

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

CONSULTATION RESPONSES SCHEDULE: SITE CONTEXT

Chapter 02: Site Context

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
49	Peter	Verity		02		It is commendable that the RBKC, H&F and the Mayor of London are taking an integrated approach and are preparing a SPD against which to evaluate the development proposals. However, it is fundamental to any systematic planning process that there are clear principles and objectives set for the existing urban context, to ensure that any new development contributes positively to the righting of existing problems, and does not passively add to and aggravate the pre-existing problems.	No change necessary. The SPD sets out the authorities' expectation that development should not aggravate pre-existing problems and where possible, should improve the existing situation.
60	Peter	Verity		02	Para 2.15	[bold] All boundary roads [end bold] carry very high levels of traffic and operate at or [bold] at near capacity [end bold] in peak periods.	No change necessary. This quotes existing text within the SPD.
61	Peter	Verity		02	Para 2.16	There are a [bold] significant number of traffic delay hot spots [end bold] in and around the Opportunity Area	No change necessary. This quotes existing text within the SPD.
62	Peter	Verity		02	Para 2.17	[bold] Earls Court One way System [end bold] has a [bold] negative impact [end bold] on the ease and attractiveness of pedestrian, amenity, access to bus services and the townscape of the area, as well [italics] as the quality of residential and commercial life in the area [end italics].	No change necessary. The current wording is considered to be clear.
63	Peter	Verity		02	Para 2.21	The Opportunity Area currently includes [bold] some areas of poor air quality [bold] which are predominantly located [bold] along roads [bold] surrounding the Opportunity Area.	No change necessary. It is necessary to mention that OA is within an Air Quality Management Area.
346	Christine	Powell		02	Para 2.31	Brompton Cemetery should not be included as an accessible open space. The influx of many more people would detract from the ambience which it provides	No change necessary. It is acknowledged in paragraph 2.31 that whilst Brompton Cemetery is a public open space, it should not be regarded as recreational space.
426	Nicholas	Fernley	Hammermsith & Fulham Historic Buildings Group	02		<p>we are pleased to see that the map showing Conservation Areas has been brought forward to page 39 in Chapter 2, Site Context, although the Borough Boundary remains missing. There is no cross-referencing to Conservation Area Profiles, which would assist a fuller understanding of the character of each CA that may be affected by the Opportunity Area redevelopment. This is especially the case as regards the potential impact of the taller buildings, as we noted in the following paragraph in March, and - we must add - as is evident from many of the Views included in the application's Environmental Statement Volume 2.</p> <p>Proposal: Please add cross-references to the relevant Conservation Area Profiles.</p> <p>Reason: We consider that the SPD needs to provide this in order that it gives the attention to heritage issues that should be given, not merely because of our concerns but in order to take full account of both the letter and the spirit of PPS5.</p>	Change proposed. The borough boundary line will not be added to the drawing because it is the authorities' aspiration to ensure that the site is treated as a whole. One of the drivers behind regeneration is to overcome severance and divisions, not reinstate them. The authorities therefore expect both sides of the site to be treated in the same manner, regardless of the borough in which they can be found. A new paragraph will be added to page 39 referencing both the Conservation Area Profiles and PPS5.
427	Nicholas	Fernley	Hammermsith & Fulham Historic Buildings Group	02		<p>There should be a reference to the possibility of [italics] 'hidden heritage' [end italics] eg Railway heritage (as was found at the CrossRail site) and at Earl's Court exhibition centres and the need to evaluate and record anything that is found to the appropriate level.</p> <p>December 2011: we can see no such reference to these issues in the</p>	No change necessary. Any application(s) will be expected to demonstrate compliance with both the letter and spirit of PPS5 and each case will be judged on its own merits. It is therefore not deemed necessary to restate this in the SPD.

						<p>revised draft SPD. PPS5 is clear on the need for such investigation and evaluation.</p> <p>Proposal: Please add reference to the possibility of 'hidden heritage', and refer to PPS5.</p> <p>Reason: We consider that the SPD needs to provide this in order that it gives the attention to heritage issues that should be given, not merely because of our concerns but in order to take full account of both the letter and the spirit of PPS5.</p>	
472	Arthur	Tait	Friends of Brompton Cemetery	02		8. Add reference in it to PPS5.	Change proposed. A reference to PPS5 has been added to page 39.
482	Malcolm	Spalding	Earl's Court Society	02	Figure 2.25	Fig 2.25 correction should be "Longridge Road" not "Longbridge"	Change proposed.
483	Malcolm	Spalding	Earl's Court Society	02	Para 2.10	2.10 ADD at end "and Warwick Road to the east"	No change proposed. Warwick Road does not cause the same level of severance as the A4 as it not as difficult to cross. It also does not cause any visual severance, which the A4 does- as a result of the elevation of the road and the layout of the buildings to the north, pedestrians struggle to see how they can continue their journey.
608	Bernard	Selwyn	Open Spaces Society	02	Para 2.25	2. [bold] Para 2.25 [end bold] While garden squares and communal gardens often provide public visual amenity, this is not invariable. For example, Philbeach Gardens is entirely enclosed by buildings. But it is regretted that there is no mention of the complete absence of any real public open space.	No change necessary. The local deficiency in publicly accessible open space is outlined in some detail on the following two pages of the SPD (pages 28 and 29). Figure 2.11 shows the area that is considered to be deficient. Paragraphs 2.31 and 2.32 and Table 2.1 set out exactly what existing open space and play provision there is in the local area.
609	Bernard	Selwyn	Open Spaces Society	02	Para 2.26	3. [bold] Para 2.26 [end bold] There is no "rich rhythm" within or surrounding the area. Such pattern as there may be is mainly in Earls Court, not West Kensington.	No change necessary. The authorities consider that, based on the extensive Character Area Analysis that was carried out to inform the production of the SPD, the surrounding area does demonstrate a rich rhythm of terraced buildings and open spaces. This is identified as the best of the local character and a trait that the authorities wish to see brought into the OA.
610	Bernard	Selwyn	Open Spaces Society	02	Para 2.30	4. [bold] Para 2.30 [end bold] This should have drawn attention to the significant deficiency of publicly accessible open space also in all the surrounding areas.	No change necessary. The SPD deals specifically with the OA itself and it is therefore important to describe the site itself. However, the figure that is referred to in paragraph 2.30 (figure 2.11) clearly shows that the open space deficiency extends beyond the boundary of the OA.
611	Bernard	Selwyn	Open Spaces Society	02	Figure 2.11	5. [bold] Figure 2.11 [end bold] This map is totally misleading. It depicts the sites of local nature conservation importance (as on Figure 2.10) as being the only area of open space deficiency instead of all of the area coloured blue. Even that is less than it is in practice. The white area, presumably intended to be 400m from Normand Park, takes no account of the street pattern which makes about half of this white part more than 400m walking distance from any entry to the park.	Change proposed. The authorities feel that the plan clearly shows the area of deficiency, which is the entire blue shaded area, not just the sites of local nature conservation importance. However, in order to avoid further confusion, annotations will be added to the plan to make this even clearer. Whilst we accept that measuring the street pattern is a more accurate way of measuring the distance from the park, the authorities feel that as an illustrative tool, demonstrating a serious deficiency of open space in the local area, the plan is sufficient.
612	Bernard	Selwyn	Open Spaces Society	02	Para 2.31	4. [bold] Para 2.31 [end bold] This is a reasonably accurate statement but is not illustrated by Figure 2.11. It would have been a truer picture if there had been a map showing at least the area of Figure 9 extended north and north-eastward and more of the earl's Court side.	No change necessary. The authorities feel that as an illustrative tool, demonstrating a serious deficiency of open space in the local area, the plan in figure 2.11, when viewed along with the text that accompanies it, is sufficient.
613	Bernard	Selwyn	Open Spaces Society	02	Para 2.31	5. [bold] Para 2.32 [end bold] Surely "eastern" extremities is a misprint for "western" as there is no existing play provision on the Earls Court side	Change proposed.
844	Cllr Linda	Wade		02	Para 2.10	2.10 Severance is caused not only by the railway lines, but also by the volume and speed of traffic caused by Warwick Road, which in itself causes 'separation' for Kempsford Gardens, Eardley Crescent and Philbeach Gardens from the rest of the Earl's Court community. The present pedestrian crossings are already a matter of local concern and there is an existing demand for their re-assessment, and so this should	No change necessary. Paragraph 2.10 acknowledges that there are problems created for pedestrians by other factors than the physical severance caused by the railway lines and exhibition centre. The SPD is a high level document and is not the appropriate location to consider issues at specific crossings. Where relevant such issues will be picked up at the application stage and improvements secured as necessary.

					have been dealt with in any road transport plans. There are no references to Cycle Lanes or routes external to the site, but within the immediate area of development.	
845	Cllr Linda	Wade		02	Para 2.13 2.13 It would be useful to have a clearer indication of the date that the upgrades on the Piccadilly line would be completed, but it is considered that 2 additional trains per hour mentioned at the Consultation meeting at St Cuthbert's Hall will not address the existing capacity problems at Earl's Court station AM/PM peaks, let alone the indicated 10% background increase due to 'population and employment', the developments north of Cromwell Road and south of High Street Kensington and the anticipated increase of residential and employment population within the site. The findings of the forthcoming TfL strategic assessment from the River to Kensal Rise OA should be considered, just evaluating the impact on traffic for Cromwell Road, Warwick Road, North End Road, and Lillie/Old Brompton Road is ultimately flawed by not taking account of the other developments in the wider area. [footnote] 'TfL is also currently considering the sensitivity of the future year transport network to more intensive growth in Opportunity and Intensification Areas. This includes full development of the Earl's Court & West Kensington, White City and Kensal Canalside OAs in line with higher London Plan/OAPF targets. This analysis will provide background evidence for the updated Sub-Regional Transport Plans, which are due to be published in January/February 2012. The conclusions of the work will also be shared with London boroughs as part of TfL's sub-regional engagement programme.' (TfL Response to queries raised on the Earl's Court & West Kensington JSPD transport chapter by Cllr. Wade, 1 December 2011) [end footnote]	No change necessary. There is currently no fixed date for the completion of the Piccadilly Line upgrade, although it is estimated to be completed in the early to mid 2020s and prior to completion of development within the Earls Court & West Kensington Opportunity Area. The upgrade will provide an approximate 25% increase in line capacity through enabling lower headways (more trains per hour) and providing higher capacity rolling stock, which equates to around an extra six trains an hour during peak periods.
846	Cllr Linda	Wade		02	Para 2.13 There is some evidence that Cycle lanes and dedicated routes are more dangerous than making bikes mingle with the traffic, but this research is mainly about overseas countries and Milton Keynes, and the recently increasing death and serious accident rates in London, would make it worthwhile revisiting the issue as Warwick Road is already considered to be dangerous by experienced cyclists.	Change proposed. Although there has been an increase in cyclist accidents in London this increase has been less than the increase in cycling. There is extensive evidence to suggest that cycle lanes do not improve safety. Paragraph 10.70 has been amended to include reference to road safety audits for new routes and junctions. Any planning application will be supported by an assessment of accidents; this is standard with Transport Assessments.
849	Cllr Linda	Wade		02	Para 2.15 2.15 The boundary roads are already at maximum capacity: the Warwick Road will still, despite the north-south route within the site, take the majority of HTV traffic. (10.59) The limitations of the ability of HTV to 'banning vehicle movements from North End Road into Lillie Road and vice versa' is likely to place more HTV traffic onto Warwick Road.	No change necessary. Paragraph 10.60 makes it clear that significant additional road capacity can be created. Paragraph 10.59 makes it clear than alternative turning movements would need to be found within the OA to replace the banned movements set out into Lillie Road.
850	Cllr Linda	Wade		02	Para 2.16 2.16 These junctions are also some of the most polluted junctions in the Capital.	No change necessary. Para 2.21 acknowledges that poor quality exists along the roads surrounding the OA, which includes the junctions. In addition to this, figures 12.6 to 12.8 show air quality in the surrounding area. These figures, together with para 12.75, show that vehicles using the surrounding roads are one of main sources of NO2, PM10 and PM2.5 emissions affecting the OA.
851	Cllr Linda	Wade		02	Para 2.18 2.18 There needs to be consideration of where the additional residential car parking will be contained given the allocation of 0.4 car parking spaces available to residents needs to be considered. This is an area where resident parking is at a premium and that all available pay and displays are used by existing residents before 9.30am and after 5.30pm, as well as use of the single yellow lines. In the Core Strategy it states there would be no garages for new build residences in RBKC or RBKC parking permits for their residents, apart for disabled residents.	No change necessary. Providing additional car parking spaces will encourage higher car ownership and increase car use in the area, this is not acceptable as set out in paragraph 10.74. The Opportunity Area is highly accessible by public transport, in combination with the difficulty of parking within the Royal Borough car ownership will be discouraged. A review of controlled parking zones and appropriate mitigations is required at paragraph 10.75 and Key Principle TRN25. The RBKC Core Strategy does not state that there will be no 'garages' for new residences, though it seeks to minimise car parking. Permit-free is required by the RBKC Core Strategy.
853	Cllr Linda	Wade		02	2.25 [italics] Correction: Fig. 2.25 The view along Longbridge Road should read Longridge. [end italics]	Change proposed.
1272	Brian	Coughlan	Met Police Authority &	02	The application site also comprises the Empress State Building (hereafter ESB) which functions as the MPS' operational headquarters.	Noted.

			Met Police Services			Mindful that strategic and pan-London policing and essential back up services are co-ordinated from this location, the MPA/S wish to highlight its importance and the existing planning policy supporting retention of policing at this location and within ESB.	
1276	Brian	Coughlan	Met Police Authority & Met Police Services	02	Para 2.34, Figure 2.12	2. Site Context Section 2.34 notes that ESB is currently occupied by the Metropolitan Police. This is also noted on Figure 2.12 which highlights ESB's office use. This is supported by the MPA/S.	Noted.
1440	Michael	Bach	Kensington Society	02	Para 2.9, Para 2.10	[bold] 2.Site Context [end bold] 2.9/2.10 The roads and railways surrounding the site create huge severance between the site and the surrounding communities - see Key Principle UF1.	Noted. The barriers to movement within the OA are noted in paragraph 2.6.
1441	Michael	Bach	Kensington Society	02	Figure 2.17	[bold] Retail [end bold] Figure 2.17 shows retail centres. Should the Tesco store not be shown since, although not a retail centre it undoubtedly will provide a lot of convenience shopping for residents and office workers on the site and the pedestrian access will need considerable improvement?	Change proposed. The Tesco store will be shown on the plan.
1442	Michael	Bach	Kensington Society	02	Figure 2.21	[bold] Conservation Areas [end bold] Fig 2.21 As the areas such as the Dorcas Estate are shown should the ESSA area not be shown as well since although not contiguous with the site boundary it will undoubtedly be affected not least by traffic and transport considerations and possibly by the impact on the skyline. Also the RBKC Building Heights SPD makes specific reference to panoramic views from Holland Park which is a conservation area which could be directly affected by tall buildings on this site and should be identified due to its elevated position.	Change proposed. The Edwards Square/ Scarsdale and Abingdon Conservation Area will be added to figure 2.21. Holland Park is too distant from the OA to be considered in figure 2.21. However, it is considered in the Townscape and Views Analysis SPD Supporting Document. Furthermore, the RBKC Building Heights SPD is referenced in the Urban Form Policy Context,
1526	Richard	Chute		02	Figure 2.21	The figure 2.21 incorrectly omits the identification of the Whiteleys Cottages as locally listed; the seven former stables are situated along on the north side of the West Cromwell Road, just behind the pavement. The envisaged 12 storey buildings in the "Metropolitan Face" directly opposite would be detrimental to their setting.	No change necessary. Best practice in Urban Design suggests that accommodating all road users, including parked cars, in the street adds to animation and vibrancy, therefore making people feel safer and more likely to linger. For example, Manual for Streets (DfT, 2007) states that "Parking is a key function of many streets... A well-designed arrangement of on-street parking provides convenient access to frontages and can add to the vitality of a street" (page 18)
1601	Claire	Craig	English Heritage	02	Page 20	In addition, English Heritage: - Requests the recognition of the significant surrounding heritage assets in the Urban Form section on page 20;	Change proposed. The heritage assets will be noted on page 20.
2020	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	02	Figure 2.2	This figure sets out the strategic context of the location of the Earls Court West Kensington Opportunity Area in relation to other Opportunity Areas across London. It is, however, unclear what the orange shaded area and directional arrows relate to. This should be clarified.	Change proposed. The orange shaded area has been added to the Key that accompanies figure 2.2. The directional arrows have been removed from the drawing.
2021	Matthew	Gibbs	CapCo/Earl's Court and Olympia	02	Paragraphs 2.38 - 2.44 Table 2.2	This section of the chapter would benefit from additional information relating to, for example, the current high house prices and affordability in the area.	No change necessary. Information on both house prices and affordability can quickly become outdated. It is therefore not felt that this sort of data would add value to the housing section of the site context chapter.

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