

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

CONSULTATION RESPONSES SCHEDULE: SPD GENERAL COMMENTS

SPD: General Comments

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
1	Claire	Wood		General		I have lived in the area for 10 years now. This proposal is fabulous . The document put together very informative and thorough and echoes a lot of the concerns I've had in the past regarding circulation, access to open space and a general feeling that the OA 's space could be better used.	Noted.
2	Susan	Walker		General		I would like to express my strong support for these proposals - a model for redevelopment. The important thing now will be to ensure that the detailed architecture is as good as the master plan.	Noted.
27	Hugo	Covaneiro		General		I support the development, as the area is deprived and dangerous.	Noted.
33	Peter	Donovan		General		it seems to be an unbelievably ambitious plan, which will certainly transform, and improve life in West London.	Noted.
48	Peter	Verity		General		The Supplementary Planning Document (SPD) sets the context for the basis of the assessment of the proposal for the Earls Court and West Kensington Opportunity Area (OA). The sympathetic and sustainable development of the area has the possibility to be an exemplary urban regeneration project which, if integrated seamlessly into the broader context, could be a potential contributor to the attractiveness and image of London as a World City.	No change necessary. The SPD sets out requirements to deliver sustainable development and integrate the new development into the broader context. The latter is particularly relevant in Urban Form Strategy.
72	Ilse	Molino		General		I have received your notification, dated 11.11.2011, for a Supplementary Planning Document, perhaps somebody could be good enough and explain in layman's terms what all this different planning permission applications and documents mean and what actually affects us, I do not think I am the only elderly resident, who cannot afford various lawyer's and surveyor's advice, to keep up with all the different variations of planning applications and fear the worst.	Noted.
80	Gems	Bonds		General		The idea seems good because it will regenerate the area.	Noted.
98	Iona	Carson		General		I have been to Chelsea town hall to look at the revised plans. I have been very impressed at all the work and thought that has gone in to it.	Noted.
110	Simon	Grantham		General		All these ideas look fine as artists impressions but the reality is quite different and far uglier.	No change necessary. The revised draft SPD, and in particular the Urban Form Strategy, sets out requirements for the design of buildings and the spaces around them, to ensure that they are well designed, integrated into the existing context and reflect the character of the surrounding area.
129	Paolo	Ferrante		General		Thank you very much indeed for inviting members of the public to have their say on the future of the Earl's Court and West Kensington area. Unfortunately the joint development plan includes 33 different documents on which the public is invited to comment, making "it clear in your comments which Key Objective, Key Principle, Chapter, Paragraph, Table or Figure your comment relates to". This is a bit of a difficult task for somebody like me who has the good fortune to be fully employed, so I shall limit myself to	No change necessary. This comment seems to relate to the planning application. The revised draft SPD establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. The developer will need to propose developments that reflect the revised draft SPD.

					<p>express my opinion on this topic in general terms.</p> <p>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 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. The final result is bound to cause overcrowding and further traffic congestion, and to put stress over local services, with damaging consequences both environmentally and socially. I am not against developments in principle of course, and should you propose less environmentally disruptive and more sustainable options I shall be delighted to give them my support.</p>	<p>Key Principles UF19 to UF39 control the height of buildings. Key Principle UF28 in particular requires 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.</p> <p>The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated.</p> <p>Chapter 9 sets out requirements for social and community facilities to support new development. Chapter 11 sets out requirements to ensure development makes sustainable choices with regards to energy consumption and production. Chapter 12 sets out requirements to control flood risk, noise, air quality, ecology and the impacts caused during construction and demolition.</p>
164	Andres	Guevara		General	<p>My main concern continues to be the material increase in population density that is planned in this project. The increase in population density not only will saturate public services in the area that ultimately will increase traffic, air pollution and noise as well as further congest public transportation. As a consequence of this the existing and new population in the area will very likely decrease its quality of life and the properties of existing residents will also reflect lower valuations as a result.</p>	<p>No change necessary.</p> <p>The revised draft SPD sets out requirements to control the impacts of the development. The Urban Form Strategy sets out requirements to minimise impacts on surrounding residents, especially from development on the edges of the OA. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. Chapter 9 sets out requirements for new social and community facilities, such as education, health, leisure, police and community meeting space, to support new development. Chapter 12 sets out requirements to control flood risk, noise, air quality, ecology and the impacts caused during construction and demolition.</p>
170	Anonymous			General	<p>Again, in summary, I am looking forward to the redevelopment of the area, and I am hopeful it will be a renovated urban quarter for residential purpose with low builds in line with the ones in West Brompton and West Kensington i.e. Victorian cottages and houses.</p>	<p>No change necessary.</p> <p>Key Principles UF19 to UF39 control the height of buildings. Key Principle UF28 in particular requires 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.</p>
171	Anonymous			General	<p>I am delighted that the exhibition centre site should be redeveloped. I feel it is of the utmost importance that it be done in a considerate manner for this residential area.</p>	<p>Noted.</p>
172	Anonymous			General	<p>I have some strong objections regarding the redevelopment of the exhibition centre as presented by EC Properties Ltd, and the impact it could have on the surrounding streets, and in particular Philbeach Gardens where I live:</p>	<p>No change necessary.</p> <p>This comment relates to the redevelopment proposed by EC Properties and not the revised draft SPD.</p>
186	Mary. J.	Teal		General	<p>We support the detailed objections submitted by the West Kensington and Gibbs Green Tenants & Residents Associations and by West Ken and Gibbs Green Community Homes.</p>	<p>Noted.</p>

187	Daniel	Benson		General	Thank you very much indeed for inviting members of the public to have their say on the future of the Earl's Court and West Kensington area. Unfortunately the joint development plan includes 33 different documents on which the public is invited to comment, making "it clear in your comments which Key Objective, Key Principle, Chapter, Paragraph, Table or Figure your comment relates to". This is a bit of a difficult task for somebody like me who has the good fortune to be fully employed, so I shall limit myself to express my opinion on this topic in general terms.	Noted.
190	Daniel	Benson		General	I am not against developments in principle of course, and should you propose a less environmentally disruptive and more sustainable option I shall be delighted to give them my support	No change necessary. This revised draft SPD sets the framework to ensure that any future development of the OA is sustainable. Chapter 9 sets out requirements for social and community facilities to support new development. Chapter 11 sets out requirements to ensure development makes sustainable choices with regards to energy consumption and production. Chapter 12 sets out requirements to control flood risk, noise, air quality, ecology and the impacts caused during construction and demolition.
221	Susan	Fitches		General	We support the detailed objections submitted by the West Kensington and Gibbs Green Tenants & Residents Associations and by West Ken and Gibbs Green Community Homes. Please notify me when the authorities adopt the final planning framework.	Noted.
228	Francis	Rutherford		General	I have studied the plans for the proposed Opportunity Area. I am impressed by the thoroughness of the planning, allowing an intelligent mix of green spaces, height of buildings and pedestrian/vehicular routes. We need much more residential accommodation in London and this will do much to relieve the pressure of demand.	No change necessary. The 'Cultural Strategy' in the revised draft SPD acknowledges the contribution that the Exhibition Centres make to the local economy (see para 8.3 and 8.9). In order to ensure the retention of cultural facilities in this location, CS1 requires a lively cultural destination with a variety of culture, arts and creative facilities that continue the Earl's Court 'brand', which does not preclude the provision of exhibition space. The SPD cannot prescribe the occupier of these facilities, as this is dependent on demand from potential occupiers.
265	Silvia	Piva		General	I am the owner of a property at Chesterton Square and I wish to indicate my DISAGREEMENT with granting permission to this proposal firstly and foremost because here is no clear statement as to how long the works will take, how they are funded and whether the funding will be fully committed on day 1 of the start of the works. This is a very big area which just risks to be left incomplete for a drying out of funds during the next cyclic crisis. We just risk to end up with another bankrupt Canary Wharf in the middle of West London	No change necessary. This comment seems to relate to the planning application. The revised draft SPD establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. The developer will need to propose developments that reflect the revised draft SPD. Key Principle PS2 requires applicants to submit a phasing strategy in support of planning applications, this set show how the development will be phased and carried out with minimum disruption to existing residents. The planning system does not control how private development schemes are funded, but does consider the financial viability in the negotiation of financial contributions. On a scheme this large, the development will usually develop the site in phases, using the income from early phases to fund later phases.
278	Tom	Jestico	DRP	General	The DRP was asked to review the second version of the emerging	Noted.

						SPD. It is at consultation until 23 December 2011 and due for adoption in January 2012. Penelope Tollitt gave a stage by stage presentation of the proposals with questions from the Panel. Excerpts from '03 Vision and Objectives' and '04 Urban Form Strategy' of the SPD were issued to the Panel and formed the basis for the discussion.	
283	Tom	Jestico	DRP	General		'Opportunity Areas' are often run down brownfield sites of low value, whereas the Earls Court area has relatively high residual land values and, it has to be recognised, is expensive to develop.	No change necessary. The SPD has been subject to an independent financial viability study, which considers the development quantum required to fund the scheme while being policy and SPD compliant, including funding the infrastructure costs.
293	Tom	Jestico	DRP	General		The Panel were appreciative of the time and effort spent in developing the revised SPD. It is a valuable document and, hopefully, will be adopted by the two Councils by February / March 2012. However, it is possible that the CapCo applications will be determined before the SPD is adopted.	Noted.
306	Shamyl	Saigol		General		I am writing to object to the revised SPD which is still inadequate and does not take into consideration the dramatic effects on an existing area that is already highly polluted, busy and over populated.	No change necessary. The revised draft SPD sets out requirements to control the impacts of the development. The Urban Form Strategy ensures that development responds to the surrounding area, especially on the edges of the OA. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. Chapter 9 sets out requirements for new social and community facilities, such as education, health, police and community meeting space, to support new development. Chapter 12 sets out requirements to control flood risk, noise, air quality, ecology and the impacts caused during construction and demolition. In particular, Key Principle ENV4 seeks to control the impact of demolition, excavation and construction on the environment and residents surrounding the OA. ENV16 seeks to ensure that air quality is no worse than existing levels and should include mitigation measures to improve air quality.
311	Shamyl	Saigol		General		My main concerns are the deterioration of air quality and increase of pollution - an important health and safety matter - and the heights of the proposed buildings very close to existing homes; both of which will affect local residents adversely. Our needs are not being taken into account by the planners who are keen to make as much money as possible by this development. They are not thinking through the effects of their proposals on local residents in a realistic fashion. I am hoping that the local councils will safeguard our interests. So far the existing residents of Earls Court and West Kensington stand to lose a lot and gain nothing from this proposal.	No change necessary. This comment seems to relate to the planning application. The revised draft SPD establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. The developer will need to propose developments that reflect the revised draft SPD. Key Principle ENV16 states that redevelopment must be air quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. The Skyline section of the Urban Form Strategy sets out a Key Objective and a number of Key Principles to ensure that no new buildings have a negative impact on the quality and character of the surrounding townscape. This is supported by the extensive Townscape and Views Analysis appended to the document.

330	Geirgina	Donnelly		General	As a resident in Earls Court since 2001, I wish to express my interest in the forthcoming development on the Earl's Court Exhibition site which I feel, if handled properly, will be an asset to the area.	Noted.
332	Geirgina	Donnelly		General	Our Ward Councillors have worked incredibly hard and successfully over the past few years to maintain and beautify this area and this has to be taken into consideration before allowing another planning disaster to unfold because developers want to make a quick profit and squeeze every last pound possible out of this space.	No change necessary. The revised draft SPD seeks to control the design of buildings and the spaces around them, to ensure that they are well designed, integrated into the existing context and reflect the character of the surrounding area.
339	Geirgina	Donnelly		General	I hope that this letter is viewed as constructive criticism and that the points will be seriously taken in consideration as I speak on behalf of many of our local residents who are not able to write/ put forward their opinions in this way. We love living here and want it to grow in a manner that does not ruin all our lives and livelihoods.	Noted.
340	Barbara	Herbin		General	I am writing to object to the revised SPD which is still inadequate and does not take into consideration the dramatic effects on an existing area that is already highly polluted, busy and over populated.	No change necessary. The revised draft SPD sets out requirements to control the impacts of the development. The Urban Form Strategy ensures that development responds to the surrounding area, especially on the edges of the OA. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. Chapter 9 sets out requirements for new social and community facilities, such as education, health, police and community meeting space, to support new development. Chapter 12 sets out requirements to control flood risk, noise, air quality, ecology and the impacts caused during construction and demolition.
345	Barbara	Herbin		General	My main concerns are the deterioration of air quality and increase of pollution - an important health and safety matter - and the heights of the proposed buildings very close to existing homes; both of which will affect local residents adversely. Our needs are not being taken into account by the planners who are keen to make as much money as possible by this development. They are not thinking through the effects of their proposals on local residents in a realistic fashion. I am hoping that the local councils will safeguard our interests. So far the existing residents of Earls Court and West Kensington stand to lose a lot and gain nothing from this proposal.	No change necessary. Key Principle ENV16 states that redevelopment must be air quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. The Urban Form Strategy ensures that development responds to the surrounding area, especially on the edges of the OA. The 'Skyline' section of the Urban Form Strategy sets out a Key Objective and a number of Key Principles to ensure that no new buildings have a negative impact on the quality and character of the surrounding townscape. This is supported by the extensive Townscape and Views Analysis appended to the document.
371	Cllrs	Buxton and Read		General	We consider the revised Draft Joint SPD to be a considerable improvement over the previous draft and welcome that in many respects it has responded positively to the comments made by Earl's Court residents, residents associations and amenity society's.	Noted.
372	Cllrs	Buxton and Read		General	We fully support the response of the Earl's Court Society to this latest draft.	Noted.
373	Cllrs	Buxton and Read		General	Whilst welcoming the document there are areas that we would like to particularly stress, parts that need strengthening and omissions filled in over and above the Earl's Court Society's response.	Noted.
389	R.T.	Shrayh		General	As a local resident I am writing to support the proposed	Noted.

					redevelopment of the above neighbourhood. Much of the area is run down and dilapidated, so a major redevelopment can only be positive in the long-term.	
390	Marcel	Zaidan	Dexters	General	<p>As a local business with interests in the above west London area, I write to oppose the so-called "regeneration plans".</p> <p>I believe the scale of redevelopment it proposes would break up a well-functioning community, damaging family ties, disrupting social networks and distressing elderly residents.</p>	<p>No change necessary.</p> <p>The decision whether the Council, as housing authority wish to include the estates within any development proposals would need to be informed by a consultation with the estates' residents.. However, the SPD acknowledges the benefits that estate regeneration will bring to the area, including improving east west connectivity and job creation. Key Principle HO5 states that the phasing strategy required in Key Principle PS1 should demonstrate that the phasing and decant for the redevelopment of the estates minimises disruption to existing residents.</p>
397	Rose	Freeman	The Theatres Trust	General	<p>Thank you for your letter and email of 11 November consulting The Theatres Trust on the revised draft of the Earl's Court and West Kensington Opportunity Area Supplementary Planning Document.</p> <p>The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that [italics] 'The Theatres Trust exists to promote the better protection of theatres. [end italics] It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include [italics] 'development involving any land on which there is a theatre.' [end italics]</p>	Noted.
400	Rose	Freeman	The Theatres Trust	General	<p>We look forward to being consulted on any further draft and the pre-application plans concerning a large cultural facility that includes a performance space.</p> <p>[bold] APPENDIX</p> <p>Cluny Mews Planning precedent [end bold]</p> <p>By way of further background, I have lived at number 68 Philbeach Gardens for 28 years and have close first-hand experience of the planning history and site specific issues for this area.</p> <p>The Warwick road end of the Cluny Mews development is less than 10 years old and was subject to a lengthy and at times heated planning process (RBKC Planning Reference PP/00/2648). There were two public planning committee hearings (both of which I attended).</p> <p>Nearly all of the key planning issues relevant to this site were</p>	Noted.
422	Paul	Dumond		General		<p>No change necessary.</p> <p>The Urban Form Strategy ensures that development responds to the surrounding area, especially on the edges of the OA. Key Principle UF19 requires development to 'preserve or enhance the character and appearance of nearby conservation areas and the setting of listed buildings'. UF21 states that '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 ...' (which includes views across Cluny Mews).</p>

					<p>examined, considered in detail by the RBKC planning department and then by the planning committee in public session. Statements of principle were made by the committee and changes were made to the plans so that they could be brought into line with the wishes of the committee so that planning approval could be granted at the second hearing. The whole process took nearly a year.</p> <p>At the meetings the councillors expressed particular concern that the development should blend harmoniously into its immediate surroundings in the conservation zone and not be out of scale with them. [bold] To achieve this the planning committee stated that the building's height should be no greater than the existing Victorian terraces on Warwick road and, on the section closest to Philbeach Gardens, no greater than the Victorian terrace on Philbeach Gardens. [end bold]</p> <p>I believe that the planning committees views on height and massing in the 2001 rejected design (its principal reasons for rejection) and the final decision to approve the building equivalent in height to the Victorian terraces, all as recently as 2001, should be fully and consistently incorporated in the SPD. As noted above the SPD is not consistent and should be amended as noted.</p>	
432	Nicholas	Fernley	Hammersmith & Fulham Historic Buildings Group	General	<p>the revised London Plan and Borough Core Strategy have both been recently adopted, the latter regrettably not specifically recognising the potential of heritage-led regeneration encouraged in the London Plan.</p> <p>As we wrote at para 2.1, page 3 in our letter of 4 December commenting on the current outline planning application for the Opportunity Area, we are very concerned that this SPD remains in draft unadopted form while the public comment period for the outline planning application has now passed. We regard this as 'cart before the horse', and urge that the Council's consideration of the planning application be deferred until the SPD has been adopted, taking account - we would hope - of relevant public comment such as this.</p>	<p>No change necessary.</p> <p>The London Plan does not specifically require heritage-led regeneration of the OA, but mentions that a range of heritage assets exist, which should be upheld and promoted through the regeneration and growth of the area. There is one listed building and several locally listed buildings in the OA, with the majority of heritage assets located outside the boundary of the OA. Key Principle UF19 requires development to 'preserve or enhance the character and appearance of nearby conservation areas and the setting of listed buildings'.</p> <p>Having been published for consultation and comments assessed, the SPD has considerable weight in determining planning applications in the OA. It will be given more weight once adopted, but the SPD does not need to be adopted before the planning applications are considered.</p>
441	Isabelle	Laborde		General	<p>It is suggested that the SPD is inadequate. It is my view that the SPD should be re-considered to address the concerns raised by the residents and the Greater London Authority rather than those of the Developer and the Council.</p>	<p>No change necessary.</p> <p>The concerns raised by the GLA mentioned in this comment relate to the planning application and not the SPD.</p> <p>The SPD has been prepared jointly by the Greater London Authority, LBHF and RBKC. Residents and the developers have been consulted during the preparation of the SPD and, where appropriate, their comments have been taken into account in the final version.</p>

473	Arthur	Tait	Friends of Brompton Cemetery	General	9. Simplify it to help Mr Everyman to see what is in it with an Index and if practicable an Executive Summary. I have read through about 445 pages in preparing this note, and there are many other pages I have not studied at all.	No change necessary. The Vision and Objectives (Chapter 3) provides a succinct summary of the vision and requirements set out in the document. An index in the planning document will not be useful.
584	Michele	Gorgodian		General	I assume the developers have a financial rationale for progressing their proposal.	No change necessary. The SPD has been subject to a financial viability study to ensure that the requirements in the SPD are financially viable. The developers will also be required to submit a financial viability study with planning applications. However, information on their rationale for progressing proposals will be confidential to the developers.
607	Bernard	Selwyn	Open Spaces Society	General	1. These comments on behalf of the Open Spaces Society relate solely to the open space and connected provisions of this document. While made on the assumption that the redevelopment of the whole OA can be carried out within a limited period of years, silence on the remainder should not be taken as approval or disapproval of any of their content. Unfortunately, it was not possible to respond to the first consultation.	Noted
620	Alan	Tenenbaum	Under The Bridge	General	These representations are made by Under The Bridge Ltd which is an established business in the Opportunity Area (OA). We have been very supportive of the London Plan and Core Strategy proposals for the area and we believe that the SPD goes a long way towards guiding the design and delivery of sustainable and comprehensive delivery in the OA on that basis. We believe that the Councils should be pursuing the implementation of this strategic vision as soon as possible but that must be on the basis of fulfilling the strategic outputs envisaged in the development plan documents, in particular by ensuring that: (a) the necessary environmental and infrastructure improvements can be secured and delivered as early as possible in the development programme so as to ensure that the regeneration of this area is on a sustainable basis; and (b) the optimal social and economic outcomes are achieved in terms of the provision of much-needed housing (including affordable homes), jobs, cultural and other facilities and commercial activity to underpin the local and regional economy	No change necessary. The Key Objective in the Phasing Strategy 'ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development'. The Environmental Strategy sets out the requirements to mitigate environmental impacts, such as air quality, noise and vibration, demolition and construction, waste and mitigating flood risk. The SPD seeks to deliver a vibrant mixed use development, with homes, jobs, cultural and social and community facilities. The Housing Strategy sets out requirements for affordable housing.
623	Alan	Tenenbaum	Under The Bridge	General	We are therefore proposing some modest amendments that will incorporate into the SPD the flexibility that were an important element of the London Plan and the Core Strategies when they were recently examined for soundness, but which might appear to have been compromised by some of the wording in the SPD which suggests that the need for flexibility has been overlooked. These amendments are set out below by reference to the paragraphs and principles contained in the SPD (November 2011).	Noted.
653	Keith	Barker-		General	The scale and the complexity of what is being proposed here is still	No change necessary.

		Main				impenetrable to most residents and a more easily digestible précis should be available to those not versed in the business of arcane planning law, urban development strategy, etc.	The Vision and Objectives (Chapter 3) provides a succinct summary of the vision and requirements set out in the document.
669	Patrick	Blake	Highways Agency	General		<p>Thank you for your letter dated 11 November 2011 inviting the Highways Agency (HA) to comment on the Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document (SPD).</p> <p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's Strategic Road Network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>We have reviewed the SPD and do not have any comment at this time.</p> <p>I hope this is helpful.</p>	Noted.
830	K.A.	Courtenay		General		I am commenting as a resident of Philbeach Gardens on the November 2011 draft of the Earl's Court and West Kensington Opportunity Area Revised Joint Supplementary Planning Document. I am a member of the Earl's Court Society and have been involved with the production of the Society's response, which you have received, and fully support it.	Noted.
839	Cllr Linda	Wade		General		<p>Despite repeated reassurances that the JSPD would meet residents concerns, there is much in this report that does not relate to, but will impact on, residents in the surrounding areas, and underlines the need for, which was turned down by the Council for an Area Action Plan to assess the impact of the development on the roads and the transport system.</p>	<p>No change necessary.</p> <p>The SPD has been prepared through extensive consultation with local people. All comments raised have been considered and where appropriate resulted in amendments to the SPD.</p> <p>The authorities have considered that an AAP is not necessary as up to date strategic policies for the Opportunity Area are already set out in the London Plan and Borough Core Strategies. In addition to this, the London Plan endorses the production of a planning framework, not AAP, and both Core Strategies endorse the production of an SPD.</p> <p>The revised draft SPD sets out various measures to control the impact of the</p>

							development on the local community. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. The Environmental Strategy sets out the requirements to mitigate environmental impacts, such as air quality, noise and vibration, demolition and construction, waste and mitigating flood risk.
840	Cllr Linda	Wade		General		It is also essential that the Seagrave Road planning application be considered at the same time as the West Kensington and Earl's Court OA.	<p>No change necessary.</p> <p>The authorities cannot unreasonably delay determining planning applications. However, having been consulted upon and comments assessed, the SPD will have considerable weight in determining planning applications in the OA. It will be given more weight once adopted, but the SPD does not need to be adopted before the planning applications are considered.</p>
841	Cllr Linda	Wade		General		The JSPD should reflect the distinct nature of the site adjacent to well-established Conservation areas, and the area is already one of the most densely populated areas in London and the existing demands on Transport and Traffic.	<p>No change necessary.</p> <p>The SPD acknowledges these heritage assets, including the conservation areas and listed buildings. Key Principle UF19 of the SPD requires development to 'preserve or enhance the character and appearance of nearby conservation areas and the setting of listed buildings'. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated.</p>
1015	Cllr Linda	Wade		General		This JSPD, contrary to what has been said will not protect existing residents, and demonstrates the necessity of an Area Action Plan, a strategic approach to road and transport management and capacities.	<p>No change necessary.</p> <p>The SPD has been prepared through extensive consultation with local people. All comments raised have been considered and where appropriate resulted in amendments to the SPD.</p> <p>The authorities have considered that an AAP is not necessary as up to date strategic policies for the Opportunity Area are already set out in the London Plan and Borough Core Strategies. In addition to this, the London Plan endorses the production of a planning framework, not AAP, and both Core Strategies endorse the production of an SPD.</p> <p>The revised draft SPD sets out various measures to control the impact of the development on the local community. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated.</p>
1060	Katherine	Alexander		General		Thank you for taking potential consequences of short term gain into account. For London as a whole, please ensure that Earls Court remains a desirable place to live and work by taking this opportunity to help create something special with lasting value for this millennium and beyond.	Noted.
1061	Bernard	Moran	NHS Kensington and Chelsea	General		This is a joint response on behalf of the Inner North West London Primary Care NHS Trusts (covering the BL of Hammersmith and Fulham, Royal Borough of Kensington and Chelsea and City of	Noted.

						Westminster). The PCTs reaffirm their support of regeneration of the area which will offer an opportunity for new and enhanced health service provision and provide housing and employment opportunities in the area.	
1062	Bernard	Moran	NHS Kensington and Chelsea	General		The PCT have a statutory responsibility for improving health and healthcare for our population	Noted.
1063	Bernard	Moran	NHS Kensington and Chelsea	General		<p>We refer to previous comments and recommendations contained in our joint response letter to the First Draft of the SPD, dated 21st April 2011. While acknowledging that some of the chapter numbers, titles and references may have changed in the Revised Draft; the comments and recommendations contained in this letter are in addition to and where appropriate conterminous with, those comments and our recommendations previously state in our response letter dated 21st April 2011. our previous comments were set out under the following headings:</p> <ol style="list-style-type: none"> 1. General Comments and Recommendations 2. Direct Influences on Health - Comments and Recommendations <ol style="list-style-type: none"> 2.1 Housing 2.2 Access to Public Services 2.3 Promotion of Physical Activity 2.4 Air Quality, Noise and Neighbourhood Amenity 2.5 Quality Amenity Space 2.6 Improving and Enhancing Existing Play Spaces 3. Indirect Influences on Health – Comments and Recommendations <ol style="list-style-type: none"> 3.1 Crime Reductions and Community Safety 3.2 Access to Healthy Food 3.3 Access to Work 3.4 Social Cohesion and Social Capital 3.5 Resource Minimisation and Climate Change 	<p>Noted.</p> <p>The comments raised in April 2011 were considered as part of the consultation analysis over the summer 2011. Where appropriate, the comments raised resulted in changes to the revised SPD. Where the SPD has not been amended, the consultation response schedules set out reasons for this.</p>
1070	Dahabo	Guled		General		I am a local resident in Earls for 20 years and community leader and know the needs of many local cultural residents and thought that I could present my views on behalf of those I assist and living in Earls Court about the redevelopment of Earls Court Exhibition and the Earls Court and West Kensington opportunity area and the submission of planning documents.	Noted.
1071	Dahabo	Guled		General		My name is Dahabo Guled, and I live in Earls Court for around 20 years. I like this area as it is homeland now, and because it is multi-cultural area with cultural diversity residents, and attracts Tourists all over the world particularly those Arab Origins due to	No change necessary.

					<p>many hostels practically in Penywern Road.</p> <p>The area has 24 hour open pharmacy and shops such as Earls Court Tesco, etc, so it is well lit, good neighbourhood and in many ways a safe area. Warwick Road is very multi-ethnic area and has many Victorian buildings and a tourist icon building which is the Exhibition centre now is going to re-develop.</p> <p>Earls Court is a very beautiful area and located at the heart of the Royal Borough of Kensington and Chelsea, and although the majority of people in are well-off, there are pockets of low income people in parts of SW5 and W14, where there is a lot of social housing - Notting Hill Housing Trust, Octavia Housing, Women's Pioneer Housing, private housing, etc. There are also lots of hostels in SW5 where the people are vulnerable and need integration and better accommodations.</p>	<p>The area being considered for redevelopment on the RBKC side only includes the Exhibition Centres and small part of Cluny mews. Many of the elements of Earl's Court mentioned are not within the Opportunity Area and therefore beyond the scope of the document.</p> <p>The London Plan and borough's Core Strategies allocate the OA for a residential led, vibrant mix of land uses. In order to ensure the retention of cultural facilities in this location, the 'Culture Strategy' in the revised draft SPD seeks to create a lively cultural destination with a variety of culture, arts and creative facilities that continue the Earl's Court 'brand'.</p> <p>The Housing Strategy sets out requirements for Affordable Housing provision within the OA.</p>
1074	Dahabo	Guled		General	<p>The new development planning at Earls Court [bold] where I live [end bold] with the West Kensington opportunity area is very interesting in my life and I want to contribute my idea, so as this new development to be compatible with the modern buildings and address the local Residents' needs.</p>	Noted.
1087	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	General	<p>the comments from the PRSC sub-group on the 1st draft of the Earls Court SPD had generally been incorporated in the revised draft SPD;</p>	Noted.
1088	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	General	<p>this draft was shorter and much clearer, which was to be commended</p>	Noted.
1089	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	General	<p>- the Sub group passed on their gratitude to the EC project team for their hard work in improving the draft SPD and collating all the changes.</p>	Noted.
1171	Paul	Williamson	RBKC Play Partnership	General	<p>The Play Partnership is a multi-agency body that supports the delivery of the RBKC Play Strategy and advises on planning applications and the use of Section 106 for community amenity.</p> <p>In our submission, we will focus on the needs of children resident in Kensington and Chelsea, although many of the points will equally apply to children living in the London Borough of Hammersmith and Fulham.</p>	Noted.
1191	Ilse	Molino		General	<p>Is it not also, as I have mentioned before, an overdevelopment in the Kensington & Chelsea Borough's side, in order to capitalise on the higher earnings potential to the detriment of the existing residents?</p>	<p>No change necessary.</p> <p>The revised draft SPD sets out requirements to control the impacts of the development. The Urban Form Strategy sets out requirements to minimise impacts on surrounding residents, especially from development on the edges of the OA. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. Chapter 9 sets out requirements for new social and community facilities, such as education, health, police and community meeting space, to support new development. Chapter 12 sets out requirements to control flood risk, noise, air quality, ecology and the impacts caused during construction and demolition.</p>

1211	Amy	Jones	Spen Hill Developments	General	On behalf of our clients, Spen Hill Developments Ltd, we set out below representations towards the current consultation on the Earls Court and West Kensington Opportunity Area SPD. We understand that this consultation represents the final stage of public consultation on the document.	Noted.
1212	Amy	Jones	Spen Hill Developments	General	[bold] Background [end bold] I previously submitted representations in April of this year on behalf of Spen Hill Developments Ltd. As noted in the previous representations Spen Hill Developments Ltd has a current planning application pending with the Royal Borough of Kensington and Chelsea (RBKC) for a mixed use development at 100 West Cromwell (Ref: PP/11/00107). This site lies to the north of the defined Opportunity Area, to the north east of Earls Court. The site of this current application is allocated for redevelopment within the adopted RBKC Core Strategy under Policy CA6 which also covers the other development sites located to the north along Warwick Road. Considerable progress has been made on this application and it is now anticipated that this application will go before the planning Committee in early 2012.	Noted.
1223	Hilary	Mackay		General	Overall I consider the latest draft plan more intelligently written and more coherent than earlier documents I have seen. It focuses well on considering the implications for the surrounding community with regard to minimising potential losses and integrating it into possible benefits from development of the OA.	Noted.
1239	Alex	Fraser		General	I write mainly to express my strong support for the development in the Opportunity Area.	Noted.
1240	Alex	Fraser		General	Anticipating what has become worryingly and perplexingly standard local opposition to redevelopment plans (ref: Fulham Reach and Hammersmith Town Hall), can I urge you to clearly communicate the benefits to local residents - particularly those on the Housing Estates included in the plans?	No change necessary. LBHF published a draft Estates Regeneration Economic Appraisal for consultation as part of the SPD, which considered an appraisal of 4 potential options. The reasons why LBHF, as planning authority, considers that the estates should be included within any comprehensive redevelopment of the OA is set out in paras 5.7-5.14 of the SPD. The decision whether the Council, as housing authority wish to include the estates within any development proposals would need to be informed by a consultation with the estates' residents.
1243	Alex	Fraser		General	These minor points aside - please start building asap!	Noted.
1244	Jenny	Montefiore		General	Generally this SPD is an improvement on the original having taken into account the previous comments and the reality of the situation in the area.	Noted.
1248	Jenny	Montefiore		General	However one of my main criticisms is that it fails to really take into account the impact of this development together with all the other developments that are taking place within the area, i.e. North Warwick Road, Imperial Wharf, Shepherds Bush. The impact of the huge Earls Court Development will be problematic enough for quality of life, overcrowding of services etc together with these other developments which is projected to be 18,000 to 25,000 new residential developments it has the potential to be cataclysmic as well as visually and architecturally disastrous.	No change necessary. The boroughs Core Strategies, and in particular in the Infrastructure Schedules, consider the infrastructure required to deliver the range of developments in each borough. However, infrastructure provided by the development must be directly linked to the impact of that development. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. This Strategy is also informed by a Transport Study that

						<p>considers the cumulative impact of development on the transport network.</p> <p>Chapter 9 sets out requirements for social and community facilities to support any new development. Chapter 11 sets out requirements to ensure development makes sustainable choices with regards to energy consumption and production. Chapter 12 sets out requirements to control flood risk, noise, air quality, ecology and the impacts caused during construction and demolition.</p> <p>Many of the Key Principles in the Urban Form Strategy control the quality of design and height of buildings. Key Principle UF19 of the SPD requires development to 'preserve or enhance the character and appearance of nearby conservation areas and the setting of listed buildings'. Key Principle UF28 in particular requires 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.</p>
1266	Wanda	Rostowska		General	<p>These comments are general and obvious. I can be more specific about the north east corner of the OA, having lived at number 64 Philbeach Gardens on and off since 1981. This part of the outer rim of Philbeach has over the last decade or so been subject to considerable planning stress brought on by developments in Cluny Mews and the so called 100 Warwick Road plot / aka Tesco Tower.</p>	<p>Noted.</p>
1267	Wanda	Rostowska		General	<p>[bold] 1 - I would urge the Planning Department to make available to the developers the history of these planning applications as they will reflect the major issues which are of concern to residents. [end bold] The main issues have always been height, blockage of light and overlooking. Endless correspondence has flown and numerous studies have been done (and slightly twisted) and there is no need to do an action replay of the arguments.</p> <p>When I say 'twisted' I can give a specific example of planning/developer tricks. The first Adshel building is allegedly 'two storeys". However, the addition of a protruding canopy in effect adds a third! Since this building came into existence my back garden gets no light at all at ground level.</p> <p>I wish for the Planning Department to be alert to such 'devices' as well as little tricks like the indiscriminate plonking down of trees on architects drawings which then never materialise. But that is for later.</p>	<p>No change necessary.</p> <p>All planning history information is available from the Planning Departments.</p> <p>The SPD sets various tests to control the height of development. Key Principle UF19 of the SPD requires development to 'preserve or enhance the character and appearance of nearby conservation areas and the setting of listed buildings'. Key Principle UF21 states that '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 ...' (which includes views across Cluny Mews). Applications for detailed planning permission will be expected to show building heights, including plant and setback top storeys.</p> <p>Key Principle UD25 requires that 'proposals for tall buildings should indicate how their impact on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference will be mitigated'. Key Principle UF28 requires that 'the privacy, daylight and sunlight of existing and future buildings must be respected'. The exact details will be dependent on the proposals and considered on a case by case basis.</p>
1284	Ben	Sawbridge		General	<p>My observations are based on nearly 50 years of familiarity with the area, living in Mornington Avenue and Talgarth Mansions. Earls Court and West Kensington are adjacent but distinct villages with different characteristics.</p>	<p>Noted.</p>
1285	Ben	Sawbridge		General	<p>The more I consider this matter, the more convinced I am that the OA was misconceived. It suggests Mayoralty megalomania, an attempt to promote over-development and merge the two villages</p>	<p>No change necessary.</p>

					into one. Bad economics prescribes the sweating of all assets for profit, to the exclusion of other considerations. The brute reality of this OA is the railway junction, which made a natural local government boundary. Of course, it could be decked over, but it would be disproportionate to hide the causal role of the railway in London's suburban expansion. Moreover, the Earls Court and West Kensington stations are very well used, without any further growth of local population.	<p>The revised draft SPD sets out requirements to control the impacts of the development. The Urban Form Strategy sets out requirements to minimise impacts on surrounding residents, especially from development on the edges of the OA. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated.</p> <p>The SPD does not require decking over the railway lines. However, a key requirement in the London Plan and borough core strategies, and therefore in this SPD, is improving east west connectivity through the site.</p>
1293	Ben	Sawbridge		General	The problems raised by this OA should be best understood by planning professionals, but there is also a need for their political masters to contribute integrity rather than short-term appetite to the process.	Noted.
1294	Geraldine	Winkler	Mrs Fay Winkler	General	I am very concerned about the above proposals and the potential impact on the local amenities, and question its necessity, particularly in light of other developments north of Cromwell Road and south of High Street Kensington, the 44-acre expansion of Westfield, and the White City and Kensal Rise Opportunity Areas.	<p>No change necessary.</p> <p>The OA was identified for redevelopment in the London Plan and borough Core Strategies. The SPD sets out a framework to ensure any redevelopment is well designed, sustainable and does not negatively impact on existing local amenities. The SPD requires that developers assess the need for social and community facilities, such as health, education, police and community meeting space, and provide what is required to meet the needs of the development.</p>
1295	Geraldine	Winkler	Mrs Fay Winkler	General	I have lived in Trebovir Road since 1962.	Noted.
1296	Geraldine	Winkler	Mrs Fay Winkler	General	I understand that the proposals will bring in approximately 14,000 new residents and 12,600 workers to the area.	Noted.
1312	Linda	Wade	Nevern Square Conservation Residents' Association	General	I wish to make response to the Earl's Court and West Kensington Opportunity Area Revised Draft JSPD, as chair of the Nevern Square Conservation Area Residents' Association. The Nevern Square Conservation Area covers the area between the sections of Warwick Road and Earl's Court Road from the station to the Cromwell Road.	Noted.
1314	Linda	Wade	Nevern Square Conservation Residents' Association	General	<p>The wording is considered to be too soft/ambiguous, without precision, and will allow for a developer to be able to drive a coach and horses through the document. There are too many instances of measures predicated on unfunded or unrealistic outcomes such as Crossrail 2, and the soft wording around a prospective developer engaging with Thames Water subject to funding from Ofwat.</p>	<p>No change necessary.</p> <p>The Introduction sets out how the SPD has been drafted to supplement existing policies and have regard to the evidence base produced.</p> <p>No reliance is placed on the transport improvements, including Crossrail two, referred to in paragraph 10.34 by the ECTS. The paragraph has been amended to make this clearer.</p> <p>The SPD does not require 'a prospective developer engaging with Thames Water subject to funding from Ofwat', but states that developers must consult with and reflect the views of Thames Water and the Environment Agency. Para 12.33 provides some detail on Thames Water's bid to Ofwat to improve capacity</p>

							in the Counters Creek sewer.
1315	Linda	Wade	Nevern Square Conservation Residents' Association	General		Residents, also feel that there is little consideration of the unique nature of this complex site, with the concentration of adjacent Conservation Areas, density of population, the already stressed conditions on the roads and on public transport, and that the emphasis of the JSPD was on the prospective residents rather than the people who already have made their homes here.	No change necessary. Section 2 considers the existing site context, which includes figure 2.21 that shows all the Conservation Areas around the OA. The revised draft SPD sets out requirements to control the impacts of the development. The impact of the development on the roads and public transport system is considered in the Transport and Accessibility Strategy (chapter 10). The SPD also sets out requirements to mitigate any impact of development on the existing residents, such as the edge conditions (Urban Form Strategy), provision of social and community facilities and controlling the impact of demolition and construction (The Environmental Strategy).
1316	Linda	Wade	Nevern Square Conservation Residents' Association	General		It has also been expressed that the Council should be protecting the residents and not seen to be so pro-developer. The majority said that there could be appropriate development taking into account the existing area, but not development for development's sake.	No change necessary. The SPD sets out requirements to mitigate any impact of development on the existing residents, such as the edge conditions (Urban Form Strategy), provision of social and community facilities and controlling the impact of demolition and construction (The Environmental Strategy). Propose change to the Demolition and Construction Key Objective to place greater emphasis on protecting existing residents. The impact of the development on the roads and public transport system is considered in the Transport and Accessibility Strategy (chapter 10).
1345	Linda	Wade	Nevern Square Conservation Residents' Association	General		While residents welcome the consultations, it is felt that there is much more work needs to be done to make this document robust enough to withstand the might of developers, and that more emphasis needs to be placed on protecting the existing residents, their health, and their well-being.	Change proposed. The SPD sets out requirements to mitigate any impact of development on the existing residents, such as the edge conditions (Urban Form Strategy), provision of social and community facilities and controlling the impact of demolition and construction (The Environmental Strategy). Propose change to the Demolition and Construction Key Objective to place greater emphasis on protecting existing residents.
1365	Dr. Ian	Sesnan	Archdeacon of Middlesex	General		We will also seek to comment on further stages but we are concerned not to take away from the key role that Councils have in ensuring the proper planning of their areas. It should not be for third parties to have to prevent poor development or over-development that is the duty of the local planning authorities.	No change necessary. The revised draft SPD sets out requirements to control the impacts of the development. The Urban Form Strategy sets out requirements to minimise impacts on surrounding residents, especially from development on the edges of the OA. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. Chapter 9 sets out requirements for new social and community facilities, such as education, health, police and community meeting space, to support any new development. Chapter 12 sets out requirements to control flood risk, noise, air quality, ecology and the impacts caused during construction and demolition.
1366	Eirik	Reddi	Residents of 67-70 Kensington Mansions	General		I am writing on behalf of the residents of 67-70 Kensington Mansions to express our grave concerns to the proposed development and the lack of hard detail in the SPD. Our building stands on the immediate corner of the current entrance to the Exhibition Centre and the impact of the proposed works will effect us in extremis.	Change proposed. The Introduction sets out how the SPD has been drafted to supplement existing policies and have regard to the evidence base produced. The SPD establishes the framework to ensure that any future development of the OA is sustainable

						and will be used to determine planning applications in the OA. The developer will need to propose developments and include significant detail that reflects the requirements in the SPD.
						The SPD sets out requirements to mitigate any impact of development on the existing residents, such as the edge conditions (Urban Form Strategy), provision of social and community facilities and controlling the impact of demolition and construction (The Environmental Strategy). Propose change to the Demolition and Construction Key Objective to place greater emphasis on protecting existing residents.
1377	Eirik	Reddi	Residents of 67-70 Kensington Mansions	General	We need the RBK&C to be strong and to act on our behalf in restraining the poorly thought through proposals in this document. We want hard facts and on all these issues, not approximations and glib promises. As the SPD stands the future of Earl's Court residents is set to be misery heaped on misery.	Change proposed. The Introduction sets out how the SPD has been drafted to supplement existing policies and have regard to the evidence base produced. The SPD establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. The developer will need to propose developments and include significant detail that reflects the requirements in the SPD.
1394	Jane	Willmot	Hammersmith and Fulham Disability Forum	General	1.Hammersmith and Fulham Disability Forum (DF) is a user led group of disabled residents supported by Hestia under contract with Hammersmith and Fulham Council. We collect evidence to improve local facilities for disabled people.	Noted.
						Change proposed.
1395	Jane	Willmot	Hammersmith and Fulham Disability Forum	General	1.1. We responded at some length to the previous consultation on this SPD. Our main concerns were - to ensure access and inclusion was embedded throughout the SPD consistent with London Plan 2011 (LP 2011) policy 7.2 [italics] an inclusive environment [end italics] - enough detail throughout the SPD to put developers and case officers on notice that existing access standards including building control should be used.	The comments raised in April 2011 were considered as part of the consultation analysis over the summer 2011. Where appropriate, the comments raised resulted in changes to the revised SPD. Where the SPD has not been amended, the consultation response schedules set out reasons for this. The Vision in the SPD will revised to include reference to improving access for all.
						Change proposed.
1396	Jane	Willmot	Hammersmith and Fulham Disability Forum	General	1.2.We are very disappointed that the revised SPD did not embed access and inclusion throughout the document or refer to LP 2011 policy 7.2 [italics] an inclusive environment. [end italics] We are told by officers that there are two reasons for this: - this SPD must not duplicate policies in other documents - planning authorities expect case officers and developers to know all relevant guidance on accessible and inclusive design.	Key Principle HO18 requires a minimum 10% of residential units to be wheelchair accessible and Key Principle HO19 requires all residential units to be built to Lifetime Homes standards. Para 5.46 refers to LBHF and RBKC access design guides, which provide guidance on accessibility for all land uses. London Plan Policy 7.2 still applies and the SPD shouldn't duplicate existing policies. Non residential public buildings will need to be accessible through the DDA legislation. Detailed proposals for access and inclusion will be considered as part of the planning application. The Vision in the SPD will revised to include reference to improving access for all.
1401	Jane	Willmot	Hammersmith	General	1.7. We noted that the planning authorities decided not to accept	Noted.

			and Fulham Disability Forum			our recommendation that the SPD should include either detailed access standards or any specific references to them on the grounds of keeping the SPD short. We are very disappointed by this decision	The comments raised in April 2011 were considered as part of the consultation analysis over the summer 2011. Where appropriate, the comments raised resulted in changes to the revised SPD. Where the SPD has not been amended, the consultation response schedules set out reasons for this.
1413	Jane	Willmot	Hammersmith and Fulham Disability Forum	General		7.1.[bold] We recommend that the planning authorities confirm they ensure that all the specific access and inclusion issues we raised in our previous response will be addressed during the planning application process. [end bold]	Change proposed. Key Principle HO18 requires a minimum 10% of residential units to be wheelchair accessible and Key Principle HO19 requires all residential units to be built to Lifetime Homes standards. Para 5.46 refers to LBHF and RBKC access design guides, which provide guidance on accessibility for all land uses. London Plan Policy 7.2 still applies and the SPD shouldn't duplicate existing policies. Non residential public buildings will need to be accessible through the DDA legislation. Detailed proposals for access and inclusion will be considered as part of the planning application. The Vision in the SPD will revised to include reference to improving access for all.
1414	Paul	Kennedy		General		I am writing to object and make representations against a number of aspects of the draft joint SPD for the Earl's Court and West Kensington Opportunity Area, on which you have invited comments by 5pm today	Noted.
1418	Paul	Kennedy		General		The plan largely ignores the massive demands that will be made on water, electricity, gas, sewage, waste and telecoms.	No change necessary. The Urban Form Strategy (UD25) requires tall buildings to mitigate their impact on telecommunication interference. The Energy Strategy requires development to provide energy in accordance with the energy hierarchy, thus reducing demand for electricity and gas. The Environmental Strategy sets out requirements with regard to water conservation, floodrisk management, including sewage and waste.
1432	Michael	Bach	Kensington Society	General		We consider this a considerable improvement on the first draft, but still consider it not sufficiently ambitious given that the redevelopment presents the opportunity of an "open field" which should allow it to become an exemplar new quarter. It needs to be more adventurous.	No change necessary. The authorities disagree that this site is considered as an 'open field'. The requirements in the SPD must be reasonable having regard to existing policy and the evidence base, including the financial viability study which was prepared as part of the SPD.
1433	Michael	Bach	Kensington Society	General		The Society considers that the revised SPD is a great improvement on the first draft, in that it presents a more coherent strategy for the development of the Opportunity Area and presents much stronger, clearer and unambiguous objectives and principles which, for the most part, the Society supports and endorses.	Noted.
1439	Michael	Bach	Kensington Society	General		[bold] Overall, this should be an opportunity to create an exemplar sustainable urban quarter. [end bold] It has huge locational and infrastructure advantages over other Opportunity Areas, yet it does not use this to raise expectations about what could really be achieved in this area.	No change necessary. The first sentence of the vision states that "residential led regeneration of the OA will result in a world class, aspirational, environmentally sustainable new urban quarter...". The detailed requirements for Energy and Environment are set out in the relevant chapters of the SPD. The requirements in the SPD must be

						Thus while the revised SPD goes some way to setting out the objectives and principles, yet is insufficiently ambitious or innovative to fully deliver these opportunities.	reasonable having regard to existing policy and the evidence base, including the financial viability study which was prepared as part of the SPD.
1497	Charlotte	Winer		General		Although modifications have clearly been made, I remain deeply concerned about the character of the proposed buildings, (tower blocks are not in keeping with the character of the area), the lack of green space, the lack of parking, the inability of the existing public transport services to cope, and the increased noise light and air pollution, in an area already full to capacity.	<p>No change necessary.</p> <p>The SPD does not propose tall buildings throughout, but acknowledges that some tall buildings could be located to form a cluster around the Empress State building (Key Principle UF22). The Urban Form Strategy provides guidance to ensure that the design of buildings respects the character area of the area, especially at the edges. The Urban Form Strategy also controls the impact of buildings on a number of views, as set out in the Townscape and Visual Analysis.</p> <p>The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. The SPD sets a maximum requirement of 0.4 parking spaces per unit, which seeks to meet needs without overly increasing car use / ownership.</p> <p>Chapter 12 (Environmental Strategy) sets out requirements to control noise and vibration, and air pollution, especially during construction and demolition. Key Principle UD25 requires that 'proposals for tall buildings should indicate how their impact on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference will be mitigated'. Key Principle UF28 states that 'the privacy, daylight and sunlight of existing and future buildings must be respected'. However, the exact details will be dependent on the proposals and considered on a case by case basis.</p>
1501	Charlotte	Winer		General		I am hoping that the local councils will do more to protect the area from what still seems a very damaging development. We would lose much - the whole character of the neighbourhood, worsened chronic congestion, and intolerable light noise and air pollution.	<p>No change necessary.</p> <p>The Urban Form Strategy provides guidance to ensure that the design of buildings respects the character area of the area, especially at the edges and for taller buildings. The Urban Form Strategy also controls the impact of buildings on a number of views, as set out in the Townscape and Visual Analysis.</p> <p>The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated.</p> <p>Chapter 12 (Environmental Strategy) sets out requirements to control noise and vibration, and air pollution, especially during construction and demolition.</p>
1502	Dr M.	Eileen Magnello		General		I attended both events of the EARLS COURT SOCIETY'S Consultation Events on 29 and 30 November with some members of the Planning Dept as speakers. The first event covered general	Noted.

					subjects and the second looked only at Traffic and Transport. These are the areas of the SPD that I feel are inadequate and need to be strengthened to meet the needs of residents present and future:	
1507	Dr M.	Eileen Magnello		General	Thank you for taking potential consequences of short term gain into account. For London as a whole, please ensure that Earls Court remains a desirable place to live and work by taking this opportunity to help create something of lasting value for this millennium and beyond.	Noted.
1510	Mrs L.	Victor		General	We/I object to re-development 100%.	Noted.
1511	Cllr. Mrs. Frances	Taylor		General	according to the ES the other day the Seagrave Road site has been acquired from Capco by a group of Hong Kong Investors to build luxury flats. Is this so?	No change necessary. The developer's funding arrangements are beyond the scope of this SPD. However, the landowners have submitted a planning application for the Seagrave Road site, which proposes predominantly residential units.
1512	Cllr. Mrs. Frances	Taylor		General	I would like to know if there is any possibility of the EDF/Electricity building being removed/reduced without interfering with the actual sub-station which is underground - that is extremely ugly as it is close to and overlooks the garden of remembrance for those who have died.	No change necessary. . This building is included within the OA, but not within the landowners masterplan. The redevelopment potential of this site will depend on the landowners expressing a desire to redevelop it.
1513	Richard	Chute		General	I object most strongly to the above consultation document.	Noted.
1522	Richard	Chute		General	I maintain that the authorities' consultation process has not been comprehensive, and meaningfully engaged the neighbourhood. A significant proportion of the population feels that the planning process is being rushed with undue haste and developer-led. The RBKC Council's decision on 22 June 2011 not to produce an Area Action Plan, despite assurances given on 2 March 2009 in the "Places" Core Strategy & N Ken Plan, is a cowardly false quick-fix appeasement measure at the expense of good planning in the long term. The authority should allocate resources to start preparing for proper planning.	No change necessary. The SPD has been prepared through extensive consultation with local people. The consultation summary report sets out details of this consultation. All comments raised have been considered and where appropriate resulted in amendments to the SPD. The authorities have considered that an AAP is not necessary as up to date strategic policies for the Opportunity Area are already set out in the London Plan and Borough Core Strategies. In addition to this, the London Plan endorses the production of a planning framework, not AAP, and both Core Strategies endorse the production of an SPD.
1536	Jonathan	Choat	Orpen House Tenants' Compact	General	I, Jonathan Choat of 8, Orpen House, 12/14 Trebovir Road, Earl's Court, London, SW5 9LY, wish to raise objections to the Earl's Court and West Kensington Opportunity Area Revised Draft JSPD, as a resident of RBKC living in a street close to the development area off Warwick Road and Chairman of the Tenant's Compact including seven other tenants in our apartment block, Orpen House, 12/14 Trebovir Road, London, SW5 9LY.	Noted.
1537	Jonathan	Choat	Orpen House Tenants' Compact	General	1.The wording content used by the developer in the documents is imprecise and we consider, purposely ambiguous in order to allow the developer substantial lee way in the actual final development, seemingly within the proposal now presented, but in fact not expected by the Planning Department of RBKC. There are too many instances of proposals predicated on unfunded or unrealistic outcomes, for example Crossrail 2; the ambiguous wording around	No change necessary. The SPD is written by the planning authorities of RBKC, LBHF and the GLA. The Introduction sets out how the SPD has been drafted to supplement existing policies and have regard to the evidence base produced.

						a prospective developer engaging with Thames Water subject to funding from Ofwat.	<p>No reliance is placed on the transport improvements, including Crossrail two, referred to in paragraph 10.34 by the ECTS. The paragraph has been amended to make this clearer.</p> <p>The SPD does not require 'a prospective developer engaging with Thames Water subject to funding from Ofwat', but states that developers must consult with and reflect the views of Thames Water and the Environment Agency. Para 12.33 provides some detail on Thames Water's bid to Ofwat to improve capacity in the Counters Creek sewer.</p>
1538	Jonathan	Choat	Orpen House Tenants' Compact	General		<p>2.The developer is concentrating on their own return from the development of this site , at least cost , with no regard for the scale and unique nature of this complex site, which has a concentration of adjacent Conservation Areas, high density of population, massively inadequate conditions on the roads and on public transport already let alone if and when this this proposal should go ahead and that the emphasis of the JSPD was on the prospective massively increased number of residents rather than respecting or paying any regard to the people who already have made their homes in the immediate surrounding areas . It is our view as residents of RBKC, that the Council should be protecting the existing residents and not seen to be so pro-developer. We understand that there could be an appropriate development taking into account the existing area, but not development alone for the developer's financial interests.</p>	<p>No change necessary.</p> <p>Section 2 considers the existing site context, which includes figure 2.21 that shows all the Conservation Areas around the OA. The revised draft SPD sets out requirements to control the impacts of the development. The impact of the development on the roads and public transport system is considered in the Transport and Accessibility Strategy (chapter 10).</p> <p>The SPD also sets out requirements to mitigate any impact of development on the existing residents, such as the edge conditions (Urban Form Strategy), provision of social and community facilities and controlling the impact of demolition and construction (The Environmental Strategy).</p>
1557	Claire	Craig	English Heritage	General		<p>Thank you for the opportunity to comment on the Earl's Court and West Kensington Opportunity Area Draft Joint Supplementary Planning Document (SPD) and its Sustainability Appraisal (SA). As the Government's adviser on the historic environment, and a statutory consultee for the Strategic Environmental Assessment of plans, English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the Local Development Framework process. We have also taken the opportunity to review several of the evidence documents that have been prepared in support of the SPD, including, most notably, the Character Area Analysis and the Townscape and Visual Analysis. We have reviewed these documents in light of Planning Policy Statement 5: Planning for the Historic Environment (PPS 5) and alongside other key national and regional planning policy, while taking account of the Draft National Planning Policy Framework (NPPF).</p>	<p>Noted.</p>
1558	Claire	Craig	English Heritage	General		<p>English Heritage appreciated the opportunity to meet with the Project Team on 10 May shortly after providing a response on the first iteration of these documents. We also appreciated recognition of the validity of our concerns about the initial iteration of the documents, particularly in respect of the need for the surrounding heritage assets to inform the SPD appropriately.</p> <p>English Heritage welcomes the improved inclusion of heritage considerations within the SPD. We also welcome, in principle, the</p>	<p>Noted.</p> <p>The detailed concerns raised by EH are considered in each of the relevant documents / chapters, such as under the SA and the Townscape and Visual Analysis.</p>

					Character Area and Townscape and Visual Analysis reports prepared as evidence for the SPD. However, we do have some significant concerns about the methodology used in both of these. Together with the apparently minimal amendment of the SA, we consider that there has still been insufficient progress in analysing the role of heritage conservation and enhancement in the SPD.	
1559	Claire	Craig	English Heritage	General	<p>We recognise that the impacts on the historic environment fall predominantly outside the development site, rather than involving direct impacts on heritage fabric within the site. We consider that such impacts amount to potential harm to the setting of the heritage assets that surround the opportunity area which is still very significant as highlighted in paragraph 44 of the PPS 5 Practice Guide:</p> <p>Local development framework policies on design can set out the local planning authority's views on the importance of new development having a good relationship with the surrounding historic environment. These will need to reflect the policies on design and setting with both PPS 5 (HE7.4, HE7.5, HE9.5 and HE10) and PPS1. By encouraging applicants to consider both how existing valued heritage assets can inform high quality design that is inspired by its local context and how the best contemporary design can fit comfortably into its surroundings, the local planning authority can help deliver sustainable communities and places that residents value highly. It is important to recognise that new development that relates well to its surroundings is likely to last longer before its replacement is considered and therefore make a greater contribution to sustainability. Local planning authorities are encouraged to seek well-conceived and inspirational design that is founded on a full understanding of local context.</p>	<p>Change proposed.</p> <p>Key Objective in the Urban Form Strategy ensures that new buildings on the edges of the OA are sensitivity integrated into and enhance the existing context. Para 4.76 states that new development will need to respond to the proximity to listed buildings and heritage assets. However, Key Principles UF19 and UF20 will be revised to make specific reference to protecting the setting of heritage assets.</p>
1594	Claire	Craig	English Heritage	General	<p>As discussed above, English Heritage recognises some significant and very welcome improvements in relation to the coverage of the historic environment in the SPD including:</p> <ul style="list-style-type: none"> - recognition of heritage assets in para 2.0 on page 18; - inclusion of conservation areas in para 4.6 on page 52; - recognition of the listing of West Brompton station and related heritage considerations in paragraphs 10.41 and 10.42 on page 136; and - recognition of archaeology in paragraph 12.3 on page 155. 	Noted.
1595	Claire	Craig	English Heritage	General	<p>We also welcome the expression of the key objectives on page 181 of the SPD and particularly support the Key Objectives for Skyline and Edges on pages 64 and 65 respectively.</p>	Noted.
1608	Claire	Craig	English Heritage	General	<p>[bold] Conclusion [end bold]</p> <p>Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the SPD, and which may, despite the SA, have</p>	Noted.

						adverse effects on the environment.	
1609	John	Drake	Campaign to Protect Rural England	General		(A) While the SPD has to meet all legislation on regeneration and renewal from government, mayoral, borough levels. It must also be a: a) A long term masterplan for sustainable development acceptable to the Boroughs, but most importantly to local residents b) The SPD has an important role to keep the commercial elements to an agreed levels.	No change necessary. The revised draft SPD establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. It is up to the developer to propose developments, which reflect the framework as set out in the revised draft SPD. The SPD is written by the planning authorities of RBKC, LBHF and the GLA, and been subject to an independent financial viability study. The Employment Strategy sets out the requirements to deliver new jobs and improving access to training initiatives and apprenticeships. The Retail Strategy sets out requirements for new retail provision.
1611	John	Drake	Campaign to Protect Rural England	General		(C) We are commenting mainly on the sections which are opposed by local residents and which fall within CPRE London Policies.	Noted.
1613	John	Drake	Campaign to Protect Rural England	General		(E) The present SPD does not take into account the development in the surrounding area; West Cromwell Road to High Street Kensington; West Cromwell Road etc. which will mean an extra 5,500 in the area plus 8,300 in this development.	No change necessary. The Transport Study considers the cumulative impact of some planned developments in the area. The SPD uses a formula to calculate the provision of social and community facilities according to the increase in population in the OA. The authorities cannot require the development to resolve problems with existing provision, but to accommodate the levels of development proposed.
1650	John	Drake	Campaign to Protect Rural England	General		Phasing While residents and CPRE appreciate the hard work which has been put into the second draft it is important that the final draft takes up the points raised and it will be satisfactory for present and future residents.	Noted. The comments raised are being considered as part of the consultation analysis over the next few months. Where appropriate, the comments raised may result in changes to the SPD. Where the SPD has not been amended, the consultation response schedules set out reasons for this.
1651	John	Raison		General		After a brief look at some of the above revised documents I feel somewhat reassured since writing during the year, by the stipulations that the development should not overwhelm nor overshadow through eg: - setting back - layered recessing - irregular and varied rooflines - the providing of visual interest through articulated rooflines and facades, avoiding unrelieved walls of development	No change necessary. These comments are addressed in the Urban Form Strategy. Key Principle UF19 requires development to preserve and enhance the character and appearance of nearby conservation areas and listed buildings. Key Principle UF24 sets out the design requirements for buildings taller than their surroundings. Key Principle UF25 requires proposals for tall buildings to mitigate their impact on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunications interference. Key Principle UF28 states that 'the privacy, daylight and sunlight of existing and future buildings must be respected'. Para 4.91 sets out requirements for setting back storeys above the shoulder

						Also that account be taken of microclimates, analysis of daylight and sunlight, that sympathy be given to any listed buildings and tall buildings should be restricted in height and of slender appearance- but if its possible that any 'high-rise' structures will seem out of place against conservation areas. Trusting that the most sensitive use of the land will prevail	height. Key Principle UF32 requires the heights of buildings and the widths of streets to vary according to street type and Key Principle UF34 seeks to avoid arbitrary variations in the roofscape. However, the exact details will be dependent on the proposals and considered on a case by case basis.
1852	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General		1. Although there are some improvements in the revised draft, compared to the original, we believe the SPD is still fundamentally flawed and cannot form the basis on which a revised Masterplan can be developed or a firm foundation for the assessment and determination of a series of phased planning applications.	No change necessary. The revised draft SPD establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. The SPD supplements existing higher order policies and is based on a sound evidence base. It is up to the developer to propose developments that reflects the framework set out in the SPD.
1853	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General		- The document takes the wrong form - it should be an Area Action Plan, as we have commented before.	No change necessary. The authorities have considered that an AAP is not necessary as up to date strategic policies for the Opportunity Area are already set out in the London Plan and Borough Core Strategies. In addition to this, the London Plan endorses the production of a planning framework, not AAP, and both Core Strategies endorse the production of an SPD.
1854	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General		- It remains a long and unnecessarily complex document which makes it hard to understand the main points being made (which should be the purpose of an SPD/Area Action Plan)	No change necessary. Owing to the size and nature of the Opportunity Area and the surrounding area, the document needs to consider a range of issues and is therefore not unnecessarily long and complicated. The Vision and Objectives (Chapter 3) provides a succinct summary of the vision and requirements set out in the document. In accordance with the Core Strategies of both LBHF and RBKC, the SPD is an appropriate vehicle to control the development of the OA. There are also site specific policies within both Core Strategies and the London Plan, which are both up to date and therefore no need for an Area Action Plan.
1858	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General		- Whilst some changes have been made to the earlier draft (some of which are welcome), the major issues are left unchanged and consultation has been largely ignored on the issues that most matter, especially estate "regeneration".	Noted. The comments raised in April 2011 were considered as part of the consultation analysis over the summer 2011. Where appropriate, the comments raised resulted in changes to the revised SPD. Where the SPD has not been amended, the consultation response schedules set out reasons for this.
1859	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe	General		3. The implications of these problems are that a further draft, not a final draft, is needed, that the Masterplan cannot be re-drafted until this is available and that the current planning applications should either be formally withdrawn or invalidated, because they are premature. No new applications should be submitted until the	No change necessary. The SPD does not set out the masterplan for the OA but establishes the

			Close TRA			SPD/AAP is revised again, and a fresh, compliant, Masterplan has been drafted, consulted upon and agreed. Any consultation on a revised application in the meantime would be an irresponsible waste of resources and time of those who would have to respond - the Local Authorities, the Mayor, the statutory consultees and the local communities, residents and commercial occupiers.	framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. It is up to the developer to propose developments, which reflect the framework as set out in the revised draft SPD. The authorities cannot require planning applications to be withdrawn and cannot unreasonably delay determination of planning application. The SPD has been subject to two rounds of consultation, which are beyond the requirements of the Town and Country Planning (Local Development)(England) Regulations 2004, as amended. Having been consulted upon and comments assessed, the SPD has considerable weight in determining planning applications in the OA. It will be given more weight once adopted, but the SPD does not need to be adopted before the planning applications are considered.
1860	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General		4. In that context, we have several comments on the Draft SPD. There are four major ones - Commitment (including Vision and Objectives), Housing, Transport and Townscape.	Noted. This comment introduces the detailed comments, which are considered in detailed under each of the chapters.
1876	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General		11. For all the above reasons, we believe the SPD needs to be altered radically if it is to convey a sense of commitment and to generate trust and support.	Noted.
1929	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General		[bold] F. Conclusion [end bold] 57. We ask for our comments to be fully taken into account in revisions to this consultation version of the SPD, including the assurance sought: - in Para 6, regarding the Local Planning Authorities stating that they would be minded to refuse any application that deviates from the SPD/AAP to any significant extent.	No change necessary. The comments raised are being considered as part of the consultation analysis over the next few months. Where appropriate, the comments raised may result in changes to the SPD. Where the SPD has not been amended, the consultation response schedules set out reasons for this. In accordance with planning legislation, planning applications are determined having regard to the development plan and other material planning considerations. Para 1.11 states that the SPD is a material planning consideration, which is one of many that will be used when determining relevant planning applications.
1931	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General		60. We ask for confirmation that, once the SPD/AAP is adopted, there will be formal consultation on a revised Masterplan, and that this will be fully compliant with the SPD/AAP. We would expect to be given adequate time to comment on the revised draft, bearing in mind that it will be substantially different from the current version.	No change necessary. The SPD does not set out the masterplan for the OA but establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. It is up to the developer to propose developments that reflect the framework as set out in the revised draft SPD. In accordance with planning legislation, planning applications are determined having regard to the development plan and other material planning considerations. Para 1.11 states that the SPD is a material planning

						consideration, which is one of many that will used when determining relevant planning applications.
						The authorities cannot control when planning applications or revisions to planning applications are submitted. In addition to this, the authorities cannot require planning applications to be withdrawn and cannot unreasonably delay determination of planning application. However, any significant revisions to planning applications would need to be published for a further consultation as part of the planning application process.
1932	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	General	61. We also ask for confirmation that there will be no further planning applications submitted until the revised Master Plan has been commented on, further revised and published. Any earlier submission would be premature and a waste of the time and resources of all those involved in commenting, including the Mayor, the local authorities, statutory consultees, local businesses, community groups and affected individuals. We have invested a lot of our time already in a process which has been poorly thought through and we wish to avoid any further wastage.	No change necessary. The authorities cannot control when planning applications or revisions to planning applications are submitted. In addition to this, the authorities cannot require planning applications to be withdrawn and cannot unreasonably delay determination of planning application. However, any significant revisions to planning applications would need to be published for a further consultation as part of the planning application process.
1933	Andy	Slaughter	Labour MP for Hammersmith	General	1. <u>Introduction</u> I am the Member of Parliament for Hammersmith, which contains the greater portion of the OA, and wish to make some general observations about the process and the objectives of the revised SPD which are detrimental to many of my constituents and to the area. I do not oppose regeneration in this area, but the scale of what is proposed here is not sustainable. The creation of three OAs in Hammersmith and Fulham, one of the smallest and most densely populated boroughs in London, and the volume of development proposed here, put unacceptable pressure on the exiting population and infrastructure of the borough.	No change necessary. The impact of all three OAs in LBHF has been considered as part of the Core Strategy Infrastructure Study and borough wide infrastructure requirements are set out in the Core Strategy. The Core Strategy is supported by a Sustainability Appraisal which has assessed the cumulative impact that all three opportunity areas will have on the development of Hammersmith and Fulham. These impacts were not found to be detrimental to LBHF, allowing the borough to contribute to London's housing target, whilst at the same time protecting those parts of the borough considered most architecturally valuable, from development. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. Chapter 9 sets out requirements for new social and community facilities, such as education, health, police and community meeting space, to support new development. However, the authorities cannot require the development to resolve problems with existing provision, but to accommodate the levels of development proposed.
1934	Andy	Slaughter	Labour MP for Hammersmith	General	The objections I made to the first SPD consultation still apply to this revised version, which in particular appears still to be ignoring the huge amount of public concern that these proposals have generated over several years. The failure of the planning authority to address these concerns or to consider the development limitations of the area, in part at least because it is a co-developer, is still a worrying aspect to the process, as well as a virtually certain indicator of an unsatisfactory outcome.	No change necessary. The comments raised in April 2011 were considered as part of the consultation analysis over the summer 2011. Where appropriate, the comments raised resulted in changes to the revised SPD. Where the SPD has not been amended, the consultation response schedules set out reasons for this.
1993	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	General	These representations are submitted by Capital & Counties (Capco) on behalf of Earls Court and Olympia Group in relation to the Earl's Court and West Kensington Opportunity Area (ECWKO) revised draft Supplementary Planning Document	Noted.

					(SPD).	
1994	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	General	Earls Court and Olympia Group are the (leasehold) owners of the Earls Court Exhibition Centre Complex (EC1, EC2, Seagrave Road Car Park) which together with surrounding land, including the Lillie Road Depot and the West Kensington and Gibbs Green housing estates make up the Earls Court & West Kensington Opportunity Area (ECWKOA).	Noted.
1995	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	General	The potential for redevelopment of the ECWKOA has been promoted by Capco in separate representations to the preparation of the Replacement London Plan (RLP), LBHF Core Strategy and RBKC Core Strategy. Capco welcomes the recognition by the two boroughs and GLA of the significant potential afforded by the ECWKOA and the acknowledgement of the benefit in bringing forward this opportunity for regeneration by the production of the revised draft SPD.	Noted.
1996	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	General	Capco submitted representations to the draft SPD published in March 2011. Those representations provided support for the general direction of the draft SPD, but proposed certain amendments and clarifications to the document to ensure that it provides an appropriate basis to allow development proposals to come forward and the full potential of the ECWKOA to be realised.	Noted.
					Level of detail and prescription contained within the draft SPD	No change necessary.
1997	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	General	For the SPD to be an effective and suitable planning tool, it needs to set in place spatial planning objectives and principles of a nature that will assist in bringing about co-ordinated development. It should however stop short of prescription. This is particularly important having regard to the large scale and the anticipated long term nature of the development project for the ECWKOA. The current phasing and development programme assumes a build out over a period of approximately 20 years. For the SPD to succeed in creating a framework for the long term future of the ECWKOA it must not give rise to unnecessary prescription or detail and should not 'fix' a design approach.	The authorities do not consider that the SPD is overly prescriptive as it provides a framework to guide redevelopment. The SPD has been drafted to supplement development plan policies and is based on a sound evidence base and thorough understanding of the site. The SPD therefore provides further detail on the implementation of development plan documents with a specific emphasis on site specific requirements. The authorities are confident that where specific requirements are mentioned, the delivery of these is important to the boroughs aspirations for the site.
2103	Geraldine	Kelly		General	I am writing concerning the proposed development to the Earls' Court/West Kensington area. As a resident of the area since 1987, I am extremely concerned about the impact of the proposed project on the existing residents of this neighbourhood. It is particularly important to take into account the other developments in the area which include the area north of the Cromwell Road and South of High Street Kensington, the expansion of Westfield, the White City and Kensal Rise Opportunity Areas and the already densely populated and saturated Earl's Court one way system.	No change necessary. Many of the Key Principles in the SPD seek to control the impact of the development on existing residents. The Urban Form Strategy seeks to control the form and scale of buildings, especially building heights on the edges of the OA which will be expected to respect the scale and massing of neighbouring buildings. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. Chapter 9 sets out requirements for new social and community facilities, such as education, health, police and community meeting space, to support any new development. Chapter 12 sets out requirements to control possible impacts, such as ecology, waste, flood risk, noise and vibration and air quality, which are especially important during the during construction and demolition. The authorities cannot require the development to resolve problems

						with existing provision, but to accommodate the levels of development proposed.
2110	Geraldine	Kelly		General	I respectfully request that you give due consideration to the concerns of existing residents when making your decision regarding the proposed project.	Noted. The comments raised are being considered as part of the consultation analysis over the next few months. Where appropriate, the SPD will be revised to reflect the consultation findings. Where the SPD has not been amended, the consultation response schedules set out reasons for this.
2114	Sandro and Jelena	Guadagnini		General	We are hopeful that you will seriously consider our objections which are real concerns of local residents.	Noted. The comments raised are being considered as part of the consultation analysis over the next few months. Where appropriate, the SPD will be revised to reflect the consultation findings. Where the SPD has not been amended, the consultation response schedules set out reasons for this.
2131	Pamela and Michael	O'Hagan		General	Having lived in Earls Court since 1971 it has been a priority of ours to help improve and conserve it and to that end we have initiated and accomplished so many improvements that much of the area has become a conservation area, (eg. Nevern Sq. Garden, Earls Court Garden), unusual flora and fauna have made their homes there, and property prices have soared!! NOW along come people on the backs of our hard work who appear to be taking the area backwards by their lack of thought as to the ESSENTIAL components of an attractive, well balanced and thriving community. This is not the first time this has happened where an improved landscape and community have seen their area deteriorate again, and we must appeal to those in the planning department to ensure this DOES NOT HAPPEN HERE!	No change necessary. The revised draft SPD establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. The first line of the authorities' vision for the OA states "Residential led regeneration of the OA will result in a world class, aspirational, environmentally sustainable new urban quarter that people will want to live in, work in and visit." The Urban Form Strategy seeks to deliver an attractive place through the design of buildings and spaces, especially taking into account the impact of buildings on existing conservation areas and listed buildings (see Key Principle UF19 and UF20). The social and community facilities section seeks to deliver a new community hub, which will help the development to create a place for people. The Environmental Strategy sets out requirements to control the impact of development on biodiversity.
2135	Pamela and Michael	O'Hagan		General	Basically this development is too large for the area. It smacks of greed trying to shove too much into too little space for quick returns. We have suffered enough at this time from that attitude. I hope wiser and cooler heads will now prevail so that we have an improved, attractive area that brings a reasonable profit to the developers but doesn't destroy the very qualities to which they wanted to attract home dwellers in the first place. I appreciate your taking the time to consider our proposals and anxieties.	No change necessary. The revised draft SPD establishes the framework to ensure that any future development of the OA is sustainable and will be used to determine planning applications in the OA. Many of the Key Principles in the SPD seek to control the impact of the development on existing residents. The Urban Form Strategy seeks to control the form and scale of buildings, especially building heights on the edges of the OA which will be expected to respect the scale and massing of neighbouring buildings. The 'Transport and Accessibility Strategy' considers the impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes

