

Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document

CONSULTATION RESPONSES SCHEDULE: RETAIL

Chapter 07: Retail Strategy

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
41	Anthony	Williams		07	RS1, RS2	I completely disagree with the proposal to extend Fulham Town Centre along North End Road north of Lillie Road. It is extremely difficult and usually impossible to manage retail use as suggested and I consider that the proposed extension would harm and not help Fulham Town Centre which is struggling. The existing retail centres are based on the three underground stations and nothing should be done to undermine this. There will be sufficient new retail opportunities within the centre of the OA without attempting to expand them on the Edge.	No change necessary. One of the key drawbacks to the northern part of Fulham Town Centre is that it lacks a destination or anchor that might act as a draw to shoppers. The expansion of the retail offer along North End Road provides opportunities to create a retail destination. This should help to draw retailers up from the southern part of Fulham Town Centre, which will in turn, reinforce the retail that currently exists along North End Road through greater footfall.
42	Anthony	Williams		07	RS8	street markets are just that and can not be easily moved without being destroyed. That said, North End Road market has been eroded in recent years and needs revitalising but this may be difficult given the changing nature of Fulham. However, it still provides a valuable function and must be retained in some form. If OA land is to be provided it needs to be on the corner of North End Road and Lillie Road so it remains adjacent to its traditional location.	No change necessary. Key Principle RS8 stipulates that the land allocated should retain a North End Road address. The exact location would need to be predicated on discussions with LBHF Council and street traders in order to ensure a workable solution, as set out in Para 7.22.
89	Simon	Fisher		07	RS1	the Use Classes Order prevents crass distinction between convenience and comparison retail space. The only bad retail units in a shopping area are the empty ones. The SPD should support a balanced mix of retail/A3 facilities on designated sites throughout the Regeneration Area. It is absurd to propose that Earl's Court residents are deprived of non-convenience shops whereas such shops are welcome in North Fulham/West Kensington. Earl's Court Road is hardly a comparison shopping centre, whilst Kensington High Street will actually benefit from a larger catchment population if the EC/WK and Warwick Road sites are redeveloped for residential-led developments. The SPD should include a requirement for a foodstore of around 2,500 square metres within the EC/WK Regeneration Area.	Change to be made. Key Principle RS1 states that comparison retail should primarily be provided along North End Road. This does not preclude comparison retail being provided elsewhere within the Opportunity Area. Key Principle RS1 will be amended so that applicants will be asked to explore the provision of an anchor store on North End Road, which could be a food store.
90	Simon	Fisher		07	RS2	support shopping facilities close to West Brompton Station.	Noted.
127	Alex	Parker		07		The cultural, business, retail and leisure facilities proposed by the developer will either take trade from existing business or become underused or left empty and boarded up. There is only so much demand.	No change necessary. The authorities have commissioned Roger Tym and Partners to look at the office and retail demand in the Opportunity Area. Any application would need to have regard to these studies and the key principles in the SPD, which have been written having regard to this background evidence. With regard to leisure, the size of facility provided would be anticipated to cater for the new population arising from the redevelopment of the OA. In relation to culture, the facilities required for in the SPD are in order to retain the Earl's Court 'brand' created by the existing Exhibition Centres. Para 8.10 states that planning conditions will be used to require details on the user/occupier of proposed cultural facilities and that the borough's and the Mayor of London should be engaged in this process. This will allow the authorities to prevent a situation where competition takes trade away from nearby cultural destinations.
128	Alex	Parker		07		At present the retail and leisure facilities in both Earls Court and Fulham are challenged by the quality that they offer. The North End Road has become full of 'Pound Shops'. This is due to free market forces and limited demand as opposed to provision of space. Although bringing more people into the area may boost local	No change necessary. The authorities will control any new retail through a Retail Management Plan, as set out in Key Principle RS5, in order to prevent any new retail from having a detrimental impact on existing centres. Key Principle RS1 sets out the majority of comparison retail should be relocated along North End Road. This will help to increase footfall along North End Road, which should in turn benefit local businesses located there.

						businesses this is immediately taken away by the provision of even more retail and business premises. This Ceteris Paribas is further compounded by the loss of the business generated by Earls Court.	
157	Mary Ann	Sieghart		07		I live just west of the North End Rd, and because of the disruption involved over many years, local residents would be grateful if some early gains were made on the North End Rd itself, perhaps with some better shops, cafes and restaurants on the stretch of the road from West Kensington tube down to Lillie Rd.	Change to be made. The authorities recognise the importance of getting some early wins on North End Road. Key Principle RS1 sets out the expectation that any application for comprehensive development provide retail along the North End Road frontage. Key Principle UF2 sets out that east-west connectivity between North End Road and Warwick Road should be created at an early phase of development. A new key principle will also be added to the Phasing and Section 106 Strategy setting out the need for any planning applications to include triggers to secure the early delivery of certain infrastructure types. The reasoned justification supporting this new key principle will set out the importance of delivering east-west connectivity early within any comprehensive approach to redevelopment of the OA.
317	Sherry	Kernan		07		It is crucial that the new retail and restaurants [underline] not kill the existing merchants [end underline] in the area. That will cause blight and job loss.	No change necessary. Key Principle RS5 sets out that the authorities will control the nature of retail in the Opportunity Area such that it does not negatively impact on existing retail and restaurants.
327	Michael	Whittall		07		The proposed retail and restaurants will have a serious effect on long standing local businesses in the area	No change necessary. Key Principle RS5 sets out that the authorities will control the nature of retail in the Opportunity Area such that it does not negatively impact on existing retail and restaurants.
511	Malcolm	Spalding	Earl's Court Society	07	RS1	RS1 DELETE "Comparison retail demand generated by the new development should be accommodated within existing town centres" The existing comparison provision is not being met and is being closed down - creating unnecessary journeys.	No change necessary. The priority is for any new comparison retail demand created by development in the Opportunity Area to be located within existing town centres in order to strengthen rather than undermine the vitality and viability of these centres.
512	Malcolm	Spalding	Earl's Court Society	07	RS6	RS6 DELETE "narrow fronted" ADD "including at least one supermarket"	Change proposed. Key Principle RS1 will be amended so that it identifies the potential for an anchor store on North End Road.
513	Malcolm	Spalding	Earl's Court Society	07	RS7	RS7 AMEND to read "a good retail and comparison offer"	No change necessary. This Key Principle relates to convenience as well as comparison retail.
567	Elizabeth	Harrap		07		The proposed retail, office and hotel plans will probably undermine the viability of businesses in the Earls Court area and make it look rather like the Lillie Road near North end Road where several shops are empty.	No change necessary. The SPD is supported by an Office and Retail Studies which have considered the acceptable quantum of retail and leisure that could be accommodated within the Opportunity Area without having a negative impact on existing provision in the vicinity of the site. Key Principles ES2 and ES3 look to control the amount of business floorspace, whilst Key Principles RS1, RS2, RS3, RS4 and RS5 look to control the quantum, location and type of retail. The SPD acknowledges that an element of hotel provision would be expected to form part of any application for comprehensive development. The exact amount of hotel space would need to be predicated on evidence of demand for hotel space in the area and the authorities would need to be satisfied that such provision would not undermine the viability of other hotels in the vicinity of the Opportunity Area.
575	Gennaro	Castaldo	Kensington Mansions Residents Association	07		It is vital that any new retail/restaurant outlets do not undermine existing merchants in the area - as this could lead to blight and job loss. The Earl's Court Road could end up as devoid as the Warwick Rd.	No change necessary. Key Principle RS5 sets out that the authorities will control the nature of retail in the Opportunity Area such that it does not negatively impact on existing retail and restaurants.
662	Keith	Barker-Main		07		Once built, new businesses would compete with and negatively impact on the shops and stalls in North End Rd and in Earl's Court Rd, local hotels and restaurants - depend heavily on regular high-spending individuals staying here while attending exhibitions. This revenue scheme will be totally lost...forever. Existing restaurants and businesses will fold, creating a ghost town high street for Earl's Court. That is not acceptable on an economic or social level.	No change necessary. This SPD looks to control the quantum, phasing, location, impact and type of retail in order that any impact on existing retail centres in the vicinity of the OA is minimised. Key Principle RS1 looks to concentrate comparison retail within existing centres and along North End Road, adjacent to Fulham Town Centre. Key Principle RS2 sets out an expectation that convenience retail should be concentrated around existing centres, transport hubs and a new centre within the OA. Key Principle RS3 requires any application proposing retail to be accompanied by a Retail Impact Assessment, in order to demonstrate that any retail proposed has a minimal impact on the vitality and viability of existing centres. Key Principle RS4 requires the provision of any retail floorspace to be phased to population and worker uplift in order to ensure that the viability of existing centres is protected. Key Principle RS5 sets out that the authorities will control the nature of any retail through a Retail Management Plan,

							which would be secured as part of any Section 106 agreement. The authorities consider that these five key principles provide enough control in order to ensure that the vitality and viability of existing retail in the vicinity of the OA will be protected. Key Principle ES6 in the Employment Strategy sets out that measures should be included as part of any planning applications to ensure that businesses outside of the OA affected by development are protected, both during and post construction.
689	Duggie	Fields	iPetition	07		The indication that they would build a high street of shops just shows how thoughtless the whole project is. The area is surrounded by existing shopping streets full of closed down premises already. More provision of retail space is certainly not a need. With the downturn in retail trade, the decline of high streets everywhere, and the rise of internet shopping there is great need to support the existing retail areas and no need for to provide more units.	No change necessary. This comment appears to relate to the planning applications rather than the SPD. figure 7.1 illustrates the potential distribution of retail in the OA, as set out in Key Principles RS1 and RS2 of the SPD. Key Principle RS5 sets out that any retail proposed within the OA would be controlled by a binding Retail Management Plan, in order that the authorities can control the nature of any retail such that it does not directly compete with retail in the vicinity of the OA.
692	Duggie	Fields	iPetition	07		<p>WITH THE CLOSING OF LANGAN'S RECENTLY THERE ARE NOW APPROXIMATELY 20 EMPTY RETAIL UNITS IN THE IMMEDIATE VICINITY. IF OR WHEN THE EXHIBITION CENTRES CLOSE THERE UNDOUBTABLY WILL BE MORE STRAIGHT AWAY. 10 – 20 YEARS LATER ACCORDING TO THE 'MASTERPLAN'THERE WILL BE A NEW HIGH STREET WITH SHOPS WITHIN THE ADJACENT FOUR VILLAGE DEVELOPMENT. ONE HAS TO WONDER WHAT WILL BECOME OF WHAT IS LEFT OF EARLS COURT'S LOCAL STORES, SHOPS AND BARS BOTH IN THE MEANTIME AND AFTER..... TO SAY NOTHING OF THE CULTURE OF LONDON....</p>	No change necessary. This SPD looks to control the quantum, phasing, location, impact and type of retail in order that any impact on existing retail centres in the vicinity of the OA is minimised. Key Principle RS1 looks to concentrate comparison retail within existing centres and along North End road, adjacent to Fulham Town Centre. Key Principle RS2 sets out an expectation that convenience retail should be concentrated around existing centres, transport hubs and a new centre within the OA. Key Principle RS3 requires any application proposing retail to be accompanied by a Retail Impact Assessment, in order to demonstrate that any retail proposed has a minimal impact on the vitality and viability of existing centres. Key Principle RS4 requires the provision of any retail floorspace to be phased to population and worker uplift in order to ensure that the viability of existing centres is protected. Key Principle RS5 sets out that the authorities will control the nature of any retail through a Retail Management Plan, which would be secured as part of any Section 106 agreement. The authorities consider that these five key principles provide enough control in order to ensure that the vitality and viability of existing retail in the vicinity of the OA will be protected. Key Principle ES6 in the Employment Strategy sets out that measures should be included as part of any planning applications to ensure that businesses outside of the OA affected by development are protected, both during and post construction.
693	Duggie	Fields	iPetition	07		<p>WITH THE CLOSING OF LANGANIS LAST WEEK THERE ARE NOW APPROXIMATELY 20 EMPTY RETAIL UNITS IN THE IMMEDIATE VICINITY. IF OR WHEN THE EXHIBITION CENTRES CLOSE THERE UNDOUBTABLY WILL BE MORE STRAIGHT AWAY. 10 - 20 YEARS LATER ACCORDING TO THE "MASTERPLAN" THERE WILL BE NEW HIGH STREET WITH SHOPS BUT WITHIN THE ADJACENT FOUR VILLAGE DEVELOPMENT. ONE HAS TO WONDER WHAT WILL BECOME OF WHAT IS LEFT OF OUR LOCAL STORES, SHOPS AND BARS BOTH IN THE MEANTIME AND AFTER.....?</p>	No change necessary. This SPD looks to control the quantum, phasing, location, impact and type of retail in order that any impact on existing retail centres in the vicinity of the OA is minimised. Key Principle RS1 looks to concentrate comparison retail within existing centres and along North End road, adjacent to Fulham Town Centre. Key Principle RS2 sets out an expectation that convenience retail should be concentrated around existing centres, transport hubs and a new centre within the OA. Key Principle RS3 requires any application proposing retail to be accompanied by a Retail Impact Assessment, in order to demonstrate that any retail proposed has a minimal impact on the vitality and viability of existing centres. Key Principle RS4 requires the provision of any retail floorspace to be phased to population and worker uplift in order to ensure that the viability of existing centres is protected. Key Principle RS5 sets out that the authorities will control the nature of any retail through a Retail Management Plan, which would be secured as part of any Section 106 agreement. The authorities consider that these five key principles provide enough control in order to ensure that the vitality and viability of existing retail in the vicinity of the OA will be protected. Key Principle ES6 in the Employment Strategy sets out that measures should be included as part of any planning applications to ensure that businesses outside of the OA affected by development are protected, both during and post construction.
907	Cllr Linda	Wade		07	Para 7.20, Para 7.21	North End Road 7.20 and 7.21 This will be perceived as undermining an essential	No change necessary. Any decision to move the market would be predicated on discussions with market traders. The decision to move the current market from its current location would not only benefit traffic circulation but would also

						part of local identity within Fulham Broadway and North End wards, and the wider area. The street market is very much a part of the character of the area, and its potential relocation to provide extra capacity to North End Road for traffic would appear to be traffic orientated rather than pro-resident.	improve circulation for pedestrians.
908	Cllr Linda	Wade		07		<p>Earl's Court Road</p> <p>There is already a loss of retail amenity in this road and Old Brompton Road, and there should be active encouragement for businesses to remain trading, with initiatives and a request for a reassessment of the Business Rate for these businesses given the reduced footfall from the closure of the Exhibition Centre.</p> <p>It is essential for the existing community that these retail units, restaurants, and bars are supported during the construction phase of the development to maintain its status as a Neighbourhood Shopping area.</p> <p>This area requires an Enterprise Initiative to support and encourage local businesses to respond to changing markets.</p>	No change necessary. This SPD looks to control the quantum, phasing, location, impact and type of retail in order that any impact on existing retail centres in the vicinity of the OA is minimised. Key Principle RS1 looks to concentrate comparison retail within existing centres and along North End road, adjacent to Fulham Town Centre. Key Principle RS2 sets out an expectation that convenience retail should be concentrated around existing centres, transport hubs and a new centre within the OA. Key Principle RS3 requires any application proposing retail to be accompanied by a Retail Impact Assessment, in order to demonstrate that any retail proposed has a minimal impact on the vitality and viability of existing centres. Key Principle RS4 requires the provision of any retail floorspace to be phased to population and worker uplift in order to ensure that the viability of existing centres is protected. Key Principle RS5 sets out that the authorities will control the nature of any retail through a Retail Management Plan, which would be secured as part of any Section 106 agreement. The authorities consider that these five key principles provide enough control in order to ensure that the vitality and viability of existing retail in the vicinity of the OA will be protected. Key Principle ES6 in the Employment Strategy sets out that measures should be included as part of any planning applications to ensure that businesses outside of the OA affected by development are protected, both during and post construction.
1043	Mary	Gardiner	Kensington and Chelsea Social Council	07	RS1	<p>Retail</p> <p>Key Principle RS1</p> <p>We support the concentration on the existing centres.</p>	Noted.
1044	Mary	Gardiner	Kensington and Chelsea Social Council	07		<p>There is concern as to the relocation of North End Road market. The policy should give a commitment to take into account the requirements and needs of the market traders.</p>	No change necessary. Para 7.22 states that any decision to move the market would be predicated on discussions with market traders. These discussions would need to include the requirements that market traders would have of any new market, including size of pitch and storage space.
1116	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	07	Figure 7.1	<p>- Fig 7.1: A 'potential anchor' is shown in the key but not mentioned in the text.</p>	Change proposed. Reference will be made to the potential for an anchor store on North End Road in Key Principle RS1.
1165	Adam	Mills	Banham Locks Ltd.	07		<p>Banham supports the mixed use retail hub around West Brompton Station, as shown in Figure 3.2 and the employment and retail strategies as described in Chapters 6 and 7 and employment cluster and mixed use cluster shown on Figures 6.1 and 7.1 respectively. Banham particularly support retail to meet the day to day needs of residents and workers around public transport hubs and welcomes paragraph 7.13 referring to other non-residential uses such as offices, hotels and cultural and community uses being appropriate in any of the retail locations.</p>	Noted.
1195	Paul	Morice		07		<p>The proposed increase in the quantity of retail, office and hotel facilities will undermine the validity of businesses in the Earl's Court area.</p>	No change necessary. The SPD is supported by an Office Study and Retail Needs Assessment. Both show that the position set out within the SPD is tenable and would not undermine existing retail and business premises in the vicinity of the OA. RBKC's Core Strategy Policy CF8 seeks to protect hotels, except in the Earl's Court ward. There would therefore not be any policy basis to protect hotels in the Earl's Court ward that are affected by development within the OA. In LBHF, hotels within town centres will continue to be encouraged, as set out in policy E11 of the UDP. The council does not look to protect hotels outside of town centres.
1231	Hilary	Mackay		07	Key	Key Objectives 7. Retail	Noted.

					Objectives	I agree with the idea of building up existing retail provision and placing new units around tube stations. This makes much more sense than the previous idea of a high street through the middle of the OA which could well have shifted business or led to another underutilised shopping area. As things stand, people do travel to find what they want and will continue to do so. Better to support and supplement what exists.	
1421	Paul	Kennedy		07	North End Road Market	I object to the proposals to 'relocate' North End Road market, and force local residents to move. This plan is not about regeneration at all. It is about politically motivated social cleansing and helping the developers make lots of money.	No change necessary. This SPD requires any developer to allocate land for the potential relocation of the market. Any decision to move the market would be predicated on consultation with market traders.
1436	Michael	Bach	Kensington Society	07		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: - [bold] a more realistic amount of commercial development, such as offices and shops, that better matches the needs of the area and the public transport capacity to support it; [end bold]	No change necessary. The SPD is supported by an Office Study and Retail Need Assessment. Both show that the position set out within the SPD is tenable and would not undermine existing retail and business premises in the vicinity of the OA. The authorities will secure the necessary transport infrastructure to support the new resident and worker population in the OA.
1474	Michael	Bach	Kensington Society	07	Key Objectives	[bold] 7.Retail Strategy Key Objectives [end bold] The Society [bold] strongly endorses [end bold] these objectives - comparison shopping in town centres and retail provision within the OA to meet day-to-day needs of residents and workers only, but clustered round North End Road and underground stations, although we have doubts as to the viability of a cluster near West Brompton.	No change necessary. The authorities support a cluster of retail around West Brompton in order to support the needs of any development at Seagrave Road and to the south of the main part of the OA. The authorities would expect any retail proposed around West Brompton to be flexibly designed, as per the requirements of Key Principle RS6, so that units are able to expand and contract with market demands and even turn to alternative uses if retail in this location proves to be unsuccessful.
1475	Michael	Bach	Kensington Society	07	Key Principle RS1	[bold] Key Principle RS1 [end bold]: Meeting the need for comparison shopping in existing town centres is [bold] strongly supported [end bold] - which would make the proposed comparison shopping provision at an expanded Tesco on West Cromwell Road in direct conflict with this principle. The Society [bold] endorses [end bold] the conclusion of the RTP retail need study.	No change necessary. The planning application on West Cromwell Road sits outside of the OA and is therefore beyond the scope of this SPD.
1476	Michael	Bach	Kensington Society	07	Key Principle RS2	[bold] Key Principle RS2 [end bold]: The Society supports this, but has doubts about the West Brompton cluster and the capacity to support a new centre within the OA. The Society is not convinced of the viability of these two centres.	No change necessary. The authorities support a cluster of retail around West Brompton in order to support the needs of any development at Seagrave Road and to the south of the main part of the OA. The authorities would expect any retail proposed around West Brompton to be flexibly designed, as per the requirements of Key Principle RS6, so that units are able to expand and contract with market demands and even turn to alternative uses if retail in this location proves to be unsuccessful. The authorities consider there to be capacity for a new local centre within the OA and that a new local centre in the vicinity of the Empress State building would be the most logical position for any additional retail as this would give meaning to the Empress State building's height and presence on the skyline (para 4.66), as well as complementing the cultural destination which the authorities would encourage to be located here.
1637	John	Drake	Campaign to	07	Social and Community Facilities		No change necessary. The authorities consider that the spatial distribution or

			Protect Rural England			iii) Shops for local use should be encouraged hopefully selling items which are immediately required. They should be sited in several parts of the site and at Seagrave Road	retail illustrated in Figure 7.1 will be sufficient on order to guarantee that residents within the OA will be within easy walking distance of a local convenience store.
1918	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	07		46. [bold] Retail [end bold]. We think the proposals here are broadly acceptable, including the proposals for affordable shops and for a new market, which we welcome. However, we do not support the proposal for a new retail centre near the Empress building. We think it is in the wrong location and would not complement a new cultural facility - about which we comment below. We question the transport sustainability of clustering significant amounts of comparison retail around the congested transport nodes, new and proposed major road junctions where the SPD sets out the possibly conflicting aims of creating enhanced interchange facilities, wider pavements, and higher capacity station entrances.	No change necessary. The SPD acknowledges that the quantum of development that could potentially be accommodated in the OA will lead to a retail demand that goes beyond what could be accommodated in and around existing centres. The authorities consider that a new local centre in the vicinity of the Empress State building would be the most logical position for any additional retail as this would give meaning to the Empress State building's height and presence on the skyline (para 4.66), as well as complementing the cultural destination which the authorities would encourage to be located here.
2069	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	07	Key Objectives	It is inappropriate for the revised draft SPD to make specific reference to comparison retail demand from new residents being met in existing town centres. It is fundamental to the success of the comprehensive redevelopment of the ECWKO for a mix of uses, including retail (both convenience and comparison) to be provided to make it an attractive place for residents, workers or visitors alike.	No change necessary. It is acknowledged that comparison retail should be provided within the OA. Key Principle RS1 identifies that this comparison retail should be primarily located along North End Road. this recognises that comparison retail may be permissible elsewhere within the OA but any developer would need to justify its provision and the reasons for any departure from Key Principle RS1.
2070	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	07	RS1	For the reasons noted above the approach to comparison retail is inappropriate, inflexible and has the potential to fetter the appropriate redevelopment of the ECWKO. The wording of the Key Principle should be amended by the insertion of the word "normally" in the second line after "development" and before "should".	No change necessary. It is acknowledged that comparison retail should be provided within the OA. Key Principle RS1 identifies that this comparison retail should be primarily located along North End Road. this recognises that comparison retail may be permissible elsewhere within the OA but any developer would need to justify its provision and the reasons for any departure from Key Principle RS1. The authorities will require justification as to why any comparison retail cannot be located in existing centres, as per the requirements of the sequential test in PPS4.
2071	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	07	RS3	It is of course understood that any application for planning permission that includes retail will need to demonstrate its likely impact on existing centres that surround the ECWKO. It is, however, inappropriate to use words such as 'minimal' particularly where this is not defined.	No change necessary. An impact that is not considered to be 'minimal' would not be acceptable to the authorities. No definition of 'minimal' is set out in the SPD as it is not a hard and fast science. The authorities will take a pragmatic approach to its definition when considering any Retail Impact Assessment.
2072	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	07	RS8	The general principle of providing for the North End Road market is acknowledged. The revised draft SPD should, however, not be overly specific as to how when or where this should be re-provided.	No change necessary. The current wording of the key principle and supporting text is considered to be sufficiently flexible in terms of how, when and where any market should be provided. When it should be provided is not specified. How it should be provided is set out as three alternative options. Where it is provided is more explicit; however, it is felt important that it retain a North End Road address in order to retain the legacy of the market, as being a part of North End Road.
2107	Geraldine	Kelly		07		Among the points which need to be considered are: 4. The proposed retail, office and hotel will undermine the viability of businesses in the Earl's Court area.	No change necessary. The SPD is supported by an Office and Retail Studies which have considered the acceptable quantum of retail and leisure that could be accommodated within the Opportunity Area without having a negative impact on existing provision in the vicinity of the site. Key Principles ES2 and ES3 look to control the amount of business floorspace, whilst Key Principles RS1, RS2, RS3, RS4 and RS5 look to control the quantum, location and type of retail. The SPD acknowledges that an element of hotel provision would be expected to form part of any application for comprehensive development. The exact amount of hotel space would need to be predicated on evidence of demand for hotel space in the area and the authorities would need to be satisfied that such provision would not undermine the viability of other hotels in the vicinity of the Opportunity Area

