

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

CONSULTATION RESPONSES SCHEDULE: VISION & OBJECTIVES

Chapter 03: Vision and Objectives

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
64	Peter	Verity		03	Para 3.1	[Italics] Why does the 'Vision' does not address the removal of through motor traffic as a key objective. [End Italics]	No change necessary. The impact of development on the road network has been addressed in the Transport and Accessibility Strategy of the SPD. The introduction of a motorway relief road along the alignment of the West London Line, as discussed in Mr Verity's letter, would be prohibitively expensive, would perpetuate the problem of poor connectivity across the site and by potentially creating significant additional road capacity would encourage additional car use. Such a proposition is not supported. More generally the SPD cannot require development to fund measures that are not necessary as a result of development.
65	Peter	Verity		03	Para 3.19	[Italics] SPD does not address motor traffic as the primary [bold] prohibitor [bold] of achieving the vision [bold] of integration and connectivity [bold] with the greater area. . [End Italics]	No change necessary. In terms of the Opportunity Area the primary barrier to integration and connectivity is the rail infrastructure and the Exhibition Centre itself. The SPD requires environmental improvements on Earl's Court Road and Warwick Road.
135	David	Hammond	Natural England	03	Para 3.4, Para 3.5	The references to Open Spaces and publicly accessible, green spaces as per paragraph's 3.4 and 3.5 are welcomed and encouraged.	Noted.
136	David	Hammond	Natural England	03	Para 3.21	Environment refers principally to construction impacts, which is relevant and welcomed, however, the Council may wish to alter the heading of this section. Inclusion of Urban Form and Green Infrastructure is welcomed and should be retained in this section.	No change necessary. Only one of the key objectives relates to construction impacts. The title 'Environment' is considered to clearly distil what this chapter addresses.
331	Geirgina	Donnelly		03		As you, the Council, are always reminding us with all other small applications we try to make, this area is a CONSERVATION AREA and therefore, any large scale changes will alter irrevocably the nature and the atmosphere of this very pleasant part of London. This is a unique opportunity to create something beautiful which is useful, modern but in harmony with the surroundings.	No change necessary. Key Principles UF19-UF30 look to control the impact of development proposals on the surrounding Conservation Areas.
347	Christine	Powell		03	Para 3.6	It states: [start italics] There will be a substantial increase in the number of homes in the area. [end italics] As the area is one of the densest wards within RBKC which in itself is one of the most densely populated within the country, it seems nonsensical to add to the problem.	No change necessary. In order to combat the chronic national shortage in housing, the Mayor of London has recognised the important role that the capital can play in reducing this housing shortage. In order to reduce the impact on the countryside surrounding London, the Mayor has acknowledged the importance that brownfield sites will play in meeting London's housing needs. The larger areas of brownfield land in London have been identified in the Mayor's London Plan as 'Opportunity Areas'. Para 2.55 of the London Plan sets out that Opportunity Areas are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development. The Earls Court and West Kensington site has been designated as an 'Opportunity Area' in the latest London Plan. This acknowledges its potential for delivery new housing and jobs for London. However, at the same time, it is important that development does not place a burden on existing infrastructure, nor impact negatively on the existing context through its massing. This SPD looks to ensure that development within the Opportunity Area is of the right amount such that it does not negatively impact on the many Conservation Areas which surround its boundary and that the right infrastructure is provided to support the needs of the new resident and worker population.
348	Christine	Powell		03	Para 3.10	It states: [italics] This new retail will complement rather than compete with existing retail centres, through careful management. [end italics] How can this be achieved?	No change necessary. Key Principle RS5 sets out that the authorities will control the nature of new retail proposed in the Opportunity Area by securing a binding Retail Management Plan as part of any planning agreements. Para 7.16 clarifies what specifically this Retail Management Plan would look to control, in order that new retail within the Opportunity Area does not have a detrimental impact on existing retail centres surrounding the Opportunity Area.

349	Christine	Powell		03	Para 3.11	Does the site for the school, in the south west sector, include the provision of both a primary and secondary school?	No change necessary. Key Principle SC1 requires applications to be assessed against the boroughs' child yield formulas in order to ascertain the requisite educational capacity to order to cater for the needs arising from development. Dependent on the scale of development, this could result in the need for an on-site primary and secondary school. If the need does not result in the need for on-site provision, the authorities will be securing financial contributions towards expanding existing primary and secondary school capacity. Please note that all masterplan drawings in the SPD and supporting Evidence Documents are illustrative only and should not be treated as proposals for the OA.
350	Christine	Powell		03	Para 3.13	How can the new buildings visible on the skyline not have a negative impact on the surrounding townscape? It would be better to have the taller building to the north of the site adjacent to West Cromwell Road and away from residential buildings	No change necessary. The SPD establishes a framework against which any future application(s) will be assessed. This includes the Key Objective that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. In order to achieve this, any application(s) will need to demonstrate that they conform with Key Principles UF19, UF20 and UF21. This includes demonstrating that the character and appearance of nearby conservation areas (including Brompton Cemetery) will be either preserved or enhanced and submitting a set of verified views (from points identified by the Authorities) and demonstrating that there will be no negative impact on any of them. These views, along with the Authorities' assessments of their significance, can be found in the Townscape and Views Analysis SPD Supporting Evidence Document.
351	Christine	Powell		03	Para 3.21	Rather than [italics] minimising the impacts of demolition, excavation and construction, [end italics] it should be the [italics] predefined legal limits should not be exceeded by the impacts of demolition, excavation and construction. [end italics]	No change necessary. The SPD cannot refer to predefined legal limits. However, this Key Objective will be revised to provide greater protection to the existing population.
352	Christine	Powell		03	Figure 3.1	The ecological area along side the railway line south of West Brompton Station should be protected as well as that adjacent to the station	No change necessary. This KO seeks the protection of the ecological area adjacent to West Brompton Station, which refers to the designed SNCI. In addition to this, KP ENV18 requires development to protect and enhance ecology and biodiversity within the OA with no net loss of species or habitat.
374	Cllrs	Buxton and Read		03		ENVIRONMENT DEMOLITION AND CONSTRUCTION Possibly uniquely amongst OA it is right next to Conservation Areas with some of the highest density of population anywhere in London. The demolition and construction processes especially that of Earl's Court 1, which is built above live railway lines will have very negative impact on neighbouring residents unless the most stringent planning conditions and s106 requirements to reduce the impact of noise, vibration and air pollution are attached to any planning permission. These negative impacts should not just be minimised, but reduced to the extent of not adversely affecting the lives of those residents next to the OA especially with regards to potential night time working in connection with the working next to and above the railway lines.	Change proposed. ENV2 requires construction, demolition and excavation logistics plans to be prepared for every phase of construction and demolition – these are listed as a S106 requirement under the Section 106 Strategy. ENV3 states that Construction Management Plans (CEMPs) will be required through planning conditions. Para 12.16 of the revised draft SPD states that CEMPs will need to identify measures to control and monitor air pollution caused during construction and demolition. Agree that this is not reflected in the Key Objective, so propose change to the Key Objective to strengthen protection for surrounding community, as suggested.
375	Cllrs	Buxton and Read		03		DENSITIES No mention in the document is made of densities in the document. We consider that Mayors Density Matrix should be included in the document and that it should explicitly state that whilst these are suggested density ranges that the overall density of the OA will be constrained by its context and in particular Urban Form and Transport considerations.	Change proposed. The London Plan and both borough's Core Strategies all rely on the Mayor's London Plan Policy 3.4 for setting the appropriate density range. It is not felt necessary to replicate this in the SPD as there is no difference that is in need of further clarity between the authorities. The Development Capacity Scenarios supporting evidence paper sets out in paras 1.4-1.7 that the Opportunity Area is considered to have a predominantly 'central' setting. In order to clarify this, a new sentence will be added to the housing Strategy in the SPD signposting the relevant policies in the London Plan.

						The above must be written into the Vision and Objectives.	
443	Arthur	Tait	Friends of Brompton Cemetery	03	Para 3.4	We note in particular that in section 3.4 any new development 'will respect the local heritage assets...' and we welcome this -- if it means what we think it should! We agree with many of the words in the Key Objectives in the revised draft SPD, but only if their interpretation is reasonable. Some of the CapCo arguments are very unreasonable interpretations of words similar to those in your draft.	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD. Any application(s) will be judged on their own merits against this aspiration.
444	Arthur	Tait	Friends of Brompton Cemetery	03	Para 3.4	Referring to the Key Objectives which relate most closely to Brompton Cemetery, we agree with and support, subject to their interpretation, the words in the Key Objectives listed on Page 45 under -- 3 - 13 'Urban Form' 3 - 21 'Environment', the last objective in particular 3 - 22 'Section 106 and Phasing Strategy'	Noted.
484	Malcolm	Spalding	Earl's Court Society	03	Para 3.11	3.11 "affordable sports and leisure" ADD "and swimming pool"	No change necessary. An audit of existing facilities has not thrown up a deficiency in swimming pools in the vicinity of the Opportunity Area. There is an existing swimming pool at Normand Park plus a planning application currently in at 100 West Cromwell road which proposes a new swimming pool. As a result, the authorities are not explicitly requiring the provision of a swimming pool as part of any comprehensive approach to redevelopment of Earl's Court. The SPD does not preclude the provision of a swimming pool and were development proposals to provide one, the authorities would look to secure affordable access to this, in line with the requirements of Key Principle SC3.
485	Malcolm	Spalding	Earl's Court Society	03	Para 3.21	3.21 DELETE "minimise impact of demolition, excavation and construction" REPLACE WITH "minimise measurable levels (here specify max dB) to make imperceptible any noise and vibration impact of demolition, excavation and construction on the existing community". Please check and quote precedents in other major construction projects in residential areas of London. Maximum dB levels at night must also be specified	No change necessary. This is too detailed for the Key Objective. The specific requirements for noise and vibration are set out in the noise and vibration section (ENV17).
625	Alan	Tenenbaum	Under The Bridge	03	Para 3.1	VISION - paragraph 3.1 We set out the current wording of this paragraph with our suggested wording in red, bold and underlines text: [red, bold, underlined] "This vision reflects and is based on the aspirations for the OA of LBHF, RBKC and the Mayor of London, as established by both boroughs' Core Strategies and the Mayor's London Plan. It responds to the initial proposals of CapCo as one of the major landowners in the area and is not intended to exclude any	No change necessary. The vision in the SPD has been drafted with flexibility in mind. Any comprehensive approach to development in the OA would be expected to deliver a development that reflects the vision, regardless of who is undertaking the development.

						development options which would accord with the London Plan and Core Strategies" [end red, bold, underlined]	
855	Cllr Linda	Wade		03	Para 3.3	3.3 It is essential that there is a specification within the Cultural provision of the amount of internal space that has to be supplied. At present the JSPD is rather nebulous about the ratios of internal and external cultural facilities and this needs to be refined.	No change necessary. This is too detailed for the vision. The specific requirements for the cultural facilities are set out in the cultural strategy (CS1 and CS2).
856	Cllr Linda	Wade		03	Para 3.7	3.7 The assumption that 'many people will choose to both live and work in the area' is questionable. The mix of retail and office space may well create an 'inward' rather than an 'internal' job market.	No change necessary. There will undoubtedly be jobs that fulfil a more strategic role and it is beyond the realms of planning to control who has access to jobs created by the development. The key objective in the Employment Strategy aims to ensure that jobs are created for local people. The authorities consider that the key principles contained within the Employment Strategy ensure the delivery of this. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.
857	Cllr Linda	Wade		03	Para 3.13	Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces; this should include that the architecture, and materials used are in keeping with the adjacent properties, particularly on the edges on Eardley Crescent and Philbeach Gardens;	No change necessary. The SPD does not address architecture or materials because they are deemed too prescriptive for a strategic planning framework. Instead, in relation to these issues any application(s) will be assessed on their own merits.
858	Cllr Linda	Wade		03	Para 3.13	that the architecture to be of a standard of excellence, both in materials and design	No change necessary. The SPD does not address architecture or materials because they are deemed too prescriptive for a strategic planning framework. Instead, in relation to these issues any application(s) will be assessed on their own merits.
859	Cllr Linda	Wade		03	Para 3.13	maximise connectivity with a straight north-south route;	No change necessary. The SPD establishes the need for north-south connectivity (Key Principle UF1), but does not specify the form in which it should be delivered. This would be too prescriptive for a strategic planning document. Instead, as part of the urban form chapter guidance is given as to the pattern new streets could adopt. It is suggested in paragraph 4.19, for example, that the pattern of surrounding streets (with direct east-west connections and more broken up north-south connections) could be replicated on the site. Any north - south route will also be subject to the Key Principles established in the Transport Chapter.
860	Cllr Linda	Wade		03	Para 3.13	provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities, this should be an open access area of at least 6-hectares;	No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space established in Key Principle UF15 to be sufficient. These Key Principles are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). In brief, they establish requirements for a 2 ha offer of a local park, for all residential units to be within 100m walking distance of a public green open space, for 10 sqm of public green open space per child and for 10 sqm of dedicated play space per child.
861	Cllr Linda	Wade		03	Para 3.13	ensure that new buildings on the edges of the OA are sensitively integrated into and do not exceed the rooflines of the existing context;	No change necessary. The objectives established in the Vision and Objectives chapter are intended to be overarching and to communicate the authorities' aspirations for the OA. Each Key Objective is subsequently expanded upon in the subsequent topic specific chapters of the SPD. The authorities feel that the overarching objective to ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context communicates our aspiration for the site well and provides the appropriate level of control when read in conjunction with the Key Principles and supporting text in the Edges section of the Urban Form Chapter. For example, Key Principle UF26 requires the height and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings. Any application(s) submitted will be assessed against this on a case by case basis, taking into account all of the site constraints that have to be overcome.
862	Cllr	Wade		03	Para 3.13	and ensure that no new buildings visible on the skyline have a	No change necessary. The objectives established in the Vision and Objectives

	Linda					negative impact on the quality and character of the surrounding townscape, and in the Brompton Cemetery and adjoining Conservation Areas. Any proposed buildings must make a positive contribution to the skyline; and	chapter are intended to be overarching and to communicate the authorities' aspirations for the OA. Each Objective is subsequently expanded upon in the following topic specific chapters of the SPD. The authorities feel that the overarching objective to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape communicates our aspiration for the site well and provides the appropriate level of control when read in conjunction with the Key Principles and supporting text in the Skyline section of the Urban Form Chapter. For example, the need to preserve or enhance the surrounding conservation areas and Brompton Cemetery is established in Key Principles UF19 and UF20. The way in which the key objective is worded reflects the statutory duty of planning officers to ensure that there is no negative impact.
863	Cllr Linda	Wade		03	Para 3.13	Design well proportioned streets that respond to those in the surrounding area	No change necessary. The Objective already establishes this. It also establishes that street design will be expected to encourage walking and cycling, which the authorities consider to be crucial to successful redevelopment of the OA.
864	Cllr Linda	Wade		03	Para 3.13	That the portal buildings replacing the Earl's Court 1 Exhibition Centre to be of world-class iconic standard.	No change necessary. This is addressed in the Culture chapter under the Key Objective to 'continue the Earl's Court brand'. It is established in paragraph 8.13 that a cultural facility should be provided in this location and that it should help to create a 'sense of arrival' to the OA from the Earl's Court Underground Station.
865	Cllr Linda	Wade		03	Figure 3.1	Correction required: Fig 3:1 does not indicate the Philbeach Garden Enclosure	No change necessary. This is a style of drawing known as a 'figure ground plan'. It basically shows the existing development plots in grey, including any private open space within them and leaves the public realm white. We have added an extra layer of information that is not normally shown in a figure ground plan- the existing garden squares that have a visual impact on the public realm. These have been shown in green because they are such important parts of the existing urban fabric. You will note that, like the Philbeach Gardens enclosure, none of the back gardens in between any of the terraced houses are shown.
970	Cllr Linda	Wade		03	Figure 3.1	With reference to Figure 3:1, the staggered north-south road might have the potential of becoming a rat-run rather than a clear through-run that would enable relief from the Warwick Road. The two linking roads behind Philbeach Gardens and Eardley Crescent are designed for connectivity to the site. Given the proximity to the rear of these residential units there is concern that there might be an increase in noise and nuisance from a flow of additional vehicles. Also given the fact that the roads within the OA are limited to 20 mph, with different road surface treatments to promote safety, this would not promote a reduction in traffic in Warwick Road.	No change necessary. All of the masterplan images in the SPD and Supporting Evidence Documents and illustrative only. Therefore, they should not be treated as proposals for the OA.
1064	Bernard	Moran	NHS Kensington and Chelsea	03		Chapter 3: Vision Health is not mentioned as a motivating factor or as across-cutting theme in the Vision section and we consider that there is an opportunity to put health improvement and health equality at the core of the proposed development. An opportunity to acknowledge that health and wellbeing is not a discrete matter but inextricably linked to the environment and should be placed at the heart of urban regeneration. We would request that the following clause is inserted in the Vision Section:	No change necessary. The vision deals with tangible benefits that can be sought and controlled through the planning system. Improvements to health and wellbeing cannot be secured directly through the planning system, but rather, as a knock on benefit as a result of the delivery of all the key principles set out in the SPD.

						[bold italics] The health and wellbeing of people is an integral part of sustainable development and one of the fundamental purposes of spatial planning. A collaborative and inclusive approach, adopting the "healthy urban spectrum" concept will help to ensure that health improvement and health equity are placed at the core of the regeneration. [end bold italics]	
1065	Bernard	Moran	NHS Kensington and Chelsea	03	Para 3.18	<p>Clause 3.18 - please add the following sentences:</p> <p>[bold italics] - Provide a detailed Health Impact Assessment (HIA) to ensure that a systematic and multifaceted appraisal of urban regeneration informs the health issues and implications</p> <p>- Consider the changing nature of healthcare commissioning responsibilities and an emerging vision around the future of primary care with changes to be led locally and conform to four key tests: support from GP Commissioners; strengthened public and patient agreement; clarity on the clinical evidence base and consistency with current and prospective patient choices. [end bold italics]</p>	No change necessary. Any developer would be required to submit a Health Impact Assessment accompanying any planning application. The second key objective does not appear to be a planning consideration and would not make sense to a layman reader of the SPD.
1093	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	03	Figure 3.4	- Vision / land use distribution: The sub group expressed its concern that the location of the cultural, retail, pubs, restaurants, bars and leisure buildings may negatively impact on the residential amenity, especially in terms of noise and nuisance. This is particularly the case for those near residential areas, accessed through residential roads or with residential above them (refer to figure 3.4). This will also put pressure on the existing Council enforcement resources and therefore the applicant should provide additional resources for enforcement, including noise / nuisance. In blocks where residential is above, this could be partially mitigated by introducing office floorspace between ground floors and the residential above.	No change necessary. Please note that the land use plans in the SPD are illustrative only and should therefore not be treated as proposals for development. However, the SPD does encourage an appropriate mix of uses as this is a desirable characteristic of any sustainable community. Key Principle ENV17 in the Environment chapter seeks to mitigate and adequately control noise and vibration. This Key Principle specifically states that "noise and vibration sensitive land uses must .. Be located away from sources of noise and vibration unless mitigation measures reduce the noise and vibration to acceptable levels".
1094	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	03	Fig 3.4, Fig 3.5	-Fig 3.4 / 3.5: Where are the community uses shown?	Change proposed. Community uses will be shown on the plan in figure 3.4. Please note that these plans are illustrative only and should not be treated as proposals for the OA.
1095	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	03	Fig 3.4, Fig 3.5	-Fig 3.4 / 3.5: Is the space shown for education large enough to accommodate a secondary school? All new schools should be provided on one site.	No change necessary. The authorities consider that the space shown would be large enough for a secondary school although it should be noted that the land use plans are for illustrative purposes only.
1159	Adam	Mills	Banham Locks Ltd.	03		<p>Thank you for providing the opportunity to comment on the above document. Please see our comments below on behalf of our client; Banham Patent locks Ltd (referred to as Banham).</p> <p>Banham owns a site on the corner of Lillie Road and Seagrave Road (11-15 Lillie Road) which is located within the Earls Court and West Kensington Opportunity Area. Banham welcomes the principle of regeneration and redevelopment of the area and supports the vision for the area of 'West London's New Urban Quarter' with residential-led regeneration resulting in a world class, aspirational, environmentally sustainable new urban quarter that people will want to live in, work in and visit (Paragraphs 3.1-3.12, page 44).</p>	Noted.
1226	Hilary	Mackay		03	Para 3.2	3.2 What do we mean by the term "world class"? - by global averages, this has to mean third world level. This term is overused and detracts from the document. Also omit "aspirational" - a pre financial crisis term. Surely, embodying the best of what we know	Change proposed. The word 'aspirational' will be removed. 'World Class' means the same as 'the best of what we know' and the authorities consider the current wording adequate.

						and appropriate for the 21st century is more what we are implying. When I first saw the notifications for the OA - my idea was that the area should be a space for living - solid ergonomic design, housing people enjoy living in and facilitates them making the most of their lives. I am in agreement about the sentiment for quality housing, but am wisened to what this might mean in practice after seeing so many ads for luxury apartments over the years which never are. The surrounding buildings are in the main over 100 years old and going strong. When we say quality, can we be clear that we are expecting buildings in the OA to be desirable for business and as homes in 100+ years too.	
1277	Brian	Coughlan	Met Police Authority & Met Police Services	03	Figure 3.2	<p>[italics] 3. Vision and Objectives [end italics]</p> <p>Figure 3.2 Indicative diagram illustrating indicative land uses for comprehensive regeneration of the Opportunity Area highlights Empress State Building and the surrounding areas as 'A new centre: Zone in which main cultural destination will be found with some retail, social/community facilities and small to mid sized offices. Upper floors to be predominantly residential'.</p> <p>As noted above Core Strategy Policy LE1 states [<u>underline</u>] premises [end underline] capable of providing continued accommodation for local services or significant employment should be retained. This also ensures that the employment capacity figures outlined in the London Plan for the Opportunity Area can be readily achieved through redevelopment proposals. Mindful that Empress State Building comprises a significant existing employment use it is therefore recommended that the legend to Figure 3.2 is amended to protect the employment use in ESB (additional wording in bold): -</p> <p>[italics] 'A new centre: Zone in which main cultural destination will be found with some retail, social/community facilities and small to mid sized offices. Upper floors to be predominantly residential [bold] with the exception of ESB which will be retained in employment use' [end bold] [end italics]</p>	No change necessary. Figures 3.4 and 3.5 show illustrative land uses in the OA. Although these are only illustrative, it is clear that the SPD proposes only to change the use of the premises at ground floor level and that the remainder of the building would remain in commercial use. Regardless of this, the SPD sets out a requirement in Key Principle ES1 that existing business floorspace in the OA should be renewed and modernised or replaced. The authorities are keen to see an additional 7,000 jobs created through redevelopment of the OA and that there should be 90,000sqm of net additional business floorspace (Key Principle ESS); The authorities do not wish to be prescriptive about what use the Empress State building should be put to but any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements if Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.
1443	Michael	Bach	Kensington Society	03	Para 3.13	<p>[bold] 3. Vision and Objectives [end bold]</p> <p>3.13 [bold] Delete [end bold] 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape', and [bold] replace with [end bold]:</p> <p>'Ensure that any buildings visible on the skyline make a positive contribution to the appearance, quality and character of the surrounding townscape and longer distance views from key panoramic view points.'</p>	No change necessary. The current wording of this Key Objective reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.

						See also Key objectives on pages 52, 64 and 181.	
1527	Richard	Chute		03	Para 3.13	I suggest that Key Objective 3.13 should read: the skyline of the new development should make a positive contribution to the quality of the townscape and longer distance views from key points; particularly the impact on views from Brompton Cemetery.	No change necessary. This Key Objective reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.
1602	Claire	Craig	English Heritage	03	Page 44	In addition, English Heritage: - Welcomes the inclusion of heritage assets in paragraph 3.4 but suggests that the use of the term 'local heritage assets' is confusing - for example, Brompton Cemetery and many of its structures are nationally designated and presumably not to be excluded here. Consequently we recommend the use of the phrase 'heritage assets' without 'local' in front on page 44;	Change proposed. The word "local" will be removed.
1867	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	03		[bold] 9. The Vision. [end bold] There are also worrying gaps between the Vision and Objectives and the Chapters that follow, again leading to some suspicion as to any real commitment to carry the SPD through. The Vision is set out in Paras 3.2 to 3.12 of the SPD. We highlight below the points where we do not believe that the detailed proposals in the SPD meet the aspiration of the Vision. This lack of commitment is also echoed in many aspirations to "avoid any unacceptable impact" on the current situation. This passive phrasing is completely unacceptable (particularly in a development of this size), which should be setting new standards and improving the current situation, not just avoiding to make it worse. The SPD, in many respects, but particularly on development capacity and transport, fails to determine or address the likely impacts of the redevelopment and therefore provides no sound basis for either the Authorities of the community to judge when the impact may become unacceptable or the tipping point at which the impacts of the development as a whole becomes unacceptable and it should therefore be refused.	No change necessary. In many ways it is considered that the aspirations of this SPD will improve the current situation, such as by creating a new 2 hectare open space. However, there are other circumstances where it is important that the impacts of development are minimised, such as noise and air pollution.
1873	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	03		10. The Vision says (our brief comments are set out in italics and are expanded in the sections that follow): - 3.8 The vision refers to the site's enviable location on the A4, equidistant from central London (West End and the City) and Heathrow - [italics] this will clearly make it more difficult to encourage living and working locally, nor the attraction of the kind of small businesses employing local people referred to in the SPD (see Para 42 below). [end italics]	No change necessary. There will undoubtedly be jobs that fulfil a more strategic role and it is beyond the realms of planning to control who has access to jobs created by the development. The key objective in the Employment Strategy aims to ensure that jobs are created for local people. The authorities consider that the key principles contained within the Employment Strategy ensure the delivery of this. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.
2022	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	03	Para 3.3	Reference to a 'new cultural destination' is included and should be removed. It is perhaps more appropriate to refer to the variety of cultural activity that could be attracted to the area. Reference to a new cultural destination also implies a single offer, when in reality, a series of buildings and/or spaces could combine to provide for the continuing legacy that is referred.	No change necessary. The provision of a new cultural destination is important to the delivery of the cultural strategy. A destination does not necessary mean one facility, but could be a number of facilities combined to create a destination.
2023	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	03	Para 3.5	It is noted that the majority of garden squares referred to are private.	Noted. This is acknowledged in the SPD in paragraph 4.26 which highlights that all contemporary garden squares proposed for the OA will be expected to be publicly accessible to everyone.
2024	Matthew	Gibbs	CapCo/Earl's Court and	03	Para 3.6	The comment is made that there will be a substantial increase in the number of homes in the area arising from development	No change necessary. This is far too detailed for the Vision and is covered within Key Principles HO6 and HO7 in the Housing Strategy.

			Olympia Group			proposals. It should be recognized, and noted as part of the SPD's Vision that the range of housing for sale and rent will be informed by matters of viability.	
2025	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	03	Para 3.10	The acknowledgment of the need for new retail to form part of the new urban quarter is important. It is essential that the community arising from the development out of the ECWKOA is able to conveniently access retail facilities. The retail provision should complement the other diverse mix of uses that could be provided throughout the ECWKOA to make it an attractive place for people to live, work and visit.	No change necessary. The need for retail to support the new community in the OA is set out in para 3.10
2026	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	03	Para 3.11	It is recognized that the ECWKOA has the potential to deliver a number of community facilities to support the new living and working populations. Clarity should be provided as to the terminology 'community hub' and it should be made clear that the potential to provide a primary, secondary school, health centre, sports and leisure facilities and police infrastructure are elements that <u>could</u> be delivered. It is not appropriate for the SPD to specify that these facilities <u>will</u> be provided and the wording should be amended accordingly.	No change necessary. the purpose of a Vision is to outline what an area will be like in the future. The use of the word 'will' is therefore considered to be more accurate in this instance than 'could' and indeed, the word 'will' is used everywhere else in the Vision.
2027	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	03	Figures 3.1 - 3.2	These diagrams relating to urban form and land use are identified as being 'indicative'. They must not be taken to imply a particular form of development that might be considered appropriate across the ECWKOA. Why, for example are the east - west routes more important? Can the notations on the diagram be clarified? Figure 3.2 implies that the ECWKOA will deliver a mix of uses primarily at its edges. This is unrealistic and has the potential for the creation an unappealing and unattractive new urban quarter, contrary to the Vision set out at page 44.	Change proposed. The captions will be changed from "indicative" to illustrative. A caveat will be added to each explaining that it is included for "illustrative purposes only".
2028	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	03	Figures 3.3 - 3.5	Similar to the comments made in respect of figures 3.1 & 3.2, the masterplan and illustrative land uses, whilst again specified as being illustrative must not be taken as being prescriptive as to the future urban form and/or disposition of land uses across the area. A review of the illustrative master plan identifies a number of unsuccessful features which reinforce the limited weight to be attached to this plan.	Change proposed. The captions will be amended to include the caveat "for illustrative purposes only".