

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

CONSULTATION RESPONSES SCHEDULE: URBAN FORM STRATEGY

MARCH 2012

Chapter 04: Urban Form Strategy

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
3	Jane	Chaston		04		it will change the landscape for the worse - buildings too high	No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for any applicant(s) to analyse and submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document.
8	Jane	Chaston		04		the buildings will be too tall for the area and over-shadow many of the surrounding streets	No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for any applicant(s) to analyse and submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, in the Edges section of the Urban Form chapter, Key Principle UF26 states 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 and Key Principle UF28 states that the privacy, daylight and sunlight
15	Linda	Chasten		04		it will change the landscape for the worse - buildings too high	No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for any applicant(s) to submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document.
20	Patricia	Rowley		04		it will change the landscape for the worse - buildings too high	No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.
25	Dany	BuBois		04	UF21, Para 4.64	I am not happy with the proposed plans set out on pages 64 - 65 of the Revised Draft for Public Consultation regarding the proposed changes to the skyline visible from the Brompton Cemetery. In Key principle UF21 it 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." And in 4.64 "However, for the majority of the views, the authorities may accept some new visible buildings if acceptable urban design	No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principle UF20 specifically addresses the importance and sensitivity of Brompton Cemetery, requiring any application(s) to preserve or enhance its character, appearance and setting. The Skyline section of the Urban Form chapter should be read in conjunction with the Townscape and Visual Analysis SPD Supporting Evidence Document. This contains a number of views that any applicant(s) will be

					justification is provided." It is my belief that any visible buildings viewed from the Brompton Cemetery will necessarily have a strongly negative impact for all local residents. The Brompton Cemetery is one of the few open spaces in the area and largely enjoys a wide skyline. The buildings which are currently visible from this location, including the Stamford Bridge football stadium and the Empress State building already greatly decrease the aesthetic pleasure of the open space, so to purposef	expected to analyse in order to demonstrate that their proposals will have no negative impact upon any of them (Key Principle UF21). It also contains the authorities' analysis of each of these views, highlighting why they are considered to be sensitive and what, if any, changes would be acceptable. In this SPD Supporting Evidence Document, views 31, 32 and 35 are taken from the cemetery (plea
37	Anthony	Williams	04	UF22	Skyline - Key Objective - The Empress State Building should not be used as a reference for the height of adjacent buildings and an excuse for high rise development, but remain an exception.	No change necessary. Paragraph 4.59 states that "the location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape". The Skyline section of the Urban Form chapter also goes on to outline how the skyline could be enhanced through the design of new buildings within the vicinity of the Empress State Building in Key Principles UF22 and UF23 and the supporting text.
38	Anthony	Williams	04	UF19	Key Principle UF19 - all buildings should recognise the essentially low level, primarily residential nature of many of the existing buildings both in the OA and especially in the surrounding areas with which any new buildings must relate and integrate.	No change necessary. The production of this SPD was constructively informed by a thorough analysis of the character and urban fabric of the surrounding area. The results of this can be seen in SPD Supporting Evidence Documents including the Character Area Analysis, Townscape and Visual Analysis and Edges Studies. The Character Area Analysis Supporting Evidence Document presents detailed analysis of the heights of surrounding buildings and their relationships with the streets on which they sit. During the production of the Urban Form Chapter in the SPD, this analysis was used to inform the sections on Skyline, Edges and Streets. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. In the Edges section, the Key Objective states that all new buildings on the edges of the OA should be sensitively integrated into and enhance the existing context and Key Principle
39	Anthony	Williams	04	UF20	Key Principle UF20 - nothing must be allowed which would be detrimental to the Brompton Cemetery and every effort should be made to enhance its setting.	No change necessary. The Skyline section of the Urban Form chapter seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which application(s) will be assessed in this regard, including Key Principle UF20 which specifically identifies the sensitivities of Brompton Cemetery and states that its character, appearance and setting must be preserved or enhanced. This is complimented by Key Principle UF21 which requires any applicant(s) to analyse and submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. In this SPD Supporting Evidence Document, views 31, 32 and 35 are taken from the cemetery (please note that i
40	Anthony	Williams	04	UF21	Key Principle UF21 - this is very important and should make it clear that the area should not become and sort of mini-Manhattan	Noted. The scale and massing of any proposed development will be assessed against all of the Key Objectives and Key Principles in the sections on Skyline, Edges and Streets in the Urban Form chapter (including Key Principle UF21). These ensure that the scale and massing of proposed development will be appropriate for its setting and will respond to the existing context.
44		Anonymous	04	Figure 4.1	Figure 4.1 - this indicates potential use of the through-route to Tesco. While this is acceptable for pedestrian / cycle access, this would cause significantly increased traffic congestion at what is already one of the busiest and most polluted junctions in Europe (namely the junction of Warwick Road and West Cromwell Road). Nothing should be done that generates any increase in congestion at that junction in particular, or on the Earls Court One Way System in general.	Change proposed. The arrow referred to highlights the route that runs between the Tesco car park and the OA under the A4. It would therefore have little or no impact on he junction of Warwick Road and West Cromwell Road at grade. It is the authorities' intention that the potential for opening up this link for pedestrians and cyclists should be explored. In general, it would not be used for any vehicular traffic with the possible exception of construction traffic during the development of the site. This will be clarified in the key that accompanies the drawing. Please note, the diagram is clearly labelled as 'illustrative' and therefore should not be treated as a proposal for the OA.
45		Anonymous	04	Figure 4.1	Figure 4.1 - there appears to be a faint arrow indicating an access route to the Opportunity Area via Cluny Mews (at the junction of	No change necessary. This arrow indicates an access point into the OA. It is likely that it would only serve the development within this small part of the site and would

					Warwick Road and West Cromwell Road). Nothing should be done that generates any increase in congestion at that junction in particular, or on the Earls Court One Way System in general, and with that in mind there should be no access to the Opportunity Area whatsoever permitted via Cluny Mews. It would be preferable to close Cluny Mews completely and facilitate access via the new roads to be built within the Opportunity Area.	not offer through access past St Cuthbert's Church to the rest of the OA. As the level changes and sensitive setting of St Cuthbert's Church will make it very difficult to introduce a road into the Cluny Mews area from the west, this arrow indicates what is potentially the only point of access point to this part of the site. Please note, the diagram is clearly labelled as 'illustrative' and should not be treated as a proposal for the OA.
46		Anonymous	04	Figure 4.1	Figure 4.1 - it appears to suggest that there would be vehicular access to and from the Opportunity Area at the Warwick Road entrance of Earls Court tube station. This should not be permitted because i) it will create significant risk to pedestrians accessing the tube station, and ii) nothing should be done that generates any increase in traffic on Warwick Road.	No change necessary. The arrows referred to simply show potential access to the OA and do not specify whether they will be for vehicular transport or not. As Key Principle TRN23 in the Transport Chapter states, "All junctions from the OA onto the existing road network... should be assessed to ensure they have no unacceptable impacts on the existing road network in terms of vehicle capacity, road safety and urban design". Paragraph 10.71 goes on to say that "An east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, though not for vehicles" and goes on to state that if a vehicular connection were to be included at this junction "the road safety and urban design impacts would need to be carefully assessed in a detailed transport assessment and it would need to be demonstrated that vehicular access is acceptable".
47		Anonymous	04	Para 4.80	Para 4.80 - this suggest that new buildings should not rise "significantly" above adjoining heights. This requirement needs to be stronger. New buildings should not rise above existing heights at all, and that should apply not only to adjoining buildings but adjacent buildings (i.e. they need not be physically attached in order to be limited). This is critical to ensure there is no impairment to the sunlight currently experienced by residents on streets on the edges of the Opportunity Area, in accordance with Key Principle UF28.	No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to set such stringent restrictions. However, Key Principle UF28 clearly states that the "privacy, daylight and sunlight of all existing and future buildings must be respected". Furthermore, residential amenities like outlook and privacy are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85. Any application(s) will be judged on its own merits against these standards and nothing deemed to be harmful will be approved.
77	M.M.	Deyes	04	UF20, UF21	The Strategy refers to [<u>new buildings on the skyline</u>] (section 02 in Equality Impact Assessment) saying they have a positive impact; the Revised Planning Document says [<u>no</u>] new building should have a [<u>negative</u>] impact; this seems to be watering down? I am concerned that there should not be intrusion into the skyline by high-rise development where viewed from Brompton Cemetery (if you have the time, go there and see how the effect of a "haven" in created by the fact that one can see nothing but trees when looking from inside the cemetery towards the west...)	Change proposed. The EQIA will be updated to match the objective set out in the SPD to ensure that "no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape." This is not to water the objective down, but rather to ensure that it accurately reflects the statutory duties of the planning officers who will be responsible for using the SPD to assess any application(s) submitted. Key Principle UF20 specifically requires the preservation or enhancement of the character, appearance and setting of Brompton Cemetery. Furthermore, views from Brompton Cemetery will be subject to Key Principle UF21 which expects any application(s) to demonstrate that their proposals do not have a negative impacts on any of the views analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Views 31, 32 and 35 in the Townscape and Visual Analysis SPD Supporting Evidence document are all taken from Brompton Cemetery (please note that in the final draft of
83	Simon	Fisher	04	UF19, UF20	support these objectives but protection and enhancement of Conservation Areas and Listed Buildings requires planning standards to prevent overdevelopment. However, any attempt at prescribing density parameters has been omitted from the document, thereby giving developers a carte blanche to build too much too high. Given the sensitivity of the site's location, an absolute maximum residential density of 800 hrph is essential in order to comply with the SPD's urban form objectives.	No change necessary. Density is dealt with within Policy 3.4 and Table 3.2 of the Mayor's London Plan. The Development Capacity Scenarios SPD Supporting Evidence Document sets out in para 1.6 that the Opportunity Area is considered to have a predominantly 'central' setting. Any scheme would have to satisfy the Key Principles set out in the Urban Form chapter, which look to control the scale of development and the relation of any new building to the existing context.
84	Simon	Fisher	04	UF26	again too vague re building heights. No new buildings over 20 storeys should be permitted within the Regeneration Area. Without this parameter, overdevelopment, damage to skylines, outlook and setting of existing townscape is inevitable.	No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to specify particular building heights. Instead, it establishes a framework against which the heights of the buildings in any application(s) submitted can be assessed. This framework is set out in the sections on Skyline, Edges and Streets in the Urban Form chapter. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. In the Edges section, the Key Objective

						states that all new buildings on the edges of the OA should be sensitively integrated into and enhance the existing context and Key Principle UF26 states 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. In the Streets section, the Key Objective states that the design of new streets should respond to those in the su
85	Simon	Fisher		04	UF28	the Empress State Building should be retained as an integral part of any future redevelopment within the Regeneration Area. No change necessary. The SPD does not preclude this from happening.
86	Simon	Fisher		04	UF29	support private rear gardens in new properties abutting Eardley Crescent and Philbeach Gardens but garden space must be defined - otherwise developers will call three squares of turf a rear garden. A minimum length of 5 metres for such rear gardens should be prescribed by the SPD. No change necessary. It would be too prescriptive for a strategic planning document like the SPD to stipulate the dimensions of back gardens. However, residential amenities of existing properties are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85. The housing chapter also sets out expectations for residential amenity spaces.
99	Iona	Carson		04	UF22, Para 4.65, Para 4.67	Surveyor's comments that the Empress state building was out of character with the surrounding area (correct) and that it might benefit from some other high and modern buildings beside it in the sky line. No change necessary. The LBHF Core Strategy states that "there may be some scope for tall buildings no higher than, and close to, the existing Empress State building". The SPD identifies the important role that the Empress State Building plays on the skyline and proposes that it could be enhanced through development. This conclusion was informed by three dimensional Urban Design testing of the local townscape and the potential visual impact that development could have. This identified that the most appropriate location for tall buildings, in which they are unlikely to have any negative impacts on the views analysed in the Townscape and Visual Analysis, as required by Key Principle UF21, is around the Empress State Building. As paragraph 4.67 states, through variations in height, silhouette, profile and orientation, new buildings within the vicinity of the Empress State Building have the potential to enhance its visual impact on the skyline. I strongly disagree, the Earls court area is popular for people to live in for many reasons, mainly because of it character and looks. The Empress building is striking and stands out, a bit like the Eiffel tower in Paris: unattractive when considered alone but very impressive in it's setting and mainly because of it's stand alone status.
101	Iona	Carson		04		However I am concerned that the high rises will not only be unpopular to live in but this will also impact on the immediate vicinity as potential buyers for the surrounding new build low rise buildings will be put off as they are over shadowed by the higher buildings. No change necessary. The heights of buildings and the impacts that they have on the surrounding context are addressed in the Skyline and Edges sections of the Urban Form chapter. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. In the Edges section, the Key Objective states that all new buildings on the edges of the OA should be sensitively integrated into and enhance the existing context and Key Principle UF26 states 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. Any application(s) that include(s) tall buildings will be expected to demonstrate how the proposals will mitigate impacts on overshadowing (Key Principle UF25). Furthermore, Key Principle UF28 expects proposals to respect the privacy, daylight and sunlight of all existing buildings and residential am
120	Alex	Parker		04		The construction of tower blocks up to 16 stories will seek to change, distort and contradict the low development height of the surrounding area and radically change the character of this part of London for ever. No change necessary. The heights of buildings and their impacts on skyline and existing townscape are addressed in the sections on Skyline, Edges and Streets in the Urban Form chapter. Each of these are informed by detailed analysis of the surrounding area, which can be seen in the Character Area Analysis and the Townscape and Visual Analysis SPD Supporting Evidence Documents. The Skyline section sets out a Key Objective and a number of Key Principles that ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. The Townscape and Visual Analysis SPD Supporting Evidence Document sets and analyses a number of important local views identified by the authorities. Key Principle UF21 requires any application(s) to demonstrate that proposals will have no negative impact on any of these views. In the Edges section, the Key Objective states that all new buildings on the edges of the OA should be sensitively integrate into and enhance the existing context and The height of the blocks will create a high rise sky line and turn a traditional residential area into a ' High Rise Metropolis'. It must be remembered that traditional forms of housing i.e. houses with gardens are favoured within British culture and have been for many centuries. The high rise experiments of the 60's and 70's must not be forgotten and despite alleged housing shortages, high density and high rise living is not desirable aesthetically or socially.
121	Alex	Parker		04		Despite the developers claims about the layout of the buildings and the 'grid systems' synergy with the surrounding area, this No change necessary. This comment appears to refer to a specific planning application and not the SPD. It would be inappropriate to comment on the contents

						development in its proposed format will not be in sympathy or character with the surrounding area. This development will destroy the culture, nature and appearance of this part of London.	of any specific application as part of this consultation on the SPD. Please note that the SPD does seek to ensure that the urban grain within the OA is inspired by the pattern of streets and open spaces that surround it through the Urban Grain key Objective in the Urban Form chapter ("Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces ") and Key Principles UF3, UF4, UF5 and UF7.
122	Alex	Parker		04		Most concerning is the impact of the development on the Brompton Cemetery. This historically, socially and environmentally significant green space is unique within a dense inner city area and to the local area. The sky line and views from the cemetery will be ruined by the Earls Court development which locates some of the tallest and densest developments, particularly the tower blocks, close to the cemetery side of the site. The value of the open space and the views it provides should not be compromised by this development. It is also not acceptable for people visiting the cemetery or attending funerals to be overlooked by people in their flats or on their balconies.	No change necessary. The Key Objective for the Skyline section of the Urban Form chapter states that no new buildings should have a negative impact on the quality and character of the surrounding townscape and Key Principle UF20 specifically addresses the importance of Brompton Cemetery, stating that its character, appearance and setting must be preserved or enhanced. The Skyline section of the Urban Form chapter, particularly Key Principle UF21, should be read in conjunction with the Townscape and Visual Analysis SPD Supporting Evidence Document. In this supporting evidence document, views 31, 32 and 35 (please note that numbers allocated to these views may change in the final draft of the SPD) are taken from the cemetery and specific guidance is provided for any buildings that may be visible in them. All three clearly identify the sensitivity of the cemetery, but also highlight the opportunity to enhance its setting. The identified opportunities to enhance the setting of the cemetery include the potential t
137	David	Hammond	Natural England	04	UF5	Key Principle UF 5 - New Green Public Open Spaces - welcomed and encouraged.	Noted
138	David	Hammond	Natural England	04	UF11	Key Principle UF 11- Provide good quality public open space welcomed and encouraged also, especially in references to Nature Conservation.	Noted
139	David	Hammond	Natural England	04	UF12	Key Principle UF 12 - Local Park, the provision of a new accessible local park is welcomed and supported at a minimum of 2 hectares, helping to alleviate deficiency of open access in the area. The park should also seek to link and connect with other green/open spaces as part of the development proposals.	Noted. This aspiration is reflected in paragraph 4.47 which quotes the RBKC's Core Strategy (2010), requiring any application(s) to "create opportunities to extend or link Green Corridors".
140	David	Hammond	Natural England	04	UF13	Key Principle UF 13 - Accessibility of open green spaces is also welcomed and encouraged	Noted.
141	David	Hammond	Natural England	04	UF17	Key Principle 17 - Phasing Strategy, the incorporation of open space and green infrastructure as an inherent aspect of phased development is welcomed and supported. Provision should also be made for connectivity to each subsequent/later phase of the development.	Noted.
142	David	Hammond	Natural England	04	UF18	Key Principle 18 is encouraged.	Noted.
165	Andres	Guevara		04		It is extremely important that the project 1) increases public spaces, such as parks and squares and 2) firmly limits the height of the new building being projected. By doing density relative to the current plan will decrease therefore limiting all the potential damages and downsides mentioned in the paragraph above. Most importantly it will allow for air quality to improve by simply having more green public spaces in the form of small parks and squares, reduce general congestion and also protect the value of the real estate in the area.	No change necessary. The aspirations to increase public space are set out in the Public Open Space section of the Urban Form chapter in the SPD. In particular, Key Principle UF12 requires a local park of at least 2Ha, Key Principle UF13 requires all residential properties to be within 100m walk of a publicly accessible green open space and Key Principle UF14 requires 10sqm of publicly accessible green open space per child within the development. The SPD does not set specific limits on the height of any buildings, as this would be too prescriptive. It does however, establish a framework of Key Objectives and Key Principles against which the height of any proposal(s) can be assessed. This framework is established in the sections on Skyline, Edges and Streets in the Urban Form chapter. Each of these were informed by detailed analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and the Townscape and Visual Analysis SPD Supporting Evidence Documents. The Skyline section
169	Andres	Guevara		04		In summary, by decreasing density in the way proposed above we will make of this area a more human area!	Change proposed. The scale of development and the impacts of tall buildings on the skyline and existing townscape are addressed in the sections on Skyline, Edges and Streets in the Urban Form chapter. Each of these were informed by detailed analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and the Townscape and Visual Analysis SPD Supporting

						Evidence Documents. The Skyline section sets out a Key Objective and a number of Key Principles that ensure that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. This section should be read in conjunction with the Townscape and Visual Analysis SPD Supporting Evidence Document, which sets out and analyses a number of sensitive or important local views identified by the authorities. Key Principle UF21 requires any application(s) to demonstrate that their proposals will have no negative impact on any of these views. In the Edges section, the Key Objecti
173	Anonymous		04		the scale of the suggested development is in complete contradiction with the charming Victorian terraces in the neighbouring streets; none of the new buildings should be more that 3 storeys high, or 4 at the most.	No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to set specific caps on heights. Instead, it establishes a framework of Key Objectives and Key Principles against which the heights of the buildings in any proposals and their impacts on skyline and existing townscape will be assessed. This framework is established in the sections on Skyline, Edges and Streets in the Urban Form chapter. These are all informed by thorough analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and Townscape and Visual Analysis SPP Supporting Evidence Documents. The Character Area Analysis revealed that much of the surrounding area comprises buildings that are over 4 storeys in height. Mansion blocks, for example, tend to be between 5 and 8 storeys tall. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrou
174	Anonymous		04		the Kensington borough is famous for its gardens squares, very present in the Earl's Court ward; the effect upon the character of the area of tall and modern buildings would be devastating, not to mention the risks to the trees of the bordering gardens of Philbeach Gardens and Eardley Crescent.	Change proposed. The aspiration to extend the existing pattern of garden squares into the OA is established in Key Principle UF5. The scale of development and the impacts of tall buildings on the skyline and existing townscape are addressed in the section on Skyline in the Urban Form chapter, which was informed by detailed analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and the Townscape and Visual Analysis SPD Supporting Evidence Documents. The Skyline section sets out a Key Objective and a number of Key Principles that seek to ensure that no new buildings will have a negative impact on the quality and character of the surrounding townscape. This section should be read in conjunction with the Townscape and Visual Analysis SPD Supporting Evidence Document which sets out a number of views from which developers will be expected to demonstrate that their proposals have no negative impact. In the Edges section, the Key Objective states that all new buildings on th
176	Anonymous		04		In a nutshell, I am very happy that the site should be turned into a lovely residential area, meaning it should be in keeping with the nearby streets, preferably with modern Victorian terraces and a central garden, and certainly no buildings over 3 storeys.	No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to set specific caps on heights. Instead, it establishes a framework of Key Objectives and Key Principles against which the heights of the buildings in any proposals and their impacts on skyline and existing townscape will be assessed. This framework is established in the sections on Skyline, Edges and Streets in the Urban Form chapter. These are all informed by a thorough analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and Townscape and Visual Analysis SPD Supporting Evidence Documents. The Character Area Analysis revealed that much of the surrounding area comprises buildings that are over 4 storeys in height. Mansion blocks, for example, tend to be between 5 and 8 storeys tall. The Skyline section sets out a Key Objective and a number of Key Principles that ensure that no new buildings will have a negative impact on the quality and character of the surrounding
188	Daniel	Benson	04		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 to be totally 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.	No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to set specific caps on heights. Instead, it establishes a framework of Key Objectives and Key Principles against which the heights of the buildings in any proposals and their impacts on skyline and existing townscape will be assessed. This framework is established in the sections on Skyline, Edges and Streets in the Urban Form chapter. These are all informed by a thorough analysis of the surrounding area, the results of which can be seen in the Character Area Analysis and Townscape and Visual Analysis SPD Supporting Evidence Documents. The Character Area Analysis revealed that much of the surrounding area comprises buildings that are over 4 storeys in height. Mansion blocks, for

							example, tend to be between 5 and 8 storeys tall. The Skyline section sets out a Key Objective and a number of Key Principles that ensure that no new buildings will have a negative impact on the quality and character of the surrounding
266	Silvia	Piva		04		The development of this size of buildings would damage the image of the area, as tall buildings in London, excluding the City and Canary Wharf, are usually associated with affordable housing population	No change necessary. There are many tall buildings in London that are aspirational, including the tower at Tarbard Square in Bermondsey, Ontario Tower at Docklands, The Barbican Towers, Knightsbridge Barracks Tower and Shearsmith House. Please note that the SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which the proposed building heights in any application(s) will be assessed.
267	Silvia	Piva		04		The skyline of the area would be damaged, allowing to build up to 15 storeys will fatally damage the sense of liveableness of the areas	No change necessary. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which the proposed building heights in any application(s) will be assessed. There are a number of Key Principles in the SPD that seek to avoid any negative impacts on the skyline and townscape of the local area, including UF19 which requires proposals to preserve or enhance the character, appearance and setting of surrounding conservation areas and listed buildings and Key Principle UF20 which requires proposals to preserve or enhance the character, appearance and setting of Brompton Cemetery. Key Principle UF21 requires all proposals to demonstrate that they will have no negative impact on any of the views identified and analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, there are four Key Principles (UF22 to UF25) that seek to guide the design of tall buildings to ensure that they are of a high architectural qua
272	Silvia	Piva		04		The view and access to sunlight from the nearby buildings would be impaired by such a tall development, although my building in particular won't be directly affected I sympathise with people living close to the redevelopment	No change necessary. Key Principle UF28 requires that the privacy, daylight and sunlight of all existing and future buildings must be respected. Furthermore, residential amenities such as outlook and privacy are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85.
277				04		Relative to the SPD, I strongly suggest to increase green areas and decrease the height of buildings and their residential and commercial capacity to make it more compatible with living in the area unless my concerns are addressed in other ways.	No change necessary. The SPD provides a framework against which any planning application for the opportunity area will be assessed. As such, it sets out principles to control the amount of green space and the heights of buildings without prescribing specific quanta or dimensions. The actual amount of green space or heights of buildings will be determined by the density of any application that comes forward. See Key Principles UF13 to UF15 which set out how the quantum of green space will be calculated in relation to the distribution of residential units or the number of children that will live on the site and Key Principles UF19 to Uf25 which control the impact of tall buildings.
281	Tom	Jestico	DRP	04		The Illustrative Land Use drawings show a continuously decked over linear park over the railway lines. The Panel questioned whether the cost of this provision could be recouped by residential development at the lower densities now suggested. A strategy of 'pocket' parks with landscaped bridges over the railway lines might be more viable and could provide adequate provision. It was important that the SPD was not too prescriptive and that the guidelines regarding the amount of open space provision were sufficiently flexible.	No change necessary. As noted in your comment, the land use drawings are illustrative only and therefore should not be read as proposals for development. Key Principle UF8 clearly states that if the introduction of a deck over the railway line proves not to be viable, a series of bridges over the railway line to ensure sufficient east - west connectivity could be acceptable. If this were the case, any application(s) would still be expected to meet the public open space requirements set out in the SPD. The SPD does not require a continuously decked over linear park over the railway lines. It only suggests that this is one way in which the authorities' connectivity and public open space aspirations could be met.
282	Tom	Jestico	DRP	04		The linear park, if retained, would benefit from north and south connections for cyclists and pedestrians. Is this possible?	No change necessary. The authorities believe this is possible and will expect any application to either demonstrate that it can be achieved or to justify why it cannot. Indeed, this is what the green, dotted arrow on figure 4.1 shows. However, it should be noted that the SPD does not require a linear park. The public opens space section requires a 2ha local park and then goes on to suggest that one possible way in which this could be delivered is as a linear park.
284	Tom	Jestico	DRP	04		Tall buildings were recognised as being those that were significantly taller than those around them. It was important to differentiate between tall residential and commercial buildings as they have differing requirements. Tall residential buildings have more potential to be slender - but both are difficult to make slender and viable! Large slab blocks with continuous flat tops are to be discouraged.	Change proposed. "Large slab blocks with continuous flat tops are discouraged" will be added to the section of the Urban form chapter that deals with the design of tall buildings. The other principles and guidance on the design of tall buildings are considered to be flexible enough to apply to either commercial or residential buildings. The expectations of officers assessing any proposal(s) will be adjusted depending on the proposed use of any building.

285	Tom	Jestico	DRP	04	The Panel favoured the location of predominantly commercial buildings along the Cromwell Road frontage, where high densities would justify the high costs of building over railway tracks and raising ground levels etc. It was possible that a very tall building might be possible here.	Noted. However, it is not necessarily the case that it would be possible a very tall building to be located on the West Cromwell Road frontage for two reasons. Firstly, it would be contrary to the LBHF Core Strategy which clearly states that "there may be some scope for tall buildings no higher than, and close to, the existing Empress State Building". The West Cromwell Road frontage is not considered to be "close to" the Empress State Building. Secondly, a very tall building in this location would be unlikely to meet the criteria set out in Key Principles UF19 and UF21. It is unlikely that the authorities would be satisfied that a very tall building in this location would preserve or enhance the character, appearance and setting of surrounding conservation areas or that it would have no negative impacts on any of the views analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document.
286	Tom	Jestico	DRP	04	The Panel was wary of locating tall buildings around the Empress State building. There was a tendency that a cluster of tall buildings here would coalesce into an amorphous and bulky silhouette when viewed from a distance. Note should be taken of the start of clustered tall buildings, with lower sections being mainly solid and upper parts more variable, with plenty of sky between them. This is to avoid a visual merging into a 'solid wall' of several buildings of similar form and height.	Change proposed. Whilst the authorities continue to believe that a cluster of tall buildings could be attractive and is preferable to an approach that sees tall buildings scattered across the OA, the text will be revised to make it clear that any designs should avoid a visual merging of the cluster into a 'solid wall' of several buildings each of similar form and height. The text will also be revised to note that whilst the lower levels of the individual taller buildings may be largely solid, it is important that their upper levels are variable, with plenty of sky visible between them. Please note that the aspiration for any tall buildings to be located close to the Empress State Building is established in the LBHF Core Strategy. Please note that, in order to make this clear the order of Key Principles UF22 to UF24 and the way in which the text that follows them is written will be amended.
287	Tom	Jestico	DRP	04	A varied skyline can be achieved at detail level, as in local historic precedents of chimneys, gables etc.	Noted. This is anticipated in the SPD in the Key Principles and associated text that address roofscapes (Key Principles UF34 and UF35 and paragraphs 4.102 to 4.106).
288	Tom	Jestico	DRP	04	Again, the Panel suggested that the SPD was not too prescriptive. It should be left to the developer to make the case for tall buildings.	Noted.
289	Tom	Jestico	DRP	04	The Urban Form Strategy of the SPD suggests a predominantly 1:1 width/height ratio. Clearly it must allow for some variation to avoid monotony and to create delight. It is also important to recognise the relationship between height and length in relation to street buildings - the surrounding context has quite long blocks, especially east/west, but they are relatively low buildings. The Panel felt that guidelines, however, should be kept to a minimum and that the usual criteria for good design should be considered. Setbacks, projections, front doors, openings etc. enliven otherwise monotonous blocks, with the block length being set by an urban street grid.	Change proposed The SPD allows for some variation by explaining that the 1:1 ratio is a general rule and setting out the expectation that "any street that breaks this rule will require significant urban design justification" (paragraph 4.90). The SPD also recognises the distinction between the long low terraces in the surrounding area and the potential for harmful long and high terraces in the Opportunity Area. This is captured in Key Principle UF35 which will be revised to state that "Building blocks that are both long and high are not appropriate. Bulk and scale should be broken down by the grid of streets and other articulation".
290	Tom	Jestico	DRP	04	The Panel felt that it was almost impossible to predict phasing sequences and suggested that the SPD should concentrate on defining development 'parcels'. It was essential that East - West routes, particularly pedestrian and cycle connections, are established as soon as possible.	Change proposed. Reference to sequential phases will be replaced with "illustrative development parcels" that could, theoretically, be delivered in any order. The intention is to demonstrate, in a purely illustrative manner, that the site could be developed in a phased manner. The need to deliver the east - west route as early as possible is already established in the SPD in Key Principle UF2 which states that applicants should "create east - west connectivity between Warwick Road and North End Road at an early phase of development". This will be restated in the text that supports the "illustrative development parcels".
291	Tom	Jestico	DRP	04	A proportion of green space needs to accompany the delivery of each parcel in case the development stalls.	Change proposed. Key Principle UF17 already establishes the need for a "phasing strategy that demonstrates how all of the public, green, open space requirements will be met". This Key Principle also sets out that the authorities will expect the public green open space to be delivered incrementally so that each phase has proportionate amounts to serve the needs of the increasing working and living populations. This will be restated in the text that supports the "illustrative development parcels".

292	Tom	Jestico	DRP	04	A study of the street grid, with the usual separation distances for both buildings lining the streets and those within block parcels, would generate a density based on the 1:1 street aspect ratio. This would determine how much tall buildings could be expected and, indeed, whether even the minimum scenario (5500 homes / 12000 jobs) can be achieved within the SPD guidance.	No change necessary. The authorities consider that including a design based density study as part of the SPD would be too prescriptive. Instead, the SPD has been written as a framework against which all aspects of any planning application(s) for the OA will be assessed, including the density. The appropriateness of any density that is proposed will be considered against the Urban Form and Transport and Accessibility chapters of the SPD and Policy 3.4 of the Mayor's London Plan.
297	Sally	Groenedijk-Trigues		04	The development will irrevocably destroy the local skyline. There will not be many places in Earl's Court that this will not affect, and the most to suffer will be the listed Brompton Cemetery.	No change necessary. The Skyline Key Objective in the Urban Form chapter of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for applicant(s) to analyse and submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.
299	Sally	Groenedijk-Trigues		04	There is insufficient green space proposed in the SPD for community or recreational use.	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 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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4
300	Sally	Groenedijk-Trigues		04	The heights, densities and the use of materials will not link in with either of the communities.	Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified and analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key O
302	Hugh	Lalor		04	A woeful lack of adequate recreational and sports facilities in the plan.	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 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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure

						facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of
303	Hugh	Lalor	04		Any new developments should be sympathetic to existing buildings. (The new block of flats at 225 Earls Court Rd, Colony Mansions shows just how new projects can be built in harmony to existing buildings - this is the very least any new developments in the area should be aspiring to)	No change necessary. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of nearby conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified and analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key O
309	Shamyl	Saigol	04		The listed Brompton cemetery will be adversely affected by the high buildings overlooking it. The skyline will suffer and local residents in Eardley Crescent and Philbeach Gardens will be overlooked by buildings that are too high and densely populated, and they will suffer as a result.	No change necessary. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 requires any application(s) to preserve or enhance its character, appearance and setting. The supporting text sets out the expectation that all applications will demonstrate that they don't involve any negative changes to the skyline as viewed from the cemetery. Furthermore, Key Principle UF21 requires all applicants to submit a set of verified views taken from points in the local area identified by the authorities. These can be seen in the Townscape and Visual Analysis SPD Supporting Evidence Document. Proposals will be expected to demonstrate that they will have no negative impact on any of these views. Views 31, 32 and 35 are taken from the Cemetery (please note that the numbers allocated to views may be changed in the final draft of the SPD). All three clearly identify the sensitivity of the cemetery, but also highlight the opportunity to enhance its setting. The identified opportunities to enhance
310	Shamyl	Saigol	04		There is not enough space for community or recreational use in this plan. There is also insufficient green space.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4,
316	Sherry	Kernan	04		If understood correctly, the possible addition of an additional N-S road would, in fact, be a series of jig-jags, which would not be a Primary Road and would not alleviate the crush experienced on the Earls Court and Warwick Roads.	Change proposed. As established in the Transport Chapter (paragraph 10.68) the SPD does not seek to achieve significant reductions in the traffic on the Earl's Court One Way System (which includes Warwick Road). An assessment of the potential for using a new north-south route within the site to relieve the Earl's Court One Way System of through traffic was undertaken. This found that a north-south route could reduce traffic on Warwick Road by up to 18% and on Earl's Court Road by up to 10%. However, in order to achieve this, traffic would be diverted along Old Brompton Road and Lillie Road where traffic levels would more than double in the PM peak hour. Accommodating this traffic would require a major new junction on Lillie Road as well as probable road widening along Lillie Road that could not be constructed without third party land acquisition. It is therefore not necessary for the north-south route to be classified as a Primary Road.
319	Sherry	Kernan	04		The provision of green space is critical and the developers have	Please note that the Urban Grain and Connectivity section of the Urba No change necessary. The authorities consider that the minimum requirements for

					<p>proposed a miserly amount in less than optimal forms. The Earl's Court Society suggestion of aggregating space into a 6 hc park would be a healthy and attractive amenity. It would also be consistent with the London Plans Green Lung concept. The SPD could be more robust on this.</p>	<p>public green open space established in the Urban Form chapter to be sufficient and robust. Key Principle UF12 require a 2ha local park, Key Principle UF13 requires all residential properties to be within 100m walking distance of a green open space, Key Principle UF14 requires any regeneration proposal to provide a minimum of 10 sqm of public space per child and Key Principle UF15 requires a minimum of 10 sqm of dedicated play space per child. These principles are consistent with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). Aggregating the open space requirements into one large park would compromise a number of the aspirations set out in the SPD. For example, it would not be in keeping with the existing urban character of the surrounding areas (which are generally punctuated by a series of smaller open spaces) and it could compromise the ability to achieve the desired level of co</p>
320	Sherry	Kernan	04	<p>K&C has come a long way in regenerating itself over the years, with the council's efforts to encourage upscaling hostels to hotels, better litter patrol, licensing controls, etc. Consequently, residents feel part of a community and are investing in and restoring the Victorian character.</p> <p>The London Plan seeks to maintain the character of areas. The SPD should support this trend and consider that the sky line/heights of buildings as well as require that the building materials should be required to be of higher quality than what was shown in the mock-ups. It looked cheap and totally out of keeping with a conservation area and risked virtually overhanging some of the surrounding homes and the Brompton Cemetery.</p> <p>Please clarify the Revised SPD so as to consider the impact of the redevelopment on the lives of existing residents and merchants.</p>	<p>No change necessary. The SPD has been informed by thorough analysis of the urban character of the surrounding areas. The results of this analysis can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis and the Townscape and Visual Analysis. The Skyline section of the Urban Form Chapter addresses the importance of the skyline and establishes the Key Objective that no new buildings visible on the skyline should have a negative impact on the quality and character of the surrounding townscape. In this regard, any application(s) will be assessed against Key Principle UF19 which requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas, Key Principle UF20 which requires development to preserve or enhance the character, appearance and setting of Brompton Cemetery and Key Principle UF21 which requires all proposals to be accompanied by a verified set of the views identified in the Townscape and Visual Analysis SPD Supporting Eviden</p>	
326	Michael	Whittall	04	<p>The local skyline will be ruined - and will be visible from almost all parts of the area which is generally low-rise. with the exception of Empress State</p>	<p>No change necessary. The Skyline of the local area is considered in detail in the Skyline section of the Urban Form chapter of the SPD. The overarching Key Objective for this section is to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape. In this regard, any application(s) will be assessed against Key Principle UF19 which requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas, Key Principle UF20 which requires development to preserve or enhance the character, appearance and setting of Brompton Cemetery and Key Principle UF21 which requires all proposals to be accompanied by a verified set of the views identified in the Townscape and Visual Analysis SPD Supporting Evidence Document and to demonstrate that there will be no negative impact on any of them. The use of materials is considered to be too detailed an issue for inclusion in a strategic framework document like</p>	
328	Michael	Whittall	04	<p>There is a serious lack of green space in the plan for recreation or community activities</p>	<p>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 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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport</p>	

							to be developed to an "elite" standard and for a community hub of
329	Michael	Whittall	04		The scale, density and materials to be used are totally at variance with the surrounding area. The density especially is beyond acceptable		Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires any application(s) to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Object
333	Geirgina	Donnelly	04		<p>Apart from the density of the buildings per square metre, I write because I am most concerned about the proposed heights of the new buildings on the site. I feel that if these are permitted to be over 7 floors - already too high as not in sympathy with the surrounding architecture, this will completely ruin the area.</p> <p>Earls Court has a large number of beautiful, well maintained and imposing period buildings which would sit uneasily with a ghastly series of modern glass and chrome residential and commercial boxes with insufficient green landscaping to break up the concrete jungle. History has proved that people do not like to live in tall buildings in this town. They become ghettos - e.g the dreadful towers on the West Way and Lily Rd/Rylston Rd in SW6 which have slowly been dismantled and replaced with houses.</p>		Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, the skyline section of the Urban Form chapter Key Principles UF19 and UF20 require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires any application(s) to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis SPD Supporting Evidence Document. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective
334	Geirgina	Donnelly	04		We do not have a public park in this area and with the increased density of population, this will become even more apparent as there is nowhere for the new residents to go, not even the odd bench to sit on for the many tourists we have due to the numerous hotels here. The number of casual visitors will also increase which will create its own problems. Generous landscaping and low-built blocks of flats interspersed with some terraces of houses are paramount to the success of the project. This must be a true new village, not a highrise horror story.		No change necessary. The deficit of open space is recognised in the SPD and, as a result, Key Principle UF12 requires a new 2ha local park as part of any redevelopment of the site. Further to this, the other Key Principles in the Public Open Space section of the Urban Form chapter set additional requirements for open space provision, including UF13 which requires all residential properties to be within 100m walking distance of a public open space, UF14 which requires 100sqm of public green open space per child and UF15 which requires a minimum of 100sqm of dedicated play space per child.
338	Geirgina	Donnelly	04		The Brompton Cemetery, our only green space in this area will be seriously affected by the altered skyline. It will be overlooked and crowded by buildings which will be too high and out of harmony with the neighbourhood. This is a listed amenity and should be regarded as such. This is our only LUNG. We need to keep it as pristine and unencumbered as possible.		No change necessary. The importance and sensitivity of Brompton Cemetery is recognised in the SPD, particularly in Key Principle UF20 which requires the preservation or enhancement of its character, appearance and setting. Furthermore, any new buildings that are visible from Brompton Cemetery will be subject the Key Principle UF21 which requires any application(s) to demonstrate that there will be no negative impact on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. For Brompton Cemetery in particular, please refer to views 35, 32 and 31 (please note that, in the final draft of the SPD, the numbers allocated to the views may change). All three clearly identify the sensitivity of the cemetery, but also highlight the opportunity to enhance its setting. The identified opportunities to enhance the setting of the cemetery include the potential to create enclosure along its western edge (identified as lacking the Conservation Area Proposal State
343	Barbara	Herbin	04		The listed Brompton cemetery will be adversely affected by the high buildings overlooking it. The skyline will suffer and local residents in Eardley Crescent and Philbeach Gardens will be overlooked by buildings that are too high and densely populated, and they will suffer as a result.		No change necessary. The importance and sensitivity of Brompton Cemetery are recognised in the SPD, particularly in Key Principle UF20 which requires the preservation or enhancement of its character and appearance. Furthermore, any new buildings that are visible from Brompton Cemetery will be subject the Key Principle UF21 which requires any application(s) to include a set of verified views, identified by the Authorities, which must be analysed to demonstrate that there will

						be no negative impact. These views can be found in the Townscape and Visual Analysis. For Brompton Cemetery in particular, please refer to views 35, 32 and 31 31 (please note that, in the final draft of the SPD, the numbers allocated to the views may change). All three clearly identify the sensitivity of the cemetery, but also highlight the opportunity to enhance its setting. The identified opportunities to enhance the setting of the cemetery include the potential to create enclosure along its western edge (identified as lacking the Cons
344	Barbara	Herbin	04		There is not enough space for community or recreational use in this plan. There is also insufficient green space.	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 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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4
353	Christine	Powell	04	Para 4.26	The statement that [italics] mature trees should be encouraged but they should not leave open spaces dark and / or overshadowed [end italics], seems to be in opposition to the effect that tall buildings would have.	Change proposed. Key Principle UF25 states and proposals for tall buildings will need to demonstrate how their impact on overshadowing of both surrounding buildings and open spaces will be mitigated. The text that follows this Key Principle will be amended to also state that proposals "should demonstrate that they do not have a detrimental effect." The enclosure ratios for open spaces established in paragraphs 4.95 to 4.97 also seek to ensure sufficient light.
354	Christine	Powell	04	Para 4.46	There should be sufficient open space where dog walkers may go	No change necessary. Although specific control of where dog walkers would be permitted to go is too detailed an issue to address in this strategic framework document, the authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 to be sufficient. In brief, they establish requirements for a 2 ha local park, for all residential units to be within 100m walking distance of a public green open space and for 10sqm of publicly accessible green open space per child.
355	Christine	Powell	04	Para 4.47	It will be difficult for excessive planting, i.e. trees and shrubs, in the linear park if it is decked over the existing railway line.	No change necessary. With the correct, well thought out engineering and landscaping solutions, it will be possible for sufficient planting to be created on the deck. Please note that the SPD does not require a linear park on a deck, although it does suggest that this could be one way of successfully delivering the public open space and connectivity requirements.
376	Cllrs	Buxton and Read	04		<p>ARCHITECTURE AND DESIGN KEY OBJECTIVE AND NEW KEY PRINCIPLES</p> <p>A new key objective is required that the Architecture and Design of any development in the OA should be of outstanding quality and be inspired by the surrounding Conservation Areas. It should be of such quality that in future years it would be considered worthy of inclusion in a conservation area.</p>	No change necessary. It is considered that the quality of architecture is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning application(s) are made. Having said that, the SPD has been informed by careful analysis of the character of the local urban context, including the conservation areas and heritage assets. Many of the Key Principles in the Urban Form chapter reflect the aspiration that design and layout should be inspired by the best of local character. For example, Key Principle UF3 requires the pattern of new streets to be inspired by the street types identified in the surrounding context, Key Principle UF5 requires the existing pattern of garden squares to be extended into the OA, Key Principle UF7 requires new compositions of views to complement those identified in the surrounding area and the Streets Key Objective requires well proportioned street
377	Cllrs	Buxton and Read	04		A New Key Principle that any new building facing Exhibition Square replacing the iconic facade of EC1 should be world class quality building that is inspired by the Art Deco Facade of EC1.	No change necessary. Specifying the style of architecture to be adopted is considered to be prescriptive for a strategic planning framework such as the SPD. Any application(s) for the buildings that replace EC1 will be considered on their own merits.
378	Cllrs	Buxton and Read	04		Key Principle UF12	No change necessary. The authorities consider the offer of a 2 ha local park (that meets the criteria set out in Table 7.2 of the London Plan) to be sufficient to

					We welcome the inclusion of an accessible park, but consider a minimum of 2 hectares as too small. We support the Earl's Court Society seeking a minimum of 5 Hectares.	overcome to local open space deficiency. However, it should also be noted that this will be the minimum amount of open space necessary. The SPD also expects a minimum of 10sqm of public open green space per child (Key Principle UF14), and expects public open space to be distributed in a manner that ensures, as far as possible, that all residential units are within a 100m walk of an open space (Key Principle UF15). Furthermore, Paragraph 4.48 requires any land area of Special Nature Conservation Importance that is lost to be reprovided in addition to the 2ha local park. In light of all of the above it is likely that the overall quantum of publicly accessible green open space will exceed 2ha.
385	Francois	Dumonteil-Lagreze	04		The development will irrevocably destroy the local skyline. There will not be many places in Earl's Court that this will not affect, and the most to suffer will be the listed Brompton Cemetery.	No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which any application(s) will be assessed in this regard, including a requirement for any applicant(s) to submit a verified set of the views, taken from points in the local area identified by the authorities, in the Townscape and Visual Analysis SPD Supporting Evidence Document. Any application(s) will also be expected to demonstrate that there will be no negative impact on any of these views. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character and appearance must be preserved or enhanced. There are 3 views in the Townscape and Views Analysis SPD Supporting Evidence Document from Brompton Cemetery; views 35, 32 and 31 (please note that in the final draft
387	Francois	Dumonteil-Lagreze	04		There is insufficient green space proposed in the SPD for community or recreational use.	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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a communi
388	Francois	Dumonteil-Lagreze	04		The heights, densities and the use of materials will not link in with either of the communities. They are still too near the existing Victorian Crescents and the different levels of the land have not been taken into consideration.	Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires any application(s) to demonstrate that they will have no negative impact on any of the views identified in the Townscape and Visual Analysis SPD Supporting Evidence Document. The Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). Simila
421	Paul	Dumond	04		[bold] 3. Phasing [end bold] The Phasing section of the SPD does not integrate credibly with the transport and accessibility section and the studies by TFL and the councils.	Change proposed. Reference to sequential phases will be replaced with "illustrative development parcels" that could, theoretically, be delivered in any order. Therefore, the north south route could be constructed earlier. The intention behind these diagrams is to demonstrate that a large strategic masterplan for the OA could be broken down and delivered in chunks, over a period of time, whilst ensuring that both old and new development can function satisfactorily. They are only intended to deal with issues of design, which is why transport upgrades are not addressed at this point in the document. Furthermore, it should be noted that

					<p>The new north/south route through the OA is worked into these studies and is key to the area coping with north south traffic flows yet it isn't even scheduled to be built until phase 4b, the penultimate phase of development (see paragraph 4.119). The Piccadilly line upgrade (an essential requirement) doesn't even have a scheduled date.</p> <p>This raises three major problems:</p> <p>[bold] (a) In the period between the start of the development and the completion of the north/south road ten years later there will be an increase in surrounding traffic but no new road putting further strain on the overloaded local roads.</p> <p>(b) The Piccadilly line upgrade must occur before significant new development is allowed in order to avoid an intolerable and dangerous travelling environment in the rush hour.</p> <p>(c) In the event that the last two stag</p>	<p>these plans are clearly labelled as 'illustrative' an should not be treated as a design solution for the OA.</p>
423	Nicholas	Fernley	Hammermsith & Fulham Historic Buildings Group	04	<p>Policy Context</p> <p>we are surprised and disappointed that there is no mention of PPS5 in the latest draft SPD. PPS5 is the Government's Planning Policy Statement on 'Planning for the Historic Environment' and as such should be seen as a driver for consideration of heritage issues in any scheme for the Opportunity Area.</p> <p>Proposal: Please add reference to PPS5 in the finalised SPD.</p> <p>Reason: for clarity.</p> <p>However we are pleased to see reference to the English Heritage / CABE Guidance on Tall Buildings, noted in 4.10, page 53. We look to see its guidance (and that in PPS5) applied in the consideration of planning applications for the Opportunity Area.</p>	<p>Change proposed. PPS5 will be referenced in the Heritage Assets section of the Site Context Chapter. There are a number of Planning Policy Statements that are relevant to the development of this site. If we were to list PPS5 in the Urban Form Policy Context we would have to list all of the others. This would unnecessarily lengthen the document, as all applications will be expected to pay due regard to all Planning Policy Statements.</p>
425	Nicholas	Fernley	Hammermsith & Fulham Historic Buildings Group	04	<p>while the London Plan's Policy 7.9 on 'heritage-led regeneration' is referenced under Policy context (4.7, page 53), we have looked without success for any indication in the SPD of how this policy might be applied to the Opportunity Area's redevelopment.</p> <p>Proposal: Please provide such an indication.</p> <p>Reason: We consider that the SPD needs to provide this in order</p>	<p>No change necessary. Any applicant(s) will be expected to demonstrate how they have applied the London Plan to their proposals. Each case will be judged on its own merits.</p>

						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.	
429	Nicholas	Fernley	Hammersmith & Fulham Historic Buildings Group	04		<p>we support the provision of adequate public open space in any Opportunity Area redevelopment, and understand the potential attraction of a north-south 'linear park' following the route of the West London railway line. At the same time we have reservations over the successful creation of a park set on a continuous raised deck over the railway, as a consequence of such an open space having no 'natural' ecology.</p> <p>We are also concerned at the loss of the current bio-diversity that currently exists in the green corridor along the railway line because of the work proposed. Similar loss has been noted in the past along the railway green corridor in White City as a result of nearby development.</p>	<p>No change necessary. With the correct engineering and landscaping solutions, sufficient planting could be provided on a park on a deck. Furthermore, it should be noted that even if the decked approach were taken (this is not prescribed by the SPD, but suggested as an appropriate way in which to meet the SPD's Public Open Space and Connectivity requirements), it is unlikely that this would be the only public open space on the site. Alone, it would be unlikely to meet the requirements for all residential units to be within 100m walking distance of a public green open space (Key Principle UF13) and for 10sqm of open space per child (Key Principle UF14). In order to mitigate the loss of Sites of Nature Conservation Importance, paragraph 4.48 states that the loss of any such land should be reprovided in addition to the 2ha local park. In the Environment Chapter of the SPD there are a number of Key Principles about protecting the ecology and biodiversity of the OA. For example, Key Principle ENV18 requires any los</p>
437	Isabelle	Laborde		04		<p>I recognise the need for improvements to the Earl's Court and West Kensington Opportunity Area ("the ECWKOA"). However, any such improvements need to be consistent with the character of the area and the distinct village identity treasured by its residents. This cannot and will not be achieved by the SPD which has clearly been drafted to accommodate the Masterplan and planning applications already submitted by EC Properties Limited ("the Developer") for the area. The scale of the Developer's proposals, supported by the London Borough of Hammersmith and Fulham ("the Council"), is clearly inadequate and unsustainable. The volume of the proposed developments simply cannot be accommodated by the area. This is neither the City of London nor Canary Wharf, but a vibrant residential neighbourhood comprising mainly of 2-3 storey terraces.</p>	<p>No change necessary. The SPD has been produced in partnership by LBHF, RBKC and the GLA as a framework to guide development of the OA. Although, as recognised in paragraph 1.16, it has been prepared in response to the development aspirations of one of the major landowners, it has not been informed by their proposals. In terms of building heights and the scale of development, any application(s) will be expected to meet the Key Principles set out in the SPD. Most significant in terms of scale are Key Principles UF19 and UF20 which require the preservation or enhancement of surrounding conservation areas (including Brompton Cemetery), Key Principle UF21 which requires the proposals to demonstrate that they will not have any negative impacts on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document, Key Principle UF26 which requires the height and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings</p>
445	Arthur	Tait	Friends of Brompton Cemetery	04	Page 55, Key Objective	<p>1. KEY OBJECTIVE ON PAGE 55 --'Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces'.</p> <p>1.1. Just how massed six to mainly eight storey buildings within 100 yards are inspired by the surrounding open spaces of Brompton Cemetery is a mystery. No normal interpretation would support that interpretation by CapCo.</p>	<p>No change necessary. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.</p>
446	Arthur	Tait	Friends of Brompton Cemetery	04	Key Principle UF6, Para 4.27	<p>1.2. Key Principle UF6 section 4-27 records St Luke's Church, Redcliffe Square as a special landmark to be retained and improved. We strongly agree, and regret that in the revised draft SPD this seems to be argued less strongly than in the first draft SPD. We think that a clear gap in the proposed Car Park buildings needs to be retained to achieve this objective. In the illustrative masterplan in figure 3.3 there is no reasonable gap between the proposed buildings. - the gap is just the width of a street, much less than in the first draft SPD which at that time was clearly seen as very important.</p>	<p>No change necessary. The importance of St. Luke's Church is not argued any less strongly than it was in the first draft of the SPD. However, as a result of the previous consultation, we have worked hard to reduce the length of the document. The SPD cannot prescribe where the gaps between buildings should occur and it ought to be noted that the masterplan in figure 3.3 is illustrative only and therefore should not be treated as a proposal for the OA. Any application(s) will be assessed against the Key Principles in the SPD, including Key Principle UF6 which requires views of special existing landmarks to be retained and/or improved, and not against any of the illustrative masterplans.</p>
447	Arthur	Tait	Friends of Brompton Cemetery	04	Page 61, Key Objective	<p>2. KEY OBJECTIVE ON PAGE 61 -- 'Provide good quality public open spaces ...' and the various related Key Principles. We argue that Brompton Cemetery could provide significant open space along part of its boundary with the Car Park, which would also produce a good sightline to St Luke's Church, Redcliffe Square and be</p>	<p>No change necessary. The SPD accepts that Brompton Cemetery is a significant local open space (see paragraphs 2.31 and 4.37), but also makes it clear that it should not be viewed as providing for formal recreation.</p>

						adjacent to the nearby Site of Nature Conservation importance.	
448	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, Key Objective, UF19, UF20, UF21	<p>3. KEY OBJECTIVE ON PAGE 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. This is interpreted in the revised draft SPD by -</p> <p>3.1. Key Principles UF 19, UF 20 and UF 21 require nearby conservation areas and specifically Brompton Cemetery to be preserved or enhanced, with a note that views from Brompton Cemetery are panoramic and open and new buildings of only moderate height may be visible. Proposals must demonstrate that they do not have a negative impact on the views identified and analysed in the Townscape and Views analysis.</p>	Noted.
449	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, Key Objective, UF19, UF20, UF21	<p>3. KEY OBJECTIVE ON PAGE 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. This is interpreted in the revised draft SPD by -</p> <p>3.2. The Cemetery Conservation Area Proposals Statement on page 19 reinforces this by recording that 'the character and appearance of all parts of the Cemetery are at risk from tall or bulky development beyond its boundaries which would impinge on views within or without the Cemetery. Where other buildings are in close proximity to the Cemetery even relatively minor alterations and extensions can have a detrimental effect on views. The likely damaging or enhancing effect of development on a vista in the conservation area will be taken into account by the Council...'</p>	Noted.
450	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, Key Objective, UF19, UF20, UF21	<p>3. KEY OBJECTIVE ON PAGE 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. This is interpreted in the revised draft SPD by -</p> <p>3.3. If the argument elsewhere in the Proposals Statement leads to a decision to add extra enclosure to the side of the Cemetery adjacent to the Car Park we argue strongly that up to four storeys in height would well achieve that. They would be much more consistent with the warnings in the Proposals Statement (3.2 above) than the massed six to mainly eight storeys proposed in the Planning Application which would clearly offend substantially against those warnings.</p>	No change necessary. The SPD does restate the opportunity to improve the enclosure of the cemetery presented by the redevelopment of the OA. However, it does not prescribe any building heights that would be suitable to achieve this. Any buildings along this edge of the cemetery will be subject to Key Principles UF20 (to preserve or enhance the character, appearance and setting of the cemetery) and Key Principle UF21 (to demonstrate that views from the cemetery, identified in the Townscape and Visual Analysis SPD Supporting Evidence Document, will not be negatively impacted upon).
451	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, Key Objective, UF19, UF20, UF21	<p>3. KEY OBJECTIVE ON PAGE 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. This is interpreted in the revised draft SPD by -</p> <p>3.4. 4.62 states that 'regeneration of the OA presents the opportunity to improve the enclosure of the Cemetery'. If this controversial view prevails it does NOT (as argued in 3.3) support massed buildings as high as six to mainly eight storeys, where four</p>	No change necessary. The SPD does not prescribe any building heights that would be suitable to achieve the desired improvements to the enclosure of the cemetery. Any buildings along this edge of the cemetery will be subject to Key Principles UF20 (to preserve or enhance the character, appearance and setting of the cemetery) and Key Principle UF21 (to demonstrate that views from the cemetery, identified in the Townscape and Visual Analysis SPD Supporting Evidence Document, will not be negatively impacted upon).

						storeys would fully achieve that objective and be consistent with the rest of the cemetery's enclosure. Also there are several gaps in the enclosure at other parts of the Cemetery which would fully justify a gap in the proposed new enclosure by omitting one of the proposed buildings. This would support the sightline to St Luke's Church.	
452	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, UF19, UF20, UF21, Para 4.26	<p>3. KEY OBJECTIVE ON PAGE 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. This is interpreted in the revised draft SPD by -</p> <p>3.5. We agree strongly with the statement in 4.62 that proposed new buildings should 'not over dominate the western edge of the Cemetery, and should enhance the character of the conservation area'. CapCo's plans clearly over dominate through height and mass, damaging the skyline and introducing significant overlooking of the burial areas where there is none at present.</p>	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
453	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, UF19, UF20, UF21, Para 4.26	<p>3. KEY OBJECTIVE ON PAGE 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. This is interpreted in the revised draft SPD by -</p> <p>3.6. We agree with Key Principle UF 24 and argue that the new buildings proposed along the east side of the Car Park, at twice the height of other residential buildings near the Cemetery, significantly fail to meet this Principle.</p>	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
454	Arthur	Tait	Friends of Brompton Cemetery	04		The CapCo arguments that their proposals either have no impact on the skyline and views from the Cemetery or are of significant benefit to the Cemetery are laughable -- very few people would agree with those special pleading statements, and most argue that the proposals would be positively harmful to the Cemetery. The open vista to the west of the Cemetery is a special feature in this part of London, as anyone familiar with it will agree.	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
455	Arthur	Tait	Friends of Brompton Cemetery	04	Para 4.67, Para 4.59	From the Cemetery's perspective any new tall buildings near and of the height of the Empress State building should at most be few and accord with section 4-67. We agree with 4-59 that 'the heights of the exhibition centres should not be seen as precedent...'	Noted.
456	Arthur	Tait	Friends of Brompton Cemetery	04	Page 69, Key Objective, UF26	<p>4. KEY OBJECTIVE ON PAGE 69 -- 'Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context'.</p> <p>4.1. Key Principle UF 26 states 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>	Noted.
457	Arthur	Tait	Friends of Brompton Cemetery	04	Page 69, Key Objective, Para 4.77	<p>4. KEY OBJECTIVE ON PAGE 69 -- 'Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context'.</p> <p>4.2. 4-77 states that 'the edge conditions along Seagrave Road and the openness of views from Brompton Cemetery are major</p>	Noted.

						influences on acceptable building heights and massing'. It quotes the heights of nearby buildings on the Seagrave Road site as between 3 and 5 storeys.	
458	Arthur	Tait	Friends of Brompton Cemetery	04	Page 69, Key Objective, Para 4.77, Character Area	4. KEY OBJECTIVE ON PAGE 69 -- 'Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context'. 4.3. The Character Area Analysis on pages 80 - 81 shows the residential typology buildings in the Boltons to be 3 - 5.5 storeys, and up to 6.5 for mansion blocks which are typically in special settings created by garden squares and primary streets.	Noted.
459	Arthur	Tait	Friends of Brompton Cemetery	04	Page 69, Key Objective, Para 4.80	4. KEY OBJECTIVE ON PAGE 69 -- 'Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context'. 4.4. 4-80 states that 'any proposed buildings in the western and eastern edges of the OA should not rise significantly higher than the prevailing adjoining heights'.	Noted.
460	Arthur	Tait	Friends of Brompton Cemetery	04	Page 69, Key Objective	The CapCo proposals fail badly against any common sense interpretation of the Objective and Principles quoted above. Six to mainly eight storey massed blocks along the eastern edge of the Car Park, and the nearby nine to sixteen storey buildings, cannot possibly be justified against the statements quoted above.	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
462	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, UF19, UF20	6. KEY OBJECTIVE Page 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. 6.1.Key Principles UF 19 and UF 20 CapCo's plans for eight storey buildings along the cemetery frontage are by any normal human interpretation of this Objective and Principles UF19 and UF20 very unreasonable at twice the height of existing buildings near the Cemetery. They do not 'preserve or enhance the character and appearance of Brompton Cemetery and the settings of listed buildings', nor for other nearby conservation areas -- they damage them.	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
463	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, Para 4.61	6. KEY OBJECTIVE Page 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. 6.2. 4-61 requires demonstration 'that changes to the skyline will not be negative'. CapCo's plans are very negative, as anyone standing in the western part of the Cemetery can see.	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
464	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, Para 4.62	6. KEY OBJECTIVE Page 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'. 6. KEY OBJECTIVE Page 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'..	No change necessary. The SPD does not prescribe any building heights that would be suitable to achieve the desired improvements to the enclosure of the cemetery. Any buildings along this edge of the cemetery will be subject to Key Principles UF20 (to preserve or enhance the character and appearance of the

						6.3. We repeat 3.4. above that enclosure required in 4-62 will be comfortably achieved with four storey buildings. Six to mainly eight storeys cannot sensibly be justified. Moreover enclosure compatible with enclosure of other parts of the Cemetery where there are several significant gaps in the building line could readily allow a wider gap than the CapCo plans provide. Removing one of the buildings would also enable a stronger sightline to St Luke's Church, Redcliffe Square.	cemetery) and Key Principle UF21 (to demonstrate that views from the cemetery, identified in the Townscape and Visual Analysis SPD Supporting Evidence Document, will not be negatively impacted upon).
465	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, Para 4.62	6. KEY OBJECTIVE Page 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'.. 6.4. 4-62 states that 'proposals on the eastern edge of the Seagrave Road site should introduce new buildings that enclose but do not over dominate the western edge of the cemetery and enhance the character of the conservation area'. Eight storey buildings and up to sixteen storeys nearby seriously 'over dominate', and are also incompatible with the Conservation Area Proposals Statement as shown above.	Noted. The SPD does not prescribe specific building heights. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
466	Arthur	Tait	Friends of Brompton Cemetery	04	Page 64, UF21	6. KEY OBJECTIVE Page 64 -- 'Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape'.. 6.5. Key Principle UF 21. CapCo's claim that the effect of their plan on identified views from within the Cemetery would be beneficial to the Cemetery is absolutely ridiculous -- it represents special pleading which Mr Everyman would not support.	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
467	Arthur	Tait	Friends of Brompton Cemetery	04	Page 69, UF26	7. KEY OBJECTIVE Page 69 -- 'Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context'. 7.1. Key Principle UF 26. CapCo's plans do NOT respect the scale and massing of neighbouring buildings.	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
468	Arthur	Tait	Friends of Brompton Cemetery	04	Page 69, Para 4.77	7. KEY OBJECTIVE Page 69 -- 'Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context'. 7.2. 4-77 states that the 'openness of views from the Brompton Cemetery are major influences on acceptable building heights and massing'. This totally supports our argument for maximum four storeys height and less massing than proposed.	Noted. The SPD does not prescribe any specific building heights. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.
469	Arthur	Tait	Friends of Brompton Cemetery	04	Page 69, UF27	7. KEY OBJECTIVE Page 69 -- 'Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context'.	Noted. It would be inappropriate to comment on the contents of a specific planning application as part of this consultation on the SPD.

						7.3. Key Principle UF 27. The eight storey buildings would seriously fail to 'preserve or enhance' ... and the sixteen storey building or any substantial height there would be a dreadful failure to match this Principle.	
478	Tony	Hunter		04		Chapter 4 of the Urban Form Strategy suggests this narrow site, formerly a mews house, is to become the same "metropolitan face" of the OA onto the A4 as the other side of the railway which is currently waste ground/commercial/light industrial with no adjacent houses, never mind a conservation area. This completely ignores that this is the only part of that 'metropolitan face' backing on to both a residential conservation area and a listed church. This should be made clear here as the character of the A4 boundary on the other side of the railway is entirely different. The yellow line should either stop at the railway or become dotted with a footnote referring to this part of the boundary having specific sensitivity. Otherwise, the uninformed reader could be forgiven for assuming that the type of building that might be suitable for the LBH&F A4 boundary is automatically suitable for the RBK&C A4 boundary. This has already been partly done on page 36 of the development scenarios. It should now be dealt with	No change necessary. The SPD is a framework against which any planning application(s) for the OA will be assessed. Figure 4.20 illustrates the authorities' broad aspirations for the site. No specific characteristics for the 'Metropolitan Face' are prescribed that would compromise the existing properties behind it. Indeed, paragraph 4.81 clearly states that buildings in this location "must preserve or enhance the setting of the Baron's Court Conservation Area and respond to local topography and character". Any building(s) proposed for this location will be subject to all of the Key Principles in the SPD including Key Principle UF26 which requires the height and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings and Key Principles UF19 and UF27 which require development to preserve or enhance the character, appearance and setting of any conservation areas and listed buildings. There are also a number of views of this area analysed in the Townscape and Vis
480	Tony	Hunter		04		[bold] 5.Height measurements throughout [end bold] I think the use of both AOD and storeys above ground level in different parts of the SPD leads to significant confusion and should be harmonised - one measure or the other should be adopted. Otherwise statements of equivalence between AOD and numbers of storeys are misleading. How about "height AOD" and "storeys AOD"? Otherwise any developer is likely to seek to use the more favourable measure of the two; and any lay reader may be left confused.	Change proposed. There needs to be some clarification of where the terms AOD and AGL are used in the documents to ensure that the approach is consistent. However, both terms will continue to be used as they are needed to describe different circumstances. In the Development Capacity Scenarios the term AGL is used because it describes the illustrative heights of buildings when measured from a illustrative remodelled ground level that would enable inclusive access across the whole OA. In other circumstances throughout the SPD and supporting documentation, the term AOD is more suitable so that a direct comparison between building heights can be made, regardless of where the ground level is.
486	Malcolm	Spalding	Earl's Court Society	04	Key Objectives	Key Objective - after "surrounding pattern" ADD "scale and character of buildings and.." After "existing context" ADD "All buildings adjacent to the existing residential boundaries to be set back at least 10m and must be no higher than existing roof line"	No change necessary. The first key objective is about urban grain, or the pattern of streets and open spaces that make up an urban area. It therefore does not deal with the scale and character of buildings. The scale of buildings is addressed under the Key Objectives on Skyline, Edges and Streets. In relation to the Edges Key Objective, specifying dimensions would be too prescriptive for a strategic planning framework like the SPD. Key Principles UF28 and UF29 and the supporting text that follows them deal specifically with the expectations in terms of the distances between new and existing properties. Paragraphs 4.84 and 4.85 set out the UDP and Core Strategy standards that any application(s) will be expected to meet and paragraph 4.86 sets out the expectation that existing residential boundaries will be sensitively incorporated into new urban blocks with an arrangement of back-to-back gardens. The specific dimensions proposed in any application(s) will be judged on a case by case basis on their own merits.
487	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF3	UF3 AMEND to read "in the best of the local context"	Change proposed.
488	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF4	UF4 ADD "including vehicle and pedestrian access northwards under the A4. No vehicle through- route access to and from Warwick Road Square entrance".	No change necessary. The SPD only suggests that the potential for pedestrian access northwards under the A4 could be explored. This could prove to be undesirable if it cannot be made into a safe, pleasant and attractive environment for pedestrians. The SPD does not preclude a vehicle access into the OA from Warwick Road. However, paragraph 10.17 in the Transport chapter does state that " A vehicle access at Warwick Road has the potential to create conflict with pedestrians using Earl's Court station and to compromise the quality of the proposed new public space. If such an access is included in development proposals the road safety and urban design impacts would need to be carefully assessed in a detailed Transport Assessment and it would need to be

							demonstrated that vehicle access is acceptable."
489	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF7	UF7 ADD after "in the OA" "and in the existing surrounding streets"	No change necessary. New development will not have the opportunity to create new view compositions (e.g. well enclosed long views or views deflected around corners) on the existing surrounding streets.
490	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF8	UF8 ADD "only if technically not possible" "a linked series of very wide landscaped and green bridges to incorporate cycle paths, safe child walking routes and dog walking paths, with any lost park replaced elsewhere."	No change necessary. This is already implied by the clause "If this proves not to be viable". It would be too prescriptive for the SPD to explicitly state the form that these bridges would be expected to take. However, there would not be any lost park area if the bridge approach were taken- the public open space requirements would be expected to be met elsewhere on the site. As paragraph 4.50 states "locating publicly accessible open spaces next to uncovered railway lines may result in unacceptable noise levels and risks to personal safety and should therefore be avoided." Any Site of Nature Conservation Importance that is lost will have to be replaced, as stated in Key Principle ENV18.
491	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF12	UF12 "at least 2 ha" CHANGE to "at least 5 ha"	No change necessary. Your support is noted. It would however, be too prescriptive for the SPD to specify dimensions. Key Principles UF28 and UF29 and the text that follows them set out the authorities' expectations for how the boundaries of existing properties will be treated. Paragraphs 4.84 and 4.85 highlight the UDP and Core Strategy standards that any application(s) will be expected to meet in this regard. In terms of actual dimensions, any application(s) will be judged on their own merits.
492	Malcolm	Spalding	Earl's Court Society	04	page 68	p68 EDGES "create new private rear gardens adjacent to existing and missing rear gardens in Philbeach Gardens" STRONGLY SUPPORT [italics] but needs specification and measurements to preclude provision of only tiny back yards [end italics]	No change necessary. Your support is noted. It would however, be too prescriptive for the SPD to specify dimensions. Key Principles UF28 and UF29 and the text that follows them set out the authorities' expectations for how the boundaries of existing properties will be treated. Paragraphs 4.84 and 4.85 highlight the UDP and Core Strategy standards that any application(s) will be expected to meet in this regard. In terms of actual dimensions, any application(s) will be judged on their own merits.
493	Malcolm	Spalding	Earl's Court Society	04	page 69	p69 EDGES [italics] The cemetery does not require any better sense of enclosure [italics]	No change necessary. As explained in paragraph 4.62 the Conservation Area Proposals Statement for the cemetery identifies this potential for a better sense of enclosure.
494	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF19	UF 19 ADD after "and appearance" "and views" REPLACE "nearby" with "surrounding"	Change proposed. "Nearby" will be replaced with "surrounding".
495	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF22	UF22 A cluster of very tall buildings must be avoided around the Empress State building, since they will take evening sunlight from existing residents in Earls Court.	Change proposed. Key Principle UF28 states that the "privacy, daylight and sunlight" of all existing residents must be respected. Key Principle UF25 requires any application(s) to demonstrate how the impact of any tall buildings on overshadowing will be mitigated. In order to achieve this, as paragraph 4.75 states, all applications will be expected to include analysis of daylight, sunlight and the overshadowing of surrounding open spaces. This paragraph will have the clause "and should demonstrate that they do not have a detrimental effect" added. The authorities remain convinced that cluster of tall buildings in the vicinity of the Empress State Building could be successful and a new paragraph will be added to the SPD in order to explain why a cluster of tall buildings is seen as preferable to an approach that sees them scattered across the OA with no relation to one another.
496	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF23	UF23 Tall buildings are better placed along west Cromwell Road, although not in locations where they will take evening sunlight from existing and new residents.	Change proposed. It is not necessarily the case that tall buildings would be better placed on the West Cromwell Road frontage for two reasons. Firstly, it would be contrary to the LBHF Core Strategy which clearly states that "there may be some scope for tall buildings no higher than, and close to, the existing Empress State Building". The West Cromwell Road frontage is not considered to be "close to" the Empress State Building. Secondly, tall buildings in this location would be unlikely to meet the criteria set out in Key Principles UF19 and UF21; it is unlikely that they would preserve or enhance the character, appearance and setting of surrounding conservation areas or that they would have no negative impacts on any of the views analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Key Principle UF28 states that the "privacy, daylight and sunlight" of all existing residents must be respected. Key Principle UF25 requires any application(s) to demonstrate how the impact of any tall

497	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF25	UF25 REPLACE "tall" with "relevant" AMEND to read "Telecommunications and electromagnetic interference will be mitigated so there are no adverse effects"	No change necessary. This Key Principle is intended to deal with the likely impacts of tall buildings.
498	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF25	UF25 is wrongly labelled UD25 on page 67.	Change proposed.
499	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF26	UF26 STRONGLY SUPPORT	Noted
500	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF26	4.80 Edges "should not rise significantly higher" DELETE "significantly"	No change necessary. It would be too prescriptive for the SPD to preclude anything taller than the existing buildings on the edge of the OA. The word "significantly" sets a framework against which any application(s) can be assessed on a case by case basis. Please note that any application(s) will also be assessed against the other Key Principles in the SPD. For example, they will be assessed against Key Principle UF26 which requires the height and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings and Key Principle UF27 which requires development to preserve or enhance the character and setting of any listed buildings or conservation areas around the edges of the OA.
501	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF26, Key Principle UF27	UF26/UF27 ADD "Design and architecture should be inspired by surrounding streets and conservation area context - including materials" "architectural expectations in different parts of the site should respect the neighbouring conservation areas with features such as balconies, porticoes, architraves, and pillars etc. in the Victorian neo-classical, neo- Palladian architectural style. Featureless, modern, four-square design will be rejected."	No change necessary. The authorities feel that it would be too prescriptive for the SPD to deal with architectural style and materiality. Any application(s) will be judged on its own merits in these respects.
502	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF29, Para 4.86	UF29 and 4.86 STRONGLY SUPPORT	Noted
503	Malcolm	Spalding	Earl's Court Society	04	Key Principle UF36	UF 36 AMEND "encourages cyclists and pedestrians" to read "encourages pedestrians, and cyclists in a pattern of integrated cycle lanes which extend into and link with new and existing cycle lanes"	Change proposed. The SPD neither requires nor precludes the use of cycle lanes. However, Urban Design best practice does suggest that for all but the busiest streets, cycle lanes are not required to ensure cyclist safety. Requiring drivers to share the carriageway with cyclists can result in reduced traffic speeds and therefore fewer accidents. See, for example, paragraph 6.4.1 in the Manual for Streets (DfT 2007) which states that "cyclists should generally be accommodated on the carriageway." Paragraph 10.27 in the Transport chapter of the SPD requires "the creation of a network of cycle friendly streets". In light of this, reference to "cycle friendly streets" will be added to paragraph 4.112 of the SPD.
504	Malcolm	Spalding	Earl's Court Society	04	Para 4.113, Page 77	4.113 p77 DELETE "accommodating cyclists in the carriage way rather than in dedicated cycle lanes"	Change proposed. The SPD neither requires nor precludes the use of cycle lanes. However, Urban Design best practice does suggest that for all but the busiest streets, cycle lanes are not required to ensure cyclist safety. Requiring drivers to share the carriageway with cyclists can result in reduced traffic speeds and therefore fewer accidents. See, for example, paragraph 6.4.1 in the Manual for Streets (DfT 2007) which states that "cyclists should generally be accommodated on the carriageway." Paragraph 10.27 in the Transport chapter of the SPD requires "the creation of a network of cycle friendly streets". ". In light of this, reference to "cycle friendly streets" will be added to paragraph 4.112.
566	Elizabeth	Harrap		04		I consider that there is insufficient green space proposed in the SPD for community and recreational use. There is already insufficient green space for children in Earl's Court and over the years nothing has been done about it. If planning is going to be granted a lack of green space in Earl's Court needs to be taken into consideration and made allowances for in this new build area.	No change necessary. The SPD recognises the existing deficiency in public open space in the OA and its surroundings (paragraph 2.31). It also recognises that existing play provision is limited (paragraph 2.32). This has informed the open space requirements set out in the Urban Form chapter. As a result, 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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key

							Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addr
574	Gennaro	Castaldo	Kensington Mansions Residents Association	04		If understood correctly, the possible construction of an additional N-S road would, in fact, be a series of jig-jags, and therefore not be a Primary Road that would alleviate the jams experienced on the Earls Court and Warwick Roads.	Change proposed. As established in the Transport Chapter (paragraph 10.68) the SPD does not seek to achieve significant reductions in the traffic on the Earl's Court One Way System (which includes Warwick Road). An assessment of the potential for using a new north-south route within the site to relieve the Earl's Court One Way System of through traffic was undertaken. This found that a north-south route could reduce traffic on Warwick Road by up to 18% and on Earl's Court Road by up to 10%. However, in order to achieve this, traffic would be diverted along Old Brompton Road and Lillie Road where traffic levels would more than double in the PM peak hour. Accommodating this traffic would require a major new junction on Lillie Road as well as probable road widening along Lillie Road that could not be constructed without third party land acquisition. It is therefore not necessary for the north-south route to be classified as a Primary Road. Please note that the Urban Grain and Connectivity section of the Urba
577	Gennaro	Castaldo	Kensington Mansions Residents Association	04		The provision of green space is critical and the developers have proposed a poor amount in less than optimal forms. The Earl's Court Society suggestion of aggregating space into a 6 hc park would be a healthy and attractive amenity. It would also be consistent with the London Plans Green Lung concept. The SPD could be more robust on this.	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 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. These principles are consistent with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). Aggregating the open space requirements into one large park could compromise a number of the aspirations set out in the SPD. For example, it would not be in keeping with the existing urban character of the surrounding areas (which are gene
578	Gennaro	Castaldo	Kensington Mansions Residents Association	04		The London Plan seeks to maintain the character of areas. The SPD should support this trend and consider that the sky line/heights of buildings as well as require that the building materials should be required to be of higher quality than what was shown in the mock-ups. It looked cheap and totally out of keeping with a conservation area and risked virtually overhanging some of the surrounding homes and the Brompton Cemetery .	No change necessary. The SPD has been informed by thorough analysis of the urban character of the surrounding areas. The results of this analysis can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis and the Townscape and Visual Analysis. The Skyline section of the Urban Form Chapter addresses the importance of the skyline and establishes the Key Objective that no new buildings visible on the skyline should have a negative impact on the quality and character of the surrounding townscape. This is achieved through Key Principle UF19 which requires development to preserve or enhance the character, appearance and setting of nearby conservation areas, Key Principle UF20 which requires development to preserve or enhance the character of Brompton Cemetery and Key Principle UF21 which requires all proposals to demonstrate that there will be no negative impact on any of the views identified and analysed in the SPD Supporting Evidence Document. The use of materials is considered to be t
582	Michele	Gorgodian		04		- [bold] The 'look' of Earl's Court [end bold] The Exhibition Centre has been a landmark for as long as I can remember. Our houses and streets reflect a sense of traditional neighbourhood. Introducing a series of modern residential towerblocks will jar with our locality; it will change its nature, even for streets like my own which are not immediately adjacent.	No change necessary. The SPD has been informed by thorough analysis of the urban character of the surrounding areas. The results of this analysis can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis and the Townscape and Visual Analysis. Furthermore, one of the key aspirations for the OA, as set out in the vision of the SPD is to ensure that it is "integrated into the existing urban fabric and character of the area, respecting the local heritage assets and the pattern of streets, buildings and open spaces". In order to achieve this, there is a whole section of the Urban Form Chapter dedicated to streets. This addresses the need for the 'enclosure ratio' (the relationship between the heights of buildings and the widths of streets) to reflect that of the surrounding streets, the need for strong building lines, as observed in the existing context and the ways in which roofscapes should be designed to integrate with the OA's surroundings. Furthermore, Key Principle UF3 requires any
614	Bernard	Selwyn	Open Spaces	04	Figure 4.10	7. [bold] Figure 4.10 [end bold] The simplest improvement of this	No change necessary. Please note that this diagram is illustrative only and

			Society			would be to join the middle accessible garden square to the linear park so as to provide a more substantial open space suitable for a variety of recreational activities for all ages	therefore should not be treated as a final proposal for the OA. It is intended to demonstrate one way in which the principles against which any application(s) will be assessed in terms of the distribution of open space could be delivered. The authorities feel that the approach that it shows ensures that open space is evenly distributed across the OA, meaning that almost all potential residential units can be within a 100m walk of an open space. It also has the potential to introduce open spaces that are more reminiscent of the pattern of open spaces that already exist in the surrounding area and therefore helps to integrate the OA into the existing urban fabric. Consolidating these well proportioned spaces into one larger open space may compromise the authorities' aspirations to improve connectivity across the site (both north-south and east-west).
615	Bernard	Selwyn	Open Spaces Society	04	Key Principle UF10	8.[bold] Key Principle UF10 [end bold] This is meaningless jargon for most of us and possibly quite superfluous	Change proposed. This Key Principle will be revised to read "High quality civic spaces should be well integrated into the proposed urban grain, especially in those locations that are expected to have high levels of movement and activity and appropriate ground floor land uses".
616	Bernard	Selwyn	Open Spaces Society	04	Para 4.40	9. [bold] Para 4.40 [end bold] Open spaces (as distinct from other types of civic space) do not require retail etc. uses around them. Their purpose is to provide the antithesis to activities dependant on drawing or encouraging as many people as possible to utilise them.	No change necessary. This paragraph clearly refers to civic spaces and not all open spaces.
617	Bernard	Selwyn	Open Spaces Society	04	Key Principle UF12	10. [bold] Key Principle UF12 [end bold] The SPD should not shy away from recommending well over 2 hectares as necessary to contribute towards making good the deficiency in the wider neighbourhood and that this should be the north-south linear park with one or more widened portions suitable for the variety of uses suggested in paras 4.46 onwards.	No change necessary. The authorities feel that the 2ha requirement is sufficient to address the open space deficiency. However, it should be noted that 2ha alone would be very unlikely to meet all of the public open space requirements established in the SPD. For example, it is unlikely to ensure that all residential units are within a 100m walk of an open space and it is unlikely to provide 10sqm of publicly accessible green open space per child. Please note that paragraph 4.49 also makes it clear that the authorities will expect any proposal for a linear park to accommodate a wide range of functions, including full size sports pitches. This paragraph clearly states that land take greater than 2ha may be required to achieve this.
618	Bernard	Selwyn	Open Spaces Society	04	Para 4.56	11.[bold] Para 4.56 [end bold] Pocket parks, as shown on the Masterplan, are not the best means of providing the necessary facilities. They can only increase the difficulties and costs of supervision and maintenance.	No change necessary. The Masterplan images in the SPD and Supporting Evidence Documents are all illustrative only and should not be treated as proposals for the OA. However, it should be noted that very few of the green space shown in these plans could be described as 'pocket parks'. Paragraph 4.56 is intended to establish principles for the distribution of play space- not the appropriateness of pocket parks. It clearly states that they should be used as play spaces for under 5s, but that larger play spaces will be needed for 5-11s and 12+.
654	Keith	Barker-Main		04		The density of housing and the proposed heights and bulk of the new built environment is totally unacceptable in so far as it dwarfs the Victorian residential area that surrounds it. It will destroy the skyline forever. LBH&F have wisely decided a proposed development on King St, one nowhere near as ambitious as this, would wreck the Hammersmith skyline and are rethinking that. The same must happen here. Buildings looming over listed Brompton Cemetery will wreck that valuable asset and space for reflection too	Change proposed. The SPD has been informed by careful analysis of the local urban context, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Views Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will integrate into the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires applications to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis Supporting Evidence document. For Brompton Cemetery, please see in particular views 31, 32 and 35. Furthermore, the Edges section has been written to ensure that new buildings are sensitively in
655	Keith	Barker-Main		04		The height of the buildings should be no greater than the existing terraces on its perimeter.	No change necessary. This would be far too prescriptive a stipulation to put in a strategic planning framework like the SPD. Furthermore, it would not reflect the urban character of the existing urban context. Along with the terraces there are also mansion blocks which are significantly taller, but of no less value in townscape terms. The SPD establishes sufficient parameters against which the heights proposed by any planning application(s) will be assessed. For example, the section on Skyline seeks to ensure that no new buildings visible on the skyline

						will have any negative impact on the quality and character of the surrounding townscape and the section on Edges has been written to ensure that new buildings on the edges of the OA will be sensitively integrated into and enhance the surrounding context.
656	Keith	Barker-Main	04		A few years ago K&C argued that penthouses were unacceptable additions to Kensington Mansions as it would make the buildings too tall. What is proposed is much much taller as to be grotesque in its scale. Properties will be overlooked and privacy will be compromised. The height of The Empress State Building must be considered as an aberration, the exception to the rule, not some aspirational yardstick to be matched in height and bulk by new buildings.	No change necessary. The SPD does not propose any specific heights or scale, but rather puts in place a framework of Key Objectives and Key Principles against which any application(s) will be assessed. The most relevant principles in terms of the expectations of building heights can be found in the Skyline section, the Edges section and the Streets section. Concerns about the overlooking and privacy of existing properties are addressed in the Edges section. For example, Key Principle UF28 states that the "privacy, daylight and sunlight of all existing and future buildings must be respected". In terms of responding to the height and mass of the Empress State building, the SPD explicitly states in paragraph 4.59 that "the location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape."
657	Keith	Barker-Main	04		The quality of the proposed built environment is not compatible with the area into which it would fit and needs to be of a much higher calibre. I draw your attention to the development at York mansions Earl's Ct rd SW5 as an example of what might be acceptable.	No change necessary. The SPD makes no specific proposals for the quality of the built environment. Instead it establishes a number of principles and objectives against which any application(s) for the site will be assessed. Each case will be judged on its own merits.
666	Keith	Barker-Main	04		The ratio of green space to urban is totally unsatisfactory and must be looked at again. The whole development should be ringed by avenues of green space and trees capable of matching the height of the area's plane trees.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. There is nothing in the SPD that precludes trees of the same height as the area's existing plane trees. Indeed paragraph 4.109 notes that "all tree species selected for the new streets within the OA should be demonstrably similar to those found in the existing context" in order to help integrate the new development into its surroundings. Ringing the whole development in ave
668	Keith	Barker-Main	04	Air Quality	The project in its totality needs to be radically scaled down.	No change necessary. The SPD does not prescribe a specific scale for the development but rather establishes a number of principles and objectives against which the height and massing of any application(s) will be assessed. In terms of the scale of development, the most important principles can be found in the sections on Skyline, Edges and Streets.
826	James	Tynte-Irvine	04		3. Height: The development as proposed contains buildings that are too high and this must be limited. As proposed the development will have a severe deleterious impact on the local skyline, including that of the listed Brompton Cemetery, resulting in loss of amenity to existing residents and making the development less appealing to future residents. Proposed buildings adjacent to Eardley Crescent and Philbeach Gardens are too close and too high and will lead to overlooking and loss of privacy for existing residents.	No change necessary. The SPD does not prescribe any specific heights, but instead establishes a framework of Key Principles and Key Objectives against which any application(s) will be assessed. The most important of these principles in terms of building heights and mass can be found in the sections on Skyline, Edges and Streets. In response to your specific concerns about the impact on the skyline, one of the Key Objectives of the SPD is to "ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape". Brompton Cemetery is specifically referenced in Key Principle UF20, which expects any application(s) to preserve or enhance the character, appearance and setting of it and its listed buildings. Furthermore, Key Principle UF21 expects any application(s) to demonstrate that there will be no negative impacts on any of the views in the Townscape and Visual Analysis SPD Supporting Evidence Document. Concerns about overlooking and the loss of pr
827	James	Tynte-Irvine	04		4. Green and Recreational Space: There is too little green space proposed in the SPD for community and recreational use. If the development is to be a long term success and an asset to the area this must be addressed. Future residents will not want to live in an almost entirely concrete jungle. The proposed "lost river park" at the moment looks to be orphaned and does not tie in effectively with the	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 local park, for all

					surrounding development. Adequate green space and recreational facilities are vital for the physical and psychological health of the populous and this development is a superb opportunity to improve the area for generations to come. More green space could be achieved by reducing the density of the development which is preferable for the reasons given above.	residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4,5
847	Cllr Linda	Wade	04		<p>RBK&C amended their Core Strategy policy CT1 following an appeal and hearing at the Planning Inquiry and a new section was added:</p> <p>'(g.) require improvements to the walking and cycling environment, including securing pedestrian and cycle links through new developments.'</p> <p>At P.195 of JSPD the Infrastructure and Planning Obligations reads:</p> <p>'(p.) improved pedestrian links from and through the site and the surrounding area to public transport facilities and improved cycle links to enhance north/south cycle accessibility.'</p> <p>If bridges rather than decking over the railway cutting are the final planning outcome that will not impede west-east cycle routes, but might do away with the north-south route over RBKC land, does this not undermine the projected relief of traffic on ECOWS?</p>	<p>No change necessary. The aspiration to achieve north-south connectivity is established in a completely separate Key Principle (UF1). It has nothing to do with the delivery of a linear park, or indeed any open space. Whatever arrangement of open space is proposed, any application(s) will be expected to deliver north-south connectivity as well. Any application(s) will also be subject to the Key Principles in the Transport Chapter.</p>
848	Cllr Linda	Wade	04		<p>In the plans it is indicated that the Linear Park would be tree-lined, but there are precedents in LBHF where this kind of recommendation within planning applications have been overturned by Network Rail, due to fear of leaves on the tracks. Therefore are trees deliverable?</p>	<p>No change necessary. The plans in the SPD are based on a scheme that decks over the railway line to create a linear park. Therefore, there would be no danger of leaves falling onto the track. However, it should be noted that these plans are illustrative only and should therefore not be treated as proposals for the OA.</p>
866	Cllr Linda	Wade	04	Figure 4.1	<p>Correction required: Fig 4:1 does not indicate the Philbeach Garden Enclosure</p>	<p>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 private back gardens in between any of the terraced houses are shown.</p>
867	Cllr Linda	Wade	04	Figure 4.1	<p>Fig. 4:1 indicates that a staggered north-south route through the site is being proposed, and this will reduce the efficacy of the route within the site to effectively reduce the north-south traffic on the Warwick Road. See note on north-south Bike path above.</p> <p>The two roads that will echo the crescents should be for access to residential properties and not as main routes to serve the site.</p>	<p>No change necessary. The Urban Grain and Connectivity section of the Urban Form chapter is intended to set a framework against the design and layout of new streets can be assessed. The aspiration behind these Key Principles is to overcome existing severance in a manner which ensures that the masterplan physically integrates well into its urban context. Key Principle UF3 states that the pattern of new streets should be inspired by the street types identified in the surrounding context. This will be amended to make it clear that the new urban grain should be inspired by both street types and street patterns. In the supporting text it is suggested that this may result in a pattern that includes direct east-west connections and more broken up north-south connections. However, this does not necessarily mean that this is the only approach to a north-south connection that would be appropriate. Development will also be expected to meet the requirements set out in the Transport Chapter. It should be noted that the d</p>
868	Cllr Linda	Wade	04	Para 4.18	<p>4.18 If the north-south route within the site is not a Primary Street it cannot be expected to handle the deliveries and goods vehicles,</p>	<p>No change necessary. As established in the Transport Chapter (paragraph 10.68) the SPD does not seek to achieve significant reductions in the traffic on the Earl's</p>

						plus be a relief route for the Warwick Road.	Court One Way System (which includes Warwick Road). An assessment of the potential for using a new north-south route within the site to relieve the Earl's Court One Way System of through traffic was undertaken. This found that a north-south route could reduce traffic on Warwick Road by up to 18% and on Earl's Court Road by up to 10%. However, in order to achieve this, traffic would be diverted along Old Brompton Road and Lillie Road where traffic levels would more than double in the PM peak hour. Accommodating this traffic would require a major new junction on Lillie Road as well as probable road widening along Lillie Road that could not be constructed without third party land acquisition. Furthermore, the Transport Chapter also establishes the need to minimise the impact of freight (Key Principle TRN26), including an on site local delivery centre
869	Cllr Linda	Wade	04	Para 4.25	Urban Grain and Connectivity 4.25 It is essential that there is sufficient green space at the centre of the new garden squares that permit sufficient daylight to permit good grass growth, be attractive and increase security and reduce 'Enclosure'. The heights of the proposed garden square buildings, as they appear within the JSPD, will reduce daylight and create 'Enclosure'.		No change necessary. The importance of not overshadowing or over-enclosing open spaces is established in a number of places in the SPD. For example, in paragraph 4.26 it is established that mature trees should not leave open spaces dark or overshadowed, Key Principle UF25 and paragraph 4.75 establish that any application(s) should indicate how their impact on overshadowing of surrounding open spaces will be mitigated and paragraphs 4.95 to 4.97 establish what is considered appropriate enclosure of open spaces. It should be noted that a certain level of 'enclosure' is desirable to create a successful sense of place around open spaces.
870	Cllr Linda	Wade	04	Para 4.27	4.27 It is essential that the listed garden of St Cuthbert's church, in Philbeach Gardens be protected from the shade that would be cast by buildings especially to the south.		No change necessary. Like all existing open spaces, any application(s) will be expected to demonstrate the impact of any overshadowing of the garden associated with St Cuthbert's Church (paragraph 4.75) and how this will be mitigated against. Furthermore, as a listed structure in a conservation area, development that impacts on the setting of St Cuthbert's Church will be subject to Key Principle UF19 ("Preserve or enhance the character, appearance and setting if surrounding conservation areas and listed buildings") and Key Principle UF27 ("preserve or enhance the character, appearance and setting of any listed buildings or conservation areas around the edges of the OA").
871	Cllr Linda	Wade	04	Key Principle UF8	Key Principle UF8 The proposal of the Linear Park has been central to the provision of active open space for any development on this site; the introduction of the concept of a series of bridges will not only disrupt the Linear Park for recreational purposes but also undermine the north-south cycle routes. Any decision to discount decking should be based on technical feasibility and not on financial viability.		No change necessary. The idea of a series of bridges over the railway lines is suggested for circumstances in which decking over the entire railway line is not viable. If this is the case, the linear park would not be created at all, but the 2ha local park would still be expected. Any applicant(s) would be expected to demonstrate that it could be provided in another form elsewhere within the OA. As noted in paragraph 4.50, locating open spaces next to uncovered railway lines may result in unacceptable noise levels and risks to personal safety and should therefore be avoided. Please note that the linear park is only a suggestion in the SPD. The authorities feel that it could achieve a number of their aspirations for the site, but the SPD does not preclude other forms of open space from coming forward.
872	Cllr Linda	Wade	04	Para 4.33, Para 4.34	4.33/34 The suggestion of different bridges rather than decking over the area should be resisted. Argument for decking: 1. reduced noise to Philbeach and Eardley Crescent residents and the new-build behind them. 2. it can and should be done to eliminate vibration to proximate housing 3. the biodiversity of the green N-S corridor the length of the borough is enhanced 4. it will also provide a safe link in the north south cycle route from the Grand Union canal to the Thames. The tangible link with the Counter's Creek sewer and sections of fragmented exposed railway line to exude noise is unproven.		No change necessary. Many of the advantages of a linear park approach are noted in the SPD (paragraph 4.46). However, it would be too prescriptive for the SPD to state that this must be delivered. Instead, the SPD sets out expectations for the quantum and distribution of open space (Key Principles UF12 to UF14), but does not specify the form that this should take.

873	Cllr Linda	Wade	04	Para 4.35	<p>4.35 The A4 has a hostile pedestrian environment and no provision for safe cycling. It is hard to see this being achieved due to the increased volume and speed of traffic along this route. The problem is the Key Principle UF9 only refers to pedestrians, but there is room for a safe east-west cycle path within the planning but 4.36 only mentions pedestrians. Picture in Fig 4.9 even shows the space for it and the path the pedestrian should have been walking on.</p>	<p>No change necessary. The SPD requires improvements to the pedestrian environment along the A4. However, it is potentially unsuitable as a cycle route and therefore, there is no specific requirement to accommodate cyclists in this location. However, as with the entire OA, any application(s) will be expected to identify cycle routes based on the likely origin and destination of trips through the area and fund appropriate improvements to make these routes as attractive and convenient as possible (paragraph 10.28 in the Transport chapter).</p>
874	Cllr Linda	Wade	04		<p>Public Open Space</p> <p>There is a deficit of public open space within the Earl's Court Ward, and a loss of public open space if the West Kensington and Gibbs Green Estates are demolished. There is a real need to have sufficient provision of open space for residential and child use in this densely populated area of London. The Earl's Court Society, in its submission to the Outline Planning Application, has suggested that some of the space is amalgamated so that there is a 6-hectare park, which would become a central part of the development area, and promote healthy living and community, as well as child play spaces for different ages in close proximity to one another so mothers with different age ranged children can permit their children to play safely and under their supervision. This is a better option than segmented areas of open space adding up to the 2-hectares option 4.46.</p> <p>The park would also provide for a 'Green Lung' and mitigate urban heat island effects (London Plan 2011 Policy 5.9 Overheating and Co</p>	<p>No change necessary. The SPD identifies the public open space deficiency in the area as well as the limited existing play provision (see paragraphs 2.30 to 2.32 in the Site Context Chapter). This has informed the drafting of the Key Principles for the quantum and distribution of open space and play space set out in the Urban Form Chapter. The authorities consider these minimum standards, established in Key Principles UF12, UF13, UF14 and UF15 to be sufficient. They are in line with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). It is important to note that the 2ha local park alone would be unlikely to meet all of these requirements - for example, it would be unlikely to ensure that all residential properties are within a 100m walk of a public open space (UF13) and depending on child yield calculations would be unlikely to provide 10 sqm of public green open space per child. The Energy Strategy sets out approaches to mitigate the urban heat island effect through</p>
875	Cllr Linda	Wade	04	Para 4.38	<p>4.38 The sites of Nature Conservation alongside the eastern West Brompton station platform needs not only to be preserved but a management plan put in place to maintain this wetland environment and a green corridor connection north and south? TfL who owns the railway land that runs along RBKC's western boundary could do more to provide both a connecting green corridor from Grand Union Canal to the Thames, and a north-south cycle route from Grand Union Canal to Thames.</p>	<p>No change necessary.</p> <p>Key Principle ENV18 requires that the SNCI adjacent to West Brompton Station northbound platform is protected and enhanced. This is shown in figure 4.10 to be retained as a green corridor. Key Principle ENV19 requires major planning applications to be accompanied by an Ecological Impact Assessment that includes an ecological survey and ecological enhancement strategy and an ecological management plan will be required through s106. The SPD cannot require connections from the Thames to the Grand Union Canal as much of the land is outside of the OA boundary.</p>
876	Cllr Linda	Wade	04	Para 4.42	<p>4.42 Open Square: 'introducing a welcoming sense of arrival and vibrant, lively public functions in this location' with the emphasis being on external cultural events, this has to be revised, as otherwise there will be in-built issues of noise and nuisance for residents in Eardley Crescent and Philbeach Gardens.</p>	<p>No change necessary. External events take place in numerous civic and public spaces across London without causing noise and nuisance. Any application(s) will be expected to demonstrate that the proposed mix of uses is appropriate and each case will be judged on its own merits in this regard.</p>
877	Cllr Linda	Wade	04	Para 4.45	<p>4.45 SUDS strategy must be extended to paving and walkways as well as open areas. Rainwater run off is better controlled when there is soak through capacity on all hard surfaces. RBKC are currently dealing with this issue in a pilot in a Holland ward associated with Counter's Creek, are there any results from this pilot?</p>	<p>No change necessary. The specific requirements for SUDs in the OA are established in the Environmental Strategy. This includes a list of measures that could be incorporated, including permeable and semi-permeable surface materials (including materials used for pavements, driveways and highway construction) and drainage channels. The SUD pilot schemes in RBKC are yet to be installed, so findings are not yet available.</p>
878	Cllr Linda	Wade	04	Para 4.46	<p>4.46 It is important that there is sufficient space on either side of the Linear Park, since with tall buildings this could lead to loss of daylight through overshadowing. There needs to be a reasonable width to the Linear Park to enable it to function for its multi-uses. 2-hectares is too small an open space for the size of this</p>	<p>No change necessary. Please note that the linear park is only a suggested approach to the inclusion of a 2ha local park. The importance of appropriate building heights in relation to any open space in the OA is established in paragraphs 4.95 to 4.97. The need for the linear park, should this approach be taken, to be wide enough to accommodate multi-uses is established in paragraph</p>

						development.	4.49. Here, it is stated that "any proposal for a 'linear park' must include public green open spaces that are wide enough to accommodate a range of functions, including full size games courts and sports pitches. It is therefore possible that if a proposal comes forward including a linear park, land take greater than 2ha will be required in order to ensure the park is fully functional".
879	Cllr Linda	Wade	04	Para 4.49	4.49 This statement is very important to ensure that the "publicly accessible local park of at least 2-hectares" does not end up as a 'string of beads' on a bare 2-hectares of the site. As to be considered is the potential for overshadowing of this open access area, which given its 1 metre depth is likely to require constant maintenance and watering.		No change necessary. Overshadowing of open spaces proposed for the OA is addressed in paragraphs 4.95 to 4.97 which set out appropriate enclosure ratios. Issues of maintenance are not addressed in the SPD, but any application(s) would be expected to include an open space maintenance strategy which would be secured through planning conditions or any section 106 agreement made between the authorities and any applicant.
880	Cllr Linda	Wade	04	Para 4.50	4.50 This might result in unacceptable noise levels from uncovered railway lines impacting on existing residents?		No change necessary. The impact of noise levels on existing residents is addressed in the Environment Chapter under Key Principle ENV17.
881	Cllr Linda	Wade	04	Para 4.55	4.55 Specifications of size and play facilities have been given within the JSPD but there is a need for these facilities to be close to one another for the younger aged groups so that parents can supervise their children of different ages, and it is essential there are sufficient levels of daylight to make these sites attractive.		No change necessary. Key Principle UF16 clearly states that play facilities should be co-located where appropriate in order to make supervision more practical for families. In terms of sufficient daylight, the appropriate enclosure of open space is established in paragraphs 4.95 to 4.97. Furthermore, paragraph 4.26 states that mature trees should not leave open spaces dark and/or overshadowed, paragraph 4.75 requires all applications to include the analysis of daylight, sunlight and the overshadowing of surrounding open spaces and Key Principle UF25 requires proposals for tall buildings to indicate how their impact on overshadowing will be mitigated.
882	Cllr Linda	Wade	04	Para 4.58	Skyline 4.58 It is stated in the JSPD that the Development within the OA will create a new skyline, but this would appear to be contrary to the London Plan 2011, 7.25 (p. 218): 'Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline' and London Plan 2011 D. (p 219) 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail'. These are particularly relevant in relation to the sensitive Brompton Cemetery, which has one of the few 'panoramic' skylines left in this part of London.		No change necessary. The London Plan does not preclude changes to the skyline so long as they are handled in a sensitive manner. The Skyline section of the SPD is intended to ensure that this is the case in the OA. In terms of Brompton Cemetery, Key Principle UF20 requires development to preserve or enhance the character, appearance and setting of Brompton Cemetery and its listed buildings. Paragraph 4.61 notes its panoramic views and the importance of ensuring that any application(s) demonstrate that changes will not be negative. Other heritage assets are considered in Key Principle UF19 and UF21. UF19 requires any proposal(s) to preserve or enhance the character and appearance of surrounding conservation areas and UF21 requires any application(s) to include a set of verified views, taken from sensitive locations identified by the authorities and to demonstrate that there will be no negative impacts on any of these views. The views selected can be seen in the Townscape and Views Analysis SPD Supporting Evid
883	Cllr Linda	Wade	04	Key Principle UF 19	Key Principle UF 19 Preserve or enhance the character, appearance and views of surrounding Conservation Areas and settings of listed buildings.		No change necessary. The views of and from conservation areas and the settings of listed buildings are considered to be integral to their character and appearance.
884	Cllr Linda	Wade	04	Key Principle UF 20	Key Principle UF20 Preserve or enhance the character, appearance, skylines and views of Brompton Cemetery as defined by English Heritage, and the setting of its listed buildings.		Change proposed. The skylines visible from and the views of Brompton Cemetery are considered to be integral to its character, appearance and setting. Reference to English Heritage's register of parks and gardens of special interest will be added to the text in para 4.61.
885	Cllr Linda	Wade	04	Para 4.62	4.62 There is no desire to improve the enclosure, just the reverse. There should be no sense of enclosure to the Brompton Cemetery, or the surrounding Conservation Areas. 4.62 is contrary to the Key principles in UF19-20 and seems to be a justification in advance for buildings crowding the Cemetery on the edge of the Seagrave site. Good quality landscaping would achieve the stated enclosure aim. This is particularly important considering that English Heritage have just awarded Grade 2 listing to 21 more memorials in the Cemetery, and that the Leyland memorial has been upgraded from 2 to 2*. There are now 28 memorials listed in the Cemetery.		No change necessary. The desire to improve the enclosure of the cemetery is established in the Brompton Cemetery Conservation Area Proposals Statement, dated 1999. The desire to improve enclosure does not contradict with Key Principles UF19 or UF20 as both require proposals to preserve or ENHANCE the settings of the conservation areas and Brompton Cemetery. It is considered that providing enclosure on the western boundary of the cemetery will enhance its setting. It should be noted that "enclosure" is not the same thing as "crowding". A certain degree of enclosure is desirable to create successful places. Therefore, although enclosure is desired, any application(s) will also be assessed to ensure that there are no negative impacts on the cemetery (paragraph 4.61 and Key Principle UF21).

					Edges	
886	Cllr Linda	Wade	04	Figure 4.20	Fig. 4.20 It is essential that there is provision of new private rear gardens (back-to-back), and that the different topographical levels are considered, so that there will be no 'boom' box effect on the proximate existing houses on Philbeach Gardens and Eardley Crescent. See 4.86 comment below on back-to-back gardens.	Noted. This is what the annotations on figure 4.20 describe. Furthermore, the importance of back to back gardens are established in paragraph 4.86 which supports Key Principle UF29.
887	Cllr Linda	Wade	04	Figure 4.20	Also of concern is the indication that North End Road market might be relocated onto the south-east section of the site.	No change necessary. The SPD provides a flexible framework which allows the potential for the market to expand or relocate, but does not require it to. For more detail on proposals for the market please refer to page 107, particularly Key Principle RS8 which states that "any application for comprehensive redevelopment of the OA should allocate land, with a North End Road address, for the potential relocation of the North End Road market".
888	Cllr Linda	Wade	04	Key Principle UF25	Key Principle UF25... that there should be zero interference	Noted. The Key Principle requires any application(s) to demonstrate how interference will be mitigated.
889	Cllr Linda	Wade	04		Telecommunications and TV reception There is no report data or examination of potential problems to existing residents' mobile and TV reception given the increased density and height of buildings. Given the fact that any development would be 4G, there is still the issue of poor reception, and this should be enhanced and not diminished.	No change necessary. In order for any application(s) to meet the requirement established in UF25 to demonstrate how telecommunications interference will be mitigated, applicants will need to provide and examine data on the effects of increasing the density and height of buildings.
890	Cllr Linda	Wade	04	Para 4.79	4.79 'On the eastern edge of the OA, the terraces of Philbeach Gardens and Eardley Crescent exhibit consistent scale and building typologies, which are characteristic of much of the area further east. However, there are also a number of mansion blocks of a larger scale, which front Warwick Road. The majority of the buildings to the east of the OA are included within conservation areas.'	Noted
891	Cllr Linda	Wade	04	Para 4.80	4.80 There should also be consideration for the same building materials and heights to be used within the development, when adjacent to existing Conservation Areas. The large-scale use of stone/reconstituted stone, unless maintained tends to discolour with pollution and brick/stucco would be more in keeping with the existing architecture.	No change necessary. The use of materials is considered to be too detailed an issue for inclusion in a strategic framework document like the SPD. Each application that is submitted will be assessed on its own merit in this regard.
892	Cllr Linda	Wade	04	Para 4.86	4.86 Fig 4.20 has a key and an annotation in conflict. The key states the same as 4.86, but the annotation refers only to rear gardens. The drawing at Figure 4.25 does not make this clear either because there are no rear gardens or communal space in this 'urban block'.	Change proposed. In terms of figure 4.20, there are a number of green spaces shown on the drawing that, as the key suggests, could be either private or communal gardens within new urban blocks. The annotation that you refer to relates specifically to the condition to the rear of Philbeach Gardens and Eardley Crescent where only private rear 'back-to-back' gardens will be appropriate. Figure 4.25 shows a new urban block with a large amount of green space in the centre that is annotated as 'PRIVATE'. This would be either private rear gardens or communal gardens. In order to clarify this further annotations will be added to the drawing.
893	Cllr Linda	Wade	04	Key Principle UF29	The implementation of UF29 by 'either back-to-back gardens or communal gardens... introduced between the new and existing buildings' requires, I think, an undertaking that there will be no attempt to take any part of the rear gardens of Philbeach Gardens or Eardley Crescent and turn them into communal gardens. Any communal gardens must be located entirely on land owned by the applicants. There needs to be clarification and assurances about access from the adjacent private gardens of the crescents' houses directly onto any communal garden. Is there the potential of altering the security to the existing residential units with the introduction of the new crescents and the diminution of their amenity?	Change proposed. The introduction of new communal gardens will have no impact on the current access arrangements to Philbeach Gardens or Eardley Crescent. Private communal gardens in the centre of urban blocks will only be accessed by the residents of the new building that surround them. Paragraph 4.86 will be rewritten in order to clarify this.
894	Cllr Linda	Wade	04	Para 4.112	Streets	No change necessary. The importance of the wider cycle network is considered in

						4.112 In order to encourage cycling, there has to be thought given for the roads immediately outside the area of the development, and include Bike Lanes on Warwick, Lillie/Old Brompton, North End and Old Brompton Roads. There should be an additional point about safe through routes north-south and west-east. The current wording only addresses cycling in relation to the area as a destination not as part of the whole fabric of West London.	the Transport Chapter. For example, Key Principle TRN8 requires new development to "deliver improved onward connections for cyclists into the streets surrounding the OA".
895	Cllr Linda	Wade		04	Para 4.113	4.113 'Instead of introducing visually intrusive traffic calming measures, such as speed humps or chicanes...new streets should be designed... to control vehicle speeds. This on the main north-south route will make it less attractive to drivers, and serve only to protect residents in the development area rather than contribute to a traffic reduction on Warwick, North End and Earl's Court Roads.	No change necessary. As established in the Transport Chapter, paragraph 10.68 "This SPD does not seek to achieve significant reductions in traffic on the Earl's Court One Way System via new north-south routes through the OA". It is therefore more important for the design of all streets in the OA to control vehicle speeds and prioritise pedestrians and cyclists rather than attract motorists.
896	Cllr Linda	Wade		04		"Accommodating cyclists in the carriageway rather than in dedicated cycle lanes". It is important that the authors of the JSPD revisit the recent London statistics and analyse the cycling accidents and their locations. London streets are more crowded, with larger vehicles on narrower roads than most of the areas where the research on which planners rely was done. Warwick Road is considered by cyclists to be one of the most dangerous roads in London, and there is no provision as to the potential limitation on one of the lanes to accommodate inward and exit traffic from the site, as well as the bus stops.	No change necessary. This paragraph refers to the design of new streets within the OA, not to the existing streets like Warwick Road. It should also be noted that this list is provided as guidance rather than as requirements. The suggestions it contains would not be suitable for all streets and any applicant(s) would be expected to use them appropriately, in conjunction with the suggestions in paragraph 4.112. In the transport chapter, improved onward connections for cyclists are required (TRN8). This includes the need for any application(s) to identify cycle routes based on the likely origin and destination and to fund appropriate improvements to make these routes as attractive and convenient as possible (paragraph 10.28).
897	Cllr Linda	Wade		04	Figure 4.37 to 4.40	Figures 4.117 to 4-120 seem to put the Linear Park quite late in the development phases. It is essential that any planning gain be locked into the specific phasing of the development.	Change proposed. Reference to sequential phases will be replaced with "illustrative development parcels" that could, theoretically, be delivered in any order. However, as identified in paragraph 4.46, one of the major advantages of a linear park is the ability to ensure that any development can provide diverse public green space in every phase. In light of this, you will note that the linear park is actually delivered incrementally from the earliest phases to the latest, increasing as the population increases. This is in line with Key Principle UF17 which requires a phasing strategy that demonstrates how all of the public, green, open space requirements will be met to be submitted with any application(s). This will be expected to demonstrate that open space will be delivered incrementally, so that each phase has proportionate public green open space to accommodate the increase living and working populations. This will be restated in the text that accompanies the "illustrative development parcels".
1039	Mary	Gardiner	Kensington and Chelsea Social Council	04	UF12	Key Principle UF12 A 2 hectare local park is welcome, but small. The Earls Court ward has virtually no public green space and none that can be regarded as playable for children and young people. This is even more important when one considers the number of children living in overcrowded accommodation. A lot of existing green space is private and there is a need to open up the garden squares; some local residents report having to go to Hyde Park. More publicly accessible green space is needed within the area of benefit and there is a London Plan requirement that play space is provided within 100 metres of all residential properties.	No change necessary. The local deficiency of open space and the limited play space facilities are identified in the SPD (see paragraphs 2.30 to 2.32). These have informed the production of the Public Open Space section of the Urban Form chapter. 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 local park, for all residential units to be within 100m walking distance of a public green open space (as you reference in your comment), for 10sqm of public green open space per child and for 10 sqm of dedicated play space per child. Please note that a 2ha park alone would be unlikely to meet all of these requirements. It is beyond the scope of th
1040	Mary	Gardiner	Kensington and Chelsea Social Council	04	UF16	Key Principle UF16 Youth facilities for young people (as required by London Plan policy 3.6 and paragraph 3.40) need to be added to the policy. The text should include a schedule showing the existing severe lack of youth	Change proposed. "Youth space" will be added to Key Principle SC6 which can be found under the heading Community Space, in the chapter of the SPD that deals with Social and Community Facilities.

					<p>facilities. Current youth clubs have inadequate opening times and the Feathers youth club closed.</p> <p>The change we are seeking is for the addition of:-</p> <p>[bold] Appropriate provision will include youth facilities and youth space, where young people can hang out and take part in informal activity [end bold] (as defined in the London Plan Providing for Children and Young People's Play and Informal Recreation SPG).</p>	
1058	Katherine	Alexander		04	<p>GREEN SPACE - There is still insufficient green space proposed in the SPD for families, communities and visitors. The elderly, children, local wildlife and pets will also suffer unless a proper, large park is created to accommodate the needs of one and all.</p>	<p>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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10 sqm of dedicated play space per child.</p>
1059	Katherine	Alexander		04	<p>HEIGHT, DENSITY, MASS and MATERIALS - The visual impact of such intensive development would affect the quality of life by destroying the skyline, especially surrounding the Grade 2 Brompton Cemetery. Outlook will be reduced, light will be blocked into many homes and streets and Conservation areas will be dwarfed. More thought needs to be put into the issues of height, mass, density and building materials allowed and how they are allowed to be used/implemented.</p>	<p>Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to address the visual impact of any new development. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis Supporting Evidence Document. The Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). Key Principle UF28 requires that the</p>
1091	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	<p>- The SPD should talk more about the need for excellent architecture, providing high quality housing, which fits in with the existing surrounding area. It is important that any new premises are sympathetic to the existing residential area and that there is no noticeable change in architecture when entering the OA area.</p>	<p>No change necessary. The SPD does not address architectural style as this is considered too detailed and prescriptive an issue to be dealt with in a strategic planning document. Any application(s) will be judged on their own merits in this regard.</p>
1092	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	<p>- The SPD ought to specifically address what alternatives would be expected if the decking/greening over of the tracks proves undeliverable. It should expressly state that the equivalent open useable green space would be expected, even if this reduces the residential or commercial land use on site, as it is paramount to the scheme's success and for the long term health of the residents in the area.</p>	<p>No change necessary. The SPD requires a 2ha local park in Key Principle UF12. It does not however require this to be delivered in any specific form or location. As paragraph 4.46 states, a linear park arrangement of contiguous public green open spaces is "encouraged", but the SPD does not preclude the proposal of any other form of park that meets the criteria set out in Table 7.2 of the Mayor's London Plan.</p>
1096	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	<p>- More emphasis should be made in the SPD of excellent architecture providing high quality housing which fits in with the surrounding area. There is no KO or KP about providing high quality architectural design in the OA.</p>	<p>No change necessary. The SPD does not address architectural style or quality as these issues are considered too detailed and prescriptive for a strategic planning framework. Any application(s) will be assessed on their own merits in this regard.</p>
1097	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	<p>- The SPD ought to address what alternatives there are if the decking over the tracks proves undeliverable i.e. that the developer will still be expected to provide alternative green open space.</p>	<p>No change necessary. The SPD requires the offer of a 2ha local park in Key Principle UF12. It does not however require this to be delivered in any specific form or location. As paragraph 4.46 states, a linear park arrangement of contiguous public green open spaces is "encouraged", but the SPD does not preclude the proposal of any other form of park that meets the criteria set out in</p>

							Table 7.2 of the Mayor's London Plan.
1098	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	Pages 61 - 63	-Pg 61 - 63: The SPD is not clear how much of the public open space will be roads and pavements.	No change necessary. Pages 61 to 63 address civic spaces and public, open, green spaces. They do not address roads and pavement at all. Therefore none of the quanta referred to will include roads or pavements.
1099	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	Pages 61 - 63	-Pg 61 - 63: RBKC is the one of the boroughs with the lowest amount of open space per population and the area is already deficient of public open space. The group wanted to ensure that any reference to 'public open space' was really public, rather than part of private back gardens?	No change necessary. Public open space will be expected to be publicly accessible. Private rear gardens will not count.
1100	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	Pages 61 - 63	-Pg 61 - 63: The SPD needs to include a minimum width or enclosure ratio to be applied if a linear park is proposed.	No change necessary. The appropriate enclosure ratios for all open spaces, including the 2ha local park, are established on page 74. Please note that paragraph 4.49 makes it clear that any proposal for a linear park will be expected to be wide enough to accommodate a range of functions including full size games courts and sports pitches. This may well require a land take of more than 2ha.
1101	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	Pages 61 - 63	-Pg 61 - 63: The SPD should be clear that roofs are not included as part of the open space provision	No change necessary. The public open space requirements will only be met by spaces that are publicly accessible. Roofs will therefore not be included.
1102	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	UF12	-UF12: It is not clear what is in table 7.2 of the Mayor of London's Plan and this may change in future. This table should be replicated in the SPD, as done in tables 4.1 and 5.1.	No change necessary. SPDs can only supplement existing policy. Therefore, if the London Plan were to change this would have to be reflected in the ways in which the SPD is used to assess any proposal(s) for the OA.
1103	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	UF12, UF14, UF15	-UF12, UF14 and UF15: The SPD is not clear how these principles apply to each other. Do all these Key Principles need to be provided, or does UF12 already include the provision of UF14 and UF15?	No change necessary. It is unlikely that the 2ha open space required in Key Principle UF12 would meet the requirements for public open space and play space set out in UF13, UF14 and UF15. Therefore, depending on the distribution of residential properties and the child yield calculation, additional public, green, open space will be necessary in addition to the 2ha.
1104	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	UF12, UF14, UF15	-UF16 and paragraph 4.56: These contradict each other. Paragraph 4.56 should be revised to require play provision for all ages in the contiguous open space. Proposed text change: "... contiguous large open space should provide play facilities for all ages including 12+" as it is otherwise hard for an adult to supervise children of mixed ages who are physically in different playgrounds.	Change Proposed. Text will be amended to refer to all age groups. Please note that the co-location of play facilities for different age groups to make it more practical for families to supervise is sought in Key Principle UF16.
1105	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	Para 4.56	- Paragraph 4.56: 'pocket parks' are not mentioned elsewhere in the text so this needs to change or requires explanation.	Change proposed. Brief definition of pocket park to be included in paragraph 4.56.
1106	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	Para 4.75	- Paragraph 4.75: At the end of this paragraph, add 'and should not have a detrimental effect'.	Change proposed. Text added.
1107	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	UF26	- UF26 is too woolly and should expressly state that buildings adjacent to the crescents should be no higher than the existing buildings in the crescents. Propose change: "... be expected to [underline] be no higher than [end underline] and respect the scale"	No change necessary. This is too prescriptive a stipulation for a framework document like the SPD. Furthermore, it would not reflect the urban character of the entire existing urban context. For example, there are mansion blocks on the edges of the OA which are significantly taller, but of no less value in townscape terms than the terraced housing. The authorities believe that the SPD establishes sufficient parameters against which the heights proposed by any planning application(s) could be assessed. For example, the section on Skyline has been written to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape and the section on Edges has been written to ensure that new buildings on the edges of the OA will be sensitively integrated into and enhance the surrounding context.
1108	Cllr J.	Gardner	RBKC Public Realm Scrutiny	04	UF28	- UF28: This should apply to all buildings, not only those on the edges and should be added to the relevant KP elsewhere in the document.	Change proposed. The Key Principle will be amended to read "all" existing and future buildings.

			Committee				
1109	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	Para 4.91	-Paragraph 4.91 states that "A general limit of one storey above shoulder height will be expected across the OA", so why does figure 4.26 on the very next page show a shoulder height of two storeys? Developers will build up to maximum shown, which is two storeys. To avoid confusion this diagram should only show shoulder heights of one storey. Paragraph 4.91 should be revised to read: "A limit of one storey above shoulder height will be expected across the OA" and the final sentence in this paragraph should be deleted.	Change proposed. Please note that the diagrams on page 73 are illustrations only and should not be treated as proposals for the OA. This will be made clearer in the caption. The illustration in figure 4.26 demonstrates a situation in which two storeys above shoulder height could be acceptable. The street is wide and supports a mix of uses. As a result of the width of the street, the second storey above shoulder height does not add to the visual impact of the building on the public realm. The final sentence in this paragraph cannot be removed because it ensures the level of flexibility that is required in the SPD.
1110	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	04	UF38	- UF38 and 4.114 is hard to understand and should be rewritten.	Change proposed. Paragraph 4.114 will be rewritten to make it easier to understand and to better define what is meant by Key Principle UF38.
1152	Ali	Negyal		04	Para 4.25	2. Substantial mature trees (4.25) is this not a considerable expense? Why not small trees that will grow?	No change necessary. The authorities are aiming to encourage the creation of a 'sense of place' from the very earliest days of this new development. Urban Design best practice suggests that one very effective way of achieving this is to plant mature trees rather than young trees that you expect to grow.
1153	Ali	Negyal		04	para 4.33	3. I agree that decking should be discouraged (4.33) for biodiversity reasons.	Noted. Please note that paragraph 4.33 does not discourage decking, but rather seeks to ensure that any land with biodiversity value that is decked over is replaced and enhanced elsewhere within the OA.
1154	Ali	Negyal		04		4. In theory, I like the thinking behind the idea that every household should be within 100 m of green space, but in reality, I think the proposal gives a disappointing sliver of green space, rather than a substantial plot that can be enjoyed more. I would encourage that planners consolidate the green space slightly. An extra 50 m to walk is not overly onerous for an altogether more enjoyable space.	No change necessary. This requirement is based on the Mayor's SPG on providing for Children and Young People's Play and Informal Recreation. It should be noted that the 2 ha local park is expected to be provided either as one discrete park or as a series of contiguous smaller spaces. It is unlikely that Key Principles UF14 or UF15 (10sqm of public green open space and 10sqm of dedicated play space per child) could be met by slivers of green space. Please also refer to Key Principle UF5 which seeks to ensure that the existing garden squares in the surrounding area are used as design precedent for new green, public open spaces (with caveats including the need for public access). This would not be satisfied by slivers of green space.
1155	Ali	Negyal		04		5. I think the enclosure ratio of 1:1 is too strict, given the extreme housing pressures in this borough. As a local resident, I would support higher density housing (i.e. more storeys), if attractively and sensitively designed.	No change necessary. The enclosure ratio of 1:1 has been established to try and achieve a network of streets that have a similar feel to those analysed in the surrounding area. The hope is that it will help to integrate the new neighbourhood into its surroundings. Furthermore it will help to ensure that the streets are not too overshadowed or uncomfortable for pedestrians to use because they feel "canyon-like". Please note that paragraph 4.90 states "any street that breaks this rule will require significant urban design justification". This allows some variation, so long as it can be shown to be attractively and sensitively designed.
1161	Adam	Mills	Banham Locks Ltd.	04		While the Banham site is clearly located within the Opportunity Area boundary, as shown on Figure 1.2, there are inconsistencies on other plans within the document which show the Banham site excluded from the Opportunity Area boundary. These plans are Figure's 3.2, 4.4, and 8.2 and should be amended in the final document to provide consistency with the other plans in the document and remove any ambiguity i.e. remove the red dotted line around the Banham site within Figures 3.2, 4.4 and 8.2.	Change proposed. The dotted lines referred to will be removed from the figures listed.
1162	Adam	Mills	Banham Locks Ltd.	04		Banham supports the key objectives within Chapter 4 Urban Form Strategy of establishing an urban grain inspired by the surrounding pattern of streets and spaces, maximising connectivity, providing good quality public open space, ensuring that buildings on the edge are sensitively integrated, that no new buildings visible on the skyline have a negative impact on the character of the townscape and to design well proportioned streets that respond to those in the surrounding area.	Noted.
1163	Adam	Mills	Banham Locks Ltd.	04		However, the previous version of the Earl's Court and West Kensington Opportunity Area Draft Joint Supplementary Planning Document First Draft for Consultation published in March	No change necessary. It was decided when redrafting the SPD for this second consultation that specifying the location of potential landmarks is too prescriptive and unnecessarily lengthens the document. Therefore, the plan that you refer to

						2011 included a plan of moving around (Figure 4.16 in the First Draft version) which highlighted the Banham site as a location for a landmark building to identify the important corner of Lillie Road and Seagrave Road. This was also supported by the potential urban form and edges plan (Figure 4.22 in the First Draft) which highlighted the corner of Lillie Road and Seagrave Road as frontage onto important edges. As Lillie Road is identified as a Primary Street through the area and Seagrave Road a Secondary Street (Figure 4.2), and that Seagrave Road is the main route to the large car park site identified for high density redevelopment, it is felt that the Banham site remains an important corner in the townscape of the area and should be identified for a landmark building to enhance legibility and moving around in the final document.	was removed. However, there is nothing in the redrafted SPD that precludes the allocation of landmark buildings in the future and the authorities note all of the reasons why the Banham site could be identified as such.
1164	Adam	Mills	Banham Locks Ltd.	04		Furthermore, the First Draft of the document included illustrative building height plans for the varying development capacities (Figure 5.12 of the First Draft) which showed maximum number of storeys across the Opportunity Area. It is felt that this is a very useful plan which helps support the objectives of the Urban Form Strategy and should be reintroduced in the final document.	No change necessary. It was decided when redrafting the SPD for this second consultation that the development capacity scenarios should be removed from the main body of the SPD and placed in an SPD Supporting Evidence Document. You will therefore find the plans that you are referring to in the Development Capacity Scenarios SPD Supporting Evidence Document. Please note that these plans are illustrative only and should not be treated as proposals for the OA.
1168	Virginia	Morck		04		2. The height of some of the buildings proposed for the new development is simply too great for this residential area, which has an overall low roof-line. We all know of developments with towering monstrosities in the middle of them which are subsequently torn down, so great are the complaints about them. And then in their place are created the kind of low-level community houses which residents in the area wanted in the first place. Please don't allow the developers get away with this.	No change necessary. The SPD does not specify any building heights but rather establishes a framework of Key Principles and Key Objectives against which the heights proposed in any application(s) will be assessed. Most significant in terms of scale are Key Principles UF19 and UF20 which require the preservation or enhancement of surrounding conservation areas (including Brompton Cemetery), Key Principle UF21 which requires applications to demonstrate that they will have no negative impact on any of the views in the Townscape and Visual Analysis, Key Principle UF26 which requires the height and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings and Key Principle UF31 which requires the widths of streets to be proportional to the heights of the buildings that frame them (in a manner which responds to the existing streets in the surrounding area).
1169	Virginia	Morck		04		3. The site is large, but I don't see enough green space for either recreational or general community use. Such space is essential for the well being of residents of all ages and, given our increasingly aging population, especially important as a place where the elderly can take light exercise and meet their friends for a chat on the park benches.	No change necessary. The authorities consider the minimum standards for the quantum of public open space sought in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space sought 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 seek a 2 ha local park, all residential units to be within 100m walking distance of a public green open space, 10sqm of public green open space per child and 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they seek range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and a community hub of 4,500 sqm.
1172	Paul	Williamson	RBKC Play Partnership	04		The Earls Court Ward in Kensington and Chelsea has virtually no public open space and certainly no open space that can be regarded as 'playable' for children and young people. There are several private garden squares that are only accessible to the immediate residents that are key holders. Beyond Earls Court Ward, for children 0-5 years of age there is only one play space within a one mile radius at Redcliffe Square. There is a small playground for over 5s in Ifield Road which is half a mile from the Southern boundary of Earls Court Ward.	Noted.

						<p>There is a lack of available land in the local area to develop new play and open space. Many children and their families live in overcrowded accommodation and houses in multiple occupation. The lack of play space in the wider area emphasises the vital importance of the provision of 'playable' space within the new development.</p> <p>The RBKC Play Partnership welcomes the Key Objective in the OA of good quality play and open space. The Partnership is committed to working to</p>	
1173	Paul	Williamson	RBKC Play Partnership	04		<p>There are several Super Output Areas in the 20% most disadvantaged that are adjacent to the OA site. These are located in Earls Court and to the north of the site in Abingdon Ward.</p> <p>When considering the location of play space within the OA good access for residents of these areas will be essential. We would like to see safe and good quality access points from the north and east of the site. The space should be designed to welcome children and young people and provide clear 'routes to play and recreation'.</p>	Noted.
1174	Paul	Williamson	RBKC Play Partnership	04		<p>The new 2 hectare linear park can be a very valuable resource for the area. We welcome the commitment to a variety of play spaces within this area, emphasising natural play features, play trails, and landscaping that encourages a variety of challenging play environments. The park is large enough to accommodate different types of play for all ages. Providing for the 5-14 age range is crucial and is well reflected in Key Principles UF13-16.</p>	Noted.
1175	Paul	Williamson	RBKC Play Partnership	04		<p>Whilst the 100m walking distance is particularly important for younger children, a variety of spaces for older children to play safely is vital, especially as there is little alternative space of this type in the locality.</p>	Noted.
1176	Paul	Williamson	RBKC Play Partnership	04		<p>We have concerns that there is no play space designated close to the Earls Court Station boundary. This appears to contradict the requirement for play space within 100m of all residential properties. There is a requirement to create play features and 'playable' space within the civic space at the Earls Court entrance to the OA, especially for younger children. Otherwise, the concentrated private residential development in this part of the site could act as a barrier to the new linear park. The design and layout of the residential buildings at the east of site must encourage the public to access the linear park. A strong commitment to public access is particularly important at this location.</p>	No change necessary. Figure 4.10 is illustrative only and should not be treated as a proposal for the OA. Any application(s) will be assessed against Key Principle UF13 (which seeks to ensure that all residential properties are within 100m walking distance of an open space). Please note that UF13 does begin with "as far as possible".
1177	Paul	Williamson	RBKC Play Partnership	04		<p>There appear to be a number of east-west transport links that may interrupt the continuity of the linear park, plus a proposal to accommodate a north-south cycle route and/or pedestrian route within it. This could result in a number of quite small disconnected green spaces. This would restrict the potential for informal and formal sports activities and limit the scope for combining toddler play areas with adventure play areas for the 5-14 age group. To a certain extent, these restrictions could be overcome by extending the park vertically, with rope bridges and adventurous walkways spanning the cross-routes. The Play Partnership would like to see greater</p>	No change necessary. Any proposal(s) for the OA will be expected to balance the authorities' aspirations for connectivity across the site with the need for sufficient public open space. Paragraph 4.49 states that "any proposal for a 'linear park' must include public green open spaces that are wide enough to accommodate a range of functions, including full size games courts and sports pitches. It is therefore possible that if a proposal comes forward including a linear park, land take greater than 2ha will be required in order to ensure the park is fully functional".

						recognition of the need for larger uninterrupted sports/play areas.	
1178	Paul	Williamson	RBKC Play Partnership	04		One opportunity for off-site investment is the playground at St Cuthbert with St Matthias Primary School. Creating a more accessible supervised evening and weekend play facility at this site would be of major benefit to the Earls Court population and reduce some pressure on the new play spaces within the OA area. It could also help to meet the requirement of play space within 100 metres of all residential properties. This proposal would require detailed consultation with the school community.	No change necessary. Given the size of the OA, it will be expected that all the requirements for play facilities will be met on site. Any Section 106 agreement will only be expected to provide facilities to meet the needs arising from the development. Given the distance between the OA and St Cuthbert with St Matthias Primary School it is unlikely that it could contribute to meeting any need that arises from the development.
1179	Paul	Williamson	RBKC Play Partnership	04		The new public squares to the south and west of the site provide excellent opportunities for other play and open space installations. Local play spaces will reflect the increased population and contribute to the realisations of Key Principles UF14 and 15.	Noted. Please note that the masterplan images within the SPD are illustrative only and should not be treated as proposals for the OA.
1180	Paul	Williamson	RBKC Play Partnership	04		The provision of sports and games courts is important and will increase access to play opportunities. As well locating these in the new public spaces, thought should be given to public access to any schools facilities that are built on or near the site.	Noted. Sports and Leisure provision is addressed in Chapter 09 of the SPD (Social and Community Facilities). Key Principle SC3 seeks "a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population". This Key Principle also establishes that a proportion of affordable sports provision will be secured and that the facilities provided should target existing deficiencies, particularly multi-use outdoor pitches and indoor multi-use sports courts.
1181	Paul	Williamson	RBKC Play Partnership	04		<p>It is the view of the RBKC Play Partnership that a challenging adventurous play space should be provided in the new linear park. The space should allow for the provision of supervised activities at certain times throughout the year. This will enable Community Safety officers and play workers to engage with local children and young people.</p> <p>Evidence from similar facilities demonstrates how they can reduce anti-social behaviour and enhance the civic responsibility of children and young people. The space should be accessible on a non-supervised basis, but flexible enough to support organised games and play activities.</p> <p>This type of service will require a base for play workers and/or play rangers to operate from. The base could be part of a community facility within or close to the new park. It could link to a nearby drop-in facility for under 5s to provide play transition for this age group.</p>	Noted.
1182	Paul	Williamson	RBKC Play Partnership	04		Consideration should be given to the best model to support the community participation of children, young people and families. Involving children and young people in the design of the new space will enhance this approach from the outset and create a greater sense of local ownership.	Noted.
1183	Paul	Williamson	RBKC Play Partnership	04		All play spaces should be designed with safety in mind, but they should also offer a reasonable level of adventurous and risky play. Good spaces for parental and community supervision is important, but should not inhibit the use of space by older children.	Noted.
1184	Paul	Williamson	RBKC Play Partnership	04		Safe routes into play spaces will encourage children and young people to attend and reduce the likelihood of anti-social behaviour. This needs to be considered in relation to the very busy existing streets adjoining the OA area and in the design of the proposed streetscape and civic space within the site.	Noted. The SPD seeks to achieve safe streets that prioritise the pedestrian. For example, Key Principle UF36 seeks a holistic approach to design that creates streets that are places where people will want to linger and that encourage pedestrians and cyclists. Paragraph 4.111 goes on to list a number of ways in which walking could be encouraged on streets in the OA. Key Principle UF37 seeks to ensure that streets within the OA are designed to keep vehicle speeds under 20mph, which will contribute greatly to pedestrian safety. In the Transport Chapter, Key Principle TRN4 seeks streets that are accessible to all with

							appropriate gradients, generous footways and accessible crossing facilities. Key Principle TRN6 seeks funding for environmental improvements and the delivery of wider, clearer footways on the existing streets surrounding the OA. TRN7 seeks new pedestrian crossings and improvements to existing crossings in order to significantly improve the pedestrian environment and access into and out of the OA.
1185	Paul	Williamson	RBKC Play Partnership	04		The Play Partnership is delighted that a Play Strategy is a requirement of any planning application. We would welcome a specific consultation with children and young people about this aspect of the proposals.	Noted.
1186	Paul	Williamson	RBKC Play Partnership	04		The Play Strategy should set out a commitment to high quality play and demonstrate how the principles within the OA will be met. It should demonstrate how the developers will engage with local partners in the design and future maintenance of play spaces. The Play Partnership can be a good resource throughout this process and is keen to be involved in shaping and delivering the Play Strategy for the OA.	Noted.
1187	Paul	Williamson	RBKC Play Partnership	04		As a local authority Play Pathfinder area, the Royal Borough of Kensington and Chelsea has gained considerable expertise in the creation of new play spaces. Well over 30 new play spaces have been designed and delivered in the past 4 years, including two new adventure playgrounds. Children and young people have been heavily involved in the design and monitoring of the new play spaces. There is a great opportunity to use this learning to support the design and sustainability of play in the OA area. The OA developments can incorporate the design of new play features, including ecological features, water play, bridges, and sculptures. Where appropriate, this approach can encourage inter-generational initiatives using older volunteers. Examples might be the regular planting of play features by adults and children, recycling projects using materials for play such as rubber, wood and bark, and ecological projects that safeguard the environment. In order to maintain the quality of the new spaces consideration	Noted.
1196	Paul	Morice		04		There is insufficient green space in the proposed SPD for community, recreational use and also for environmental reasons. A particularly important example of this is the narrowness of the Lost River space covering the overground railway between Kensington Olympia and West Brompton stations. The plans still show high rise residential developments immediately on either side of it. The width of this particular space will need to be increased by at least three times its size as currently shown on the plans to reduce the effect of the vibration of the 'overground trains' passing through the concrete tunnels which are being proposed to accommodate them a metre or	No change necessary. The authorities consider the minimum standards for the quantum of public open space sought in Key Principles UF12, UF13 and UF14 and the minimum standards for the quantum of play space sought 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 seek a 2 ha offer of a local park, all residential units to be within 100m walking distance of a public green open space, 10 sqm of public green open space per child and 10 sqm of dedicated play space per child. The SPD does not propose any heights of development, but seeks to establish a framework against which the scale and massing of any application(s) could be assessed. This is established through Key Objectives and Key Principles on Skyline, Edges and

					so below the new raised ground level. As presently shown, the noise and vibration of this railway traffic, especially freight traffic at night, will severely impact these properties.	Streets. Of particular relevance to the heights of buildings around open spaces, including any linear park that may be proposed, are paragraphs 4.95, 4.96 and
1201	David	Trodden	04	4) Design and Architecture The lead architect talked of the whole development being reflective of the architectural heritage of the garden squares and streets of RBKC. He carried on in a similarly splendid vein, I was eager to see their designs. A few days earlier I had the pleasure to receive a presentation from another British firm of architects who had been responsible for the development of a large area of East Calgary, Canada and there I heard great designs talked of and delivered. When I saw the details of the proposed development for this Opportunity Area I was truly disappointed. There are none of the grand proportions and lines, the large open squares of Earls Court it was all rhetoric. The whole development is mediocre and never likely to be a Conservation area. The design and architecture should be required to be outstanding and worthy of being part of a Conservation area.	No change necessary. This comment refers to a specific planning application. It would not be appropriate to comment on a specific application as part of this consultation on the SPD.	
1202	David	Trodden	04	The heights, densities and the use of materials must link in with the communities they are adjacent to.	Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link the existing communities. For example, Key Principles UF19 and UF20 in the Skyline section of the Urban Form chapter require development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton cemetery) and Key Principle UF21 requires developers to demonstrate that there will be no negative impact on any of the views identified in the Townscape and Visual Analysis. The Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). Similarly the section on streets is intended to	
1203	David	Trodden	04	The development will irrevocably destroy the local skyline. There will not be many places in Earl's Court that this will not affect, and the most to suffer will be the listed Brompton Cemetery.	No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to demonstrate that their proposals will have no negative impacts on the views identified by the authorities that can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.	
1206	David	Trodden	04	[bold] 48 Philbeach Gardens personal note [end bold] On a personal level when the architect talked about the development adjoining Philbeach Gardens he referred to Mews type development being consistent with the architecture to be found in RBKC at present. Certainly I feel that the proposed building very close to 48 Philbeach Gardens is not reminiscent of Mews in height nor style. We currently enjoy an open view across the proposed development area and glorious sunsets. I must request that the heights of the buildings are like Mews, i.e. only two floors, not overlooking us, respect our rights to a pleasant view and privacy.	Noted. This comment refers to a specific planning application. It would not be appropriate to comment on a specific application as part of this consultation on the SPD.	

1220	Amy	Jones	Spen Hill Developments	04	Figure 4.1	<p>Current Representations</p> <p>We also note that Figure 4.1 of the SPD consultation document highlights the <i>"potential to reuse the existing link to the Tesco store"</i>, this is not however an existing route, it is merely safeguarded.</p>	Change proposed. The key to figure 4.1 will be rewritten to say "Potential to explore the use of the link under A4 by pedestrians and cyclists and/or as a temporary construction traffic route"
1224	Hilary	Mackay		04		I see some merit in diagonal connections between Lilley Road/North End Road and Warwick Road/A4 and West Kensington tube to Warwick Road/Old Brompton Road corners.	Noted. Please note that any masterplan drawings in the SPD and Supporting Evidence documents are for illustrative purposes only and should not be treated as proposals for the OA.
1225	Hilary	Mackay		04		I am convinced that considered, intelligent, environmentally sensitive quality construction will mean more in the long term than quantitative measures of how many properties can be fitted on the OA and how many people can be coaxed into the area.	Noted.
1227	Hilary	Mackay		04	Key Principle UF28	<p>3.13/ Key Objectives 4/Edges 4.76 - UF28</p> <p>I consider retention of privacy to properties bordering the OA of importance and think this should be integrated into the plan. For example, offices could be the buffering properties rather than residential. I think it is fundamental that UF28 stays in the final document.</p>	Noted. UF28 will remain in the final version of the documents. Please note that any masterplan images in the SPD or Supporting Evidence Documents are for illustrative purposes only and should not be treated as proposals for the OA.
1241	Alex	Fraser		04	Phasing	<p>* sections 4-117 to 4-120 show the Phasing of the development.</p> <p>I would only question why the redevelopment of the housing estates in what is currently 'phase 5' are left until last given that many residents will have presumably been relocated to the new properties built in 'phase 1'?</p> <p>I'm puzzled as to why the building in 'phase 5' can't happen at the same time as 'phase 3/3b'?</p> <p>Is this because the area has been parcelled into manageable sizes to reduce financial risk and/or local disruption?</p> <p>My concern is that some phases will be built but that future phases may get delayed - for whatever reason; the development's benefits would appear to only work to their best advantage when the whole area is complete, and I would like to see that happen as quickly as possible.</p>	Change proposed. Reference to sequential phases will be replaced with "illustrative development parcels" that could, theoretically, be delivered in any order. Therefore the phases to which you refer may not be delivered in the order currently suggested. Please note that figures 4.37 to 4.40 are for illustrative purposes only and should not be treated as proposals for redevelopment. However, it should also be noted that the redevelopment of the housing estates is likely to happen in a phased manner because it is likely that only a proportion of the existing estate residents could be relocated to the Seagrave Road site. Others could be relocated into new housing in other parts of the OA once they have been redveloped. Key Principle PS2 seeks to ensure that the proposed redevelopment, together with re-provision of the existing housing will be carried out with minimum disruption to existing residents. In terms of your concern about comprehensive development, Key Principle PS1 seeks to ensure the delivery of a comp
1253	Jenny	Montefiore		04		GREEN SPACE - There is still insufficient green space proposed in the SPD for families, communities and visitors. The elderly, children, teenagers local wildlife and pets will also suffer unless a proper, large park is created to accommodate the needs of one and all. The Mayor's plans stipulated that the under fives much have easy access to outside play areas which is provided in the SDP but the over 5's, and teens need green outside space, to run and use their imagination in play, playing fields are needed in the area. The Government has determined to cut obesity and improve the health and the wellbeing of the nation therefore adequate green space as well as inside affordable leisure facilities are needed. The Lost	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 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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure

						Creek, Linear Park is not going to provide the necessary space. We need plants, tree's greenery too offset the pollution as well as enhance living, and streetscenes, and if we were really visionary and looking to the future market gardens to grow vegetables and food.	facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of
1254	Jenny	Montefiore	04			HEIGHT, DENSITY, MASS and MATERIALS - The visual impact of such intensive development would affect the quality of life by destroying the skyline, especially surrounding the Grade 2 Brompton Cemetery. Outlook will be reduced, light will be blocked into many homes and streets and Conservation areas will be dwarfed. I am against the accepted notion that there should be any high rise buildings, near the Empress Building or anywhere on the site, creating a mini clusters and ruining the skyline and setting future precedents. More thought needs to be put into the issues of height, mass, density and building materials allowed and how they are allowed to be used/implemented.	Change proposed. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to submit a set of verified views taken from points in the local area, identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in the Townscape and Visual Analysis SPD Supporting Evidence Document. Key Principle UF19 seeks to ensure that the character, appearance and setting of surrounding conservation areas and listed buildings are preserved or enhanced. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be
1260	Jenny	Montefiore	04			I welcome the public square on the Warwick Road site and hopefully there will be outside café's as well as public seating etc. and be an attractive place to meet for residents and visitors.	Noted. Paragraph 4.40 seeks to ensure that there will be retail, café, culture and community uses on the ground floor around civic spaces.
1261	Wanda	Rostowska	04			The scale and scope of this development is overwhelming. Your role as OUR representatives in balancing two conflicting interests: those of the residents who want minimal disruption and for development of our living space to be sensitive and organic, and those of the developers who obviously want a maximum return on their investment, is not going to be easy. I appreciate the fact that you are attempting to define some parameters and hope for these to be as robust as possible.	Noted. The Key Objectives and Key Principles in the Skyline, Edges and Streets section of the Urban Form chapter all present a framework against which the heights of buildings proposed for the OA will be assessed. The authorities consider them to be robust.
1262	Wanda	Rostowska	04			As a long term resident, while welcoming improvement to the area around the railway lines, I do want it to be - low rise	Noted. The aspiration of the authorities is to ensure that development integrates well into the existing urban context. Low rise development alone would not achieve this as there is a rich variety of building heights surrounding the OA. However, the SPD does put in place a number of Key Objectives and Key Principles that will be used as a framework against which the heights of any proposal(s) for the OA will be assessed. Please refer to the Skyline, Edges and Streets sections of the Urban Form Chapter.
1269	Wanda	Rostowska	04		Key Principle UF26	3 - REVISED SPD, page 69. KEY PRINCIPLE UF26. 'expected to respect' is too ambiguous and again, seems subjective. One man's respect is not another's. I suggest you say, new buildings should be, or even must be 'in line with neighbouring buildings'.	No change necessary. It is important that a strategic planning framework like the SPD contains a certain level of flexibility to ensure that innovative design solutions are not stifled.
1270	Wanda	Rostowska	04		Para 4.81	4 - REVISED SPD, page 70. 4-81, "The Metropolitan Face". Not for us to dictate to developers at this stage, but again, height is an issue that should be nipped in the bud as early as possible. As we experienced with Cluny Mews and Tesco Tower, the macho tendencies of developers to go for tall buildings are evident. The reference to the Barons Court Conservation Area is good as these are low, beautifully elegant buildings. Please stress this more as the preferred model.	No change necessary. Development along the 'Metropolitan Face' will be subject to the Key Principles and Key Objectives in the Skyline and Edges sections. Therefore, any application(s) will be expected to demonstrate that development in this location does not have any negative impacts on the quality and character of the surrounding townscape. This will be assessed through the requirement in Key Principle UF21 for any application(s) to demonstrate that the proposal(s) will have no negative impacts on any of the views that can be seen in the Townscape and Visual Analysis SPS Supporting Evidence document. The views that are particularly relevant to the 'Metropolitan Face' include 50, 51, 16, A148, 53, 54 and 14 (please note that the numbers allocated to these views may change in the final draft of the SPD).
1287	Ben	Sawbridge	04		Key Principle UF1	The A4 is an over-loaded highway already. The last thing it needs is connection to a new urban quarter. As for Key Principle UF1 - the creation of new roads within the OA - they obviously would be necessary to service dense development, but without that they are not missed. Four major roads suitably contain most of the OA with its present uses.	No change necessary. The SPD seeks comprehensive redevelopment of the OA and this will require the appropriate infrastructure, including new roads, to accompany it.

1301	Geraldine	Winkler	Mrs Fay Winkler	04		The development will destroy the local skyline for all local residents. It will change the character of the listed Brompton Cemetery.	No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to demonstrate that their proposals will have no negative impact on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.
1304	Geraldine	Winkler	Mrs Fay Winkler	04		I am also concerned that the proposed buildings will be out of character with the existing architecture.	No change necessary. It is considered that the quality of architecture is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning application(s) are made.
1307	Sibylle	Mitnacht		04		Worrisome lack of contiguous and sustainable outdoor and family friendly recreational space. This is of particular concern as increase in population density likely to increase pressure on already sparse existing provisions.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4,5
1308	Sibylle	Mitnacht		04		The vast majority of planned dwelling and architecture in grass break with the adjacent Victorian architecture and its character.	No change necessary. It is considered that materiality is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, materiality will be assessed on a case by case basis as and when any planning application(s) are made.
1309	Sibylle	Mitnacht		04		Building height particularly towards the Cromwell road end will over tower adjacent Philbeach Gardens buildings, reducing light, quality of living and privacy.	No change necessary. The SPD does not propose any specific building heights. Instead, it establishes a framework of Key Objectives and Key Principles that the heights of any proposal(s) will be assessed against. These Key Principles and Key Objectives can be found in the Skyline, Edges and Streets sections of the Urban Form chapter. Of specific relevance to this comment is UF19, which seeks to ensure that the character, appearance and setting of surrounding conservation areas are preserved or enhanced. The existing properties in Philbeach Gardens are in a conservation area. Residential amenities like light, quality of living and privacy are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85.
1321	Linda	Wade	Nevern Square Conservation Residents' Association	04		It was felt that the heights, scale and massing indicated in the JSPD were still too large, and that the proposed heights would dominate the surrounding area. The rejection of the Penthouses at Kensington Mansions due to increased height has been cited as a precedent, as to what would be considered to be acceptable. The Empress State building is unique in the area and should not be used as a benchmark to permit taller buildings and the height lines of other buildings on the site should be the same and in keeping to the areas immediately adjacent. This JSPD would permit buildings routinely above the average of the houses in both Kensington and Chelsea, and Hammersmith and Fulham.	No change necessary. The SPD does not propose any specific building heights but rather establishes a framework of Key Principles and Key Objectives against which the heights of any proposal(s) will be assessed. These Key Principles and Key Objectives can be found in the Skyline, Edges and Streets sections of the Urban Form chapter. It is acknowledged in paragraph 4.59 that "the location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape."
1322	Linda	Wade	Nevern Square Conservation Residents' Association	04		The quality of the built environment does not link-in with the surrounding areas, and needs to be of a high architectural quality. If the iconic Exhibition Centre is to be replaced, it should be replaced by a building that has equal iconic landmark status.	No change necessary. It is considered that the quality and style of architecture is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning application(s) are made.

1329	Linda	Wade	Nevern Square Conservation Residents' Association	04		The one thing that this part of London needs is open access space, and the emphasis of this provision in the Linear Park is a concern. This element is considered to be one of the most expensive elements of the plan, and therefore is highly likely not to be delivered on the basis of financial viability. The space indicated is too narrow, and the suggestion that if it cannot be delivered that there would be a series of bridges will negate the sense and the usage of the space and create rat runs into the Warwick Road.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. The linear park is only suggested in the SPD as one effective way in which the 2ha local park could be achieved. The SPD does not require the railway line to be decked over completely. As stated in Key Principle UF8, if this proves not to be viable, a series of bridges (that achieve the desired connectivity) could be acceptable. If a series of bridges were proposed, the 2ha
1330	Linda	Wade	Nevern Square Conservation Residents' Association	04		The ratio of green space to the built environment is not satisfactory and needs to be revisited.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.
1331	Linda	Wade	Nevern Square Conservation Residents' Association	04		It is felt that the height and massings as proposed would create a sense of Enclosure, and that some of the reasons that residents had buy in this area was due to the sense of space both in the widths of the roads, the heights of the buildings, the quality of the architectural, but also that there was a sense of 'views'.	No change necessary. The existing width of roads, the heights of buildings and the quality of architecture will remain unaffected by development. Indeed, the SPD actively seeks to bring some of these characteristics into the OA. For example, the street enclosure ratios proposed in the Streets section of the Urban Form chapter are informed by analysis of the heights and widths of the streets in the surrounding area. The SPD seeks to ensure that the 'views' from the surrounding area will be preserved or enhanced through Key Principles UF19 to UF21. UF19 and UF20 require proposal(s) to preserve or enhance the character, appearance and setting of surrounding conservation areas, with particular reference to Brompton Cemetery. UF21 requires any applicant(s) to demonstrate that their proposals will not have any negative impacts on the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence document. It is considered that the quality of architecture is too detailed and subjec
1332	Linda	Wade	Nevern Square Conservation Residents' Association	04		Particular concern was voiced about the proposed heights, and impacts, of tall buildings around the Brompton Cemetery, one of our more open area, and that if granted would greatly diminish the unique quality of the cemetery.	No change necessary. Key Principle UF20 seeks to ensure that the skyline of Brompton Cemetery is preserved or enhanced. As stated in paragraph 4.6, any application(s) will be expected to demonstrate that changes to the skyline in this location will not be negative. Furthermore, three of the views expected to be analysed and submitted as part of any application(s) under Key Principle UF21 are from Brompton Cemetery. Again, application(s) will be expected to demonstrate that there will be no negative impact on any of them.
1333	Linda	Wade	Nevern Square Conservation Residents' Association	04		It was welcomed that there would be consideration for the built environment near to the edges of the site, but that some of the heights referred to as being the norm were not, as in Philbeach Gardens where there are 3-4 floors above road level and not 5.	Noted.
1348	Jonathan	Green		04		3. Skyline - our road, Earls Court Gardens, runs east to west and I fear that the western skyline will be ruined by high rise. Brompton Cemetery will be overlooked and feel enclosed;	No change necessary. The Key Objective of the Skyline section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. This is followed by Key Principle UF19 which seeks to preserve or enhance the character, appearance and setting of surrounding conservation areas. Earls Court Gardens is in the Courtfield Conservation Area. Furthermore, Key Principle UF21 requires any application(s) to demonstrate that ot will have no negative impacts on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence document. For the view with the most relevance for Earl's Court Gardens, please see View 21.

1349	Jonathan	Green		04		4. Green space - the green space area shown at the moment is mean and insufficient for a development of this size;	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.
1350	Jonathan	Green		04		5. Architecture - there is a quite justifiable worry that the heights, densities and use of materials will not link in with the surrounding communities. This must be addressed.	Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Views Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will link in with the existing communities. For example, the skyline section of the Urban Form chapter requires development to preserve or enhance the character and appearance of surrounding conservation areas (including specific reference to Brompton cemetery) and requires developers to demonstrate that there will be no negative impact on exiting townscape. See Key Principle UF21 and the Townscape and Views Analysis for further information. The Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). Similarly the section on streets is intended to ensure that wh
1351	Dr. Ian	Sesnan	Archdeacon of Middlesex	04		Thank you for the opportunity to comment on the above revised SPD. It is clear that some of our previous comments have been taken on board (e.g. regarding views of local landmarks/Churches and we welcome that).	Noted.
1364	Dr. Ian	Sesnan	Archdeacon of Middlesex	04		[bold] Concluding comments [end bold] Having made some critical commentary here we would re-iterate our view submitted in the first round consultation that there are many merits in the SPD. For example the policies on the early provision of inter-connecting routes between old and new communities such as the direct extension of Star Road into the Opportunity Area.	Noted
1374	Eirik	Reddi	Residents of 67-70 Kensington Mansions	04		The proposed height of building adjacent to ours appears to exceed what is existing and given their residential nature means that we will now be towered over and overlooked, impacting on our privacy and natural light levels, whilst at night we will now be subjected to street lighting to the rear of our building and the additional impact of yet more traffic. The rear of the building has been our one oasis of privacy, peace and darkness from the excess of Warwick Road, it appears that the development will rob us of even that small luxury.	No change necessary. The SPD does not propose any specific building heights, but rather establishes a framework of Key Principles and Key Objectives against which any application(s) will be assessed. Your particular concerns about the heights of buildings relative to existing properties on the edges of the OA are addressed in the Edges section of the Urban Form chapter. For example, Key Principle UF26 seeks to ensure that the height and massing of new buildings on the edges of the OA will respect the scale and massing of neighbouring buildings. Residential amenities like overlooking, privacy and natural light levels are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85. Key Principle UF28 seeks to ensure that the privacy, daylight and sunlight of existing and future buildings are respected.
1375	Eirik	Reddi	Residents of 67-70 Kensington Mansions	04		Having gone to the first development meeting we were promised that the buildings would be sympathetic to the local environment and reflect the quality of existing Mansion Blocks, which are a source of pride to residents and the Borough. What is actually being offered up is nothing of the sort, it appears bland, faceless and cheap. The quality and finish should provide a legacy, not a fast buck. Building that are a source of pride in 100 years and that physically match existing both in height and materials.	No change necessary. This comment refers to a specific planning application. It would not be appropriate to comment on a specific application as part of this consultation on the SPD.
1382	Sandra	Yarwood		04		GREEN SPACE - There is still insufficient green space proposed in the SPD for families, communities and visitors. Holland Park which is the only large green space in the area apart from the cemetery, is already unbearably crowded on warm days and unless a proper, large park is created to accommodate the needs of the new	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

					population, the pressure for space at Holland Park will be intolerable.	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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a commun
1383	Sandra	Yarwood		04	HEIGHT, DENSITY, MASS and MATERIALS - I am extremely saddened and shocked that no obligation has been made on the developer to conserve the frontage of Earls Court one. This is a major over-sight as it gives identity to the area and will be a huge loss. At the very least the developers should be obliged to re-create a frontage that mirrors the existing building and preserves the lovely art deco bas relief losenges. Earls Court needs its identity.	No change necessary. It would be too prescriptive for a strategic planning framework like the SPD to specify the style of architecture expected in any location on the OA. However, it should be noted that any application(s) submitted will be assessed on their own merits in this regard and that the heritage assets of the site and its surroundings will be an important consideration in this.
1384	Sandra	Yarwood		04	The visual impact of such intensive development would affect the quality of life by marring the skyline, and creating unbearable light intrusion at night. Even if buildings were no taller than the existing Exhibition Centre, they would have a much greater detrimental impact as much of the height of the Centre is made up of the apex of its roof which has no windows and therefore no light pollution. Even the sides of the existing structure have very few windows. The existing structure also protects the surrounding area from light spillage from the Empress Building which will be lost if it is allowed to be replaced by tower blocks. Tower blocks are not at all in keeping with general architecture in the surrounding area and more stringent restrictions should be made to prevent high buildings on too narrow streets which would over-shadow the elegant surrounding Conservation areas. Tougher restrictions need to be put on height, mass, density and building materials allowed and how they are allowed to be used/impleme	Change proposed. The SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. This has been informed by careful analysis of the townscape and skyline as viewed from the surrounding area. Please see the Townscape and Visual Analysis SPD Supporting Document for the conclusions reached from this analysis. Key Principle UF21 in the SPD requires any application(s) to demonstrate that ot will have no negative impact on any of the viewsa idetified by the authorities the Townscape and Visual Analysis SPD Supporting Evidence document. The SPD also seeks to protect or enhance the character, appearance and setting of the surrounding conservation areas (Key Principles UF19 and UF20). It also seeks to prevent the construction of buildings that are too tall in proportion to the widths of the streets onto which they front through Key Principle UF31 which sets and building height to street width ratio of 1:1. Any proposal(s) that b
1386	Cllr. Charles	Williams	Redcliffe Ward	04	Scale and Form We welcome Key Principles UF26, that the height and massing of new buildings on the edges of the Opportunity Area (OA) will be expected to respect the scale and massing of neighbouring buildings,UF27, that development will be expected to preserve or enhance the character and setting of any listed buildings or conservation areas around the edges of the OA, and UF20, which says that Development should preserve or enhance the character and appearance of Brompton Cemetery and the setting of its listed buildings. We are very concerned about the excessive height of proposed buildings in Seagrave Road and fully support RBKC's representations in December 2011 on the Seagrave Road Scheme which are entirely consistent with UF20.	No change necessary. Your support for the Key Principles in the SPD is noted. However, 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 the Key Principles established in the SPD.
1399	Jane	Willmot	Hammersmith and Fulham Disability Forum	04	1.5. We also noticed that the SPD Urban Form Strategy Policy Context on p 53 listed 11 policy contexts from LP2011 and CS 2011. However, we are very surprised that it omitted LP 2011 policy 7.2 <i>an inclusive environment</i> . This must be is an over sight. Otherwise it is one rule for some policies and a different rule for accessible and inclusive policies which is not acceptable and discriminatory. It gives the impression of institutional disablism and rightly or wrongly that accessible and inclusive development is not a material consideration.	Change proposed. London Plan Policy 7.2 An Inclusive Environment will be added to the Policy Context section of the Urban Form Chapter.
1400	Jane	Willmot	Hammersmith and Fulham Disability	04	1.6. We strongly recommend that the SPD is explicit that every development proposal shall be accessible and inclusive without exception to be consistent with LP 2011.	Change proposed. This will be added to the text under Key Principle UF36.

			Forum				
1402	Jane	Willmot	Hammersmith and Fulham Disability Forum	04		1.8. We welcome the references to selected access standards: [italics] Inclusive Mobility [end italics] for footway gradients; [italics] LP2011, H & F Access for All and K & C Access Design Guide [end italics] for Lifetime Homes and wheelchair accessible housing; [italics] Legible London [end italics] standards for way finding (TRN5). These standards are not comprehensive.	Noted.
1408	Jane	Willmot	Hammersmith and Fulham Disability Forum	04	Key Principle UF8	[bold] Urban Grain and connectivity Key Principle UF8 [end bold] supports decking over railway lines and mentions a series of bridges. Para 4.32 refers to new routes being accessible to all road users which is welcomed. This section should go further and confirm where applications include gradients that are too steep or too long [italics] (as defined by Inclusive Mobility) [end italics] or if they include steps or bridges then proposals should include alternative accessible and inclusive means of step free access.	No change necessary. The authorities feel that requiring all links to be accessible for all road users is sufficient, especially when read in conjunction with paragraph 4.111 which seeks to ensure that gradients meet the standards set out in 'Inclusive Mobility'.
1409	Jane	Willmot	Hammersmith and Fulham Disability Forum	04	Page 63	[bold] Public Open Space p 63: [end bold] There is no suggestion in this section that public open space or play space should also be accessible and inclusive. This is not acceptable. Our concern based on experience with applications is that developers do not automatically provide accessible and inclusive proposals for public open space or place spaces.	Change Proposed. The vision (Chapter 3) will make it explicit that ALL development in the OA must be "accessible and inclusive"- including open space, play space, streets and buildings.
1410	Jane	Willmot	Hammersmith and Fulham Disability Forum	04	Key Principle UF16, UF18	[bold] Key Principles UF 16 -18 [end bold] We are not clear - whether the SPD specifically requires developments to provide accessible and inclusive open space and play space to enable disabled children to use them. Parents of disabled children have told us that Hammersmith and Fulham does not provide inclusive playgrounds that are accessible to disabled children unlike Kensington and Chelsea. We note that the H&F submission development management DPD specifically requires play space to be accessible and inclusive for all children including disabled children.	Change proposed. Text will be added to paragraph 4.56 that requires any applicant(s) to consider the needs of disabled children and children with other special needs in any proposals for open space or play space.
1411	Jane	Willmot	Hammersmith and Fulham Disability Forum	04	Key Principle UF16, UF18	[bold] Key Principles UF 16 -18 [end bold] We are not clear - which other policies the SPD is relying on to achieve this. These are important points for disabled children and their families and should be clarified in the SPD.	Change proposed. Text will be added to paragraph 4.56 that requires any applicant(s) to consider the needs of disabled children or children with other special needs in any proposals for open space or play space.
1412	Jane	Willmot	Hammersmith and Fulham Disability Forum	04	Skyline	6.1.[bold] Skyline: Edges or Streets (p64 - 77) [end bold]: whatever the height or uses of new buildings the revised SPD should expect sufficient evacuation lifts as standard so disabled and older people feel safe either as residents or users of new buildings. This reduces anxiety that they could be trapped either on upper floors or in the lift.	No change necessary. This is dealt with in Building Regulations and other building design standards and guidelines. It is too detailed an issue for a strategic planning framework like the SPD. Any application(s) will be assessed on their own merits against all of the relevant standards.
1415	Paul	Kennedy		04		The plan focuses on the future residents of the new development area, and largely ignores the impact on existing residents and visitors in surrounding streets.	No change necessary. The SPD has been informed by a thorough analysis of the existing context of the OA. The conclusions of these studies can be found in the Character Area Analysis, Edges Study and Townscape and Views Analysis SPD Supporting Evidence documents. The findings of these studies have directly resulted in the drafting of a number of the Key Principles found in the SPD, such as Key Principle UF21 which requires any application(s) to assess the impact of their proposals on the views identified in the Townscape and Views Analysis and demonstrate that there will be no negative impact on any of them. The Edges section focuses in particular on the impact on existing residents. For example, it

							seeks to ensure that the height and massing of new buildings on the edges of the OA will respect the scale and massing of neighbouring buildings (Key Principle UF26) and to ensure that the privacy, daylight and sunlight of existing properties are respected (Key Principle UF28).
1416	Paul	Kennedy		04		The proposed scale of the development, the heights of the buildings, and the proposed population density, are completely out-of-line with the surrounding area, and will be intolerable for local residents. This is a residential area, not Canary Wharf. The proposals have already encouraged satellite applications by neighbouring hotels, in reliance on the proposed new skyscrapers, which should be rejected. Many of the proposed "open spaces" will hardly see the sun, and the high-rise buildings will also overlook the properties of existing residents.	Change proposed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. There are a number of Key Principles in the SPD that have been put in place to ensure that any new development will integrate with the existing communities. For example, the skyline section of the Urban Form chapter requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas (including specific reference to Brompton Cemetery) and requires developers to demonstrate that there will be no negative impact on exiting townscape. Furthermore, the Edges section has been written to ensure that new buildings are sensitively integrated and enhance the existing context (as stated in the Key Objective). The Edges section also seeks to protect the residential amenities of existing properties (such as overlooking) in Key Prin
1419	Paul	Kennedy		04		The plan ignores the impact on our local heritage, retaining the ghastly Empress State Building while destroying the iconic Earl's Court Exhibition Centre, and existing communities. The skyline will be transformed from a residential setting blighted only by the Empress State Building, to a high-rise dystopia. Even those areas which will not be destroyed, such as historic Brompton Cemetery, will be overlooked. The proposed development will be soulless, with no social housing, and will have no community feel at all.	No change necessary. The heritage assets of the local area are one of the primary drivers behind the SPD and are considered in great deal in the SPD and SPD Supporting Evidence Documents (for example the Character Area Analysis and the Townscape and Visual Analysis). The importance of heritage assets is particularly evident in the Skyline section of the Urban Form chapter which seeks to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape. Key Principle UF19 seeks to preserve or enhance the character, appearance and setting of surrounding conservation areas and Key Principle UF20 seeks to preserve or enhance the character, appearance and setting of Brompton Cemetery. The skyline is further protected by Key Principle UF21 which requires any application(s) to include a verified set of views taken from points identified by the authorities and to demonstrate that the proposal(s) will have no negative impact upon any of them. These vi
1434	Michael	Bach	Kensington Society	04		We do, however, have some strong concerns, especially since as a new urban quarter this should adopt a more challenging approach than can be applied to incremental development that usually faces local planning authorities. An Opportunity Area which involves effective total redevelopment represents a unique opportunity to achieve much higher standards, such as: - [bold] a quality townscape [end bold] where the policies are more ambitious for the quality of architecture and the impact of buildings on the wider townscape - it should represent a positive improvement not a pathetically low aim such as not causing unacceptable harm;	No change necessary. It is considered that the quality of architecture is too detailed and subjective an issue to be addressed in a strategic planning framework such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning applications are submitted. Having said that, please note that the impact of new buildings on the wider townscape is addressed at length in the SPD, primarily under the Skyline Key Objective which seeks to ensure that no new buildings visible on the skyline have a negative impact on the quality and character of surrounding townscape. The wording of this objective reflects the statutory duty that planning officers will be expected to discharge when reviewing any application(s) submitted.
1438	Michael	Bach	Kensington Society	04		We do, however, have some strong concerns, especially since as a new urban quarter this should adopt a more challenging approach than can be applied to incremental development that usually faces local planning authorities. An Opportunity Area which involves effective total redevelopment represents a unique opportunity to achieve much higher standards, such as: - [bold] a high-density environment with good access to green space. [end bold]	Change proposed. 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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. In terms of density, 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. Policy 3.4 of the London Plan states that taking into account local

							context and character, the design principles and public transport capacity, development s
1444	Michael	Bach	Kensington Society	04	Key Objective	<p>Page 52: Fifth bullet: Change to read:</p> <p>"Ensure that any new buildings visible on the skyline have a positive impact on the quality and character of the surrounding townscape and enhance the skyline and townscape of the area"</p> <p>This objective is unambitious - it is not about adding a few buildings to an existing context but creating West London's New Urban Quarter - it should enhance the skyline.</p> <p>Reason: Policies 7.6 (Architecture) and 7.7 (Location and Design of Tall and Large Buildings) between them seek to ensure that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape and that tall and large buildings should not have an unacceptably harmful impact o their surroundings, but Policy 7.7C (f) also says that:</p> <p>"tall or large buildings should, individually or as a group, improve the legibility of an area, by empha</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.
1445	Michael	Bach	Kensington Society	04	Para 4.6	<p>4.6 It should be made clear that it is not only the conservation areas surrounding the site which need to be respected but also longer distance views particularly those identified in the RBKC Building Heights SPD (referred to in 4.10) but also others not identified in accordance with English Heritage The Setting of Heritage Assets published 2011. The latter should be included in Policy Context.</p>	<p>Change proposed. Text about longer distance views will be added to paragraph 4.6, which will be amended to read "There are 19 conservation areas in and around the OA, including Brompton Cemetery. There are also a number of sensitive long distance views, particularly those identified in the RBKC Building Heights SPD, which may be effected by development in the OA. Any development will be required to respect the character and appearance of its surroundings and all heritage assets."</p> <p>The setting of Heritage Assets will be added to the Policy Context.</p>
1446	Michael	Bach	Kensington Society	04	Page 55	<p>Page 55 Maximise connectivity</p> <p>This should focus on increasing permeability and reducing severance.</p>	No change necessary. The Connectivity section does focus on increasing permeability and reducing severance. As paragraph 4.14 states "overcoming the existing severance is one of the fundamental aims of regeneration in the OA".
1447	Michael	Bach	Kensington Society	04	Para 4.15	<p>4.15 This should be about increasing access not creating through routes for rat-running traffic.</p>	Change proposed. The SPD does not encourage through rat-running for traffic. A sentence will be added to paragraph 4.18 stating that care should be taken to avoid the creation of new vehicular 'rat runs'. In the transport chapter of the SPD it is clearly stated that "an east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, through not for vehicles" (paragraph 10.71). The 'Connectivity' referred to in the Urban Form chapter covers all modes of transport. In line with Key Principle UF36, all streets should encourage pedestrians and cyclists, and in line with Key Principle UF37 all streets should be designed to keep vehicle speeds under 20mph.

1448	Michael	Bach	Kensington Society	04	Para 4.18	4.18 Care will need to be taken to avoid creating new capacity for through traffic.	Change proposed. A sentence will be added to paragraph 4.18 stating that care should be taken to avoid the creation of new vehicular 'rat runs'.
						[bold] Key Principle UF4: Extend existing streets into and through the OA [end bold]	
1449	Michael	Bach	Kensington Society	04	Key Principle UF4	The Society is concerned about encouraging through traffic to rat-run through the area. Through streets need to be kept to minimum.	Change proposed. A sentence will be added to paragraph 4.18 stating that care should be taken to avoid the creation of new vehicular 'rat runs'.
1450	Michael	Bach	Kensington Society	04	Para 4.21	4.21 These streets could be extended into the area without going through the OA.	No change necessary. The SPD does not stipulate that these streets must go through the entire OA, but suggests that they could be extended into it as part of comprehensive regeneration.
						[bold] Key Principle UF8 [end bold]	
1451	Michael	Bach	Kensington Society	04	Key Principle UF8	This is fundamental to the principle of improving the connectivity east to west. Therefore the requirement for bridging over or if that cannot be achieved bridges needs to be strengthened and the bridge links would need to be wide landscaped links. The retained open sections along the railway might be used to advantage to preserve the wildlife status but if so then there will need to be a construction management plan which acknowledges this aspiration.	Noted.
1452	Michael	Bach	Kensington Society	04	Para 4.29	4.29 Change to "Wimbledon branch of the District Line"	Change proposed. The text will be changed to "the District Line of the London Underground". It is the authorities' intention that all branches of the District Line that pass through the OA will be either decked or bridged over to ensure sufficient connectivity.
1453	Michael	Bach	Kensington Society	04	Para 4.36	4.36 How realistic is a vehicle connection to the A4 - it could only be an exit from the OA.	No change necessary. The Transport Chapter of the SPD addresses connection to the A4 in greater detail. See paragraph 10.59.
						[bold] Key Principle UF10: High-quality civic spaces [end bold]	
1454	Michael	Bach	Kensington Society	04	Key Principle UF10	Strongly support improved public realm outside underground stations.	Noted.
1455	Michael	Bach	Kensington Society	04	Open Spaces	[bold] Key principles UF13-15: Public green spaces [end bold] - support	Noted.
						[bold] Skyline [end bold]	
1456	Michael	Bach	Kensington Society	04	Skyline	Since, with the exception of the Empress State Building, all the buildings likely to affect the skyline will be new buildings, there is absolutely no reason why such a low threshold for acceptability should be set - all new buildings, as required by the London Plan Policy 7.6, should make a positive contribution to the public realm and to the wider cityscape. London Plan Policy 7.7 is inappropriate to an area where nearly all the buildings will be new. They should all make a positive contribution - the suggestion that it is sufficient that buildings do not have a negative impact is an unacceptably low ambition/objective.	No change necessary. The current wording of the Key Objectives and Key Principles in the Skyline section reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.
						Key Objective: As 3.13 above [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]:	
1457	Michael	Bach	Kensington Society	04	Skyline Key Objective	'Ensure that any buildings visible on the skyline make a positive	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.

						contribution to the appearance, quality and character of the surrounding townscape and longer distance views from key panoramic view points.'	
1458	Michael	Bach	Kensington Society	04	Para 4.58	4.58 Reword as follows ' <u>any</u> new buildings within the OA <u>should make a positive impact on the skyline and enhance the existing context.</u> '	No change necessary. The current wording of this paragraph reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.
1459	Michael	Bach	Kensington Society	04	Para 4.59	4.59 We strongly support the statement that the heights of the existing exhibition centres should not be seen as precedent for redevelopment proposals and that the location and height of any new buildings should not be based on the location and height of existing buildings on the site. Above all, we strongly object to the Empress State Building being seen as a positive contribution to the area.	Noted.
1460	Michael	Bach	Kensington Society	04	Key Principle UF19	Key Principle UF19: Preserve and enhance the character of nearby conservation areas and the settings of listed buildings. This should not be restricted to nearby conservation areas. PPS5 and The Setting of Heritage Assets both require account to be taken of designated assets, which include both listed buildings and conservation areas even if these are some distance away. In particular in the RBKC SPD on Building Heights panoramic views are identified which could be affected by the skyline of this site. Residents in mansion blocks up to Kensington High Street could also be affected by the skyline, and PPS5 and the supporting Historic Environment Planning Practice Guide both require views from whatever level to be taken into account.	Change proposed. The wording in Key Principle UF19 will be amended to refer to "surrounding" conservation areas rather than "nearby" conservation areas.
1461	Michael	Bach	Kensington Society	04	Para 4.61, Para 4.62	4.61 and 4.62. There appears to be a contradiction between the statement that the views are open and the suggestion of an improvement in the enclosure of the Cemetery. It should be clarified that the sense of openness is an inherent characteristic of Brompton Cemetery notwithstanding that there is a lower physical enclosure around the curtilage. Dominant modern design could be overbearing and destroy the sense of openness which exists at present. We are particularly concerned that the high-rise redevelopment of the Seagrave Road site could have an extremely detrimental impact on the Cemetery. We fully support the principle in para 4.64 that new visible buildings should enhance the skyline as seen from the Cemetery	Change proposed. The wording of paragraph 4.61 will be amended to make the authorities' intentions more clear. It is felt that there is the potential to improve the weakly enclosed western boundary of the cemetery, as identified in RBKC's Conservation Area Proposals Statement, and therefore enhance its character, appearance and setting without necessarily compromising the panoramic nature of the views. Paragraph 4.62 specifically states that proposals along the eastern edge of the Seagrave Road site must not "over dominate" the cemetery. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which the heights proposed in any application(s) will be assessed.
1462	Michael	Bach	Kensington Society	04	Key Principle UF22	Key Principle UF22: The Society does not wish to see a "cluster" of tall buildings - one mistake in the area is quite enough. We object to paragraphs 4.65-4.67 - there is nothing of strategic significance proposed in this SPD which warrants providing such a major "landmark" in this location - there is and will not be "a significant, London-wide public function/destination" nor anything else to justify this approach.	Change proposed. The authorities remain convinced that cluster of tall buildings in the vicinity of the Empress State Building could be successful and a new paragraph will be added to the SPD in order to explain why a cluster of tall buildings is seen as preferable to an approach that sees them scattered across the OA with no relation to one another. The Culture Strategy in the SPD (Chapter 08) sets out the aspiration for a strategic leisure, cultural and visitor attraction (Key Principle CS1) within the OA. It is the authorities' intention that this will give meaning to the height of Empress State building and its presence on the skyline (as established in paragraph 4.66). The authorities are also of the opinion that, following extensive analysis of the local townscape, an attractive composition of taller buildings in the vicinity of the Empress State Building has the potential to enhance the skyline. Any buildings visible on the skyline will be subject to Key Principles UF19, UF20 and UF21.
1463	Michael	Bach	Kensington Society	04	Edges	Support Key Objective and Key Principles 26-30	Noted.

1464	Michael	Bach	Kensington Society	04	Para 4.77	4.77 We are very concerned that the proposals for the Seagrave Road site are in direct conflict with this	No change necessary. It would be inappropriate to comment on the contents on a specific planning application as part of this consultation on the SPD.
1465	Michael	Bach	Kensington Society	04	Para 4.80	4.80 Significantly taller needs to be defined. In the RBKC Building Heights it is considered that one and a half time higher is tall. Where there are historic buildings with high floor to floor heights this will produce too great a difference since the appearance of a building with lower floor to floor heights will appear denser and more dominant. It is suggested that significantly should be no more than two floors higher or one and a quarter times the height which ever is the lesser. There is always scope for the developer to argue the case for a taller building.	No change necessary. The SPD is a strategic planning document that establishes a framework against which proposals for the OA will be assessed. It would therefore be too prescriptive for the SPD to define specific dimensions or building heights. Any application(s) submitted will be assessed on their own merits against the framework of Key Objectives and Key Principles established in the SPD.
1466	Michael	Bach	Kensington Society	04	Streets	[bold] Streets [end bold] Fig 4.26 -4.28. It should be made clear that the heights indicated should include plant rooms etc since particularly for hotels or offices with air conditioning this can be the equivalent of an additional floor.	Change proposed. A clause stating that "plant should be included within the overall design of buildings and not simply added to rooftops" will be added to paragraph 4.90.
1498	Charlotte	Winer		04		The listed Brompton cemetery - a working cemetery - will be irrevocably spoiled by the new high buildings overlooking it - and the skyline will be irreversibly destroyed for much of this area - residents in Eardley Crescent and Philbeach Gardens in particular will find themselves overlooked by ugly light-blocking and polluting buildings.	No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will be assessed in this regard. Key Principle UF21 require any application(s) to demonstrate that there will be no negative impact on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced. Key Principle UF28 seeks to protect the privacy, daylight and sunlight of all existing buildings (including those in Philbeach Gardens and Eardley Crescent). Furthermore, residential amenities such as outlook, noise and disturbance are protected by the UDP and Core Strategy standards
1500	Charlotte	Winer		04		This proposal still contains too many buildings of a type out of character with the area and needs far more stringent control. As it stands there is not enough obligation on the developers to control noise, light and air pollution. A new town, which is essentially what still seems to be being proposed would surely require a new substantial green space or park. Holland Park on a sunny day is already full to capacity.	No change necessary. The SPD does not propose any building types and it would be inappropriate to comment on the contents of any specific application as part of this consultation on the SPD. However, the SPD does set out detailed analysis of the character of the surrounding areas (please see the Character Analysis SPD Supporting Evidence Document) to which any applicant(s) will be expected to respond. As one of the key drivers in the vision for the OA, the integration of any proposal into the "existing urban fabric and character of the surrounding area" (paragraph 3.4) will be a key concern when any assessing any application(s). The authorities consider that the framework established by the Key Principles and Key Objectives in the Environment Chapter to the SPD to be sufficient to control noise, light and air pollution. The authorities also 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 sp
1505	Dr M.	Eileen Magnello		04		GREEN SPACE - There is still insufficient green space proposed in the SPD for families, communities and visitors. The elderly, children, local wildlife and pets will also suffer unless a proper, large park is created to accommodate the needs of one and all.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.
1506	Dr M.	Eileen Magnello		04		HEIGHT, DENSITY, MASS and MATERIALS - The visual impact of such intensive development would affect the quality of life by destroying the skyline, especially surrounding the Grade 2 Brompton Cemetery. Outlook will be reduced, light will be blocked into many	Change proposed. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF 25 set out the framework against which application(s) will

					homes and streets and Conservation areas will be dwarfed. More thought needs to be put into the issues of height, mass, density and building materials allowed and how they are allowed to be used/implemented.	be assessed in this regard. Key Principle UF21 require any application(s) to demonstrate that it will have no negative impact on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced. Key Principle UF28 seeks to protect the privacy, daylight and sunlight of existing buildings such as those in Philbeach Gardens and Eardley Crescent. Furthermore, residential amenities such as loss of outlook, noise and disturbance are protected by the UDP and Core Strategy standards quo
1523	Richard	Chute	04	Para 4.31	Many suggestions such as for a new underground railway station in the OA have not been properly considered: the suggested 'Philbeach Interchange'. The consented "Earl's Court relief access link-road" could be continued to create a complete north-south route through the site. In paragraph 4.31, the sentence "The deck could be used for either...", should be amended by adding: ".... or for a road."	Change proposed. The importance of increasing connectivity across the OA is established in paragraph 4.32 which states that "if the top of a deck is used for open space, it must not compromise connectivity". In order to emphasise the importance of connectivity across a deck, this will be revised to read "Whether the top of a deck is used for open space or buildings, it must not compromise connectivity. Any open space should be permeable, and there should be new routes created around and across it that are accessible for all road users". Please note that it is established in the Transport Chapter (paragraph 10.68) that the SPD does not seek to achieve significant reductions in the traffic on the Earl's Court One Way System (which includes Warwick Road). An assessment of the potential for using a new north-south route within the site to relieve the Earl's Court One Way System of through traffic was undertaken. This found that a north-south route could reduce traffic on Warwick Road by up to 18% and on Earl's Co
1525	Richard	Chute	04		Re.: building heights: whilst appreciating the efforts to establish a 1:1 ratio, it is still necessary to have a policy of a maximum of 9 storeys. Research on the impact of tall buildings on communities is not favourable. Tall high-density blocks are proven unsuitable for families.	No change necessary. It would be too prescriptive for a strategic planning document like the SPD to specify c building heights. Instead, it establishes a framework of Key Principles and Key Objectives against which the proposed heights of any application(s) will be assessed. Key Principles UF19 to UF25 are particularly relevant as they deal with potential impacts on the skyline and the design of tall buildings. Key Principle UF21 requires any application(s) to demonstrate that there will be no negative impact on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and other surrounding conservation areas and therefore Key Principles UF19 and UF20 specifically state that their character, appearance and settings must be preserved or enhanced.
1528	Richard	Chute	04	Para 4.113	In paragraph 4.113, I oppose the control of vehicle speeds by the encouragement of on-street parking; landscaping with vegetation is a more effective influence on motorists' behaviour. And any car parking spaces should be below ground.	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)
1529	Richard	Chute	04		There still appears to be inadequate provision for open/green space in Chapter 2. Whether there is a 'Linear Park' or not, the needs of over 12s have been overlooked in this draft SPD: there should be a consolidated large park in the OA, where they can play more willingly than in 8 insignificant small gardens. Geometrically a consolidated large park would allow a greater proportion of the ground level to receive at least some sunlight, for a given occupancy level.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4,
1533	Richard	Chute	04		Also, allotment or enclosed communal gardens would be beneficial.	No change necessary. Community gardens are among the list of different leisure pursuits that new public open spaces will be expected to provide for, as stated in

							Key Principle UF11. Enclosed communal gardens are not mentioned in the Public Open Spaces section as they would not be public. However, they are referred to in paragraph 4.86. The amenity standards expected for all new homes are also set out in Key Principle HO17.
1543	Jonathan	Choat	Orpen House Tenants' Compact	04		7.The heights, scale and massing of buildings indicated in the JSPD are still too large and that the proposed excessive heights would dominate the surrounding area. Buildings in the surrounding area in RBKC and Hammersmith & Fulham are at the most 6 storeys from street level , which provides a proportion to the width of the streets and the human eye's perception of a proportionate scale. Incidentally , this is why people prefer to live in this Borough and not in gigantic Canary Wharf style glass boxes elsewhere . The extraordinary planning error of The Empress State building is fortunately unique in the area and apart from being isolated from the surrounding housing areas, should not be used as a benchmark to permit taller buildings. Thus the height lines of other residential and commercial buildings on the site should be the same and in keeping to the areas immediately adjacent. This JSPD would permit buildings routinely above the average of the houses in both Kensington and Chelsea, and Hammersmith and F	No change necessary. No specific building heights are proposed in the SPD. Instead, it presents a framework of Key Objectives and Key Principles against which the heights of any buildings will be assessed. Key Principles UF19, UF20 and UF21 seek to prevent the heights of buildings dominating the area. UF19 and UF20 seek to preserve the character, appearance and settings of surrounding conservation areas and listed buildings, including specific reference to Brompton Cemetery. Key Principle UF21 requires any application(s) to include a set of verified views, taken from points identified by the authorities, and to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be found in the Townscape and Visual Analysis SPD Supporting Document. The proportion of the streets in the area surrounding the OA was identified as one of the strongest local traits in the Character Area Analysis carried out to inform the SPD. As a result, the Streets section
1544	Jonathan	Choat	Orpen House Tenants' Compact	04		8.The quality of the built environment proposed does not link-in with or compliment the surrounding areas, and needs to be of a far higher and more respectfully attuned architectural quality.	No change necessary. It is considered that the quality of architecture is too detailed and subjective an issue to be addressed in a strategic planning document such as the SPD. Instead, the quality of architecture will be assessed on a case by case basis as and when any planning application(s) are made.
1550	Jonathan	Choat	Orpen House Tenants' Compact	04		14. Public Open Space is made much of in the plan, but this part of RBKC and London needs large accessible open space. The emphasis of this provision on the relatively small little more than street width , Linear Park is inadequate for this size and scale of development . In addition with the over building of the river , this element is likely to be one of the most expensive elements of the plan and therefore is highly likely not to be delivered on the basis of 'financial viability' by the developer The space indicated is too narrow, needs to be substantially larger in width and should be the subject of a financial bond held independently to ensure its completion early in the construction phases .	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. It should be noted that the SPD recognises that the railway may not be entirely decked over (see Key Principle UF8). The requirements for the provision of open space in the OA, as set out above, are in no way dependent on the decking over of the railway, or the delivery of a linear park. Key Principle UF12 clearly states that the 2ha local park could be delivered as one di
1551	Jonathan	Choat	Orpen House Tenants' Compact	04		15.The entire ratio of non enclosed green space and private garden space to the built environment is not sufficient for the scale and size of the development and needs to be substantially increased .	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.
1556	Jonathan	Choat	Orpen House Tenants' Compact	04		20. RBKC has a duty of care for its residents and voters . It should be seen to exercise this with a distinct bias towards the interests and stated objections and concerns of the existing local residents - particularly those proximate to the development and not seen to be overwhelmed by inexperience of the sheer scale and size of the development and persuaded by the self interested and often specious plaudits and representations of the developer and professional architects as soi disant arbiters of taste and style.	Noted.
1596	Claire	Craig	English Heritage	04		However, we must emphasise that Key Principles UF 19 and UF 20 on page 64 both require amendment to ensure compliance with PPS 5 and the emerging NPPF. We recommend the following	Change proposed. Both key Principles will be revised in line with your suggestion.

						<p>rewordings:</p> <p>"UF 19 - Preserve or enhance the character, appearance and setting of conservation areas and listed buildings."</p> <p>"UF 20 - Preserve or enhance the character, appearance and setting of Brompton Cemetery and its listed buildings"</p>	
1597	Claire	Craig	English Heritage	04	UF21	<p>English Heritage considers that Key Principle UF 21 is not sufficiently consistent with the PPS 1 objective that development be plan-led, and essentially leaves a severe adverse potential impact of the planned development to be managed on an application by application basis. English Heritage further considers that the remaining Key Principles relating to Skyline on pages 66 and 67 also contribute to the management of this issue on an application by application, rather than plan-led, basis.</p>	<p>No change necessary. The authorities consider that, as the SPD is intended to supplement existing policy, the primary role of the Urban Form Strategy is to establish a framework of Key Principles and Key Objectives against which any planning application(s) for the OA could be assessed. It is not intended to provide a definitive masterplan with a fixed spatial solution, but rather to provide planning guidance for the OA that supplements the requirements of the Boroughs' Core Strategies and the Mayor's London Plan. Key Principle UF21 should not be read in isolation but rather as part of the whole Urban Form Strategy, and indeed the whole SPD, which the authorities consider to be consistent with the 'spatial planning' requirements of PPS1, particularly paragraphs 30, 31 and 32.</p>
1598	Claire	Craig	English Heritage	04		<p>A number of other elements in the Urban Form Strategy cover matters relating to the design (including height) of various elements of the OA, most notably key principles UF 24, UF 26, and UF 35. While English Heritage appreciates what these principles are endeavouring to achieve, we consider that they demonstrate a lack of clarity about what scale means in terms of impacts in the different parts of the OA. English Heritage recommends that the Project Team develop a more specific vision about this in order to overcome more effectively the critical issue of potential adverse impacts on the surrounding historic environment. As emphasised on a number of occasions, we consider that modelling based on the recommendations that we have made for the TVA will prove to be a very valuable component of the SPD for all who will use it and will <u>eliminate a great deal of potentially costly uncertainty</u> that could be associated with the much needed development of this area.</p>	<p>No change necessary. The authorities consider that, as the SPD is intended to supplement existing policy, the primary role of the Urban Form Strategy is to establish a framework of Key Principles and Key Objectives against which any planning application(s) for the OA could be assessed. It is not intended to provide a definitive masterplan with a fixed spatial solution, but rather to provide planning guidance for the OA that supplements the requirements of the Boroughs' Core Strategies and the Mayor's London Plan. The authorities are satisfied that the framework of Key Principles and Objectives set out under the Skyline, Edges and Streets sections of the Urban Form Strategy provide a robust framework against which any application(s) for the OA could be assessed, without being overly prescriptive. It is not the role of the SPD to set in place a fixed Masterplan solution for the OA. The authorities consider it appropriate that the SPD allows some flexibility, as this provides a more effective basis upon which de</p>
1599	Claire	Craig	English Heritage	04		<p>English Heritage is mindful that concurrent master planning of this site has revealed the value of drawing on local vernacular when designing the taller elements surrounding the Empress Building. It has also demonstrated that quite specific management of tall building locations is preferable for all parties. We consider that this supports our request for further work in this regard.</p>	<p>Noted.</p>
1600	Claire	Craig	English Heritage	04		<p>English Heritage must register our reservations about suggesting relatively tall elements on the northern edge of the OA. While we understand the notion of presenting a Metropolitan Face for the development, we would not want to see excessive scale here. We appreciate the conscious avoidance of mono-façades element but again consider that a clearer notion about height would be beneficial here as part of an overall strategy for tall buildings in the OA.</p>	<p>No change necessary. Although the SPD does recognise that there is some potential for "relatively tall" elements along the 'Metropolitan Face', any application(s) for this area will be subject to all of the Key Principles established in the Skyline and Edges sections of the Urban Form Strategy. This includes the requirement to preserve or enhance the character, appearance and setting of surrounding conservation areas and listed buildings and the need to demonstrate that there are no negative impacts on the views identified in the Townscape and Visual Analysis. Views 50, 51, 52, 53, 54, 16 and 14 (please note that the numbers allocated to the views may change in the final draft of the SPD) are of particular relevance to the 'Metropolitan Face'. Furthermore, any application(s) for this area will be expected to demonstrate compliance with the Edges Key Principles, namely that the height and massing of any new buildings on the edge of the OA will need to respect the scale and massing of neighbouring buildings an</p>
1604	Claire	Craig	English	04	Para 4.102	<p>In addition, English Heritage:</p>	<p>Noted.</p>

			Heritage			- Welcomes the identification at paragraph 4.102 on page 75 of what is actually conservation area detail as discussed above in relation to the CAA. We recommend that this type of information could be used more widely throughout the Urban Form Strategy;	
1610	John	Drake	Campaign to Protect Rural England	04		(B) The revised SPD still mirrors too closely CapCo's masterplan and outline Planning Application which the local amenity societies and residents found unacceptable	No change necessary. The masterplan work in the SPD has been produced independently of any specific planning application in order to test the Key Principles and Key Objectives established in the document. Please note that all masterplan drawings and images in the SPD and SPD Supporting Evidence documents are included for illustrative purposes only and should not be treated as proposals for the OA.
1617	John	Drake	Campaign to Protect Rural England	04		(G) The present SPD allows the developer to damage the setting of St. Cuthberts Church listed Grade II* by constructing the so called 'Lost river Park' which will if the West London Line is upgraded with pantograph power, because of the gauge necessary will bring the ground level to half way up the Baptistry wall. At present it comes from the A4 viaduct and a brief glance from the underground lines as though it is on a hill. It will also put parts of the church boundary below ground level.	No change necessary. The SPD requires any application(s) to preserve or enhance the character, appearance and setting of all surrounding conservation areas and listed buildings (Key Principles UF19 and UF26). The importance of local heritage assets are also established in the Site Context chapter. Furthermore, Key Principle UF6 seeks to retain and/or improve views of special existing local landmarks. St Cuthbert's Church is identified in the following text and in figure 4.4 as one of these special existing landmarks. Please note that whilst the SPD seeks to secure a certain quantum and quality of public open space (see Key Principles UF11 to UF15), it does not specify any locations or arrangements. Please note that all masterplan drawings and images in the SPD and Supporting Evidence documents are for illustrative purposes only and should not be treated as proposals for the OA. Your comment appears to relate in large part to a specific planning application. It would be inappropriate to comment on the content
1618	John	Drake	Campaign to Protect Rural England	04		(H) There are conservation areas in Philbeach Gardens and Eardley Crescent as well as LB Fulham which will be compromised by the proposed oversized towers and walls of housing.	No change necessary. All of the surrounding conservation areas, including those at Philbeach Gardens and Eardley Crescent, are shown on page 39 of the SPD. The importance of preserving or enhancing the character, appearance and setting of all surrounding conservation areas is established in Key Principles UF19 and UF27.
1619	John	Drake	Campaign to Protect Rural England	04		(I) Brompton Cemetery in RBKC facing Seagrave Road which have Grade 1 and 2 buildings and Grade 1 landscape. The setting will be destroyed by the proposed housing of 5 storey plus housing in the Seagrave Road development.	No change necessary. The SPD seeks to protect the particular sensitivities of Brompton Cemetery in Key Principle UF20, which requires any application(s) to demonstrate that its character, appearance and setting will be preserved or enhanced. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which the heights of any proposal(s) will be assessed. Please note that all masterplan drawings and images in the SPD and Supporting Evidence documents are included for illustrative purposes only and should not be treated as proposals for the OA.
1620	John	Drake	Campaign to Protect Rural England	04		(J) The roof and width of the existing streets and terraces should be taken into account but not necessarily copied.	No change necessary. This is exactly what the Streets section of the Urban Form Chapter in the SPD seeks to achieve. For example, the 'street enclosure ratio' established in Key Principle UF31 is inspired by the 'street enclosure ratios' found in the surrounding area, but does not copy them. Paragraph 4.90 states that "As a general rule across the OA, it is considered that any enclosure ratio less than 1:1 would not be in keeping with the existing character of the area and would risk feeling oppressive or 'canyon-like' and/or having restricted daylight/sunlight. Therefore, any street that breaks this rule will require significant urban design justification.". A similar approach is taken under Key Principle UF33, which seeks to ensure building lines respond to those found in the surrounding context and UF34 which seeks to ensure roofscapes respond to those in the surrounding area.
1621	John	Drake	Campaign to Protect Rural England	04		Public Open Space i) In the present masterpan Public Open Space is dwindled into relatively small areas which could easily become semi-private or private in the present layout.	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. Please note that all masterplan drawings in the SPD are included for illustrative purposes only and should not be treated as proposals for the OA.
1622	John	Drake	Campaign to Protect Rural England	04		Public Open Space ii) For the number of proposed numbers of residents it is insufficient	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.
1623	John	Drake	Campaign to Protect Rural England	04		Public Open Space iii) There should be public space either in front or rear of the houses and which should be grassed and have permeable patterns	No change necessary. Open spaces in front of and to the rear of houses tends to be private or semi private. Public open space to the rear of houses in particular would cause problems with access and security. The SPD encourages the use of private defensible space to the front of properties and private, or semi private amenity spaces to the rear.
1624	John	Drake	Campaign to Protect Rural England	04		Public Open Space iv) There must be a large enough area to play organised games and positioned not to annoy the neighbouring properties. Sited possible near the centre of the site.	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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a commun
1625	John	Drake	Campaign to Protect Rural England	04		Public Open Space v) Smaller 'teach about' spaces should be positioned in each of the so called 'village areas' with the above provisos	No change necessary. This comment appears to relate to a specific planning application, as there is no reference to 'village areas' in the SPD. It would be inappropriate to comment on the contents of any specific application as part of this consultation on the SPD.
1626	John	Drake	Campaign to Protect Rural England	04		Public Open Space vi) As currently described the so called 'lost river park' will be difficult to acceptably achieve. Unless the levels are raised so it is higher over the railway lines and lower at the sides with a grass bank and landscaping	No change necessary. This comment appears to relate to a specific planning application. It would be inappropriate to comment on the contents of any specific application as part of this consultation on the SPD.
1627	John	Drake	Campaign to Protect Rural England	04		Public Open Space vii) In the commercial areas more formal spaces allowed to have markets and entertainments.	No change necessary. Key Principle UF10 seeks to ensure high quality civic spaces in locations that are likely to have the highest levels of movement and appropriate mix of land uses. Paragraph 4.40 seeks to ensure that civic spaces have retail, café, culture and community uses in the surrounding ground floors.
1628	John	Drake	Campaign to Protect Rural England	04		Public Open Space viii) The Seagrave Road site has insufficient public open space for the number of residents. It should be increased but it is difficult to	No change necessary. This comment appears to relate to a specific planning application. It would be inappropriate to comment on the contents of any specific application as part of this consultation on the SPD. The authorities consider the minimum standards for the quantum of public open space established in the SPD 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

						see how it can be done within the present layout in the planning permission.	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.
1865	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	04		There are four important issues in this respect that are not clarified or resolved in the SPD - it says that there should be: - East/West connectivity across the site (North/South connectivity is not identified as an issue in the Policy Context, but forms a major part of the Transport Chapter)	No change necessary. The Urban Form chapter establishes the need to maximise connectivity in one of its six Key Objectives. Key Principle UF1 seeks the introduction of "a number of new east-west and north-south connections across the OA that overcome the existing severance".
1870	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	04		10. The Vision says (our brief comments are set out in italics and are expanded in the sections that follow): - 3.4 There is an aspiration to integrate the development "into the existing urban fabric and character of the surrounding area" - [italics] Chapter 4 however opens up the possibility of a very different kind of development (see Section D below). [end italics]	No change necessary. The Urban Form Chapter has been informed by comprehensive analysis of the surrounding urban context. The results of much of this analysis can be found in SPD Supporting Evidence Documents such as the Character Area Analysis, the Townscape and Visual Analysis and the Edges Studies. There are a number of Key Objectives and Key Principles that directly reflect the authorities' aspirations for any proposals to integrate into the existing urban fabric. These include the Urban Grain Key Objective, which seeks to establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces, Key Principle UF3 which seeks to ensure that any pattern of new streets is inspired by the street types identified in the surrounding context, (this will be amended to make it clear that it should also be inspired by the existing pattern of streets) UF4 which seeks to extend existing streets into the OA, UF5 which seeks to extend the existing pattern of garden squares into the
1881	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	04		16. As already said, we do not accept the argument about needing demolition to solve deprivation. The other reasons given for demolition (in Para 5.12 of the SPD) merely restate the findings of the flawed Development Capacity Scenarios (which surely now need to be revised if they are to form a sound part of the evidence base for the SPD). These include greater benefits in terms of "extending the urban grain" (whatever that is taken to mean) and "increasing public open space and improving connectivity". As to increasing open space, it is obviously perfectly possible to achieve this in the area without wholesale demolition of the estates, indeed the SPD says that the WK estate in particular "has large areas of underused communal land that is poorly laid out" - a clear opportunity for the provision of new well-designed public open space. As to improving connectivity, the SPD itself identifies many ways of improving connectivity without estate demolition, including across the railway lines (see also Para 31	No change necessary. Currently the roads within the estates only lead to properties within the estates. Without comprehensive redevelopment of the entire OA, including extensive remodelling of the topography, it would not be possible to maximise connectivity in a manner that is accessible to all. The aspiration of the authorities is to increase connectivity between North End Road and Warwick Road. Crossing the railway lines alone would not achieve this and would be likely to result in a number of 'dead end' streets. The incidental open space in the estates could, to a degree, be remodelled. However, in order to achieve sufficient quantum of open space with adequate accessibility and natural surveillance, this would be likely to require the removal of some estate buildings and the construction of new urban blocks. It is unlikely that such an approach would meet Key Principle UF13, which seeks to ensure that all residential properties are within a 100m walk of an open space. Furthermore, this approach would no
1909	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	04		D. [bold] Townscape and open space 37. The fourth topic on which we have major concerns is Townscape. Taken at face value, there appears to have been a radical shift in thinking (which inter alia makes the current Masterplan inappropriate). The earlier SPD and Masterplan proposed essentially that the OA should only rise to the heights of adjacent areas at its boundaries, but towards the centre of the Area, it could rise to substantial heights. The current draft appears to be saying that the "edge" should respect the heights of adjacent areas, that there should be higher development along the A4 frontage, and that there should be a "gateway" building(s) to mark the entrance to the development. Bearing in mind that we are opposed to the development of the WK and GG estates, we do not see the relevance of higher "edge buildings" on the A4 and we oppose any suggestion of a "gateway building" which hints of aggrandisement - which is not appropriate.	No change necessary. Neither the current nor the previous draft of the SPD contain any prescription of specific building heights. Any masterplan drawings included in the SPD and SPD supporting documents are for illustrative purposes only and should not be treated as proposals for the OA. However, it has always been one of the authorities' primary aims to ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context (as stated in the Edges Key Objective). This includes the 'Metropolitan Face' along the A4. It is important to note the special context of the Metropolitan Face, fronting as it does the strategically important A4. The authorities are therefore of the opinion that, as a result of this special context, there is potential for "some relatively tall elements" (para 4.81) in this location as well as a "potential gateway". It should be noted that any proposal(s) for the 'Metropolitan Face' will not only be assessed against these aspirations, but also aga

1910	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	04		38. Beyond those principles, the SPD is less clear. It doesn't mention stepping up heights towards the centre of the OA, which we welcome, but is silent on any maximum heights across the whole Area. It refers, oddly, to the possible establishment of a cluster of taller, slim buildings around the Empress building, theoretically to soften its impact. We feel this is odd because such a cluster, of tall but slender buildings, would in fact make the Empress building appear even clumsier and more dominant. Para 4.67 is also contradictory in this respect. On the one hand it is saying that the tall new buildings should "enhance its visual impact on the skyline", but in the very next sentence it says they should be slender in order to "reduce their visual impact". No building can simultaneously have a visual impact and seek to reduce its visual impact! We are not arguing for tall and fatter buildings - we believe that the impact of the Empress building would be worse as part of a cluster, nor do we accept the a	Change proposed. The authorities remain convinced that cluster of tall buildings in the vicinity of the Empress State Building could be successful and a new paragraph will be added to the SPD in order to explain why a cluster of tall buildings is seen as preferable to an approach that sees them scattered across the OA with no relation to one another. The SPD does not prescribe any specific building heights, or indeed set any maximum parameters. Instead, it establishes a framework of Key Objectives and Key Principles against which any application(s) will be assessed. The aspiration for a cluster of tall buildings around the Empress State building is driven by a number of factors. Firstly, the LBHF Core Strategy (2011) establishes that "there may be some scope for taller buildings no higher than, and close to, the existing Empress State building". This was tested through three dimensional urban design analysis (completed for illustrative purposes only). As noted in paragraph 4.65, this analysis revealed that th
1911	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	04		39. We are concerned that the Key Objective regarding the Skyline, and its expression in Para 4.61 regarding Brompton Cemetery, is essentially negative. It seeks to ensure that "no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape." This is deeply under-ambitious and needs to be strengthened. We do however welcome the statement that the heights of the existing exhibition centres should not be seen as precedent for redevelopment proposals.	No change necessary. The current wording of this Key Principle and the supporting text reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted.
1912	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	04		40. The Section on Streets is illogical and should be amended. Para 4.89 makes clear that there is a variety of "enclosure ratios" in the OA's surroundings. They varied, in Primary Streets from 1:1.25 to 1:1.54; in Secondary Streets from 1:1.2 to 1:1.32 and in Tertiary Streets from 1:0.8 to 1:1.9. Thus in almost all cases in the local area the streets are wider than the buildings are high, in some cases over one and a half times as wide as high. Yet UF31 says that "no street should have an 'enclosure ratio' narrower than 1:1". This should be revised to match the average of those in the surrounding area and the typology of different streets - that is, between 1:1 in smaller streets and 1:1.5 in larger ones.	No change necessary. The street enclosure ratio set in Key Principle UF31 sets a minimum standard. Paragraph 4.90 points out that, as a result of the analysis of the surrounding streets, any enclosure ratio less than 1:1 would not be in keeping with the existing character of the area. It is expected that this enclosure ratio will be applied in conjunction with the requirement established in Key Principle UF32 to ensure that the heights of buildings and the widths of streets vary according to street type.
1913	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	04		41. We remain deeply concerned that the proposed amount of open space is low and highly dependent upon decking over railways with associated high cost, phasing and construction complexity and the burden of long term maintenance, all to be borne by the later phases of the redevelopment. The aspirations for active play and sports facilities are not locked down so that there appears to be a high risk that even where such facilities are funded and provided by the development, this will result in a loss of passive open space such as parks, gardens, greens.	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. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a commun
2029	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Para 4.3	As noted above, the garden squares that are referred to are predominantly 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.
2030	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Figure 4.1	The analysis set out is questioned. How does this reflect the aspirations at Figure 3.1?	No change necessary. Figure 4.1 is illustrative only and should not be treated as a proposal for the OA. However, it reflects the following aspirations set out in figure 3.1; identifying existing streets that could be extended into the OA, the potential for new east-west connections across the OA, the potential for new north south connections through the OA, potential 'green' north-south links/corridor, the

							potential for a vehicular connection with the A4 and a number of pedestrian and cyclist connections. It also takes this one stage further and reflects the Key Principles established in the Connectivity and Urban Form section of the Urban Form chapter, such as the importance of the connection with Star Road, the potential for streets like the crescents to be replicated in the OA, the special existing local landmarks and the expectation that the link under the A4 will be explored.
2031	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Para 4.13	It should be noted that to the north of Cromwell Road, the "well defined street hierarchy" does not exist.	No change necessary. The authorities do not agree with this analysis. The illustration in figure 4.2 demonstrates that the street hierarchy can be applied north of the Cromwell Road.
2032	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF3	The wording of the Principle is inconsistent with and should be revised to accord with paragraph 4.16 which "encourages" street alignments to replicate that of the surroundings.	No change necessary. The authorities feel that asking for the street pattern to be inspired by the existing street types identified in the surrounding context is neither unreasonable or in contradiction with paragraph 4.16.
2033	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Para 4.18	What is the background to the statement regarding Primary Streets? How are these defined - grid pattern; dimensions between? Please clarify.	No change necessary. All of the different street types, including Primary Streets are defined in the Character Area Analysis SPD Supporting Evidence document that it is expected will be read alongside the main body of the SPD. In this document it is stated that "Primary Streets define the area and connect it with the wider city." This definition is informed by their role in the urban grain and the type of movement that they accommodate. It is also acknowledged in the Character Area Analysis that specific characteristics, like the dimensions of these streets, may vary.
2034	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF2	Whilst the key principle of delivering the East to West connectivity between Warwick Road and North End Road is recognised as a key aspiration for development in the ECWKOA its delivery must be related to viability.	Noted.
2035	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF4	It may not be appropriate to extend existing streets into and through the ECWKOA. As such the key principles should be amended to refer to the potential for extending these streets into and through the ECWKOA.	No change necessary. The text that follows Key Principle UF4 makes it clear that this is not necessarily applicable to all streets, but that there are a number of streets that the authorities believe have the potential to be extended into and through the OA. For example, paragraph 4.22 says "There are a number of existing streets that could be extended into the OA" and paragraph 4.23 reads "If these existing streets are extended..."
2036	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Para 4.23	The specific reference to the direct extension of Star Road and its delivery should be removed. Whilst the principle of connecting into existing streets, where appropriate, is noted it is, however, not appropriate to specify particular links that must be delivered.	No change necessary. The connection with Star Road is key to the authorities' connectivity aspirations for the site as it is of strategic importance and will ensure the connectivity of the site to the west.
2037	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF12	Similar comments were made in respect of the draft SPD. The revised draft still includes too much detail for an SPD. In particular, the continued reference to the 100m distance from publicly accessible open spaces and to the provision of a public linear park of at least 2 hectares. The key principle should be revised to remove reference to the 2 hectare figure. It is noted that at paragraph 4.46, that reference to proposals for a series of contiguous public green open spaces that combine to make the offer of a linear 2 hectare local park are 'encouraged'. This is very different to the current wording of the key principle which states that the comprehensive regeneration proposals 'will be expected' to include the offer of a publicly accessible local park of at least 2 hectares.	No change necessary. The provision of a 2 hectare local park and the requirement for as many residential properties as possible to be within a 100m walk of a public green open space are both absolute requirements of the SPD and therefore will not be removed. Please note that there is no requirement in the SPD for the two hectare park to be a linear park. Key Principle UF12 states that "any proposal for comprehensive regeneration will be expected to include a publicly accessible local park of at least 2 hectares, either as one discrete park or as a series of contiguous smaller spaces that meet the criteria set out in Table 7.2 of the Mayor's London Plan (2011)". The authorities believe that this makes it clear that a 2 ha park must be delivered, but that it may be delivered as a discrete park or as a series of contiguous public open spaces.
2038	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF13	As stated with regard to the draft SPD, the revised draft is being too prescriptive in looking for residential properties to be within 100metres walking distance of a public green open space. It is also noted that the terminology employed in key principle UF13 is different to that included on the indicative diagram (figure 4.10) which refers to 'publicly accessible open spaces'. The principal comment remains that the SPD is being too prescriptive and is inconsistent in respect of these requirements.	Change proposed. All Key Principles and the plan in figure 4.10 will refer to "publicly accessible, green, open spaces" for the sake of consistency.

2039	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Skyline Key Objective	It is suggested that the key objective be re-worded so that there is no ambiguity as to what constitutes a 'negative' impact on the quality and character of the surrounding townscape. Reference should be made to Policy HE10.1 PPS5 which relates to development affecting the setting of a designated heritage asset.	Change proposed. This Key Objective reflects the statutory duty that planning officers will be expected to discharge when assessing any application(s) submitted. Reference will be made to the importance of PPS5 as a complete document in the Site Context chapter. The authorities consider it unnecessary to refer to any one specific policy from PPS5 as any application(s) will be expected to pay due regard to the entire document.
2040	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Para 4.63	Reference to financial contributions for enhancements to Brompton Cemetery should be clarified to make clear that such contributions will only be sought where directly relevant and in scale and kind to the development proposals.	Change proposed. This clause will be amended to read "Financial contributions will be sought for enhancements to Brompton Cemetery where directly relevant and in scale and kind to any development proposals."
2041	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF21	This has the potential to be too prescriptive in that views have been identified in the Townscape and Views Analysis. Whilst there are clearly buildings and spaces of interest in and around the Opportunity Area it is too prescriptive to set out a list of townscape and views. The wording of the key principle already acknowledges that there may be other views that should be assessed as individual scheme proposals come forward. This rather illustrates that it is inappropriate to put forward a set of prescribed Townscape Views as part of the SPD.	No change necessary. The views identified in the Townscape and Visual Analysis are considered by the authorities to be the most significant in the OA's surroundings. It is therefore an absolute requirement of the SPD that these should be analysed as part of any application(s) in order to demonstrate that there is no negative impact on any of them. The wording of the Key Principle allows for ADDITIONAL views to be considered. In circumstances where additional views are required, it will also be necessary to analyse those views already identified in the Townscape and Visual Analysis.
2042	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF23	Reference is made at paragraph 4.65 to the appropriateness of further tall buildings around the Empress State. The proposed location for additional tall buildings has the potential therefore to provide an appropriate marker for the Opportunity Area - it need not, as Key Principle UF 23 sets out, be a marker for the presence of a significant London wide public function/destination.	No change necessary. It is the aspiration of the authorities, in line with the RBKC Building Heights SPD, to ensure that meaning is given to the presence of tall buildings on the skyline. Without a London wide public function/destination, there would be no reason to mark the presence of the OA on the skyline. Please note that the Culture Strategy (Chapter 8), requires any redevelopment of the OA that involves the loss of EC1 and/or EC2 to create a new strategic leisure, cultural and visitor destination. It is the authorities' intention that this should be a "significant, London-wide public function/destination".
2043	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF24	This includes too much detail for an SPD - these key principles are set out in development plan documents and, amongst others, the Cabe/EH guidance note.	No change necessary. The authorities consider it important to establish some broad, guiding principles for the design of tall buildings. Reference is made in the SPD to the CABE/EH guidance, with which any application(s) will be expected to demonstrate compliance.
2044	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF26	The key principle is too prescriptive. It is not appropriate to expect new buildings at the edges to 'respect the scale and massing of neighbouring buildings'. It is suggested that new buildings should 'respond appropriately' to the heights of those that surround them, or as worded at Policy 7.4Ba of the London Plan "... have regard to" the pattern and grain of...	No change necessary. The authorities do not consider it unreasonable to expect any application(s) to "respect" the scale and massing of neighbouring buildings.
2045	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Para 4.78	Building heights and typologies in the area of the North End Road cannot be said to be consistent - there is an ad hoc mixture.	No change necessary. Although there is SOME variation in building heights along North End Road itself, this paragraph actually refers to "the streets adjoining it", where heights and typologies do "tend to be consistent".
2046	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF27	The document should have regard to the advice in PPS5, particularly Policy He9 and HE10.	Change proposed. Reference will be made to the importance of PPS5 as a complete document in the Site Context chapter (page 39).
2047	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Key Principle UF28	Is it necessary to include this particular Key Principle? As noted by the text both Core Strategy's include appropriate policy and text relating to daylight, sunlight and privacy. If it is retained, it is inappropriate to quote selectively from the core strategy documents in this regard.	No change necessary. This is an area that is of particular concern to local residents. Therefore, the authorities consider it important to include this Key Principle and to draw attention to the relevant UDP/Core Strategy standards that protect residential amenities.
2048	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Paras 4.87 - 4.94 Figures 4.26 - 4.28	For the reasons set out in comments to the draft SPD, the SPD still includes too much prescription regarding proposed building/street width relationships. Whilst the material is identified as being illustrative the clear inference is that new development in the Opportunity Area should respect the enclosure ratios and street width analysis that is set out.	No change necessary. Whilst it is the authorities' intention that these enclosure ratios will be used in the OA in order to help to achieve the key aspiration of integrating well into the existing urban character and fabric, flexibility is built into this section of the Urban Form chapter with a clause that states; "any street that breaks this rule will require significant urban design justification" (para 4.90).
2049	Matthew	Gibbs	CapCo/Earl's	04	UF31	The 1:1 ratio that is referred is too general and fails to reflect the	No change necessary. The street enclosure ratio established in Key Principle

			Court and Olympia Group			much varied character of London.	UF31 sets a minimum standard. Paragraph 4.90 points out that, as a result of the analysis of the surrounding streets, any enclosure ratio less than 1:1 would not be in keeping with the existing character of the area. It is expected that this enclosure ratio will be applied in conjunction with the requirement of Key Principle UF32 to ensure that the heights of buildings and the widths of streets vary according to street type.
2050	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Para 4.95 - 4.97 Figure 4.30	Similar to the comments above the proposed application of the enclosure ratios to open spaces as well as streets is also too prescriptive and risks constraining innovative design solutions.	Change proposed. Whilst it is the authorities' intention that these enclosure ratios will be used in the OA in order to help to achieve the key aspiration of integrating well into the existing urban character and fabric, there is no desire to constrain innovative design solutions. Therefore, some flexibility is built into this section of the Urban Form chapter. In order to clarify this, the clause at the end of paragraph 4.97 will be amended to read; "any open spaces that differ significantly from those found in the surrounding area in terms of spatial dimensions, the heights of surrounding buildings and/or enclosure ratios will require significant urban design justification" (para 4.90).
2051	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	UF37	It is unclear why there is a specific reference to street design in order to keep vehicle speeds under 20mph. It is appreciated that this does not mean that a 20mph speed limit would apply but, if the core objective of development in the Opportunity Area is to achieve integration with the surrounding area a specific design constraint that is not reflective of that surrounding will not achieve this objective.	No change necessary. The Key Objective for the Streets section of the SPD is not just to design well proportioned streets that respond to those in the surrounding area, but also to "encourage walking and cycling". The authorities believe that, in order to achieve this, it is very important that streets are designed to keep vehicular speeds under 20mph.
2052	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	04	Figure 4.37 - 4.40	The details set out at paragraphs 4.117 - 4.120 are too prescriptive for the revised draft SPD. Reference, for example, to the specific phases and the delivery of open space etc is likely to prove too prescriptive and inflexible. Equally, references to the delivery of a specific link from surrounding streets are also likely to prove inflexible. It is suggested that this detail is removed.	Change proposed. Reference to sequential phases will be replaced with "illustrative development parcels" that could, theoretically, be delivered in any order. The drawings are clearly labelled as illustrative. To make this clearer, additional text reading "for illustrative purposes only" will be added to each caption. An introduction to this section will also be added, which will read "Comprehensive redevelopment of the OA will need to be approached in phases. Each phase must contribute towards the appropriate Key Objectives and Key Principles from this SPD in order to ensure that the new and growing population can access the appropriate services and infrastructure. The following illustrations show how the Key Objectives and Key Principles could be delivered in different development parcels, and ultimately for the OA as a whole. They should not however, be treated as an illustration of phasing and no application will be assessed against them."
2106	Geraldine	Kelly		04		Among the points which need to be considered are: 3. The development will irrevocably destroy the local skyline. There will not be many places in Earl's Court that this will not affect, and the most to suffer will be the listed Brompton Cemetery.	No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant (s) to submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced.
2108	Geraldine	Kelly		04		Among the points which need to be considered are: 5. There is insufficient green space proposed in the SPD for community or recreational use.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child. Furthermore, Key Principles SC3 and SC4 deal with Sports and Leisure Provision and SC6 addresses the need for community space. In brief they establish requirements for a range of indoor and outdoor sports and leisure

						facilities to cater for a range of incomes, sports facilities to allow at least one sport to be developed to an "elite" standard and for a community hub of 4,
2109	Geraldine	Kelly		04	Among the points which need to be considered are: 6. The heights, densities and the use of materials will not link in with either of the communities.	Change proposed. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which any application(s) will be assessed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. As a result, there are a number of Key Principles in the SPD that have been put in place to ensure that any new development will integrate with the existing communities. For example, Key Principle UF19 in the Skyline section of the Urban Form chapter requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas, (specific reference is made to Brompton Cemetery in Key Principle UF20) and Key Principle UF21 requires applicant(s) to demonstrate that there will be no negative impact on any of the views in the Townscape and Visual Analysis. F
2113	Sandro and Jelena	Guadagnini		04	We are writing with reference to the planned development of the current Earls Court site. Having reviewed the application we feel compelled to raise the following concerns about the development and would like to raise our strongest objections against the development: 3) Light obstruction and skyline. The proposed height will significantly alter the area's skyline and most importantly impact on light and outlook into and of our apartment.	No change necessary. One of the Key Objectives in the Urban Form section of the SPD seeks to ensure that no new buildings visible on the skyline will have a negative impact on the quality and character of the surrounding townscape. Key Principles UF19 to UF25 set out the framework against which application(s) will be assessed in this regard, including a requirement for applicant(s) to submit a set of verified views, taken from points in the local area identified by the authorities, in order to demonstrate that there will be no negative impact on any of them. These views, along with the authorities' analysis of them, can be seen in the Townscape and Visual Analysis SPD Supporting Evidence Document. The SPD recognises the sensitivity of Brompton Cemetery and therefore Key Principle UF20 specifically states that its character, appearance and setting must be preserved or enhanced. Residential amenities like outlook and light are protected by the UDP and Core Strategy standards quoted in paragraphs 4.84 and 4.85.
2116	Dora	Bertolutti Howard		04	Also the effects on local gardens and existing flats and houses near the exhibition centre which will be dominated by the new proposed Buildings, which are far too high and close to the existing ones in Eardley Crescent and Philbeach Gardens. These current proposals will damage our gardens and the wildlife which in currently thriving - birds, bees, butterflies, squirrels. I am also very concern about the reduction in Light which will affect the garden, my ground floor flat and the basement flats below, if the proposals are accepted. We get little sunlight As it I and this would be reduced even further if the new proposals went ahead.	No change necessary. The section on Edges in the Urban Form chapter of the SPD seeks to ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context. Key Principle UF29 is of particular relevance to your comment as it seeks to ensure that any application(s) sensitively incorporate the existing buildings on the edges of the OA into new urban blocks. As paragraph 4.86 states, "where the back gardens of existing buildings occur on the boundary of the OA, they should be incorporated into new urban blocks... Either new 'back-to-back' private gardens or semi private communal gardens, which are only accessed by the residents of the new adjoining properties, should be introduced between the new buildings and the existing rear gardens". It is very unlikely that such an approach would negatively impact on existing wildlife- in fact, with the creation of new back garden environments it may even improve it! Residential amenities like outlook and light are protected by
2118	Dora	Bertolutti Howard		04	Why are there no plans for more green spaces?	No change necessary. The SPD contains an entire section that proposes new public green spaces. Please see pages 60 to 63. In particular, Key Principles UF12, UF13 and UF14 establish minimum requirements for the quantum of publicly accessible, green, open space and Key Principle UF15 sets the minimum standards for the quantum of play space. 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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.
2133	Pamela and Michael	O'Hagan		04	2. QUALITY OF LIFE - One of the attractions of an area is the amount of open space and park facilities, for health, recreation and	No change necessary. The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and

						relaxation, and having fought hard for these in the area, it is depressing to learn how inadequately that has been planned for in the new development. THIS MUST BE RETHOUGHT. A park should be provided.	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 local park, for all residential units to be within 100m walking distance of a public green open space, for 10sqm of public green open space per child and for 10sqm of dedicated play space per child.
2134	Pamela and Michael	O'Hagan		04		3. AESTHETIC APPEAL. The area has a wonderful Victorian flavour. Blocking out the skyline with high density high rises will reduce the attractiveness of the area, and very importantly destroy the surrounds for many residents already living there. THESE BUILDINGS SHOULD BE REDUCED IN HEIGHT AND DENSITY.	Change proposed. The SPD does not propose any specific building heights, but rather establishes a framework of Key Objectives and Key Principles against which any application(s) will be assessed. The SPD has been informed by careful analysis of the local communities, the conclusions of which can be seen in SPD Supporting Evidence Documents such as the Character Area Analysis, Townscape and Visual Analysis and Edge Studies. As a result, there are a number of Key Principles in the SPD that have been put in place to ensure that any new development will integrate with the existing communities. For example, Key Principle UF19 in the Skyline section of the Urban Form chapter requires development to preserve or enhance the character, appearance and setting of surrounding conservation areas, (specific reference is made to Brompton Cemetery in Key Principle UF20) and Key Principle UF21 requires applicant(s) to demonstrate that there will be no negative impact on any of the views in the Townscape and Visual Analysis.