impact of such intensive development would affect the quality of life by destroying the skyline, especially surrounding the Grade 2 Brompton Cemetery. Outlook will be reduced, light will be blocked into many homes and streets and Conservation areas will be dwarfed. More thought needs to be put into the issues of height, mass and building materials allowed and how they are allowed to be used/implemented.

**No change necessary.** The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, or 10sqm of public green open space per child and for 10 sqm of dedicated play space per child.

**GREEN SPACE** - There is still insufficient green space proposed in the SPD for families, communities and visitors. The elderly, children, local wildlife and pets will also suffer unless a proper, large park is created to accommodate the needs of one and all.

Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to address the visual impact of any new development. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis Supporting Evidence Document. The Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). Key Principle UF28 requires that the

**HEIGHT, DENSITY, MASS and MATERIALS** - The visual impact of such intensive development would affect the quality of life by destroying the skyline, especially surrounding the Grade 2 Brompton Cemetery. Outlook will be reduced, light will be blocked into many homes and streets and Conservation areas will be dwarfed. More thought needs to be put into the issues of height, mass and building materials allowed and how they are allowed to be used/implemented.

**No change necessary.** The SPD does not address architectural style or quality as these issues are considered too detailed and prescriptive for a strategic planning framework. Any application(s) will be assessed on their own merits in this regard.

**HEIGH**T, **DEN**SITY, **MASS** and **MATERIALS** - The visual impact of such intensive development would affect the quality of life by destroying the skyline, especially surrounding the Grade 2 Brompton Cemetery. Outlook will be reduced, light will be blocked into many homes and streets and Conservation areas will be dwarfed. More thought needs to be put into the issues of height, mass and building materials allowed and how they are allowed to be used/implemented.

**No change necessary.** The SPD requires a 2ha local park in Key Principle UF12. It does not however require this to be delivered in any specific form or location. As paragraph 4.46 states, a linear park arrangement of contiguous public green open spaces is “encouraged”, but the SPD does not preclude the proposal of any other form of park that meets the criteria set out in Table 7.2 of the Mayor’s London Plan.

**MORE EMPHASIS SHOUL**D BE MADE IN THE SPD OF EXCELLENT ARCHITECTURE providing high quality housing which fits in with the surrounding area. There is no KO or KP about providing high quality architectural design in the OA.

**No change necessary.** The SPD does not address architectural style or quality as these issues are considered too detailed and prescriptive for a strategic planning framework. Any application(s) will be assessed on their own merits in this regard.

The SPD ought to address what alternatives there are if the decking over the tracks proves undeliverable i.e. that the developer will still be expected to provide alternative green open space.

**No change necessary.** The SPD requires the offer of a 2ha local park in Key Principle UF12. It does not however require this to be delivered in any specific form or location. As paragraph 4.46 states, a linear park arrangement of contiguous public green open spaces is “encouraged”, but the SPD does not preclude the proposal of any other form of park that meets the criteria set out in
1098 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 Pages 61 - 63 - Pg 61 - 63: The SPD is not clear how much of the public open space will be roads and pavements. No change necessary. Pages 61 to 63 address civic spaces and public, open, green spaces. They do not address roads and pavement at all. Therefore none of the quanta referred to will include roads or pavements.

1099 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 Pages 61 - 63 - Pg 61 - 63: RBKC is the one of the boroughs with the lowest amount of open space per population and the area is already deficient of public open space. The group wanted to ensure that any reference to ‘public open space’ was really public, rather than part of private back gardens? No change necessary. Public open space will be expected to be publicly accessible. Private rear gardens will not count.

1100 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 Pages 61 - 63 - Pg 61 - 63: The SPD needs to include a minimum width or enclosure ratio to be applied if a linear park is proposed. No change necessary. The appropriate enclosure ratios for all open spaces, reference to ‘public open space’ was really public, rather than part of the open space provision.

1101 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 Pages 61 - 63 - Pg 61 - 63: The SPD should be clear that roofs are not included as part of the open space provision. No change necessary. The public open space requirements will only be met by spaces that are publicly accessible. Roofs will therefore not be included.

1102 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 UF12 - UF12: It is not clear what is in table 7.2 of the Mayor of London’s Plan and this may change in future. This table should be replicated in the SPD, as done in tables 4.1 and 5.1. No change necessary. The SPD needs to include a minimum width or enclosure ratio to be applied if a linear park is proposed.

1103 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 UF12, UF14, UF15 - UF12, UF14 and UF15: The SPD is not clear how these principles apply to each other. Do all these Key Principles need to be provided, or does UF12 already include the provision of UF14 and UF15? No change necessary. SPDs can only supplement existing policy. Therefore, if the London Plan were to change this would have to be reflected in the ways in which the SPD is used to assess any proposal(s) for the OA.

1104 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 UF12, UF14, UF15 - UF16 and paragraph 4.56: These contradict each other. Paragraph 4.56 should be revised to require play provision for all ages in the contiguous open space. Proposed text change: “... contiguous large open space should provide play facilities for all ages including 12+” as it is otherwise hard for an adult to supervise children of mixed ages who are physically in different playgrounds. Change proposed. Text will be amended to refer to all age groups. Please note that the co-location of play facilities for different age groups to make it more practical for families to supervise is sought in Key Principle UF16.

1105 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 Para 4.56 - Paragraph 4.56: ‘pocket parks’ are not mentioned elsewhere in the text so this needs to change or requires explanation. Change proposed. Brief definition of pocket park to be included in paragraph 4.56.

1106 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 Para 4.75 - Paragraph 4.75: At the end of this paragraph, add ‘and should not have a detrimental effect’. Change proposed. Text added.

1107 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 UF26 - UF26 is too woolly and should expressly state that buildings adjacent to the crescents should be no higher than the existing buildings in the crescents. Propose change: “... be expected to [underline] be no higher than [end underline] and respect the scale” Change proposed. The Key Principle will be amended to read “all” existing and future buildings.

1108 Cllr J. Gardner RBKC Public Realm Scrutiny Committee 04 UF28 - UF28: This should apply to all buildings, not only those on the edges and should be added to the relevant KP elsewhere in the document. Change proposed. The section on Skyline has been written to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape and the section on Edges has been written to ensure that new buildings on the edges of the OA will be sensitively integrated into and enhance the surrounding context.
Paragraph 4.91 states that "A general limit of one storey above shoulder height will be expected across the OA," so why does figure 4.26 on the very next page show a shoulder height of two storeys? Developers will build up to maximum shown, which is two storeys. To avoid confusion this diagram should only show shoulder heights of one storey. Paragraph 4.91 should be revised to read: "A limit of one storey above shoulder height will be expected across the OA" and the final sentence in this paragraph should be deleted.

Change proposed. Please note that the diagrams on page 73 are illustrations only and should not be treated as proposals for the OA. This will be made clearer in the caption. The illustration in figure 4.26 demonstrates a situation in which two storeys above shoulder height could be acceptable. The street is wide and supports a mix of uses. As a result of the width of the street, the second storey above shoulder height does not add to the visual impact of the building on the public realm. The final sentence in this paragraph cannot be removed because it ensures the level of flexibility that is required in the SPD.

Banham supports the key objectives within Chapter 4 Urban Form Strategy of establishing an urban grain inspired by the surrounding pattern of streets and spaces, maximising connectivity, providing good quality public open space, ensuring that buildings on the edge are sensitively integrated, that no new buildings visible on the skyline have a negative impact on the character of the townscape and to design well proportioned streets that respond to those in the surrounding area.

Change proposed. The dotted lines referred to will be removed from the figures listed.

However, the previous version of the Earl's Court and West Kensington Opportunity Area Draft Joint Supplementary Planning Document First Draft for Consultation published in March 2005 was noted for its good quality public open space, ensuring that buildings on the edge are sensitively integrated, that no new buildings visible on the skyline have a negative impact on the character of the townscape and to design well proportioned streets that respond to those in the surrounding area.

No change necessary. It was decided when redrafting the SPD for this second consultation that specifying the location of potential landmarks is too prescriptive and unnecessarily lengthens the document. Therefore, the plan that you refer to...
2011 included a plan of moving around (Figure 4.16 in the First Draft) which highlighted the Banham site as a location for a landmark building to identify the important corner of Lillie Road and Seagrave Road. This was also supported by the potential urban form and edges plan (Figure 4.22 in the First Draft) which highlighted the corner of Lillie Road and Seagrave Road as frontage onto important edges. As Lillie Road is identified as a Primary Street through the area and Seagrave Road a Secondary Street (Figure 4.2), and that Seagrave Road is the main route to the large car park site identified for high density redevelopment, it is felt that the Banham site remains an important corner in the townscape of the area and should be identified for a landmark building to enhance legibility and moving around in the final document.

2. The height of some of the buildings proposed for the new development is simply too great for this residential area, which has an overall low roof-line. We all know of developments with towering monstrosities in the middle of them which are subsequently torn down, so great are the complaints about them. And then in their place are created the kind of low-level community houses which residents in the area wanted in the first place. Please don't allow the developers get away with this.

3. The site is large, but I don't see enough green space for either recreational or general community use. Such space is essential for the well being of residents of all ages and, given our increasingly aging population, especially important as a place where the elderly can take light exercise and meet their friends for a chat on the park benches.

The Earls Court Ward in Kensington and Chelsea has virtually no public open space and certainly no open space that can be regarded as 'playable' for children and young people. There are several private garden squares that are only accessible to the immediate residents that are key holders.

Beyond Earls Court Ward, for children 0-5 years of age there is only one play space within a one mile radius at Redcliffe Square. There is a small playground for over 5s in Field Road which is half a mile from the Southern boundary of Earls Court Ward.

No change necessary. The SPD does not specify any building heights but rather establishes a framework of Key Principles and Key Objectives against which the heights proposed in any application(s) will be assessed. Most significant in terms of scale are Key Principles UF19 and UF20 which require the preservation or enhancement of surrounding conservation areas (including Brompton Cemetery, Key Principle UF21 which requires applications to demonstrate that they will have no negative impact on any of the views in the Townscape and Visual Analysis, Key Principle UF26 which requires the height and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings and Key Principle UF31 which requires the widths of streets to be proportional to the heights of the buildings that frame them (in a manner which responds to the existing streets in the surrounding area).
There is a lack of available land in the local area to develop new play and open space. Many children and their families live in overcrowded accommodation and houses in multiple occupation. The lack of play space in the wider area emphasises the vital importance of the provision of ‘playable’ space within the new development.

The RBKC Play Partnership welcomes the Key Objective in the OA of good quality play and open space. The Partnership is committed to working to

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<th>1173</th>
<th>Paul</th>
<th>Williamso n</th>
<th>RBKC Play Partnership</th>
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<td>There are several Super Output Areas in the 20% most disadvantaged that are adjacent to the OA site. These are located in Earls Court and to the north of the site in Abingdon Ward.</td>
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<td>When considering the location of play space within the OA good access for residents of these areas will be essential. We would like to see safe and good quality access points from the north and east of the site. The space should be designed to welcome children and young people and provide clear ‘routes to play and recreation’</td>
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<td>The new 2 hectare linear park can be a very valuable resource for the area. We welcome the commitment to a variety of play spaces within this area, emphasising natural play features, play trails, and landscaping that encourages a variety of challenging play environments. The park is large enough to accommodate different types of play for all ages. Providing for the 5-14 age range is crucial and is well reflected in Key Principles UF13-16.</td>
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<td>We have concerns that there is no play space designated close to the Earls Court Station boundary. This appears to contradict the requirement for play space within 100m of all residential properties. There is a requirement to create play features and ‘playable’ space within the civic space at the Earls Court entrance to the OA, especially for younger children. Otherwise, the concentrated private residential development in this part of the site could act as a barrier to the new linear park. The design and layout of the residential buildings at the east of site must encourage the public to access the linear park. A strong commitment to public access is particularly important at this location.</td>
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<td>There appear to be a number of east-west transport links that may interrupt the continuity of the linear park, plus a proposal to accommodate a north-south cycle route and/or pedestrian route within it. This could result in a number of quite small disconnected green spaces. This would restrict the potential for informal and formal sports activities and limit the scope for combining toddler play areas with adventure play areas for the 5-14 age group. To a certain extent, these restrictions could be overcome by extending the park vertically, with rope bridges and adventurous walkways spanning the cross-routes. The Play Partnership would like to see greater</td>
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<td>Paul</td>
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<td>No change necessary. Any proposal(s) for the OA will be expected to balance the authorities’ aspirations for connectivity across the site with the need for sufficient public open space. Paragraph 4.49 states that “any proposal for a ‘linear park’ must include public green open spaces that are wide enough to accommodate a range of functions, including full size games courts and sports pitches. It is therefore possible that if a proposal comes forward including a linear park, land take greater than 2ha will be required in order to ensure the park is fully functional”.</td>
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<td>1178</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership 04</td>
<td>recognition of the need for larger uninterrupted sports/play areas. One opportunity for off-site investment is the playground at St Cuthbert with St Matthias Primary School. Creating a more accessible supervised evening and weekend play facility at this site would be of major benefit to the Earls Court population and reduce some pressure on the new play spaces within the OA area. It could also help to meet the requirement of play space within 100 metres of all residential properties. This proposal would require detailed consultation with the school community.</td>
<td>No change necessary. Given the size of the OA, it will be expected that all the requirements for play facilities will be met on site. Any Section 106 agreement will only be expected to provide facilities to meet the needs arising from the development. Given the distance between the OA and St Cuthbert with St Matthias Primary School it is unlikely that it could contribute to meeting any need that arises from the development.</td>
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<td>1179</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership 04</td>
<td>The new public squares to the south and west of the site provide excellent opportunities for other play and open space installations. Local play spaces will reflect the increased population and contribute to the realisations of Key Principles UF14 and 15.</td>
<td>Noted. Please note that the masterplan images within the SPD are illustrative only and should not be treated as proposals for the OA.</td>
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<td>1180</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership 04</td>
<td>The provision of sports and games courts is important and will increase access to play opportunities. As well locating these in the new public spaces, thought should be given to public access to any schools facilities that are built on or near the site.</td>
<td>Noted. Sports and Leisure provision is addressed in Chapter 09 of the SPD (Social and Community Facilities). Key Principle SC3 seeks &quot;a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population&quot;. This Key Principle also establishes that a proportion of affordable sports provision will be secured and that the facilities provided should target existing deficiencies, particularly multi-use outdoor pitches and indoor multi-use sports courts.</td>
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<td>1181</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership 04</td>
<td>It is the view of the RBKC Play Partnership that a challenging adventurous play space should be provided in the new linear park. The space should allow for the provision of supervised activities at certain times throughout the year. This will enable Community Safety officers and play workers to engage with local children and young people. Evidence from similar facilities demonstrates how they can reduce anti-social behaviour and enhance the civic responsibility of children and young people. The space should be accessible on a non-supervised basis, but flexible enough to support organised games and play activities. This type of service will require a base for play workers and/or play rangers to operate from. The base could be part of a community facility within or close to the new park. It could link to a nearby drop-in facility for under 5s to provide play transition for this age group.</td>
<td>Noted.</td>
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<td>1182</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership 04</td>
<td>Consideration should be given to the best model to support the community participation of children, young people and families. Involving children and young people in the design of the new space will enhance this approach from the outset and create a greater sense of local ownership.</td>
<td>Noted.</td>
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<tr>
<td>1183</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership 04</td>
<td>All play spaces should be designed with safety in mind, but they should also offer a reasonable level of adventurous and risky play. Good spaces for parental and community supervision is important, but should not inhibit the use of space by older children.</td>
<td>Noted.</td>
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<td>1184</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership 04</td>
<td>Safe routes into play spaces will encourage children and young people to attend and reduce the likelihood of anti-social behaviour. This needs to be considered in relation to the very busy existing streets adjoining the OA area and in the design of the proposed streetscape and civic space within the site.</td>
<td>Noted. The SPD seeks to achieve safe streets that prioritise the pedestrian. For example, Key Principle UF36 seeks a holistic approach to design that creates streets that are places where people will want to linger and that encourage pedestrians and cyclists. Paragraph 4.111 goes on to list a number of ways in which walking could be encouraged on streets in the OA. Key Principle UF37 seeks to ensure that streets within the OA are designed to keep vehicle speeds under 20mph, which will contribute greatly to pedestrian safety. In the Transport Chapter. Key Principle TRN4 seeks streets that are accessible to all with</td>
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<td>1185</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership</td>
<td>04</td>
<td>The Play Partnership is delighted that a Play Strategy is a requirement of any planning application. We would welcome a specific consultation with children and young people about this aspect of the proposals. Noted.</td>
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<td>1186</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership</td>
<td>04</td>
<td>The Play Strategy should set out a commitment to high quality play and demonstrate how the principles within the OA will be met. It should demonstrate how the developers will engage with local partners in the design and future maintenance of play spaces. Noted.</td>
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<td>1187</td>
<td>Paul Williamson</td>
<td>RBKC Play Partnership</td>
<td>04</td>
<td>As a local authority Play Pathfinder area, the Royal Borough of Kensington and Chelsea has gained considerable expertise in the creation of new play spaces. Well over 30 new play spaces have been designed and delivered in the past 4 years, including two new adventure playgrounds. Children and young people have been heavily involved in the design and monitoring of the new play spaces. There is a great opportunity to use this learning to support the design and sustainability of play in the OA area. The OA developments can incorporate the design of new play features, including ecological features, water play, bridges, and sculptures. Where appropriate, this approach can encourage inter-generational initiatives using older volunteers. Examples might be the regular planting of play features by adults and children, recycling projects using materials for play such as rubber, wood and bark, and ecological projects that safeguard the environment. Noted.</td>
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<td>1196</td>
<td>Paul Morice</td>
<td>04</td>
<td>There is insufficient green space in the proposed SPD for community, recreational use and also for environmental reasons. A particularly important example of this is the narrowness of the Lost River space covering the overground railway between Kensington Olympia and West Brompton stations. The plans still show high rise residential developments immediately on either side of it. The width of this particular space will need to be increased by at least three times its size as currently shown on the plans to reduce the effect of the vibration of the 'overground trains' passing through the concrete tunnels which are being proposed to accommodate them a metre or appropriate gradients, generous footways and accessible crossing facilities. Key Principle TRN6 seeks funding for environmental improvements and the delivery of wider, clearer footways on the existing streets surrounding the OA. TRN7 seeks new pedestrian crossings and improvements to existing crossings in order to significantly improve the pedestrian environment and access into and out of the OA. No change necessary. The authorities consider the minimum standards for the quantum of public open space sought in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space sought in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they seek a 2 ha offer of a local park, all residential units to be within 100m walking distance of a public green open space, 10 sqm of public green open space per child and 10 sqm of dedicated play space per child. The SPD does not propose any heights of development, but seeks to establish a framework against which the scale and massing of any application(s) could be assessed. This is established through Key Objectives and Key Principles on Skyline, Edges and...</td>
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<td>David Trodden</td>
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<td><strong>4) Design and Architecture</strong></td>
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<td>The lead architect talked of the whole development being reflective of the architectural heritage of the garden squares and streets of RBKC. He carried on in a similarly splendid vein, I was eager to see their designs. A few days earlier I had the pleasure to receive a presentation from another British firm of architects who had been responsible for the development of a large area of East Calgary, Canada and there I heard great designs talked of and delivered. When I saw the details of the proposed development for this Opportunity Area I was truly disappointed. There are none of the grand proportions and lines, the large open squares of Earls Court it was all rhetoric. The whole development is mediocre and never likely to be a Conservation area.</td>
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<td>The design and architecture should be required to be outstanding and worthy of being part of a Conservation area.</td>
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<td>No change necessary. This comment refers to a specific planning application. It would not be appropriate to comment on a specific application as part of this consultation on the SPD.</td>
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<td>Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis. The Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). Similarly the section on streets is intended to</td>
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<td>The heights, densities and the use of materials must link in with the communities they are adjacent to.</td>
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<td>No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to demonstrate that their proposals will have no negative impacts on the views identified by the authorities that can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.</td>
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<td>The development will irrevocably destroy the local skyline. There will not be many places in Earl’s Court that this will not affect, and the most to suffer will be the listed Brompton Cemetery.</td>
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<td>Change proposed. The SPD was informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis. The Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). Similarly the section on streets is intended to</td>
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<td>[bold] 48 Philbeach Gardens personal note [end bold]</td>
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<td>On a personal level when the architect talked about the development adjoining Philbeach Gardens he referred to Mews type development being consistent with the architecture to be found in RBKC at present. Certainly I feel that the proposed building very close to 48 Philbeach Gardens is not reminiscent of Mews in height nor style. We currently enjoy an open view across the proposed development area and glorious sunsets. I must request that the heights of the buildings are like Mews, i.e. only two floors, not overlooking us, respect our rights to a pleasant view and privacy.</td>
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<td>Noted. This comment refers to a specific planning application. It would not be appropriate to comment on a specific application as part of this consultation on the SPD.</td>
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<td>Amy Jones</td>
<td>Spen Hill</td>
<td>04</td>
<td>4.1</td>
<td>We also note that Figure 4.1 of the SPD consultation document highlights the [italics] &quot;potential to reuse the existing link to the Tesco store&quot; [end italic], this is not however an existing route, it is merely safeguarded.</td>
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<td>Hilary Mackay</td>
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<td>I see some merit in diagonal connections between Lilley Road/North End Road and Warwick Road/A4 and West Kensington tube to Warwick Road/Old Brompton Road corners.</td>
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<td>Hilary Mackay</td>
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<td>04</td>
<td>3.13</td>
<td>I was convinced that considered, intelligent, environmentally sensitive quality construction will mean more in the long term than quantitative measures of how many properties can be fitted on the OA and how many people can be cooped into the area.</td>
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<td>Hilary Mackay</td>
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<td>04</td>
<td>Key Principle UF28</td>
<td>I would only question why the redevelopment of the housing estates in what is currently 'phase 5' are left until last given that many residents will have presumably been relocated to the new properties built in 'phase 1'?</td>
</tr>
<tr>
<td>Alex Fraser</td>
<td></td>
<td>04</td>
<td>Phasing</td>
<td>Sections 4-117 to 4-120 show the Phasing of the development.</td>
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</tbody>
</table>
| Jenny Montefiore |           | 04   |          | GREEN SPACE - There is still insufficient green space proposed in the SPD for families, communities and visitors. The elderly, children, teenagers, and pets will also suffer unless a proper, large park is created to accommodate the needs of one and all. The Mayor's plans stipulated that the under fives much have easy access to outside play areas which is provided in the SDP but the over 5’s, and teens need green outside space, to run and use their imagination in play, playing fields are needed in the area. The Government has determined to cut obesity and improve the health and the wellbeing of the nation therefore adequate green space as well as inside affordable leisure facilities are needed. The Lost...
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<th>ID</th>
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<tr>
<td>1254</td>
<td>Jenny Montefiore</td>
<td>04</td>
<td>Creek, Linear Park is not going to provide the necessary space. We need plants, tree’s greenery too offset the pollution as well as enhance living, and street scenes, and if we were really visionary and looking to the future market gardens to grow vegetables and food. Facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an &quot;elite&quot; standard and for a community hub of need plants, tree’s greenery too offset the pollution as well as enhance living, and street scenes, and if we were really visionary and looking to the future market gardens to grow vegetables and food.</td>
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<tr>
<td>1260</td>
<td>Jenny Montefiore</td>
<td>04</td>
<td>HEIGHT, DENSITY, MASS and MATERIALS - The visual impact of such intensive development would affect the quality of life by destroying the skyline, especially surrounding the Grade 2 Brompton Cemetery. Outlook will be reduced, light will be blocked into many homes and streets and Conservation areas will be dwarfed. I am against the accepted notion that there should be any high rise buildings, near the Empress Building or anywhere on the site, creating a mini clusters and ruining the skyline and setting future precedents. More thought needs to be put into the issues of height, mass, density and building materials allowed and how they are allowed to be used/implemented. Change proposed. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to submit a set of verified views taken from points in the local area, identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in the Townscape and Visual Analysis SPD Supporting Evidence Document. Key Principle UF19 seeks to ensure that the character, appearance and setting of surrounding conservation areas and listed buildings are preserved or enhanced. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be recognised the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be</td>
</tr>
<tr>
<td>1261</td>
<td>Wanda Rostowska</td>
<td>04</td>
<td>I welcome the public square on the Warwick Road site and hopefully there will be outside café’s as well as public seating etc. and be an attractive place to meet for residents and visitors. Noted. Paragraph 4.40 seeks to ensure that there will be retail, café, culture and community uses on the ground floor around civic spaces.</td>
</tr>
<tr>
<td>1262</td>
<td>Wanda Rostowska</td>
<td>04</td>
<td>The scale and scope of this development is overwhelming. Your role as OUR representatives in balancing two conflicting interests: those of the residents who want minimal disruption and for development of our living space to be sensitive and organic, and those of the developers who obviously want a maximum return on their investment, is not going to be easy. I appreciate the fact that you are attempting to define some parameters and hope for these to be as robust as possible. Noted. The Key Objectives and Key Principles in the Skyline, Edges and Streets section of the Urban Form chapter all present a framework against which the heights of buildings proposed for the OA will be assessed. The authorities consider them to be robust.</td>
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<tr>
<td>1269</td>
<td>Wanda Rostowska</td>
<td>04</td>
<td>The A4 is an over-loaded highway already. The last thing it needs is creation of new roads within the OA - they obviously would be necessary to service dense development, but without that they are not missed. Four major roads suitably contain most of the OA with its present uses. No change necessary. The SPD seeks comprehensive redevelopment of the OA and this will require the appropriate infrastructure, including new roads, to accompany it.</td>
</tr>
<tr>
<td>1270</td>
<td>Wanda Rostowska</td>
<td>04</td>
<td>Noted. The aspiration of the authorities is to ensure that development integrates well into the existing urban context. Low rise development alone would not achieve this as there is a rich variety of building heights surrounding the OA. However, the SPD does put in place a number of Key Objectives and Key Principles that will be used as a framework against which the heights of any proposal(s) for the OA will be assessed. Please refer to the Skyline, Edges and Streets sections of the Urban Form Chapter.</td>
</tr>
<tr>
<td>1287</td>
<td>Ben Sawbridge</td>
<td>04</td>
<td>As a long term resident, while welcoming improvement to the area around the railway lines, I do want it to be - low rise - high rise 3 - REVISED SPD, page 69. KEY PRINCIPLE UF26. ‘expected to respect’ is too ambiguous and again, seems subjective. One man’s respect is not another’s. I suggest you say, new buildings should be, or even must be ‘in line with neighbouring buildings’. No change necessary. It is important that a strategic planning framework like the SPD contains a certain level of flexibility to ensure that innovative design solutions are not stifled.</td>
</tr>
<tr>
<td>1287</td>
<td>Ben Sawbridge</td>
<td>04</td>
<td>4 - REVISED SPD, page 70. 4-81, &quot;The Metropolitan Face&quot;. Not for us to dictate to developers at this stage, but again, height is an issue that should be nipped in the bud as early as possible. As we experienced with Cluny Mews and Tesco Tower, the macho tendencies of developers to go for tall buildings are evident. The reference to the Barons Court Conservation Area is good as these are low, beautifully elegant buildings. Please stress this more as the preferred model. No change necessary. Development along the ‘Metropolitan Face’ will be subject to the Key Principles and Key Objectives in the Skyline and Edges sections. Therefore, any application(s) will be expected to demonstrate that development in this location does not have any negative impacts on the quality and character of the surrounding townscape. This will be assessed through the requirement in Key Principle UF21 for any application(s) to demonstrate that the proposal(s) will have no negative impacts on any of the views that can be seen in the Townscape and Visual Analysis SPS Supporting Evidence document. The views that are particularly relevant to the ‘Metropolitan Face’ include 50, 51, 16, A148, 53, 54 and 14 (please note that the numbers allocated to these views may change in the final draft of the SPD).</td>
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<tr>
<td>1270</td>
<td>Wanda Rostowska</td>
<td>04</td>
<td>Para 4.81</td>
</tr>
<tr>
<td>1270</td>
<td>Wanda Rostowska</td>
<td>04</td>
<td>Key Principle UF26</td>
</tr>
<tr>
<td>1270</td>
<td>Wanda Rostowska</td>
<td>04</td>
<td>Para 4.81</td>
</tr>
</tbody>
</table>
The development will destroy the local skyline for all local residents. It will change the character of the listed Brompton Cemetery. No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to demonstrate that their proposals will have no negative impact on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.

I am also concerned that the proposed buildings will be out of character with the existing architecture. No change necessary. It is considered that the quality of architecture is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning application(s) are made.

Worrisome lack of contiguous and sustainable outdoor and family friendly recreational space. This is of particular concern as increase in population density likely to increase pressure on already sparse existing provisions. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an “elite” standard and for a community hub of 4.5 hectares.

The vast majority of planned dwelling and architecture in grass break with the adjacent Victorian architecture and its character. No change necessary. It is considered that materiality is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, materiality will be assessed on a case by case basis as and when any planning application(s) are made.

Building height particularly towards the Cromwell road end will over tower adjacent Philbeach Gardens buildings, reducing light, quality of living and privacy. No change necessary. The SPD does not propose any specific building heights. Instead, it establishes a framework of Key Objectives and Key Principles that the heights of any proposal(s) will be assessed against. These Key Principles and Key Objectives can be found in the Skyline, Edges and Streets sections of the Urban Form chapter. Of specific relevance to this comment is UF19, which seeks to ensure that the character, appearance and setting of surrounding conservation areas are preserved or enhanced. The existing properties in Philbeach Gardens are in a conservation area. Residential amenities like light, quality of living and privacy are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85.

It was felt that the heights, scale and massing indicated in the JSPD were still too large, and that the proposed heights would dominate the surrounding area. The rejection of the Penthouses at Kensington Mansions due to increased height has been cited as a precedent, as to what would be considered to be acceptable. The Empress State building is unique in the area and should not be used as a benchmark to permit taller buildings and the height lines of other buildings on the site should be the same and in keeping to the areas immediately adjacent. This JSPD would permit buildings routinely above the average of the houses in both Kensington and Chelsea, and Hammersmith and Fulham. No change necessary. The SPD does not propose any specific building heights but rather establishes a framework of Key Principles and Key Objectives against which the heights of any proposal(s) will be assessed. These Key Principles and Key Objectives can be found in the Skyline, Edges and Streets sections of the Urban Form chapter. It is acknowledged in paragraph 4.59 that "the location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape."

The quality of the built environment does not link-in with the surrounding areas, and needs to be of a high architectural quality. If the iconic Exhibition Centre is to be replaced, it should be replaced by a building that has equal iconic landmark status. No change necessary. It is considered that the quality and style of architecture is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning application(s) are made.
No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. The linear park is only suggested in the SPD as one effective way in which the 2ha local park could be achieved. The SPD does not require the railway line to be decked over completely. As stated in Key Principle UF8, if this proves not to be viable, a series of bridges (that achieve the desired connectivity) could be acceptable. If a series of bridges were proposed, the 2ha

The one thing that this part of London needs is open access space, Recreation (2008). In brief, they establish requirements for and the emphasis of this provision in the Linear Park is a concern. This element is considered to be one of the most expensive elements of the plan, and therefore is highly likely not to be delivered on the basis of financial viability. The space indicated is too narrow, and the suggestion that if it cannot be delivered that there would be a series of bridges will negate the sense and the usage of the space and create rat runs into the Warwick Road.

No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.

The ratio of green space to the built environment is not satisfactory and needs to be revisited.

No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.

No change necessary. The existing width of roads, the heights of buildings and the quality of architecture will remain unaffected by development. Indeed, the SPD actively seeks to bring some of these characteristics into the OA. For example, the street enclosure ratios proposed in the Streets section of the Urban Form chapter are informed by analysis of the heights and widths of the streets in the surrounding area. The SPD seeks to ensure that the 'views' from the surrounding area will be preserved or enhanced through Key Principles UF19 to UF21. UF19 and UF20 require proposal(s) to preserve or enhance the character, appearance and setting of surrounding conservation areas, with particular reference to Brompton Cemetery. UF21 requires any applicant(s) to demonstrate that their proposals will not have any negative impacts on the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence document. It is considered that the quality of architecture is too detailed and subjective.

It is felt that the height and massings as proposed would create a sense of Enclosure, and that some of the reasons that residents who buy in this area was due to the sense of space both in the widths of the roads, the heights of the buildings, the quality of the architectural, but also that there was a sense of 'views'.

No change necessary. Key Principle UF20 seeks to ensure that the skyline of Brompton Cemetery is preserved or enhanced. As stated in paragraph 4.6, any application(s) will be expected to demonstrate that changes to the skyline in this location will not be negative. Furthermore, three of the views expected to be analysed and submitted as part of any application(s) under Key Principle UF21 are from Brompton Cemetery. Again, application(s) will be expected to demonstrate that there will be no negative impact on any of them.

Particular concern was voiced about the proposed heights, and impacts, of tall buildings around the Brompton Cemetery, one of our more open area, and that if granted would greatly diminish the unique quality of the cemetery.

It was welcomed that there would be consideration for the built environment near to the edges of the site, but that some of the heights referred to as being the norm were not, as in Philbeach Gardens where there are 3-4 floors above road level and not 5.

No change necessary. The Key Objective of the Skyline section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. This is followed by Key Principle UF19 which seeks to preserve or enhance the character, appearance and setting of surrounding conservation areas. Earls Court Gardens is in the Courtfield Conservation Area. Furthermore, Key Principle UF21 requires any application(s) to demonstrate that it will have no negative impacts on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence document. For the view with the most relevance for Earls Court Gardens, please see View 21.
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<tr>
<td>1349</td>
<td>Jonathan Green</td>
<td>04</td>
<td>4. Green space - the green space area shown at the moment is mean and insufficient for a development of this size;</td>
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</tr>
<tr>
<td>1350</td>
<td>Jonathan Green</td>
<td>04</td>
<td>Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Views Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link in with the existing communities. For example, the skyline section of the Urban Form chapter requires development to preserve or enhance the character and appearance of surrounding conservation areas (including specific reference to Brompton cemetery) and requires developers to demonstrate that there will be no negative impact on exiting townscapes.</td>
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<tr>
<td>1351</td>
<td>Dr. Ian Sesnan</td>
<td>Archdeacon of Middlesex</td>
<td>04</td>
<td>Thank you for the opportunity to comment on the above revised SPD. It is clear that some of our previous comments have been taken on board (e.g. regarding views of local landmarks/churches and we welcome that).</td>
</tr>
<tr>
<td>1354</td>
<td>Dr. Ian Sesnan</td>
<td>Archdeacon of Middlesex</td>
<td>04</td>
<td>Concluding comments</td>
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<tr>
<td>1364</td>
<td>Dr. Ian Sesnan</td>
<td>Archdeacon of Middlesex</td>
<td>04</td>
<td>The proposed height of building adjacent to ours appears to exceed what is existing and given their residential nature that we will now be towered over and overlooked, impacting on our privacy and natural light levels, whilst at night we will now be subjected to street lighting to the rear of our building and the additional impact of yet more traffic. The rear of the building has been our one oasis of privacy, peace and darkness from the excess of Warwick Road, it appears that the development will rob us of even that small luxury.</td>
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<tr>
<td>1374</td>
<td>Eirik Reddi</td>
<td>Residents of 67-70 Kensington Mansions</td>
<td>04</td>
<td>Having gone to the first development meeting we were promised that the buildings would be sympathetic to the local environment and reflect the quality ofExisting Mansion Blocks, which are a source of pride to residents and the Borough. What is actually being offered up is nothing of the sort, it appears bland, faceless and cheap. The quality and finish should provide a legacy, not a fast buck. Building that are a source of pride in 100 years and that physically match existing both in height and materials,</td>
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<tr>
<td>1375</td>
<td>Eirik Reddi</td>
<td>Residents of 67-70 Kensington Mansions</td>
<td>04</td>
<td>No change necessary. This comment refers to a specific planning application. It would not be appropriate to comment on a specific application as part of this consultation on the SPD.</td>
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<tr>
<td>1382</td>
<td>Sandra Yarwood</td>
<td>Yarwood</td>
<td>04</td>
<td>No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha offer of a local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child.</td>
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population, the pressure for space at Holland Park will be intolerable.

Recreation (2008). In brief, they establish requirements for a 2 ha offer of a local park, for all residential units to be within 100m walking distance of a public green space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a common

HEIGHT, DENSITY, MASS and MATERIALS - I am extremely saddened and shocked that no obligation has been made on the developer to conserve the frontage of Earls Court one. This is a major over-sight as it gives identity to the area and will be a huge loss. At the very least the developers should be obliged to re-create a frontage that mirrors the existing building and preserves the lovely art deco bas relief losenges. Earls Court needs its identity.

The visual impact of such intensive development would affect the quality of life by marring the skyline, and creating unbearable light intrusion at night. Even if buildings were no taller than the existing Exhibition Centre, they would have a much greater detrimental impact as much of the height of the Centre is made up of the apex of its roof which has no windows and therefore no light pollution. Even the sides of the existing structure have very few windows. The existing structure also protects the surrounding area from light spillage from the Empress Building which will be lost if it is allowed to be replaced by tower blocks. Tower blocks are not at all in keeping with general architecture in the surrounding area and more stringent restrictions should be made to prevent high buildings on too narrow streets which would over-shadow the elegant surrounding Conservation areas. Tougher restrictions need to be put on height, mass, density and building materials allowed and how they are allowed to be used/impleme

We welcome Key Principles UF26, that the height and massing of new buildings on the edges of the Opportunity Area (OA) will be expected to respect the scale and massing of neighbouring buildings,UF27, that development will be expected to preserve or enhance the character and setting of any listed buildings or conservation areas around the edges of the OA, and UF20, which says that Development should preserve or enhance the character and appearance of Brompton Cemetery and the setting of its listed buildings. We are very concerned about the excessive height of proposed buildings in Seagrave Road and fully support RBKC’s representations in December 2011 on the Seagrave Road Scheme which are entirely consistent with UF20.

We are very concerned about the excessive height of proposed buildings in Seagrave Road and fully support RBKC’s representations in December 2011 on the Seagrave Road Scheme which are entirely consistent with UF20.

No change necessary. Your support for the Key Principles in the SPD is noted. However, it would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD. Any application(s) will be judged on their own merits against the Key Principles established in the SPD.

No change necessary. Your support for the Key Principles in the SPD is noted. However, it would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD. Any application(s) will be judged on their own merits against the Key Principles established in the SPD.

Hammersmith and Fulham Disability Forum

1.5. We also noticed that the SPD Urban Form Strategy Policy Context on p 53 listed 11 policy contexts from LP2011 and CS 2011. However, we are very surprised that it omitted LP 2011 policy 7.2 [italics] an inclusive environment [end italics]. This must be is an over sight. Otherwise it is one rule for some policies and a different rule for accessible and inclusive policies which is not acceptable and discriminatory. It gives the impression of institutional disablism and rightly or wrongly that accessible and inclusive development is not a material consideration.

Change proposed. London Plan Policy 7.2 An Inclusive Environment will be added to the Policy Context section of the Urban Form Chapter.

Hammersmith and Fulham Disability Forum

1.6. We strongly recommend that the SPD is explicit that every development proposal shall be accessible and inclusive without exception to be consistent with LP 2011.

Change proposed. This will be added to the text under Key Principle UF36.

Key Principle UF8 [bold] Urban Grain and connectivity

Key Principle UF8 [bold] supports decking over railway lines and mentions a series of bridges. Para 4.32 refers to new routes being accessible to all road users which is welcomed. This section should go further and confirm where applications include gradients that are too steep or too long [italics] (as defined by Inclusive Mobility) [end italics] or if they include steps or bridges then proposals should include alternative accessible and inclusive means of step free access.

No change necessary. The authorities feel that requiring all links to be accessible for all road users is sufficient, especially when read in conjunction with paragraph 4.111 which seeks to ensure that gradients meet the standards set out in 'Inclusive Mobility'.

No change necessary. This is dealt with in Building Regulations and other building design standards and guidelines. It is too detailed an issue for a strategic planning framework like the SPD. Any application(s) will be assessed on their own merits against all of the relevant standards.

Change proposed. The vision (Chapter 3) will make it explicit that ALL development in the OA must be "accessible and inclusive"- including open space, play space, streets and buildings.

Change proposed. Text will be added to paragraph 4.56 that requires any applicant(s) to consider the needs of disabled children and children with other special needs in any proposals for open space or play space.

Change proposed. Text will be added to paragraph 4.56 that requires any applicant(s) to consider the needs of disabled children or children with other special needs in any proposals for open space or play space.

No change necessary. This is dealt with in Building Regulations and other building design standards and guidelines. It is too detailed an issue for a strategic planning framework like the SPD. Any application(s) will be assessed on their own merits against all of the relevant standards.

The plan focuses on the future residents of the new development area, and largely ignores the impact on existing residents and visitors in surrounding streets.

No change necessary. The SPD has been informed by a thorough analysis of the existing context of the OA. The conclusions of these studies can be found in the Character Area Analysis, Edges Study and Townscape and Views Analysis SPD Supporting Evidence documents. The findings of these studies have directly resulted in the drafting of a number of the Key Principles found in the SPD, such as Key Principle UF21 which requires any application(s) to assess the impact of their proposals on the views identified in the Townscape and Views Analysis and demonstrate that there will be no negative impact on any of them. The Edges section focuses in particular on the impact on existing residents. For example, it
<table>
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<tr>
<th>1416</th>
<th>Paul Kennedy</th>
<th>04</th>
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<td>Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will integrate with the existing communities. For example, the skyline section of the Urban Form chapter requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton Cemetery) and requires developers to demonstrate that there will be no negative impact on exiting townscape. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). The Edges section also seeks to protect the residential amenities of existing properties (such as overlooking) in Key Principle UF28.</td>
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<td>The proposed scale of the development, the heights of the buildings, and the proposed population density, are completely out-of-line with the surrounding area, and will be intolerable for local residents. This is a residential area, not Canary Wharf. The proposals have already encouraged satellite applications by neighbouring hotels, in reliance on the proposed new skyscrapers, which should be rejected. Many of the proposed “open spaces” will hardly see the sun, and the high-rise buildings will also overlook the properties of existing residents.</td>
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<td>No change necessary. The heritage assets of the local area are one of the primary drivers behind the SPD and are considered in great detail in the SPD and SPD Supporting Evidence Documents (for example the Character Area Analysis and the Townscape and Visual Analysis). The importance of heritage assets is particularly evident in the Skyline section of the Urban Form chapter which seeks to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape. Key Principle UF19 seeks to preserve or enhance the character, appearance and setting of surrounding conservation areas and Key Principle UF20 seeks to preserve or enhance the character, appearance and setting of Brompton Cemetery. The skyline is further protected by Key Principle UF21 which requires any application(s) to include a verified set of views taken from points identified by the authorities and to demonstrate that the proposal(s) will have no negative impact upon any of them.</td>
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<td>The plan ignores the impact on our local heritage, retaining the ghastly Empress State Building while destroying the iconic Earl's Court Exhibition Centre, and existing communities. The skyline will be transformed from a residential setting blighted only by the Empress State Building, to a high-rise dystopia. Even those areas which will not be destroyed, such as historic Brompton Cemetery, will be overlooked. The proposed development will be soulless, with no social housing, and will have no community feel at all.</td>
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<td>We do, however, have some strong concerns, especially since as a new urban quarter this should adopt a more challenging approach than can be applied to incremental development that usually faces local planning authorities. An Opportunity Area which involves effective total redevelopment represents a unique opportunity to achieve much higher standards, such as:</td>
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<td>- [bold] a quality townscape [end bold] where the policies are more ambitious for the quality of architecture and the impact of buildings on the wider townscape - it should represent a positive improvement not a pathetically low aim such as not causing unacceptable harm;</td>
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<td>No change necessary. It is considered that the quality of architecture is too detailed and subjective an issue to be addressed in a strategic planning framework such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning applications are submitted. Having said that, please note that the impact of new buildings on the wider townscape is addressed at length in the SPD, primarily under the Skyline Key Objective which seeks to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of surrounding townscape. The wording of this objective reflects the statutory duty that planning officers will be expected to discharge when reviewing any application(s) submitted.</td>
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<td>We do, however, have some strong concerns, especially since as a new urban quarter this should adopt a more challenging approach than can be applied to incremental development that usually faces local planning authorities. An Opportunity Area which involves effective total redevelopment represents a unique opportunity to achieve much higher standards, such as:</td>
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<td>- [bold] a high-density environment with good access to green space. [end bold]</td>
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<td>Change proposed. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. In terms of density, Para 2.55 of the London Plan sets out that Opportunity Areas are the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development. Policy 3.4 of the London Plan states that taking into account local</td>
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<td>Society</td>
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| 52   | Michael Bach | Kensington Society | Key Objective | "Ensure that [bold underline] new buildings visible on the skyline have a [bold underline] positive [bold underline] impact on the quality and character of the surrounding townscape [bold underline] and enhance the skyline and townscape of the area." [end bold underline]  
This objective is unambitious - it is not about adding a few buildings to an existing context but creating West London's New Urban Quarter - it should enhance the skyline.  
[bold] Reason [end bold]: Policies 7.6 (Architecture) and 7.7 (Location and Design of Tall and Large Buildings) between them seek to ensure that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape and that tall and large buildings should not have an unacceptably harmful impact on their surroundings, but Policy 7.7C (f) also says that: |
| 4.6  | Michael Bach | Kensington Society | Para 4.6 | Page 55  
[bold] Maximise connectivity [end bold]  
4.6 It should be made clear that it is not only the conservation areas surrounding the site which need to be respected but also longer distance views particularly those identified in the RBKC Building Heights SPD (referred to in 4.10) but also others not identified in accordance with English Heritage The Setting of Heritage Assets published 2011. The latter should be included in Policy Context.  
The setting of Heritage Assets will be added to the Policy Context. |
| 55   | Michael Bach | Kensington Society | Page 55 | 4.15 This should be about increasing access [bold] not [end bold] creating through routes for rat-running traffic.  
Change proposed. The SPD does not encourage through rat-running for traffic. A sentence will be added to paragraph 4.18 stating that care should be taken to avoid the creation of new vehicular 'rat runs'. In the transport chapter of the SPD it is clearly stated that "an east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, through not for vehicles" (paragraph 10.71). The 'Connectivity' referred to in the Urban Form chapter covers all modes of transport. In line with Key Principle UF36, all streets should encourage pedestrians and cyclists, and in line with Key Principle UF37 all streets should be designed to keep vehicle speeds under 20mph. |
| 4.6  | Michael Bach | Kensington Society | Para 4.6 | Page 55  
This should focus on increasing permeability and reducing severance.  
No change necessary. The Connectivity section does focus on increasing permeability and reducing severance. As paragraph 4.14 states "overcoming the existing severance is one of the fundamental aims of regeneration in the OA". |
| 55   | Michael Bach | Kensington Society | Page 55 | 4.6  
[bold] Maximise connectivity [end bold]  
4.6 It should be made clear that it is not only the conservation areas surrounding the site which need to be respected but also longer distance views particularly those identified in the RBKC Building Heights SPD (referred to in 4.10) but also others not identified in accordance with English Heritage The Setting of Heritage Assets published 2011. The latter should be included in Policy Context.  
The setting of Heritage Assets will be added to the Policy Context.  
4.15 This should be about increasing access [bold] not [end bold] creating through routes for rat-running traffic.  
Change proposed. The SPD does not encourage through rat-running for traffic. A sentence will be added to paragraph 4.18 stating that care should be taken to avoid the creation of new vehicular 'rat runs'. In the transport chapter of the SPD it is clearly stated that "an east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, through not for vehicles" (paragraph 10.71). The 'Connectivity' referred to in the Urban Form chapter covers all modes of transport. In line with Key Principle UF36, all streets should encourage pedestrians and cyclists, and in line with Key Principle UF37 all streets should be designed to keep vehicle speeds under 20mph. |
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<th>Para</th>
<th>Text</th>
<th>Change</th>
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<tbody>
<tr>
<td>1448</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Para 4.18</td>
<td>4.18 Care will need to be taken to avoid creating new capacity for through traffic.</td>
<td>Change proposed. A sentence will be added to paragraph 4.18 stating that care should be taken to avoid the creation of new vehicular 'rat runs'.</td>
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<tr>
<td>1449</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Key Principle UF4</td>
<td>The Society is concerned about encouraging through traffic to rat-run through the area. Through streets need to be kept to minimum.</td>
<td>Change proposed. A sentence will be added to paragraph 4.18 stating that care should be taken to avoid the creation of new vehicular 'rat runs'.</td>
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<td>1450</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Para 4.21</td>
<td>These streets could be extended into the area without going through the OA.</td>
<td>No change necessary. The SPD does not stipulate that these streets must go through the entire OA, but suggests that they could be extended into it as apart of comprehensive regeneration.</td>
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<tr>
<td>1451</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Key Principle UF8</td>
<td>This is fundamental to the principle of improving the connectivity east to west. The requirement for bridging over or if that cannot be achieved bridges needs to be strengthened and the bridge links would need to be wide landscaped links. The retained open sections along the railway might be used to advantage to preserve the wildlife status but if so then there will need to be a construction management plan which acknowledges this aspiration.</td>
<td>No change necessary. The text will be changed to &quot;the District Line of the London Underground&quot;. It is the authorities' intention that all branches of the District Line that pass through the OA will be either decked or bridged over to ensure sufficient connectivity.</td>
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<tr>
<td>1455</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Key Principle UF10</td>
<td>Support improved public realm outside underground stations.</td>
<td>No change necessary. The current wording of the Key Objectives and Key Principles in the Skyline section reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.</td>
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<td>1456</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Skyline</td>
<td>Since, with the exception of the Empress State Building, all the buildings likely to affect the skyline will be new buildings, there is absolutely no reason why such a low threshold for acceptability should be set - all new buildings, as required by the London Plan Policy 7.6, should make a positive contribution to the public realm and to the wider cityscape. London Plan Policy 7.7 is inappropriate to an area where nearly all the buildings will be new. They should all make a positive contribution - the suggestion that it is sufficient that buildings do not have a negative impact is an unacceptably low ambition/objective.</td>
<td>No change necessary. The current wording of the Key Objectives and Key Principles in the Skyline section reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.</td>
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<td>1457</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Skyline Key Objective</td>
<td>Ensure that any buildings visible on the skyline make a positive</td>
<td>No change necessary. The current wording of this Key Objective reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.</td>
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<td>Line 1458</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Para 4.58</td>
<td>4.58 Reword as follows: &quot;...[bold underline] any [end bold underline] new buildings within the OA [bold underline] should make a positive impact on the skyline and enhance the existing context.&quot; [end bold underline] No change necessary. The current wording of this paragraph reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.</td>
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<td>Line 1459</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Para 4.59</td>
<td>4.59 We strongly support the statement that the heights of the existing exhibition centres should not be seen as precedent for redevelopment proposals and that the location and height of any new buildings should not be based on the location and height of existing buildings on the site. Above all, we strongly object to the Empress State Building being seen as a positive contribution to the area. Noted.</td>
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<tr>
<td>Line 1460</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Key Principle UF19</td>
<td>4.61 and 4.62: &quot;There appears to be a contradiction between the statement that the views are open and the suggestion of an improvement in the enclosure of the Cemetery. It should be clarified that the sense of openness is an inherent characteristic of Brompton Cemetery notwithstanding that there is a lower physical enclosure around the curtilage. Dominant modern design could be overbearing and destroy the sense of openness which exists at present. We are particularly concerned that the high-rise redevelopment of the Seagrave Road site could have an extremely detrimental impact on the Cemetery. We fully support the principle in para 4.64 that new visible buildings should enhance the skyline as seen from the Cemetery. Change proposed. The wording of paragraph 4.61 will be amended to make the authorities' intentions more clear. It is felt that there is the potential to improve the weakly enclosed western boundary of the cemetery, as identified in RBKC's Conservation Area Proposals Statement, and therefore enhance its character, appearance and setting without necessarily compromising the panoramic nature of the views. Paragraph 4.62 specifically states that proposals along the eastern edge of the Seagrave Road site must not &quot;over dominate&quot; the cemetery. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which the heights proposed in any application(s) will be assessed.</td>
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<td>Line 1461</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Key Principle UF22:</td>
<td>4.65 Key Principle UF19: Preserve and enhance the character of nearby conservation areas and the settings of listed buildings. [end bold] This should not be restricted to nearby conservation areas. PPS5 and The Setting of Heritage Assets both require account to be taken of designated assets, which include both listed buildings and conservation areas even if these are some distance away. In particular in the RBKC SPD on Building Heights panoramic views are identified which could be affected by the skyline of this site. Residents in mansion blocks up to Kensington High Street could also be affected by the skyline, and PPS5 and the supporting Historic Environment Planning Practice Guide both require views from whatever level to be taken into account. Change proposed. The wording in Key Principle UF19 will be amended to refer to &quot;surrounding&quot; conservation areas rather than &quot;nearby&quot; conservation areas.</td>
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<td>Line 1462</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>04</td>
<td>Key Principle UF22:</td>
<td>The Society does not wish to see a &quot;cluster&quot; of tall buildings - one mistake in the area is quite enough. We [bold object [end bold] to paragraphs 4.65-4.67 - there is nothing of strategic significance proposed in this SPD which warrants providing such a major &quot;landmark&quot; in this location - there is and will not be &quot;a significant, London-wide public function/destination&quot; nor anything else to justify this approach. The authorities remain convinced that cluster of tall buildings in the vicinity of the Empress State Building could be successful and a new paragraph will be added to the SPD in order to explain why a cluster of tall buildings is seen as preferable to an approach that sees them scattered across the OA with no relation to one another. The Culture Strategy in the SPD (Chapter 08) sets out the aspiration for a strategic leisure, cultural and visitor attraction (Key Principle CS1) within the OA. It is the authorities' intention that this will give meaning to the height of Empress State building and its presence on the skyline (as established in paragraph 4.66). The authorities are also of the opinion that, following extensive analysis of the local townscape, an attractive composition of taller buildings in the vicinity of the Empress State Building has the potential to enhance the skyline. Any buildings visible on the skyline will be subject to Key Principles UF19, UF20 and UF21.</td>
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4.77 We are very concerned that the proposals for the Seagrave Road site are in direct conflict with this. No change necessary. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.

4.80 Significantly taller needs to be defined. In the RBKC Building Heights it is considered that one and a half time higher is tall. Where there are historic buildings with high floor to floor heights this will produce too great a difference since the appearance of a building with lower floor to floor heights will appear denser and more dominant. It is suggested that significantly should be no more than two floors higher or one and a quarter times the height which ever is the lesser. There is always scope for the developer to argue the case for a taller building. Change proposed. A clause stating that "plant should be included within the overall design of buildings and not simply added to rooftops" will be added to paragraph 4.90.

The listed Brompton cemetery - a working cemetery - will be irreversibly spoiled by the new high buildings overlooking it - and the skyline will be irreversibly destroyed for much of this area - residents in Eardley Crescent and Philbeach Gardens in particular will find themselves overlooked by ugly light-blocking and polluting buildings. This proposal still contains too many buildings of a type out of character with the area and needs far more stringent control. As it stands there is not enough obligation on the developers to control noise, light and air pollution. A new town, which is essentially what still seems to be being proposed would surely require a new substantial green space or park. Holland Park on a sunny day is already full to capacity. No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will be assessed in this regard. Key Principle UF21 require any application(s) to be assessed in this regard. Key Principle UF21 require any application(s) to be assessed in this regard. Key Principle UF21 require any application(s) to be assessed in this regard. Key Principle UF21 require any application(s) to be assessed in this regard. Key Principle UF21 require any application(s) to be assessed in this regard. Key Principle UF21 require any application(s) to be assessed in this regard.

GREEN SPACE - There is still insufficient green space proposed in the SPD for families, communities and visitors. The elderly, children, local wildlife and pets will also suffer unless a proper, large park is created to accommodate the needs of one and all. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.

HEIGHT, DENSITY, MASS and MATERIALS - The visual impact of such intensive development would affect the quality of life by destroying the skyline, especially surrounding the Grade 2 Brompton Cemetery. Outlook will be reduced, light will be blocked into many. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.

CHANGE PROPOSED. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will...
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<td>1523</td>
<td>Richard Chute</td>
<td>04</td>
<td>Para 4.31</td>
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<td>1525</td>
<td>Richard Chute</td>
<td>04</td>
<td>Para 4.113</td>
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<td>Richard Chute</td>
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<td>1533</td>
<td>Richard Chute</td>
<td>04</td>
<td>Para 4.113</td>
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| homes and streets and Conservation areas will be dwarfed. More thought needs to be put into the issues of height, mass, density and building materials allowed and how they are allowed to be used/implemented. | be assessed in this regard. Key Principle UF21 require any application(s) to demonstrate that it will have no negative impact on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced. Key Principle UF28 seeks to protect the privacy, daylight and sunlight of existing buildings such as those in Philbeach Gardens and Eardley Crescent. Furthermore, residential amenities such as loss of outlook, noise and disturbance are protected by the UDP and 
**Core Strategy standards quo** |
| Many suggestions such as for a new underground railway station in the OA have not been properly considered: the suggested "Philbeach Interchange". The consented "Earl's Court relief access link-road" could be continued to create a complete north-south route through the site. In paragraph 4.31, the sentence "The deck could be used for either...", should be amended by adding: "...or for a road." | Change proposed. The importance of increasing connectivity across the OA is established in paragraph 4.32 which states that "If the top of a deck is used for open space, it must not compromise connectivity". In order to emphasise the importance of connectivity across a deck, this will be revised to read "Whether the top of a deck is used for open space or buildings, it must not compromise connectivity. Any open space should be permeable, and there should be new routes created around and across it that are accessible for all road users". Please note that it is established in the Transport Chapter (paragraph 10.68) that the SPD does not seek to achieve significant reductions in the traffic on the Earl's Court One Way System (which includes Warwick Road). An assessment of the potential link-road" could be continued to create a complete north-south route for using a new north-south route within the site to relieve the Earl's Court One Way System of through traffic was undertaken. This found that a north-south route could reduce traffic on Warwick Road by up to 18% and on Earl's Co |
| Re.: building heights: whilst appreciating the efforts to establish a 1:1 ratio, it is still necessary to have a policy of a maximum of 9 storeys. Research on the impact of tall buildings on communities is not favourable. Tall high-density blocks are proven unsuitable for families. | No change necessary. It would be too prescriptive for a strategic planning document like the SPD to specify c building heights. Instead, it establishes a framework of Key Principles and Key Objectives against which the proposed heights of any application(s) will be assessed. Key Principles UF19 to UF25 are particularly relevant as they deal with potential impacts on the skyline and the design of tall buildings. Key Principle UF21 requires any application(s) to demonstrate that there will be no negative impact on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and other surrounding conservation areas and therefore Key Principles UF19 and UF20 specifically state that their character, appearance and settings must be preserved or enhanced. |
| In paragraph 4.113, I oppose the control of vehicle speeds by the encouragement of on-street parking: landscaping with vegetation is a more effective influence on motorists' behaviour. Any car parking spaces should be below ground. | No change necessary. Best practice in Urban Design suggests that accommodating all road users, including parked cars, in the street adds to animation and vibrancy, therefore making people feel safer and more likely to linger. For example, Manual for Streets (DfT, 2007) states that "Parking is a key function of many streets... A well-designed arrangement of on-street parking provides convenient access to frontages and can add to the vitality of a street" (page 18) |
| There still appears to be inadequate provision for open/green space in Chapter 2. Whether there is a 'Linear Park' or not, the needs of over 12s have been overlooked in this draft SPD: there should be a consolidated large park in the OA, where they can play more willingly than in 8 insignificant small gardens. Geometrically a consolidated large park would allow a greater proportion of the ground level to receive at least some sunlight, for a given occupancy level. | No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4, |
| Also, allotment or enclosed communal gardens would be beneficial. | No change necessary. Community gardens are among the list of different leisure pursuits that new public open spaces will be expected to provide for, as stated in |
1543 Jonathan Choat Orpen House Tenants' Compact 04

7. The heights, scale and massing of buildings indicated in the JSPD are still too large and that the proposed excessive heights would dominate the surrounding area. Buildings in the surrounding area in RBKC and Hammersmith & Fulham are at the most 6 storeys from street level, which provides a proportion to the width of the streets and the human eye's perception of a proportionate scale. Incidentally, this is why people prefer to live in this Borough and not in gigantic Canary Wharf style glass boxes elsewhere. The extraordinary planning error of The Empress State building is fortunately unique in the area and apart from being isolated from the surrounding housing areas, should not be used as a benchmark to permit taller buildings. Thus the height lines of other residential and commercial buildings on the site should be the same and in keeping to the areas immediately adjacent. This JSPD would permit buildings routinely above the average of the houses in both Kensington and Chelsea, and Hammersmith and Fulham. No change necessary. No specific building heights are proposed in the SPD. Instead, it presents a framework of Key Objectives and Key Principles against which the heights of any buildings will be assessed. Key Principles UF19, UF20 and UF21 seek to prevent the heights of buildings dominating the area. UF19 an UF20 seek to preserve the character, appearance and settings of surrounding conservation areas and listed buildings, including specific reference to Brompton Cemetery. Key Principle UF21 requires any application(s) to include a set of verified views, taken from points identified by the authorities, and to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be found in the Townscape and Visual Analysis SPD Supporting Document. The proportion of the streets in the area surrounding the OA was identified as one of the strongest local traits in the Character Area Analysis carried out to inform the SPD. As a result, the Streets section

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8. The quality of the built environment proposed does not link-in with or compliment the surrounding areas, and needs to be of a far higher and more respectfully attuned architectural quality. No change necessary. It is considered that the quality of architecture is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning application(s) are made.

1550 Jonathan Choat Orpen House Tenants' Compact 04

14. Public Open Space is made much of in the plan, but this part of RBKC and London needs large accessible open space. The emphasis of this provision on the relatively small little more than street width, Linear Park is inadequate for this size and scale of development. In addition with the over building of the river, this element is likely to be one of the most expensive elements of the plan and therefore is highly likely not to be delivered on the basis of financial viability by the developer. The space indicated is too narrow, needs to be substantially larger in width and should be the subject of a financial bond held independently to ensure its completion early in the construction phases. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. It should be noted that the SPD recognises that the railway may not be entirely decked over (see Key Principle UF8). The requirements for the provision of open space in the OA, as set out above, are in no way dependent on the decking over of the railway, or the delivery of a linear park. Key Principle UF12 clearly states that the 2ha local park could be delivered as one di

1551 Jonathan Choat Orpen House Tenants’ Compact 04

15. The entire ratio of non enclosed green space and private garden space to the built environment is not sufficient for the scale and size of the development and needs to be substantially increased. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.

1556 Jonathan Choat Orpen House Tenants’ Compact 04

20. RBKC has a duty of care for its residents and voters. It should be seen to exercise this with a distinct bias towards the interests and stated objections and concerns of the existing local residents - particularly those proximate to the development and not seen to be overwhelmed by inexperience of the sheer scale and size of the development and persuaded by the self interested and often specious plaudits and representations of the developer and professional architects as soi disant arbiters of taste and style. Noted.

1596 Claire Craig English Heritage 04

However, we must emphasise that Key Principles UF 19 and UF 20 on page 64 both require amendment to ensure compliance with PPS 5 and the emerging NPPF. We recommend the following Change proposed. Both key Principles will be revised in line with your suggestion.
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<tr>
<th>Page</th>
<th>Name</th>
<th>Author</th>
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<th>Para</th>
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<tr>
<td>1597</td>
<td>Claire</td>
<td>Craig</td>
<td>English Heritage 04</td>
<td>UF21</td>
<td>English Heritage considers that Key Principle UF 21 is not sufficiently consistent with the PPS 1 objective that development be plan-led, and essentially leaves a severe adverse potential impact of the planned development to be managed on an application by application basis. English Heritage further considers that the remaining Key Principles relating to Skyline on pages 66 and 67 also contribute to the management of this issue on an application by application, rather than plan-led, basis.</td>
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<tr>
<td>1598</td>
<td>Claire</td>
<td>Craig</td>
<td>English Heritage 04</td>
<td></td>
<td>No change necessary. The authorities consider that, as the SPD is intended to supplement existing policy, the primary role of the Urban Form Strategy is to establish a framework of Key Principles and Key Objectives against which any planning application(s) for the OA could be assessed. It is not intended to provide a definitive masterplan with a fixed spatial solution, but rather to provide planning guidance for the OA that supplements the requirements of the Boroughs' Core Strategies and the Mayor's London Plan. Key Principle UF21 should not be read in isolation but rather as part of the whole Urban Form Strategy, and indeed the whole SPD, which the authorities consider to be consistent with the 'spatial planning' requirements of PPS1, particularly paragraphs 30, 31 and 32.</td>
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<td>1599</td>
<td>Claire</td>
<td>Craig</td>
<td>English Heritage 04</td>
<td></td>
<td>A number of other elements in the Urban Form Strategy cover matters relating to the design (including height) of various elements of the OA, most notably key principles UF 24, UF 26, and UF 35. While English Heritage appreciates what these principles are endeavouring to achieve, we consider that they demonstrate a lack of clarity about what scale means in terms of impacts in the different parts of the OA. English Heritage recommends that the Project Team develop a more specific vision about this in order to overcome more effectively the critical issue of potential adverse impacts on the surrounding historic environment. As emphasised on a number of occasions, we consider that modelling based on the recommendations that we have made for the TVA will prove to be a very valuable component of the SPD for all who will use it and will underline eliminate a great deal of potentially costly uncertainty that could be associated with the much needed development of this area.</td>
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<tr>
<td>1600</td>
<td>Claire</td>
<td>Craig</td>
<td>English Heritage 04</td>
<td></td>
<td>No change necessary. Although the SPD does recognise that there is some potential for &quot;relatively tall&quot; elements along the 'Metropolitan Face', any application(s) for this area will be subject to all of the Key Principles established in the Skyline and Edges sections of the Urban Form Strategy. This includes the requirement to preserve or enhance the character, appearance and setting of surrounding conservation areas and listed buildings and the need to demonstrate that there are no negative impacts on the views identified in the Townscape and Visual Analysis. Views 50, 51, 52, 53, 54, 16 and 14 (please note that the numbers allocated to the views may change in the final draft of the SPD) are of particular relevance to the 'Metropolitan Face'. Furthermore, any application(s) for this area will be expected to demonstrate compliance with the Edges Key Principles, namely that the height and massing of any new buildings on the edge of the OA will need to respect the scale and massing of neighbouring buildings an</td>
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<tr>
<td>1604</td>
<td>Claire</td>
<td>Craig</td>
<td>English 04</td>
<td>Para 4.102</td>
<td>In addition, English Heritage: Noted.</td>
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<tr>
<td>1610</td>
<td>04</td>
<td>Heritage</td>
<td>Welcomes the identification at paragraph 4.102 on page 75 of what is actually conservation area detail as discussed above in relation to the CAA. We recommend that this type of information could be used more widely throughout the Urban Form Strategy.</td>
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<td>1617</td>
<td>04</td>
<td>Campaign to Protect Rural England</td>
<td>No change necessary. All of the surrounding conservation areas, including those at Philbeach Gardens and Eardley Crescent, are shown on page 39 of the SPD. The importance of preserving or enhancing the character, appearance and setting of all surrounding conservation areas is established in Key Principles UF19 and UF27.</td>
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<td>1618</td>
<td>04</td>
<td>Campaign to Protect Rural England</td>
<td>No change necessary. The revised SPD still mirrors too closely CapCo’s masterplan and outline Planning Application which the local amenity societies and residents found unacceptable.</td>
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<tr>
<td>1619</td>
<td>04</td>
<td>Campaign to Protect Rural England</td>
<td>No change necessary. The SPD seeks to protect the particular sensitivities of Brompton Cemetery in Key Principle UF20, which requires any application(s) to demonstrate that its character, appearance and setting will be preserved or enhanced. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which the heights of any proposal(s) will be assessed. Please note that all masterplan drawings and images in the SPD and Supporting Evidence documents are included for illustrative purposes only and should not be treated as proposals for the OA.</td>
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<tr>
<td>1620</td>
<td>04</td>
<td>Campaign to Protect Rural England</td>
<td>No change necessary. This is exactly what the Streets section of the Urban Form Chapter in the SPD seeks to achieve. For example, the ‘street enclosure ratio’ established in Key Principle UF31 is inspired by the ‘street enclosure ratios’ found in the surrounding area, but does not copy them. Paragraph 4.90 states that “As a general rule across the OA, it is considered that any enclosure ratio less than 1:1 would not be in keeping with the existing character of the area and would risk feeling oppressive or ‘canyon-like’ and/or having restricted daylight/sunlight. Therefore, any street that breaks this rule will require significant urban design justification.” A similar approach is taken under Key Principle UF33, which seeks to ensure building lines respond to those found in the surrounding context and UF34 which seeks to ensure roofscapes respond to those in the surrounding area.</td>
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<td>1621</td>
<td>04</td>
<td>Campaign to Protect Rural England</td>
<td>No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF19 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha offer of a local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of...</td>
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<td>No.</td>
<td>Author</td>
<td>Group</td>
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<tr>
<td>1622</td>
<td>John Drake</td>
<td>Campaign to Protect Rural England</td>
<td>04</td>
<td>ii) For the number of proposed numbers of residents it is insufficient dedicated play space per child. Please note that all masterplan drawings in the SPD are included for illustrative purposes only and should not be treated as proposals for the OA.</td>
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<tr>
<td>1623</td>
<td>John Drake</td>
<td>Campaign to Protect Rural England</td>
<td>04</td>
<td>iii) There should be public space either in front or rear of the houses and which should be grassed and have permeable patterns No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha offer of a local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child.</td>
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<tr>
<td>1624</td>
<td>John Drake</td>
<td>Campaign to Protect Rural England</td>
<td>04</td>
<td>iv) There must be a large enough area to play organised games and positioned not to annoy the neighbouring properties. Sited possible near the centre of the site. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha offer of a local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an “elite” standard and for a common</td>
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<tr>
<td>1625</td>
<td>John Drake</td>
<td>Campaign to Protect Rural England</td>
<td>04</td>
<td>v) Smaller ‘teach about’ spaces should be positioned in each of the so called ‘village areas’ with the above provisos No change necessary. This comment appears to relate to a specific planning application, as there is no reference to ‘village areas’ in the SPD. It would be inappropriate to comment on the contents of any specific application as part of this consultation on the SPD.</td>
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<tr>
<td>1626</td>
<td>John Drake</td>
<td>Campaign to Protect Rural England</td>
<td>04</td>
<td>vi) As currently described the so called ‘lost river park’ will be difficult to acceptably achieve. Unless the levels are raised so it is higher over the railway lines and lower at the sides with a grass bank and landscaping No change necessary. This comment appears to relate to a specific planning application. It would be inappropriate to comment on the contents of any specific application as part of this consultation on the SPD.</td>
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<tr>
<td>1627</td>
<td>John Drake</td>
<td>Campaign to Protect Rural England</td>
<td>04</td>
<td>vii) In the commercial areas more formal spaces allowed to have markets and entertainments. No change necessary. Key Principle UF10 seeks to ensure high quality civic spaces in locations that are likely to have the highest levels of movement and appropriate mix of land uses. Paragraph 4.40 seeks to ensure that civic spaces have retail, café, culture and community uses in the surrounding ground floors.</td>
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<td>1628</td>
<td>John Drake</td>
<td>Campaign to Protect Rural England</td>
<td>04</td>
<td>viii) The Seagrave Road site has insufficient public open space for the number of residents. It should be increased but it is difficult to No change necessary. This comment appears to relate to a specific planning application. It would be inappropriate to comment on the contents of any specific application as part of this consultation on the SPD. The authorities consider the minimum standards for the quantum of public open space established in the SPD in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These</td>
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There are four important issues in this respect that are not clarified or resolved in the SPD - it says that there should be:

- see how it can be done within the present layout in the planning permission.
- East/West connectivity across the site (North/South connectivity is not identified as an issue in the Policy Context, but forms a major part of the Transport Chapter).

Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha offer of a local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child.

There are a number of Key Objectives and Key Principles that directly reflect the authorities’ aspirations for any proposals to integrate into the existing urban fabric. These include the Urban Grain Key Objective, which seeks to establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces, Key Principle UF3 which seeks to ensure that any pattern of new streets is inspired by the street types identified in the surrounding context, (this will be amended to make it clear that it should also be inspired by the existing pattern of streets) UF4 which seeks to extend existing streets into the OA, UF5 which seeks to extend the existing pattern of garden squares into the open space per child and for 10 sqm of dedicated play space per child.

10. The Vision says (our brief comments are set out in italics and are expanded in the sections that follow):

- 3.4 There is an aspiration to integrate the development “into the existing urban fabric and character of the surrounding area” (italics) Chapter 4 however opens up the possibility of a very different kind of development (see Section D below), [end italics]

No change necessary. The Urban Form chapter has been informed by comprehensive analysis of the surrounding urban context. The results of much of this analysis can be found in SPD Supporting Evidence Documents such as the Character Area Analysis, the Townscape and Visual Analysis and the Edges Studies. There are a number of Key Objectives and Key Principles that directly reflect the authorities’ aspirations for any proposals to integrate into the existing urban fabric. These include the Urban Grain Key Objective, which seeks to establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces, Key Principle UF3 which seeks to ensure that any pattern of new streets is inspired by the street types identified in the surrounding context, (this will be amended to make it clear that it should also be inspired by the existing pattern of streets) UF4 which seeks to extend existing streets into the OA, UF5 which seeks to extend the existing pattern of garden squares into the open space per child and for 10 sqm of dedicated play space per child.

16. As already said, we do not accept the argument about needing demolition to solve deprivation. The other reasons given for demolition (in Para 5.12 of the SPD) merely restate the findings of the flawed Development Capacity Scenarios (which surely now need to be revised if they are to form a sound part of the evidence base for the SPD). These include greater benefits in terms of “extending the urban grain” (whatever that is taken to mean) and “increasing public open space and improving connectivity”. As to increasing open space, it is obviously perfectly possible to achieve this in the area without wholesale demolition of the estates, indeed the SPD says that the WK estate in particular “has large areas of underused communal land that is poorly laid out” - a clear opportunity for the provision of new well-designed public open space. As to improving connectivity, the SPD itself identifies many ways of improving connectivity without estate demolition, including across the railway lines (see also Para 31).

No change necessary. The roads within the estates only lead to properties within the estates. Without comprehensive redevelopment of the entire OA, including extensive remodelling of the topography, it would not be possible to maximise connectivity in a manner that is accessible to all. The aspiration of the authorities is to increase connectivity between North End Road and Warwick Road. Crossing the railway lines alone would not achieve this and would be likely to result in a number of ‘dead end’ streets.

The incidental open space in the estates could, to a degree, be remodelled. However, in order to achieve sufficient quantum of open space with adequate accessibility and natural surveillance, this would be likely to require the removal of some estate buildings and the construction of new urban blocks. It is unlikely that such an approach would meet Key Principle UF13, which seeks to ensure that all residential properties are within a 100m walk of an open space. Furthermore, this approach would not provide sufficient quantum of open space.

D. [bold] Townscape and open space

37. The fourth topic on which we have major concerns is Townscape. Taken at face value, there appears to have been a radical shift in thinking (which inter alia makes the current Masterplan inappropriate). The earlier SPD and Masterplan proposed essentially that the OA should only rise to the heights of adjacent areas at its boundaries, but towards the centre of the Area, it could rise to substantial heights. The current draft appears to be saying that the “edge” should respect the heights of adjacent areas, that there should be higher development along the A4 frontage, and that there should be a “gateway” building(s) to mark the entrance to the development. Bearing in mind that we are opposed to the development of the WK and GG estates, we do not see the relevance of higher "edge buildings" on the A4 and we oppose any suggestion of a "gateway building" which hints of aggrandisement which is not appropriate.

No change necessary. Neither the current nor the previous draft of the SPD contain any prescription of specific building heights. Any masterplan drawings included in the SPD and SPD supporting documents are for illustrative purposes only and should not be treated as proposals for the OA. However, it has always been one of the authorities’ primary aims to ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context (as stated in the Edges Key Objective). This includes the ‘Metropolitan Face’ along the A4. It is important to note the special context of the Metropolitan Face, fronting as it does the strategically important A4. The authorities are therefore of the opinion that, as a result of this special context, there is potential for "some relatively tall elements" (para 4.81) in this location as well as a "potential gateway". It should be noted that any proposal(s) for the ‘Metropolitan Face’ will not only be assessed against these aspirations, but also against...
32. Beyond those principles, the SPD is less clear. It doesn’t mention stepping up heights towards the centre of the OA, which we welcome, but is silent on any maximum heights across the whole area. It refers, oddly, to the possible establishment of a cluster of tall buildings around the Empress building, theoretically to the vicinity of the Empress State Building could be successful and a new building is seen as preferable to an approach that sees them scattered across the OA with no relation to one another. The SPD does not prescribe any specific building heights, or indeed set any maximum parameters. Instead, it establishes a framework of Key Objectives and Key Principles against which any application(s) should be assessed. The aspiration for a cluster of tall buildings around the Empress building would be worse as part of a cluster, nor do we accept the a

33. We are concerned that the Key Objective regarding the Skyline, and its expression in Para 4.61 regarding Brompton Cemetery, is essentially negative. It seeks to ensure that “no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape.” This is deeply under ambitious and needs to be strengthened. We do however welcome the statement that the heights of the existing exhibition centres should not be seen as precedent for redevelopment proposals.

34. The Section on Streets is illogical and should be amended. Para 4.68 makes clear that there is a variety of “enclosure ratios” in the OA’s surroundings. They varied, in Primary Streets from 1:1.25 to 1:1.54; in Secondary Streets from 1:1.2 to 1:1.32 and in Tertiary Streets from 1:0.8 to 1:1.5. Thus in almost all cases in the local area the streets are wider than the buildings are high, in some cases over one and a half times as wide as high. Yet UF31 says that “no street should have an enclosure ratio narrower than 1:1.” This should be revised to match the average of those in the surrounding area and the typology of different streets - that is, between 1:1 in smaller streets and 1:1.5 in larger ones.

35. As noted in paragraph 4.65, this analysis revealed that the buildings are high, in some cases even clumsier and more dominant. No building can simultaneously have a visual impact and seek to reduce its visual impact! We are not change necessary. The current wording of this Key Principle and the supporting text reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.

36. We remain deeply concerned that the proposed amount of open space is low and highly dependent upon decking over railways with associated high cost, phasing and construction complexity and the burden of long term maintenance, all to be borne by the later phases of the redevelopment. The aspirations for active play and sports facilities are not locked down so that there appears to be a high risk that even where such facilities are funded and provided by the development, this will result in a loss of passive open space such as parks, gardens, greens.

37. The analysis set out is questioned. How does this reflect the aspirations at Figure 3.1?

38. No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha offer of a local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an “elite” standard and for a common connection.

39. No change necessary. The street enclosure ratio set in Key Principle UF31 sets a minimum standard. Paragraph 4.90 points out that, as a result of the analysis of the surrounding streets, any enclosure ratio less than 1:1 would not be in keeping with the existing character of the area. It is expected that this enclosure ratio will be applied in conjunction with the requirement established in Key Principle UF32 to ensure that the heights of buildings and the widths of streets vary according to street type.

40. Noted. This is acknowledged in the SPD in paragraph 4.26 which highlights that all contemporary garden squares proposed for the OA will be expected to be publicly accessible to everyone.

41. No change necessary. Figure 4.1 is illustrative only and should not be treated as a proposal for the OA. However, it reflects the following aspirations set out in figure 3.1: identifying existing streets that could be extended into the OA, the potential for new north-south connections across the OA, the potential for new north south connections through the OA, potential ‘green’ north-south links/Corridor, the
potential for a vehicular connection with the A4 and a number of pedestrian and cyclist connections. It also takes this one stage further and reflects the Key Principles established in the Connectivity and Urban Form section of the Urban Form chapter, such as the importance of the connection with Star Road, the potential for streets like the crescents to be replicated in the OA, the special existing local landmarks and the expectation that the link under the A4 will be explored.

It should be noted that to the north of Cromwell Road, the "well defined street hierarchy" does not exist. The wording of the Principle is inconsistent with and should be revised to accord with paragraph 4.16 which "encourages" street alignments to replicate that of the surroundings. No change necessary. The authorities feel that asking for the street pattern to be inspired by the existing street types identified in the surrounding context is neither unreasonable or in contradiction with paragraph 4.16.

What is the background to the statement regarding Primary Streets? How are these defined - grid pattern; dimensions between? Please clarify. No change necessary. The authorities do not agree with this analysis. The illustration in figure 4.2 demonstrates that the street hierarchy can be applied north of the Cromwell Road.

Whilst the key principle of delivering the East to West connectivity between Warwick Road and North End Road is recognised as a key aspiration for development in the ECWKOA its delivery must be related to viability. No change necessary. The text that follows Key Principle UF4 makes it clear that this is not necessarily applicable to all streets, but that there are a number of streets that the authorities believe have the potential to be extended into and through the OA. For example, paragraph 4.22 says "There are a number of existing streets that could be extended into the OA" and paragraph 4.23 reads "If these existing streets are extended..."

A similar comment remains that the SPD is being too prescriptive and is inconsistent in respect of these requirements.

As stated with regard to the draft SPD, the revised draft is being too prescriptive in looking for residential properties to be within 100metres walking distance of a public green open space. It is also noted that the terminology employed in key principle UF13 is different to that included on the indicative diagram (figure 4.10) which refers to "publicly accessible open spaces". The principal comment remains that the SPD is being too prescriptive and is inconsistent in respect of these requirements.

Change proposed. All Key Principles and the plan in figure 4.10 will refer to "publicly accessible, green open spaces" for the sake of consistency.
2039 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 Skyline Key Objective
It is suggested that the key objective be re-worded so that there is no ambiguity as to what constitutes a 'negative' impact on the quality and character of the surrounding townscape. Reference should be made to Policy HE10.1 PPS5 which relates to development affecting the setting of a designated heritage asset.

Change proposed. This Key Objective reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted. Reference will be made to the importance of PPS5 as a complete document in the Site Context chapter. The authorities consider it unnecessary to refer to any one specific policy from PPS5 as any application(s) will be expected to pay due regard to the entire document.

2040 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 Para 4.63
Reference to financial contributions for enhancements to Brompton Cemetery should be clarified to make clear that such contributions will only be sought where directly relevant and in scale and kind to the development proposals.

Change proposed. This clause will be amended to read "Financial contributions will be sought for enhancements to Brompton Cemetery where directly relevant and in scale and kind to any development proposals."

2041 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 UF21
This has the potential to be too prescriptive in that views have been identified in the Townscape and Views Analysis. Whilst there are clearly buildings and spaces of interest in and around the Opportunity Area it is too prescriptive to set out a list of townscape and views. The wording of the key principle already acknowledges that there may be other views that should be assessed as individual scheme proposals come forward. This rather illustrates that it is inappropriate to put forward a set of prescribed Townscapes Views as part of the SPD.

No change necessary. It is the aspiration of the authorities, in line with the RBKC Building Heights SPD, to ensure that meaning is given to the presence of tall buildings on the skyline. Without a London wide public function/destination, there would be no reason to mark the presence of the OA on the skyline. Please note that the Culture Strategy (Chapter 8), requires any redevelopment of the OA that involves the loss of EC1 and/or EC2 to create a new strategic leisure, cultural and visitor destination. It is the authorities' intention that this should be a "significant, London-wide public function/destination".

2042 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 UF23
Reference is made at paragraph 4.65 to the appropriateness of further tall buildings around the Empress State. The proposed location for additional tall buildings has the potential therefore to provide an appropriate marker for the Opportunity Area - it need not be Key Principle UF 23 sets out, be a marker for the presence of a significant London wide public function/destination.

No change necessary. The views identified in the Townscape and Visual Analysis are considered by the authorities to be the most significant in the OA's surroundings. It is therefore an absolute requirement of the SPD that these should be analysed as part of any application(s) in order to demonstrate that there is no negative impact on any of them. The wording of the Key Principle allows for ADDITIONAL views to be considered. In circumstances where additional views are required, it will also be necessary to analyse those views already identified in the Townscape and Visual Analysis.

2043 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 UF24
This includes too much detail for an SPD - these key principles are set out in development plan documents and, amongst others, the Cabe/EH guidance note.

No change necessary. The authorities consider it important to establish some broad, guiding principles for the design of tall buildings. Reference is made in the SPD to the CABE/EH guidance, with which any application(s) will be expected to demonstrate compliance.

2044 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 UF26
The key principle is too prescriptive. It is not appropriate to expect new buildings at the edges to 'respect the scale and massing of neighbouring buildings'. It is suggested that new buildings should 'respond appropriately' to the heights of those that surround them, or as worded at Policy 7.48a of the London Plan "... have regard to" the pattern and grain of...

No change necessary. The authorities do not consider it unreasonable to expect any application(s) to "respect" the scale and massing of neighbouring buildings.

2045 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 Para 4.78
Building heights and typologies in the area of the North End Road cannot be said to be consistent - there is an ad hoc mixture.

No change necessary. Although there is SOME variation in building heights along North End Road itself, this paragraph actually refers to "the streets adjoining it", where heights and typologies do "tend to be consistent".

2046 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 UF27
The document should have regard to the advice in PPS5, particularly Policy He9 and HE10.

Change proposed. Reference will be made to the importance of PPS5 as a complete document in the Site Context chapter (page 39).

2047 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 Key Principle UF28
Is it necessary to include this particular Key Principle? As noted by the text both Core Strategy's include appropriate policy and text relating to daylight, sunlight and privacy. If it is retained, it is inappropriate to quote selectively from the core strategy documents in this regard.

No change necessary. This is an area that is of particular concern to local residents. Therefore, the authorities consider it important to include this Key Principle and to draw attention to the relevant UDP/Core Strategy standards that protect residential amenities.

2048 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 Paras 4.87, 4.94 Figures 4.26 - 4.28
For the reasons set out in comments to the draft SPD, the SPD still includes too much prescription regarding proposed building/ street width relationships. Whilst the material is identified as being illustrative the clear inference is that new development in the Opportunity Area should respect the enclosure ratios and street width analysis that is set out.

No change necessary. Whilst it is the authorities’ intention that these enclosure ratios will be used in the OA in order to help to achieve the key aspiration of integrating well into the existing urban character and fabric, flexibility is built into this section of the Urban Form chapter with a clause that states; “any street that breaks this rule will require significant urban design justification” (para 4.90).

2049 Matthew Gibbs
CapCo/Earl's Court and Olympia Group
04 UF31
The 1:1 ratio that is referred to is too general and fails to reflect the

No change necessary. The street enclosure ratio established in Key Principle
<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Author</th>
<th>Changes</th>
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</thead>
<tbody>
<tr>
<td>4.90</td>
<td>Matthew Gibbs</td>
<td>It is unclear why there is a specific reference to street design in order to keep vehicle speeds under 20mph. It is appreciated that this does not mean that a 20mph speed limit would apply but, if the core objective of development in the Opportunity Area is to achieve integration with the surrounding area a specific design constraint that is not reflective of that surrounding will not achieve this objective.</td>
</tr>
<tr>
<td>4.95 - 4.97</td>
<td>Matthew Gibbs</td>
<td>The details set out at paragraphs 4.117 - 4.120 are too prescriptive for the revised draft SPD. Reference, for example, to the specific phases and the delivery of open space etc is likely to prove too prescriptive and inflexible. Equally, references to the delivery of a specific link from surrounding streets are also likely to prove inflexible. It is suggested that this detail is removed.</td>
</tr>
<tr>
<td>4.99</td>
<td>Geraldine Kelly</td>
<td>Among the points which need to be considered are: 3. The development will irrevocably destroy the local skyline. There will not be many places in Earl’s Court that this will not affect, and the most to suffer will be the listed Brompton Cemetery.</td>
</tr>
</tbody>
</table>
Change proposed. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against facilities to cater for a range of incomes, sports facilities to allow at least one sport which any application(s) will be assessed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. As a result, there are a number of Key Principles in the SPD that have been put in place to ensure that any new development will integrate with the existing communities. For example, Key Principle UF19 in the Skyline section of the Urban Form chapter requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas, (specific reference is made to Brompton Cemetery in Key Principle UF20) and Key Principle UF21 requires applicant(s) to demonstrate that there will be no negative impact on any of the views in the Townscape and Visual Analysis.

Among the points which need to be considered are:

1. Among the points which need to be considered are:

2. The heights, densities and the use of materials will not link in with either of the communities.

3. Light obstruction and skyline. The proposed height will significantly alter the area’s skyline and most importantly impact on light and outlook into and of our apartment.

4. No change necessary. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against facilities to cater for a range of incomes, sports facilities to allow at least one sport which any application(s) will be assessed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. As a result, there are a number of Key Principles in the SPD that have been put in place to ensure that any new development will integrate with the existing communities. For example, Key Principle UF19 in the Skyline section of the Urban Form chapter requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas, (specific reference is made to Brompton Cemetery in Key Principle UF20) and Key Principle UF21 requires applicant(s) to demonstrate that there will be no negative impact on any of the views in the Townscape and Visual Analysis.

4. No change necessary. The SPD contains an entire section that proposes new public green spaces. Please see pages 60 to 63. In particular, Key Principles UF12, UF13 and UF14 establish minimum requirements for the quantum of publicly accessible, green, open space and Key Principle UF15 sets the minimum standards for the quantum of play space. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.

5. We are writing with reference to the planned development of the current Earls Court site.

6. Having reviewed the application we feel compelled to raise the following concerns about the development and would like to raise our strongest objections against the development:

7. As it stands the proposals are not acceptable, as the new buildings will completely dominate the skyline and have a negative impact on the quality and character of the surrounding townscape.

8. As paragraph 4.86 states, “Where the back gardens of existing buildings occur on the boundary of the OA, they should be incorporated into new urban blocks... Either new ‘back-to-back’ private gardens or semi private communal gardens, which are only accessed by the residents of the new adjoining properties, should be introduced between the new buildings and the existing rear gardens”. It is very unlikely that such an approach would negatively impact on existing wildlife- in fact, with the creation of new back garden environments it may even improve it! Residential amenities like outlook and light are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85.

9. As it stands the proposals are not acceptable, as the new buildings will completely dominate the skyline and have a negative impact on the quality and character of the surrounding townscape.

10. We are writing with reference to the planned development of the current Earls Court site.

11. Key Principles UF19 to UF25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced. Residential amenities like outlook and light are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85.

12. As it stands the proposals are not acceptable, as the new buildings will completely dominate the skyline and have a negative impact on the quality and character of the surrounding townscape.

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relaxation, and having fought hard for these in the area, it is depressing to learn how inadequately that has been planned for in the new development. THIS MUST BE RETHOUGHT. A park should be provided.

UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.

3. AESTHETIC APPEAL. The area has a wonderful Victorian flavour. Blocking out the skyline with high density high rises will reduce the attractiveness of the area, and very importantly destroy the surrounds for many residents already living there. THESE BUILDINGS SHOULD BE REDUCED IN HEIGHT AND DENSITY.

Change proposed. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which any application(s) will be assessed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. As a result, there are a number of Key Principles in the SPD that have been put in place to ensure that any new development will integrate with the existing communities. For example, Key Principle UF19 in the Skyline section of the Urban Form chapter requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas, (specific reference is made to Brompton Cemetery in Key Principle UF20) and Key Principle UF21 requires applicant(s) to demonstrate that there will be no negative impact on any of the views in the Townscape and Visual Analysis.