CONSULTATION RESPONSES SCHEDULE: SOCIAL & COMMUNITY FACILITIES
<table>
<thead>
<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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<tbody>
<tr>
<td>6</td>
<td>Jane</td>
<td>Chaston</td>
<td>09</td>
<td>I and many other people will lose the Doctor's Surgery at 82 Lillie Road</td>
<td></td>
<td>No change necessary. Figures 3.3, 3.4 and 3.5 show 82 Lille Road remaining underdeveloped through any comprehensive approach to regeneration in the OA. Were an application to come forward proposing the demolition of the surgery, the authorities would require its replacement with at least equivalent floorspace and in an equally accessible location for all those that currently use the facility.</td>
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<td>Linda</td>
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<td>23</td>
<td>Patricia</td>
<td>Rowley</td>
<td>09</td>
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<tr>
<td>26</td>
<td>Dany</td>
<td>BuBois</td>
<td>09</td>
<td>As a local resident with a young family I am unhappy about the amount of new residents proposed to move to this area as it will mean far greater competition to get into already over-subscribed local schools. I understand that there is a new primary and a new secondary school proposed, but this is unlikely to have space for the families of the 7,500 new residents as well as the children who need an education already in the borough. As the majority of the people moving into the area will be from social housing, the schooling need will be very high.</td>
<td>SC1</td>
<td>No change necessary. The authorities can only require developers to provide for the education capacity requirements arising from their development. Separate to this process, the authorities have a duty to provide for the educational needs of its residents and are in the process of improving and expanding the capacity of existing nursery, primary and secondary schools to meet this need.</td>
<td></td>
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<tr>
<td>31</td>
<td>Helen</td>
<td>Coope</td>
<td>09</td>
<td>The projected area of new residential 'villages' and blocks of some stories high is going to bring in a new increased density of population.</td>
<td>SC1, SC2</td>
<td>No change necessary. Key Principle SC1 deals with education provision. Key Principle SC2 deals with health provision. Chapter 10 of the SPD deals with transport provision. Developers would be required to mitigate against the impacts arising from their developments.</td>
<td></td>
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<tr>
<td>93</td>
<td>Simon</td>
<td>Fisher</td>
<td>09</td>
<td>support increased CCTV coverage, police shop and library</td>
<td>SC5, SC6</td>
<td>Noted.</td>
<td></td>
</tr>
<tr>
<td>119</td>
<td>Alex</td>
<td>Parker</td>
<td>09</td>
<td>The LBHF does not have enough measures to manage anti social behaviours common to transitory populations e.g. noise, litter, rubbish dumping, effective parking controls.</td>
<td></td>
<td>No change necessary. The authorities have sufficient controls in order to manage these issues. There are contact numbers available on the council’s website that you can call if you feel that any anti-social behaviour laws are being breached. In addition, Key Principle SC5 sets out that the authorities will secure a policing facility and extended CCTV network throughout the Opportunity Area.</td>
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<tr>
<td>153</td>
<td>Richard</td>
<td>Lane</td>
<td>Kensington and Chelsea College</td>
<td>KCC currently delivers education and training in all London prisons. Our work is increasingly focused on Vocational training giving routes to sustainable employment. That outcome is proven to significantly change proposed. Para 6.23 will be altered to make specific mention of the need for a specific focus to be paid to the employment opportunities for young offenders.</td>
<td>09</td>
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<tr>
<td>Page</td>
<td>Author</td>
<td>Institution</td>
<td>Section</td>
<td>Comments</td>
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<tr>
<td>154</td>
<td>Richard Lane</td>
<td>Kensington and Chelsea College (KCC)</td>
<td>09</td>
<td>We welcome the population growth close to one of our main centres at Hortensia Road and the suggestion that funding should be made available (presumably through section 106 agreements) for development of Social and Community Provision.</td>
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<tr>
<td>155</td>
<td>Richard Lane</td>
<td>Kensington and Chelsea College (KCC)</td>
<td>09</td>
<td>SC1</td>
<td>However, we are concerned that there is no mention in SC1 (which concerns an obligation to provide for nursery, primary and secondary capacity) of post 16 educational provision. Increased local capacity will be required for this age group if targets to contain or reduce travel are to be met.</td>
<td></td>
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<tr>
<td>156</td>
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<td>Kensington and Chelsea College (KCC)</td>
<td>09</td>
<td>SC6</td>
<td>We however note the requirement in SC6 to provide a new 4,500sqm community building including library and training facilities. We would caution against the creation of additional facilities of this size which would be uneconomic to run - particularly as funding for libraries and training is likely to be at a lower level in the coming years. Instead developers should be required to work with existing local providers to maintain or grow existing capacity. A site owned by the RBKC adjacent to the College’s current Hortensia Road site would seem to be a more viable option for a community facility which - as part of a larger facility - would more sustainable in the long term.</td>
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<tr>
<td>271</td>
<td>Silvia Piva</td>
<td></td>
<td>09</td>
<td>Provision should be made for a swimming pool in the leisure and sports facilities. I note the development includes a proposal for indoor 'community areas'; which simply risk to create blind areas (i.e. the police won't have easy access for control) for the development of illegal activities.</td>
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<tr>
<td>356</td>
<td>Christine Powell</td>
<td>Earl's Court Society</td>
<td>09</td>
<td>Para 9.14</td>
<td>Provision should be made for a swimming pool in the leisure and sports facilities.</td>
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<td>519</td>
<td>Malcolm Spalding</td>
<td>Earl's Court Society</td>
<td>09</td>
<td>Key Principle SC2</td>
<td>SC2 STRONGLY SUPPORT</td>
<td></td>
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<tr>
<td>520</td>
<td>Malcolm Spalding</td>
<td>Earl's Court Society</td>
<td>09</td>
<td>Key Principle SC3</td>
<td>SC3 &quot;target existing deficiencies...&quot; STRONGLY SUPPORT ADD at end &quot;and at least one 6-lane 25m swimming pool&quot;</td>
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<tr>
<td>521</td>
<td>Malcolm Spalding</td>
<td>Earl's Court Society</td>
<td>09</td>
<td>Key Principle SC6</td>
<td>SC6 STRONGLY SUPPORT ADD &quot;in addition to the hub there should be devolved community spaces in each of the four village quarters of the development&quot;</td>
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</table>
On behalf of the Congregation of Jehovah's Witnesses, I would like to put in a submission in relation to section 9 of the document entitled 'Social and Community Facilities Strategy' in the following terms:

We note that 'places of worship' are not included among those land uses specifically referred to in paragraph 9.1 of the Revised SPD as constituting 'social and community facilities'. We would respectfully request that this omission be rectified so as not to preclude the future provision of such facilities within the opportunities area, if and when a future need should arise.

Although we acknowledge that the 'London Plan' (referred to in passing in paragraph 9.3) does make provision for places of worship, which we are happy to rely upon should a future need arise, we would still request that the Revised SPD include a specific reference to 'places of worship' for purposes of consistency and to ensure that the future provision of such facilities within the opportunities area, if needed, is not precluded by omission.

This is consistent with Government Guidance as follows:

Paragraph 14 of PPS1 which states: "...The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas. This means meeting the diverse needs of all people in existing and future communities, promoting personal well-being, social cohesion and inclusion and creating equal opportunity for all citizens". Paragraph 16 goes on to say: "...Plan policies should...take into account the needs of all the community, including particular requirements relating to...religion".

Paragraph 126 of the draft National Planning Policy Framework (NPPF) states that in order to deliver the facilities and services that the community needs, planning policy should: "...plan positively for the provision and integration of community facilities (such as...places of worship)...to enhance the sustainability of communities and residential environments".

We would be grateful if you could take these comments into consideration before adopting the Revised SPD.
<table>
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<tr>
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<td>Sports and Leisure</td>
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<td>It is essential that there is sufficient space for young adults and teenagers to play football so that scope for anti-social behaviour is designed out of the development area. The present provision allocated on the Linear Park is insufficient, which supports the earlier request for a 6-hectare open access park for the site.</td>
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| Change proposed. The SPD already identifies the need for nursery provision in Key Principle SC1. Key Principle SC6 and para 9.22 will be altered to include "children’s centre". |
| 1030 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | The policy wording is that the present system is working at full capacity, whereas in fact there is a gap in terms of meeting needs and this gap in provision should not be carried forward. For example, schools are over-subscribed and at present parents are having to go out of the area to find a secondary school. No change necessary. Applicants can only be required to provide infrastructure and this gap in provision should not be carried forward. It would contravene Section 122(2) of the Community Infrastructure Levy regulations to require infrastructure beyond this. |
| 1031 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | The impact of the population increase is also not well analysed. There is a doubling of the population, which will have a huge impact on amenity and require a doubling of social infrastructure. No change necessary. The SPD sets out the requirements for what infrastructure will be necessary to mitigate against the impacts of development. |
| 1032 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | SC2 Key Principle SC2 We are concerned that the new health facility could be a private provider. We are therefore seeking a clear reference to NHS provision, both in the text and the policy. With the population increase that is anticipated, the commitment should be to an integrated primary care centre whose core services are defined in the text (e.g. it is essential that an NHS dental practice is included). Change proposed. Clarification will be put in both the Key Principle and the text that the health facility will be owned and operated by the NHS. The first and second bullet in para 9.10 set out that the requirement is that for a population under 10,800, the facility should be a Health Centre, whilst the requirement for a population over 10,800 is that the facility should be an Integrated Primary Care Centre. This position has been agreed with both boroughs’ PCT’s. |
| 1033 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | SC3 Key Principle SC3 Leisure facilities need to be defined. For example, libraries, meeting halls, recreation, youth facilities, pubs, arts and culture. No change necessary. It is implicit in the wording of the Key Principle that Key Principle SC3 is referring to facilities such as sports centres, gyms and health clubs. The authorities will not be looking to secure affordable access to pubs and culture whilst libraries, meeting halls and youth centres are dealt with under Key Principle SC6. |
| 1034 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | SC3 There should be reference to the local demand for a public swimming pool. No change necessary. An audit of existing facilities has not thrown up a deficiency in swimming pools in the vicinity of the Opportunity Area. There is an existing swimming pool at Normand Park plus a planning application currently in at 100 West Cromwell road which proposes a new swimming pool. As a result, the authorities are not explicitly requiring the provision of a swimming pool as part of any comprehensive approach to redevelopment of Earl’s Court. The SPD does not preclude the provision of a swimming pool and were development proposals to provide one, the authorities would look to secure affordable access to this, in line with the requirements of Key Principle SC3. |
| 1035 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | SC3 Whilst welcoming the reference to affordability in the policy, this needs to be defined. The change we are seeking is for a range of sports and leisure provision [bold] to be available free of charge to low income groups. [end bold] No change necessary. The exact affordability level that would be secured is too detailed for this SPD and would be dependent on viability. |
| 1036 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | SC6 Key Principle SC6 We strongly support the community hub, which we see as the heart of the development and absolutely crucial for supporting and resourcing a sustainable community, and bringing together new and existing residents. The community hub will respond to the current unmet need for community facilities. The first sentence in paragraph 9.20 is inaccurate and should be re-worded. No change necessary. The first sentence in para 9.20 is accurate and does not require alteration. The SPD currently states that the facility should be delivered in the early phases of development. To specify the first phase is too specific and might result in the facility being delivered in an unsuitable location. The fit out and rent level/management arrangements are too detailed for this SPD and would be resolved through discussions between the authorities and developer and dependent on viability. |
| 1037 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | SC6 We propose that the policies under Cultural Strategy (CST-4) are linked to key principle SC6. Local cultural diversity is an important part of the make up of Earls Court and should be recognised in the text. Accessibility within the community hub also needs a mention within the policy; there should be the provision of lifts. Change proposed. The SPD currently states that the facility should be delivered in the early phases of development. To specify the first phase is too specific and might result in the facility being delivered in an unsuitable location. The suggested wording on meeting cultural needs will be included. Play space is dealt with under Key Principle UF16. The authorities consider that requiring
We change we seek is for the policy to include the wording:-

[bold] This will take place in the first phase of the development.

The community spaces will meet diverse cultural needs and be affordable and accessible to all new and existing residents.

Activities will include play space, opportunities for young people, a community café, a performance space, a space for local cultural diversity.  [end bold]

All of these activities will pull people together. Youth facilities should be referred to under Community Space with s 106 funding for youth workers.

Space for performance space and a space for cultural diversity is too specific for this SPD. The exact fit out of the facility would need to be predicated on discussions with the authorities closer to the delivery of any facility. Youth space will be added into Key Principle SC6. Youth workers would need to be funded by the local authorities.

| 1038 | Mary Gardiner | Kensington and Chelsea Social Council | 09 | We strongly support the existing reference to affordable office space for voluntary and community sector organisations, as we have heard evidence from organisations who have had to relocate to Ladbroke Grove because of nil affordable space at Earls Court. |
| 1066 | Bernard Moran | NHS Kensington and Chelsea | 09 | Key Principle SC2 - please add the following sentence: Community engagement is an important lever to reduce health inequalities and the local community views should be considered in addition to an analysis of the impact on health and well being. |
| 1067 | Bernard Moran | NHS Kensington and Chelsea | 09 | Change proposed. Clarification will be provided in a new paragraph after 9.10 on what an Integrated Primary Care Centre would include. The other suggestions seem too specific for this SPD and would need to result from more detailed |
Clause 9.12:

[bold italics] An analysis of the health impacts of the proposed developments will need to factor-in the following sectors:

- Acute healthcare;
- Mental healthcare;
- Intermediate healthcare;
- Primary healthcare.

A Health Impact Assessment would need to consider future trends, advances in technology and social change which may have an impact on future healthcare delivery. If an integrated Primary Care Centre for the GP-led primary care services is required; such a centre may include: dental services; space to support the specialist skills that GPs are developing in response to local health and wellbeing needs; outreach facilities and home-based medical support. Examples of future issues that need to be addressed include the following:

- Demographic shifts to an increasing elderly population;
- Greater public access to healthcare and choice;
- Rapid developments in information, medical and communications technology;
- Greater emphasis on community-based preventive medicine initiatives;
- Socialist outreach centres - hospital specialists undertaking consultations and investigations in a primary care setting requiring more flexible clinical and diagnostic facilities;
- Special facilities and room allocations to accommodate GPs with special interests, nurse practitioner clinics and health visitor services

Please include:

Clause 9.13:

[bold italic] As well as considering a strategic approach in respect of emerging Government Policy and health reforms, the Health Impact Assessment will need to consider the policies in the London Plan which seeks to ensure that new developments are designed and constructed in ways that improve health and reduce health inequalities. London Plan “Social Infrastructure (Policy 3.17).”

Change proposed. A new key principle will be inserted requiring applicants to submit a health impact assessment with any planning applications in the OA. This key principle will include the suggested supporting text.
Healthcare Facilities require development to meet the increased demands for such infrastructure to adequately assess need and ensure provision is made where shortfalls are identified. With this in mind, an evidence-based strategy which promotes greater integration of primary health and wellbeing; social care services and community services may need to be considered. A facility which allows for the co-location of social infrastructural services could provide an effective, flexible and sustainable solution. [end bold italic]

Furthermore, Earl's Court has density and growing population, as the younger generations now also have lots of offspring, and the movement of new people into the area such those above Earl's Tesco, affect the increasing population, where the health centres are demanding more than before. Without new infrastructure and services being provided my worry is that the pressure from the sudden increase in population will cause health related issues such as mental health, Sexual health, community tensions, and anti social behaviour.

There is already a waiting list and a limited number of GPs in Earls Court, although now there is a new health centre at Hogarth Road and the density of the population need free NHS GPs with free dentists' facilities. There is also a great need for the local primary and secondary school.

No change necessary. The Social and Community Facilities Strategy sets out the sort of social infrastructure that would need to be provided within the OA to support the needs of development. Applicants can only be required to provide infrastructure to mitigate against the impact of their development. It would contravene Section 122(2) of the Community Infrastructure Levy regulations to require infrastructure beyond this.

3. Community hub
- affordable community and voluntary office spaces
- Meeting halls
- Praying spaces
- Cafe
- Space for drop - in information and culturally artefact exhibition centre
- Cafe space
- Youth club

Change proposed. Youth space will be added to Key Principle SC6.

4. Leisure centre to combat the increasing obesity
- friendly gym
- Swimming pool, free and gender friendly
- Health facility.
- Youth facilities

Change proposed. Youth space will be added to Key Principle SC6. Key Principle SC2 sets out the requirements for development to deliver a health facility. Key Principle SC3 sets out the requirements for development to deliver a range of indoor and outdoor sports and leisure facilities and that the authorities will secure affordable access to these facilities. An audit of existing facilities has not thrown up a deficiency in swimming pools in the vicinity of the Opportunity Area. There is an existing swimming pool at Normand Park plus a planning application currently in at 100 West Cromwell road which proposes a new swimming pool. As a result, the authorities are not explicitly requiring the provision of a swimming pool as part of any comprehensive approach to redevelopment of Earl's Court. The SPD does not preclude the provision of a swimming pool and were development proposals to provide one, the authorities would look to secure affordable access to this, in line with the requirements of Key Principle SC3.

5. Nursery
- Family friendly drop-in centre for low income and vulnerable

Change proposed. A children's centre will be added to Key Principle SC6. Key Principle SC1 sets out that the authorities will require applicants to deliver nursery space related to the needs of the new population. Key Principle UF16
<table>
<thead>
<tr>
<th>Page</th>
<th>Author</th>
<th>Section</th>
<th>Note</th>
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</thead>
<tbody>
<tr>
<td>1080</td>
<td>Dahabo Guled</td>
<td>7. Health Centre</td>
<td>- Affordable nursery for working mothers with small babies&lt;br&gt;- Children's play safe area is paramount importance&lt;br&gt;- Consultants and specialists availability&lt;br&gt;- NHC GPs space&lt;br&gt;- Free Dental facilities&lt;br&gt;- Community offices spaces at cheap rents are badly needed, also other community services to be affordable too. Moreover affordable small business and restaurants which serve for non-European clothes, perfumes and food are important for people with other cultural skills.&lt;br&gt;- Schools in the borough are already oversubscribed, so the development must provide sufficient education provision for the OA and, if required, beyond&lt;br&gt;- Community offices spaces at cheap rents are badly needed, also other community services to be affordable too. Moreover affordable small business and restaurants which serve for non-European clothes, perfumes and food are important for people with other cultural skills.&lt;br&gt;- Schools in the borough are already oversubscribed, so the development must provide sufficient education provision for the OA and, if required, beyond&lt;br&gt;- Table 9.1 &amp; 9.2 should use consistent terminology, as such 'private' on figure 9.2 should be changed to 'market' or at least '(market)' in brackets thereafter. &lt;br&gt;Table 9.1 &amp; 9.2</td>
</tr>
<tr>
<td>1081</td>
<td>Dahabo Guled</td>
<td>8. Schools</td>
<td>- Primary schools for the increasing children&lt;br&gt;- Secondary school in Earls Court is very essential as families travel either to Holland park or World's End Area&lt;br&gt;- Schools in the borough are already oversubscribed, so the development must provide sufficient education provision for the OA and, if required, beyond&lt;br&gt;- Schools in the borough are already oversubscribed, so the development must provide sufficient education provision for the OA and, if required, beyond</td>
</tr>
<tr>
<td>1085</td>
<td>Dahabo Guled</td>
<td>RBKC Public Realm Scrutiny Committee</td>
<td>- Community offices spaces at cheap rents are badly needed, also other community services to be affordable too. Moreover affordable small business and restaurants which serve for non-European clothes, perfumes and food are important for people with other cultural skills.&lt;br&gt;- Schools in the borough are already oversubscribed, so the development must provide sufficient education provision for the OA and, if required, beyond</td>
</tr>
<tr>
<td>1119</td>
<td>Cllr J. Gardner</td>
<td>RBKC Public Realm Scrutiny Committee</td>
<td>- Community offices spaces at cheap rents are badly needed, also other community services to be affordable too. Moreover affordable small business and restaurants which serve for non-European clothes, perfumes and food are important for people with other cultural skills.&lt;br&gt;- Schools in the borough are already oversubscribed, so the development must provide sufficient education provision for the OA and, if required, beyond</td>
</tr>
<tr>
<td>1120</td>
<td>Cllr J. Gardner</td>
<td>RBKC Public Realm Scrutiny Committee</td>
<td>- Table 9.1 &amp; 9.2 should use consistent terminology, as such 'private' on figure 9.2 should be changed to 'market' or at least '(market)' in brackets thereafter.</td>
</tr>
<tr>
<td>1121</td>
<td>Cllr J. Gardner</td>
<td>RBKC Public Realm Scrutiny Committee</td>
<td>- 9.7 &amp; 9.10: Why use Wandsworth's calculations? It is not clear why these are included and why LBHF’s calculations are not being used? If they are to remain, then please explain why.</td>
</tr>
<tr>
<td>1122</td>
<td>Cllr J. Gardner</td>
<td>RBKC Public Realm Scrutiny Committee</td>
<td>- SC2 and 9.10 are not clear how many doctors surgeries are actually being required? We suggest the words a &quot;minimum of&quot; is included.</td>
</tr>
<tr>
<td>1123</td>
<td>Cllr J. Gardner</td>
<td>RBKC Public Realm Scrutiny Committee</td>
<td>- SC3: Should a swimming pool be added as a requirement given the size of the OA?</td>
</tr>
<tr>
<td>1124</td>
<td>Cllr J. Gardner</td>
<td>RBKC Public Realm Scrutiny Committee</td>
<td>- SC6: It is not clear where the community facilities are to be sited. This should be more specific.</td>
</tr>
</tbody>
</table>
| 1125  | Cllr J. Gardner | RBKC Public Realm Scrutiny Committee | - Para 9.22 (last sentence): What is meant by 'accessible to all'? Businesses may think this is an opportunity for cheap office | No change necessary. This means that the spaces provided should be available without prejudice. They should be designed so as to be multi-faith, multi-ethnicity
<table>
<thead>
<tr>
<th>Scrutiny Committee</th>
<th>meeting space. and useable for those with disabilities.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ali Negyal</td>
<td>1. What is the anticipated increase in population from this redevelopment? (a) Local schools are known to already be at capacity (2.45) so what provision will be made for children moving in/natural family growth? No change necessary. The new population would be dependent on the scale of development and size of units proposed. New development would need to be assessed against the 2004 Wandsworth New Housing Survey data in order to ascertain the likely population yield, as set out in the third bullet point in para 9.10. Key Principle SC1 deals with the authorities expectations in relation to education provision from any development in the OA.</td>
</tr>
<tr>
<td>Ali Negyal</td>
<td>b) Health centre developments (2.46) are not intended to meet additional healthcare needs, but simply to re-house GPs, so how will these be met for residents of the new development? No change necessary. Key Principle SC2 sets out the authorities requirements in relation to health facilities.</td>
</tr>
<tr>
<td>Jenny Montefiore</td>
<td>SERVICES The large increase in population will have an impact on all aspects and services in the area Approval should not even be considered if there is not provision for a secondary School as well as the planned for Primary and Nursery School. No change necessary. Key Principle SC1 sets out the authorities requirements in relation to education provision in the OA.</td>
</tr>
<tr>
<td>Jenny Montefiore</td>
<td>SERVICES A large community affordable Leisure and Sports Facility is needed, not just the private small gyms and healthclubs which are provided, this should not be confined to an underground hole in a basement and should not be an afterthought, but a provision. Chelsea and Westminster already has reported a 100% increase in appointments this year. No change necessary. Key Principle SC3 sets out that the authorities will expect redevelopment to provide a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population. As part of this provision the authorities will look to secure affordable access as part of any relevant planning agreements.</td>
</tr>
<tr>
<td>Brian Coughlan</td>
<td>Police Facilities The Metropolitan Police Service provide a vital community service to the Royal Borough of Kensington and Chelsea and London Borough of Hammersmith and Fulham. This significant cross-borough development will lead to an increase in the number of people living, working and visiting the local area. This will have a direct impact on policing which should be mitigated by the development. Noted.</td>
</tr>
<tr>
<td>Brian Coughlan</td>
<td>Police Facilities The representations outlined below, initially detail the MPA/S’ operational needs in relation to ESB and outline why it is vital that this is protected. Secondly, the projected impact the overall development will have on policing is assessed and appropriate representations detail requested alterations to the draft SPD which will ensure the development impact upon policing is mitigated. Noted.</td>
</tr>
<tr>
<td>Met Police Authority &amp; Met Police Services</td>
<td>Police Facilities [bold] Protecting policing use in ESB [end bold] ESB is a significant landmark within west London, comprising 31 floors providing circa 48,000m2 floorspace. The building is occupied in its entirety by the Metropolitan Police. The Metropolitan Police Service (MPS) are one of the largest employers in London and occupy and manage circa 1,000,000m2 of property across London. The majority of the services required in order to ensure effective operational policing is delivered across London are based at ESB. These functions comprise both key policing and security operations. Essential policing services comprising Property Services, Corporate Real Estate, Procurement, Human Resources, Recruitment, Media Liaison, Officer and Staff Training, Communications, Archiving and Logistics are undertaken at ESB. These functions are served by essential car parking, good public transport links and the required facilities do not wish to be prescriptive about what use the Empress State building should be put to but in order to satisfy Policy LE1 in LBHF’s Core Strategy, any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements of Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.</td>
</tr>
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</table>
Secure IT infrastructure close to ESB. Finally, ESB has recently served as a focus for the consolidation of other MPS offices, therefore adding weight to its crucial role in delivering effective policing and a secure environment across London.

Mindful of its role within strategic policing, the loss of ESB as a strategic policing facility may prejudice strategic policy objectives seeking to maintain a safe and secure environment in London. Our representations therefore seek proposed amendments to the draft SPD to protect the policing use within ESB. The following national guidance and statutory development plan policy demonstrate the planning policy support for these representations.

**Protecting policing use in ESB**

[italics] National, Regional and Local Guidance

The Crime and Disorder Act 1998 places a duty on the local planning authority to do all that it reasonably can to prevent crime and disorder in its area. The potential impact on policing operation through the loss of policing use in ESB through the draft SPD should be considered. The SPD must protect the policing use in ESB. By virtue of the Crime and Disorder Act 1988 the LPA have a statutory duty to ensure the policing impact is mitigated. The following national guidance and development plan policy is therefore relevant in determining this application.

The draft National Planning Policy Framework (NPPF) was published by the Government in July 2011 and is intended to replace the current suite of Government Guidance. A strategic priority identified within the NPPF requires the provision of security and community infrastructure.

[italics] Planning Policy Statement 1 (PPS1) - Delivering Sustainable Development requires authorities to ensure infrastructure is provided to support new and existing economic development and housing. PPS1 significantly raised the profile of policing as a material planning matter, with paragraph 1 recognising that “[italics] poor planning can result in a legacy for current and future generations of run down town centres, unsafe and dilapidated housing, crime and disorder...” PPS12 recognises the Police as one of the key social infrastructure delivery agencies.

The draft SPD should also be aware of the strategic and local development plan. This is demonstrated immediately below.

<table>
<thead>
<tr>
<th>1275</th>
<th>Brian Couthan</th>
<th>Met Police Authority &amp; Met Police Services</th>
<th>09 Police Facilities</th>
</tr>
</thead>
</table>

1.[italics] Adopted London Plan Policy 3.16 refers to No change necessary. The authorities do not wish to be prescriptive about what use the Empress State building should be put to but in order to satisfy Policy LE1 in LBHF’s Core Strategy, any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements of Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.
provision of appropriate social infrastructure which by definition (paragraph 3.86) includes policing and states that proposals which result in a net loss without realistic proposals for re-provision should be resisted. It is thus clear that unless ESB is supported for continued policing use the SPD conflicts with the strategic development plan.

2. [italics] Adopted London Plan Policy 7.13 [end italics] seeks to maintain a safe and secure environment at strategic level and that development should design out crime and assist detection of terrorist activity. Mindful of the essential role of ESB in delivering operational policing across London, the SPD should protect the policing use

3. The Community Services chapter within the [italics] LBHF UDP [end italics] (Adopted 2003 and as ‘saved’ January 2011) defines ‘Community Service Uses’ to include ‘operational facilities of public emergency services’. Policy CS8 states the Council will seek to ensure the availability of land or buildings required for the provision of community service uses, where proposals are programmed for implementation within the period of this Plan.

4. The [italics] LBHF Core Strategy [end italics] was adopted in October 2011. The Strategic Objective dealing with community facility provision includes policing facilities within this definition. Policy CF1 states the Council will work with its strategic partners to provide borough-wide, accessible and inclusive community facilities by protecting existing premises that remain satisfactory for these purposes.

5. Similarly, the Core Strategy highlights in Policy LE1 the importance of [italics] ‘retaining [bold] premises [bold] capable of providing continued accommodation for local services or significant employment’ [end italics] (my emphasis). It protects these premises unless the use would adversely impact on residential areas, an alternative use would give a demonstrably greater benefit; it can be demonstrated that the property is no longer required for employment purposes; or an alternative use would enable support for essential public services. The loss of the policing use in ESB would see the premises fall from providing significant employment. None of the exception criteria provided by policy LE1 are met in this case:

- No adverse impact upon residential amenity is caused by the current use;
- Alternative uses comprising community/culture, residential or leisure use (as proposed) would not be of greater benefit that cannot be accommodated elsewhere within the application boundary;
- No evidence is submitted to demonstrate ESB is no longer viable for office use;
- The current use already provides vital support for essential public services.

Mindful of the policy outlined above, and in support of the retention of ESB in policing use; the following changes to the document are recommended.

<table>
<thead>
<tr>
<th>1279</th>
<th>Brian Coughlan</th>
<th>Met Police Authority &amp; Met Police Services</th>
<th>09</th>
<th>Police Facilities</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>[bold] Impact of development on policing [end bold]</td>
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</table>

Notwithstanding the requirement above to ensure ESB is retained within an employment use, it is further considered necessary to ensure that ESB is protected as a strategic policing facility, albeit in a B1 Use. This will ensure the draft SPD complies with relevant national guidance and strategic development plan policy in relation to policing and security, detailed on Page 3 above.

In relation to the overall changes to the SPD which address the impact upon policing which the development will have, these are welcomed and it is anticipated they will be retained in the final/adopted version of the document. We recognise that the development will come forward over an extended period of time and policing terminology/circumstances may alter, therefore we would welcome some additional flexibility in the wording. In light of this and the policy background above the following minor changes are recommended. Noted.

<table>
<thead>
<tr>
<th>1280</th>
<th>Brian Coughlan</th>
<th>Met Police Authority &amp; Met Police Services</th>
<th>09</th>
<th>Key Principle SC5</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>[italics] Key Principle SC5:</td>
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</table>

Key Principle SC5 notes that the authorities will secure through any planning agreement(s) a police shop and financial contributions towards staffing the facility. It is recommended that a minor alteration is made to this to ensure that the wording is 'future proof' and it take into account new terminology now used by the MPA/S. The following changes are recommended to Key Principle SC5:

[italics] Key Principle SC5:

The authorities will secure, through any planning agreement(s):
- [bold] Retention of Empress State Building within policing use; [end bold]

Change proposed. The wording will be altered from 'police shop' to 'community policing facility'. The word 'of' will be inserted within the final bullet point of SC5. The additional bullet point on the Empress State Building will not be added to the Key Principle. The authorities do not wish to be prescriptive about what use the Empress State building should be put to but in order to satisfy Policy LE1 in LBHF's Core Strategy, any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements of Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.
<table>
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<tr>
<th>Page</th>
<th>Author</th>
<th>Met Police Authority &amp; Met Police Services</th>
<th>Location</th>
<th>Issue</th>
<th>Remarks</th>
</tr>
</thead>
</table>
| 1281 | Brian Coughlan | Met Police Authority & Met Police Services | 09 | Para 9.18 | - A **bold** community policing facility [end bold] [strike through] police shop [end strike through] and financial contributions towards staffing the facility;  
- Closed Circuit Television (CCTV) within the OA; and  
- Financial contributions towards the expansion [bold] of [end bold] the boroughs’ CCTV control centres [end italics]  
[bold] Impact of development on policing [end bold]  
The supporting text in 9.18 should be similarly amended:  
[italics] 9.18 The authorities will require development to deliver a **bold** community policing facility **bold** [strike through] police shop [end strike through], located within a retail frontage. It should operate a small base from which the police can launch patrols and at which the new community would be able to have day to day contact with the police service. **bold** It should be no less than 150m2 and provided at peppercorn rent for a period of not less than 25 years [end bold]. Financial contributions will be sought towards the staffing of this facility’. [end italics]  
Change proposed. ‘Police shop’ will be altered to ‘community policing facility’. The exact size of the police facility and terms of rent would form part of the detailed discussions around any Section 106 agreement. It is felt disingenuous to set out minimums in the SPD, which may not be unattainable as a result of viability. |
| 1283 | Brian Coughlan | Met Police Authority & Met Police Services | 09 | Police Facilities | I trust that the policing requirements in this area are clear and the importance of ESB for pan-London policing have been highlighted sufficiently above. |
| 1359 | Dr. Ian Sesnan | Archdeacon of Middlesex | 09 | Key Objective | It is noted that the assessment of available community facilities includes those currently on the Gibbs Green and West Kensington Estates. These may be demolished but there does not seem to be provision for ensuring that they are replaced. The demolition of these estates even with the proposed re-housing will inevitably lead to the breakup of long standing local family and community networks and the infrastructure needs to be in place to ameliorate this. |
| 1360 | Dr. Ian Sesnan | Archdeacon of Middlesex | 09 | Key Objective | It is noted that the assessment of available community facilities includes those currently on the Gibbs Green and West Kensington Estates. These may be demolished but there does not seem to be provision for ensuring that they are replaced. The demolition of these estates even with the proposed re-housing will inevitably lead to the breakup of long standing local family and community networks and the infrastructure needs to be in place to ameliorate this. |
| 1361 | Dr. Ian Sesnan | Archdeacon of Middlesex | 09 | Key Principle | **bold** Faith - relating to Key Principle SC6. [end bold]  
Change proposed. The Social and Community Facilities Strategy sets out the community infrastructure deemed necessary from any development in order to
<table>
<thead>
<tr>
<th>Page</th>
<th>Author</th>
<th>Email/Contact</th>
<th>Key Principle(s)</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1362</td>
<td>Dr. Ian Sesnan of Middlesex</td>
<td>09</td>
<td>SC6</td>
<td>We note that in the Equality Impact Assessment over 70% of people in the two Boroughs have declared religious affiliations and this makes it surprising that the SPD does not deal in any way with how such faith uses and spiritual needs are to be planned for. The sections marked “Religion” in the EIA are particularly weak. The reference on Page 40 to investigating the provision of a “multi-faith facility” seems not to have been carried forward into the SPD. We would predict a significant increase in the population requiring Church of England provision. We are also aware that for other faith groups there are difficulties in accessing suitably located provision. This important part of civic life requires more attention. At a minimum the investigation of one or more faith facilities appropriate to the different religions’ needs to become a firm commitment.</td>
</tr>
<tr>
<td>1376</td>
<td>Eirik Reddi</td>
<td>09</td>
<td></td>
<td>No change necessary. The Social and Community Facilities Strategy sets out the authorities requirements in relation to nurseries, schools, doctors and dentists. The authorities requirements in relation to transport are set out in the Transport and Accessibility Strategy.</td>
</tr>
<tr>
<td>1479</td>
<td>Michael Bach</td>
<td>Kensington Society</td>
<td>09</td>
<td>Key Principles SC6</td>
</tr>
<tr>
<td>1508</td>
<td>Mrs L. Victor</td>
<td></td>
<td></td>
<td>No change necessary. Green space, health care and education are all closely tied to population increase. Key Principle UF14 requires any regeneration proposal to provide a minimum of 10sqm of publicly accessible green open space per child. Key Principle SC1 requires any education provision to relate to child yield. Key Principle SC2 requires the provision of a health facility, the size of which is related to population yield.</td>
</tr>
<tr>
<td>1530</td>
<td>Richard Chute</td>
<td>Paras 9.12-9.14</td>
<td></td>
<td>Change proposed. Youth space will be added to Key Principle SC6. Play space for young adults and teenagers is dealt with in Key Principle UF16. Figure 3.3 shows an indicative masterplan for the OA, which includes four hard surfaced courts to cater for this age group.</td>
</tr>
<tr>
<td>1531</td>
<td>Richard Chute</td>
<td>09</td>
<td>Health</td>
<td>In Chapter 9 “Community Space” paragraphs 9.20 on, there should be mention of the need to replace the loss of the Mund Street CAB advice centre. Also there should be a Post Office in the W14 postal district.</td>
</tr>
<tr>
<td>1535</td>
<td>Richard Chute</td>
<td></td>
<td></td>
<td>Change proposed. Wording will be inserted into the SPD to state that mechanisms will be put in place to ensure that the new community hub, which will be secured at peppercorn rent, is available for hire before the Citizens Advice Bureau on Mund Street is demolished or that temporary space of at least equivalent floor space is provided at the same rent.</td>
</tr>
<tr>
<td>1634</td>
<td>John Drake</td>
<td>09</td>
<td>Campaign to Protect Rural England</td>
<td>Social and Community Facilities</td>
</tr>
<tr>
<td>1635</td>
<td>John Drake</td>
<td>09</td>
<td>Campaign to Protect Rural England</td>
<td>Social and Community Facilities</td>
</tr>
<tr>
<td>1636</td>
<td></td>
<td></td>
<td></td>
<td>No change necessary. The authorities will require only one health facility to be provided in order to streamline management and maintenance costs of the facility for the NHS, who are going through a national process of consolidating premises.</td>
</tr>
<tr>
<td>ID</td>
<td>Name</td>
<td>Organisation</td>
<td>Date</td>
<td>Section</td>
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</tr>
<tr>
<td>1636</td>
<td>John Drake</td>
<td>Campaign to Protect Rural England 09</td>
<td>Social and Community Facilities</td>
<td>No change necessary. Key Principle SC1 deals with the provision of primary and secondary school space.</td>
</tr>
<tr>
<td>1874</td>
<td>Jonathan Rosenberg</td>
<td>WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA 09</td>
<td>Social and Community Facilities</td>
<td>No change necessary. The authorities will ensure that any community space is secured at peppercorn rent in order to ensure its affordability to any occupier.</td>
</tr>
<tr>
<td>1922</td>
<td>Jonathan Rosenberg</td>
<td>WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA 09</td>
<td>Social and Community Facilities</td>
<td>Change proposed. The wording in Key Principle SC1 will be amended.</td>
</tr>
<tr>
<td>1923</td>
<td>Jonathan Rosenberg</td>
<td>WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA 09</td>
<td>Social and Community Facilities</td>
<td>Change proposed. The wording will be altered where relevant in the Social and Community Facilities Strategy Key Principles so that the requirements are &quot;musts&quot;.</td>
</tr>
<tr>
<td>1924</td>
<td>Jonathan Rosenberg</td>
<td>WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA 09</td>
<td>Social and Community Facilities</td>
<td>Change proposed. A comprehensive approach to the redevelopment of the OA would require the demolition of the facilities on the West Kensington and Gibbs Green estates. The existing facilities have been factored into the calculation for the amount of community space needed were a comprehensive approach to the redevelopment of the OA to be taken. Wording will be inserted into the SPD to state that mechanisms will be put in place to ensure that the new community hub is available for hire before either of the existing community spaces are demolished or that temporary spaces of at least equivalent floorspace are provided free of charge to residents.</td>
</tr>
<tr>
<td>1925</td>
<td>Jonathan Rosenberg</td>
<td>WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA 09</td>
<td>Social and Community Facilities</td>
<td>No change necessary. The educational facilities required can only relate to the needs of the development, as set out in Community Infrastructure Levy regulations.</td>
</tr>
<tr>
<td>1944</td>
<td>Andy Slaughter</td>
<td>Labour MP for Hammersmith 09</td>
<td>Social and Community Facilities</td>
<td>No change necessary. The authorities will require the needs of development to be met, through any Section 106 agreement. No pressure should be put on existing facilities by the development and the authorities will require that each phase is self-sufficient in terms of the infrastructure that it provides, as set out in the second Key Objective in the Phasing and Section 106 Strategy.</td>
</tr>
<tr>
<td>2078</td>
<td>Matthew Gibbs</td>
<td>CapCo/Earl's Court and Olympia Group 09</td>
<td>Social and Community Facilities</td>
<td>Change proposed. Clarification will be provided that these child yield formulas are consistent with GLA guidance and advice and are based in the 2004 Wandsworth child yield formulas.</td>
</tr>
<tr>
<td>2079</td>
<td>Matthew Gibbs</td>
<td>CapCo/Earl's Court and Olympia 09</td>
<td>Social and Community Facilities</td>
<td>No change necessary. The second Key Objective in the Phasing and Section 106 Strategy sets out the importance that the relevant infrastructure is delivered within the relevant phase(s) to support the needs of development. Existing health facilities will need to be provided in such a way that they comply with the needs of the community as set out in the Community Infrastructure Levy regulations.</td>
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<tr>
<td><strong>2080</strong> Matthew Gibbs</td>
<td>CapCo/Earl's Court and Olympia Group</td>
<td>09</td>
<td>Para 9.10</td>
<td></td>
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<tr>
<td><strong>Group</strong> to an assessment of feasibility/viability. The figure of 225 sq m per GP (paragraph 9.10) is considered too high and further detail should be set out to explain how this figure has been derived.</td>
<td>Facilities in the vicinity of the OA are currently at capacity. It is therefore imperative that a new health facility is delivered in the OA within the early development phases. This facility can be designed so that it increases incrementally over time as the resident and worker population rises.</td>
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<td><strong>2081</strong> Matthew Gibbs</td>
<td>CapCo/Earl's Court and Olympia Group</td>
<td>09</td>
<td>SC3</td>
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<td>Similar to the comments in respect of SC2. Whilst this provision is acknowledged as being required the precise type and quantum must be subject to viability/feasibility appraisals.</td>
<td>Change proposed. The third bullet in para 9.10 will be amended to Wandsworth’s 2004 New Housing Survey.</td>
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<td><strong>2082</strong> Matthew Gibbs</td>
<td>CapCo/Earl's Court and Olympia Group</td>
<td>09</td>
<td>SC6</td>
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<td>It is not clear how the figure of 4,500 m² has been defined. It is considered inappropriate to specify a defined floor area as the precise figure will be dependant upon the nature of the residential population proposed as part of any planning application. It is considered that the figure is substantially in excess of that which is required. The delivery of such a facility will also be dependant upon the nature of any planning application and the feasibility/viability of providing it early in the development process.</td>
<td>No change necessary. The figure has arisen from discussions with borough’s voluntary sector departments and is based on an identified need as well as the space deemed appropriate for the variety of different facilities that the community hub would need to provide. As with the affordable sports provision, viability is a legitimate consideration; however, the authorities feel that every Section 106 ask should not need to be caveated with viability considerations.</td>
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