

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

CONSULTATION RESPONSES SCHEDULE: SOCIAL & COMMUNITY FACILITIES

Chapter 09: Social and Community Facilities

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
6	Jane	Chaston		09		I and many other people will lose the Doctor's Surgery at 82 Lillie Road	No change necessary. Figures 3.3, 3.4 and 3.5 show 82 Lille Road remaining underdeveloped through any comprehensive approach to regeneration in the OA. Were an application to come forward proposing the demolition of the surgery, the authorities would require its replacement with at least equivalent floorspace and in an equally accessible location for all those that currently use the facility.
18	Linda	Chasten		09		I and many other people will lose the Doctor's Surgery at 82 Lillie Road	No change necessary. Figures 3.3, 3.4 and 3.5 show 82 Lille Road remaining underdeveloped through any comprehensive approach to regeneration in the OA. Were an application to come forward proposing the demolition of the surgery, the authorities would require its replacement with at least equivalent floorspace and in an equally accessible location for all those that currently use the facility.
23	Patricia	Rowley		09		I and many other people will lose the Doctor's Surgery at 82 Lillie Road	No change necessary. Figures 3.3, 3.4 and 3.5 show 82 Lille Road remaining underdeveloped through any comprehensive approach to regeneration in the OA. Were an application to come forward proposing the demolition of the surgery, the authorities would require its replacement with at least equivalent floorspace and in an equally accessible location for all those that currently use the facility.
26	Dany	BuBois		09	SC1	As a local resident with a young family I am unhappy about the amount of new residents proposed to move to this area as it will mean far greater competition to get into already over-subscribed local schools. I understand that there is a new primary and a new secondary school proposed, but this is unlikely to have space for the families of the 7,500 new residents as well as the children who need an education already in the borough. As the majority of the people moving into the area will be from social housing, the schooling need will be very high.	No change necessary. The authorities can only require developers to provide for the education capacity requirements arising from their development. Separate to this process, the authorities have a duty to provide for the educational needs of its residents and are in the process of improving and expanding the capacity of existing nursery, primary and secondary schools to meet this need.
31	Helen	Coope		09	SC1, SC2	The projected area of new residential 'villages' and blocks of some stories high is going to bring in a new increased density of population. Where are the schools, surgeries transport provisions for the new influx? In The area between Barons Court Library , through to Gliddon Rd and up to Hammersmith Rd facilities will be stretched to deal with overspill.	No change necessary. Key Principle SC1 deals with education provision. Key Principle SC2 deals with health provision. Chapter 10 of the SPD deals with transport provision. Developers would be required to mitigate against the impacts arising from their developments.
93	Simon	Fisher		09	SC5, SC6	support increased CCTV coverage, police shop and library	Noted.
119	Alex	Parker		09		The LBHF does not have enough measures to manage anti social behaviours common to transitory populations e.g. noise, litter, rubbish dumping, effective parking controls.	No change necessary. The authorities to have sufficient controls in order to manage these issues. There are contact numbers available on the council's website that you can call if you feel that any anti-social behaviour laws are being breached. In addition, Key Principle SC5 sets out that the authorities will secure a policing facility and extended CCTV network throughout the Opportunity Area.
153	Richard	Lane	Kensington and Chelsea College	09		KCC currently delivers education and training in all London prisons. Our work is increasingly focused on Vocational training giving routes to sustainable employment. That outcome is proven to significantly	Change proposed. Para 6.23 will be altered to make specific mention of the need for a specific focus to be paid to the employment opportunities for young offenders.

			(KCC)			reduce re-offending . We should accordingly welcome an explicit focus on employment and basic skills training for this group to contribute to social cohesion in the area. We also promote schemes with Registered Social Landlords to provide housing based incentives to change offending behaviour.	
154	Richard	Lane	Kensington and Chelsea College (KCC)	09		We welcome the population growth close to one of our main centres at Hortensia Road and the suggestion that funding should be made available (presumably through section 106 agreements) for development of Social and Community Provision.	Noted.
155	Richard	Lane	Kensington and Chelsea College (KCC)	09	SC1	However, we are concerned that there is no mention in SC1 (which concerns an obligation to provide for nursery, primary and secondary capacity) of post 16 educational provision. Increased local capacity will be required for this age group if targets to contain or reduce travel are to be met.	No change necessary. Any increase in secondary school capacity would also need to include sixth form capacity. Adult learning is dealt with in Key Principle SC6.
156	Richard	Lane	Kensington and Chelsea College (KCC)	09	SC6	We however note the requirement in SC6 to provide a new 4,500sqm community building including library and training facilities. We would caution against the creation of additional facilities of this size which would be uneconomic to run - particularly as funding for libraries and training is likely to be at a lower level in the coming years. Instead developers should be required to work with existing local providers to maintain or grow existing capacity. A site owned by the RBKC adjacent to the College's current Hortensia Road site would seem to be a more viable option for a community facility which - as part of a larger facility - would more sustainable in the long term.	No change necessary. The size of this facility is based on discussions with both borough's community service departments and is based on evidence of need. This figure incorporates the need for any applicant to provide affordable and flexible office, training and meeting space and a library.
271	Silvia	Piva		09		I note the development includes a proposal for indoor 'community areas', which simply risk to create blind areas (ie the police won't have easy access for control) for the development of illegal activities	No change necessary. Key Principle SC6 sets out an expectation that any application for comprehensive redevelopment provides a community hub. The facility would have its own management team, with a front desk at which bookings for community space and halls for hire could be made. Much like other community spaces in West London, the facility would need to be carefully managed in order to ensure that illegal activities do not take place within the facility. The councils would have the power to close the facility or insist on tighter management of the facility if such activities were to take place.
356	Christine	Powell		09	Para 9.14	Provision should be made for a swimming pool in the leisure and sports facilities	No change necessary. An audit of existing facilities has not thrown up a deficiency in swimming pools in the vicinity of the Opportunity Area. There is an existing swimming pool at Normand Park plus a planning application currently in at 100 West Cromwell road which proposes a new swimming pool. As a result, the authorities are not explicitly requiring the provision of a swimming pool as part of any comprehensive approach to redevelopment of Earl's Court. The SPD does not preclude the provision of a swimming pool and were development proposals to provide one, the authorities would look to secure affordable access to this, in line with the requirements of Key Principle SC3.
519	Malcolm	Spalding	Earl's Court Society	09	Key Principle SC2	SC2 STRONGLY SUPPORT	Noted
520	Malcolm	Spalding	Earl's Court Society	09	Key Principle SC3	SC3 "target existing deficiencies..." STRONGLY SUPPORT ADD at end "and at least one 6-lane 25m swimming pool"	No change necessary. No change necessary. An audit of existing facilities has not thrown up a deficiency in swimming pools in the vicinity of the Opportunity Area. There is an existing swimming pool at Normand Park plus a planning application currently in at 100 West Cromwell road which proposes a new swimming pool. As a result, the authorities are not explicitly requiring the provision of a swimming pool as part of any comprehensive approach to redevelopment of Earl's Court. The SPD does not preclude the provision of a swimming pool and were development proposals to provide one, the authorities would look to secure affordable access to this, in line with the requirements of Key Principle SC3.
521	Malcolm	Spalding	Earl's Court Society	09	Key Principle SC6	SC6 STRONGLY SUPPORT ADD "In addition to the hub there should be devolved community spaces in each of the four village quarters of the development"	No change necessary. The authorities are of the opinion that the community space should be provided in a community hub in order that the most efficient use of the space is made, management costs are reduced and so that benefits can

							be had from the collocation of uses in terms of increasing the potential for residents to make convenient use of a number of the community hub uses (i.e. make use of the library at the same time as using the adult learning space).
						<p>On behalf of the Congregation of Jehovah's Witnesses, I would like to put in a submission in relation to section 9 of the document entitled 'Social and Community Facilities Strategy' in the following terms:</p> <p>We note that 'places of worship' are not included among those land uses specifically referred to in paragraph 9.1 of the Revised SPD as constituting 'social and community facilities'. We would respectfully request that this omission be rectified so as not to preclude the future provision of such facilities within the opportunities area, if and when a future need should arise.</p> <p>Although we acknowledge that the 'London Plan' (referred to in paragraph 9.3) does make provision for places of worship, which we are happy to rely upon should a future need arise, we would still request that the Revised SPD include a specific reference to 'places of worship' for purposes of consistency and to ensure that the future provision of such facilities within the opportunities area, if needed, is not precluded by omission.</p> <p>This is consistent with Government Guidance as follows:</p> <p>Paragraph 14 of PPS1 which states: "...The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas. This means meeting the diverse needs of all people in existing and future communities, promoting personal well-being, social cohesion and inclusion and creating equal opportunity for all citizens". Paragraph 16 goes on to say: "...Plan policies should...take into account the needs of all the community, including particular requirements relating to...religion".</p> <p>Paragraph 126 of the draft National Planning Policy Framework (NPPF) states that in order to deliver the facilities and services that the community needs, planning policy should: "...plan positively for the provision and integration of community facilities (such as...places of worship)...to enhance the sustainability of communities and residential environments".</p>	
670	Kervin	Fontaine-Waldron	Jehovah's Witnesses	09	Para 9.1	We would be grateful if you could take these comments into consideration before adopting the Revised SPD.	Change proposed. The Social and Community Facilities Strategy sets out the community infrastructure deemed necessary from any development in order to make development acceptable in planning terms. Ecclesiastical premises are not considered to fall within this definition, nor would the authorities look to secure any ecclesiastical premises in any Section 106 agreement. However, the SPD does not preclude the provision of such premises and any application proposing the provision of places of worship would be assessed on its own merits. Space within the community hub identified in Key Principle SC6 could be used by faith groups for faith events. Wording will be inserted in the Key Principle and the supporting text to state that the space in the community hub should also provide for multi-faith space.
912	Cllr	Wade		09		Education	Change proposed. Text will be added to paragraph 4.56 that requires any

	Linda					It is welcomed that there will be provision in the JSPD for nursery, primary and secondary education facilities. But is there provision for play/educational for Special Needs Children and crèche facilities?	applicant(s) to consider the needs of disabled children and children with other special needs in any proposals for open space or play space. The SPD is not requiring any on site provision for special needs children. The borough has existing schools that cater for special needs children in which there is spare capacity to carer for any need arising from development in the OA. The SPD does not explicitly require the provision of crèche facilities as crèche facilities tend to be attached to places of work of places of activity, such as shopping centres of gyms. The authorities will not look to secure such facilities as part of any Section 106 agreement. However, the SPD does not preclude the provision of such premises and any application proposing the provision of a crèche would be assessed on its own merits.
913	Cllr Linda	Wade		09		Sports and Leisure It is essential that there is sufficient space for young adults and teenagers to play football so that scope for anti-social behaviour is designed out of the development area. The present provision allocated on the Linear Park is insufficient, which supports the earlier request for a 6-hectare open access park for the site.	No change necessary. It is unclear if the comment on provision for young adults and teenagers relates to the SPD or to the planning applications. Figure 3.3 shows four court/game areas within the OA. This is however, only an illustrative masterplan. The exact requirements would need to be ascertained from assessing any planning applications against the boroughs' child yield formulas and having regard to the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). The authorities consider the minimum standards for the quantum of public open space established in Key Principles UF12, UF13 and UF14 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) and Table 7.2 of the Mayor's London Plan (2011). 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.
914	Cllr Linda	Wade		09		Community Space There is an existing lack of venue space for local groups to meet in the area, which needs to include facilities such as New Horizon provision, on the Cadogan Street model, alongside Youth provision on the site.	Change proposed. Applicants can only be required to provide infrastructure to mitigate against the impact of their development It would contravene Section 122(2) of the Community Infrastructure Levy regulations to require infrastructure beyond this. Key Principle SC6 sets out that redevelopment of the OA will need to provide a community hub of 4,500sqm. New Horizon would be able to rent this space, at an affordable rate. "Youth space" will be added to Key Principle SC6.
1027	Mary	Gardiner	Kensington and Chelsea Social Council	09	SC1	Key Principle SC1 The child yield formula is different for the 2 boroughs and needs to be standardised.	No change necessary. There are great differences in the occupancy of housing between both boroughs. Applications submitted in RBKC would need to be assessed against RBKC's formula whilst applications in LBHF would need to be assessed against LBHF's formula.
1028	Mary	Gardiner	Kensington and Chelsea Social Council	09		An increase in schools is vital as the population grows, yet there is no identified site for new schools. It should not be necessary to travel long distances to school and to have to cross main roads. The number and location of schools needs to be planned so as to achieve walkable neighbourhoods for both existing and new residents. There should be school provision for children with special needs.	No change necessary. Para 9.9 states that the exact location of any education provision should be predicated on discussions with both boroughs' education departments. Figures 3.4 and 3.5 show an illustrative land use plan for the SPD, which identifies what the planning authorities consider to be a suitable location for any educational provision.
1029	Mary	Gardiner	Kensington and Chelsea Social Council	09		There is no drop-in under threes parent and child provision - there used to be, but this facility closed and is much missed. The text should refer to this under-provision. Alongside a drop-in provision where parents can attend and socialise (for which facilities are needed) there is also a local and proven need for an affordable/free nursery school for 1 - 5 year olds to provide childcare for working parents. This could be part of a children's centre open from 8 a.m. to 6 p.m. We seek the addition of [bold] Access to affordable and high quality nursery provision and a children's centre, to meet the needs of local communities, will be planned in cooperation with parents, the voluntary sector and the NHS. [end bold]	Change proposed. The SPD already identifies the need for nursery provision in Key Principle SC1. Key Principle SC6 and para 9.22 will be altered to include "children's centre".

1030	Mary	Gardiner	Kensington and Chelsea Social Council	09		The policy wording is that the present system is working at full capacity, whereas in fact there is a gap in terms of meeting needs and this gap in provision should not be carried forward. For example, schools are over-subscribed and at present parents are having to go out of the area to find a secondary school.	No change necessary. Applicants can only be required to provide infrastructure to mitigate against the impact of their development. It would contravene Section 122(2) of the Community Infrastructure Levy regulations to require infrastructure beyond this.
1031	Mary	Gardiner	Kensington and Chelsea Social Council	09		The impact of the population increase is also not well analysed. There is a doubling of the population, which will have a huge impact on amenity and require a doubling of social infrastructure.	No change necessary. The SPD sets out the requirements for what infrastructure will be necessary to mitigate against the impacts of development.
1032	Mary	Gardiner	Kensington and Chelsea Social Council	09	SC2	Key Principle SC2 We are concerned that the new health facility could be a private provider. We are therefore seeking a clear reference to NHS provision, both in the text and the policy. With the population increase that is anticipated, the commitment should be to an integrated primary care centre whose core services are defined in the text (e.g. it is essential that an NHS dental practice is included).	Change proposed. Clarification will be put in both the Key Principle and the text that the health facility will be owned and operated by the NHS. the first and second bullet in para 9.10 set out that the requirement is that for a population under 10,800, the facility should be a Health Centre, whilst the requirement for a population over 10,800 is that the facility should be an Integrated Primary Care Centre. This position has been agreed with both boroughs' PCTs.
1033	Mary	Gardiner	Kensington and Chelsea Social Council	09	SC3	Key Principle SC3 Leisure facilities need to be defined. For example, libraries, meeting halls, recreation, youth facilities, pubs, arts and culture.	No change necessary. It is implicit in the wording of the Key Principle that Key Principle SC3 is referring to facilities such as sports centres, gyms and health clubs. The authorities will not be looking to secure affordable access to pubs and culture whilst libraries, meeting halls and youth centres are dealt with under Key Principle SC6.
1034	Mary	Gardiner	Kensington and Chelsea Social Council	09	SC3	There should be reference to the local demand for a public swimming pool.	No change necessary. An audit of existing facilities has not thrown up a deficiency in swimming pools in the vicinity of the Opportunity Area. There is an existing swimming pool at Normand Park plus a planning application currently in at 100 West Cromwell road which proposes a new swimming pool. As a result, the authorities are not explicitly requiring the provision of a swimming pool as part of any comprehensive approach to redevelopment of Earls Court. The SPD does not preclude the provision of a swimming pool and were development proposals to provide one, the authorities would look to secure affordable access to this, in line with the requirements of Key Principle SC3.
1035	Mary	Gardiner	Kensington and Chelsea Social Council	09	SC3	Whilst welcoming the reference to affordability in the policy, this needs to be defined. The change we are seeking is for a range of sports and leisure provision [bold] to be available free of charge to low income groups. [end bold]	No change necessary. The exact affordability level that would be secured is too detailed for this SPD and would be dependent on viability.
1036	Mary	Gardiner	Kensington and Chelsea Social Council	09	SC6	Key Principle SC6 We strongly support the community hub, which we see as the heart of the development and absolutely crucial for supporting and resourcing a sustainable community, and bringing together new and existing residents. The community hub will respond to the current unmet need for community facilities. The first sentence in paragraph 9.20 is inaccurate and should be re-worded. The community hub needs to be built in the first phase of the development. It should be fitted out by the developer, and managed and maintained by s 106 payments for a minimum of 5 years.	No change necessary. The first sentence in para 9.20 is accurate and does not require alteration. The SPD currently states that the facility should be delivered in the early phases of development. To specify the first phase is too specific and might result in the facility being delivered in an unsuitable location. The fit out and rent level/management arrangements are too detailed for this SPD and would be resolved through discussions between the authorities and developer and dependent on viability.
1037	Mary	Gardiner	Kensington and Chelsea Social Council	09		We propose that the policies under Cultural Strategy (CS1-4) are linked to key principle SC6. Local cultural diversity is an important part of the make up of Earls Court and should be recognised in the text. Accessibility within the community hub also needs a mention within the policy; there should be the provision of lifts.	Change proposed. The SPD currently states that the facility should be delivered in the early phases of development. To specify the first phase is too specific and might result in the facility being delivered in an unsuitable location. The suggested wording on meeting cultural needs will be included. Play space is dealt with under Key Principle UF16. the authorities consider that requiring

						<p>We change we seek is for the policy to include the wording:-</p> <p>This will take place in the first phase of the development.</p> <p>The community spaces will meet diverse cultural needs and be affordable and accessible to all new and existing residents.</p> <p>Activities will include play space, opportunities for young people, a community café, a performance space, a space for local cultural diversity. [end bold]</p> <p>All of these activities will pull people together. Youth facilities should be referred to under Community Space with s 106 funding for youth workers.</p>	<p>space for performance space and a space for cultural diversity is too specific for this SPD. The exact fit out of the facility would need to be predicated on discussions with the authorities closer to the delivery of any facility. youth space will be added into Key Principle SC6. Youth workers would need to be funded by the local authorities.</p>
1038	Mary	Gardiner	Kensington and Chelsea Social Council	09		<p>We strongly support the existing reference to affordable office space for voluntary and community sector organisations, as we have heard evidence from organisations who have had to relocate to Ladbroke Grove because of nil affordable space at Earls Court.</p>	Noted.
1066	Bernard	Moran	NHS Kensington and Chelsea	09	SC2	<p>Chapter 09, Social and Community Facilities: Health:</p> <p>We recommend the following changes:</p> <p>Key Principle SC2 - please add the following sentence:</p> <p><i>Community engagement is an important lever to reduce health inequalities and the local community views should be considered in addition to an analysis of the impact on health and well being.</i> [end bold italics]</p>	<p>No change necessary. This does not relate to the need for health infrastructure and therefore appears to fall outside of the scope of the SPD. The public have been engaged in the preparation of the SPD and likewise would be consulted on any planning applications within the OA.</p>
1067	Bernard	Moran	NHS Kensington and Chelsea	09	Key Principle SC2	<p>Clause 9. 11- please amend to read as follows:</p> <p><i>The primary healthcare centre must be fully accessible with a viable street presence and meet the current requirements for the equality Act 2010.</i></p> <p>Reference to current NHS guidance for planning new Primary and Social Care Premises is set out in the Department of Health's (DH) Design Guidance including "Facilities for Primary and Community Care Services: Planning and Design manual 1183:0.6 England" published 2011. Also reference to "Health Building note (HBN) 00-10 Performance requirements for building elements used in healthcare facilities 8941:0.6 England" published April 2011. [end bold italics]</p>	Change proposed.
1068	Bernard	Moran	NHS Kensington and Chelsea	09	Key Principle SC2	<p>Please include:</p>	<p>Change proposed. Clarification will be provided in a new paragraph after 9.10 on what an Integrated Primary Care Centre would include. The other suggestions seem too specific for this SPD and would need to result from more detailed</p>

					<p>Clause 9.12:</p> <p>[bold italics] An analysis of the health impacts of the proposed developments will need to factor-in the following sectors:</p> <ul style="list-style-type: none"> - Acute healthcare; - Mental healthcare; - Intermediate healthcare; - Primary healthcare. <p>A Health Impact Assessment would need to consider future trends, advances in technology and social change which may have an impact on future healthcare delivery. If an integrated Primary Care Centre for the GP-led primary care services is required; such a centre may include: dental services; space to support the specialist skills that GPs are developing in response to local health and wellbeing needs; outreach facilities and home-based medical support. Examples of future issues that need to be addressed include the following;</p> <ul style="list-style-type: none"> - Demographic shifts to an increasing elderly population; - Greater public access to healthcare and choice; - Rapid developments in information, medical and communications technology; - Greater emphasis on community-based preventive medicine initiatives; - Socialist outreach centres - hospital specialists undertaking consultations and investigations in a primary care setting requiring more flexible clinical and diagnostic facilities; - Special facilities and room allocations to accommodate GPs with special interests, nurse practitioner clinics and health visitor services <p>[bold italics]</p>	<p>discussions with any developer upon the implementation of any health facility. A new key principle will be inserted requiring applicants to submit a health impact assessment with any planning applications in the OA.</p>
1069	Bernard	Moran	NHS Kensington and Chelsea	09	<p>Key Principle SC2</p> <p>Please include:</p> <p>Clause 9.13:</p> <p>[bold italic] As well as considering a strategic approach in respect of emerging Government Policy and health reforms, the Health Impact Assessment will need to consider the policies in the London Plan which seeks to ensure that new developments are designed and constructed in ways that improve health and reduce health inequalities. London Plan "Social Infrastructure (Policy 3.17),</p>	<p>Change proposed. A new key principle will be inserted requiring applicants to submit a health impact assessment with any planning applications in the OA. This key principle will include the suggested supporting text.</p>

					Healthcare Facilities", require development to meet the increased demands for such infrastructure to adequately assess need and ensure provision is made where shortfalls are identified. With this in mind, an evidence-based strategy which promotes greater integration of primary health and wellbeing; social care services and community services may need to be considered. A facility which allows for the co-location of social infrastructural services could provide an effective, flexible and sustainable solution. [end bold italic]	
1072	Dahabo	Guled		09	<p>Furthermore, Earl's Court has density and growing population, as the younger generations now also have lots of offspring, and the movement of new people into the area such those above Earls Tesco, affect the increasing population, where the health centres are demanding more than before. Without new infrastructure and services being provided my worry is that the pressure from the sudden increase in population will cause health related issues such as mental health, Sexual health, community tensions, and anti social behaviour.</p> <p>There is already a waiting list and a limited number of GPs in Earls Court, although now there is a new health centre at Hogarth Road and the density of the population need free NHS Gps with free dentists' facilities. There is also a great need for the local primary and secondary school.</p>	No change necessary. The Social and Community Facilities Strategy sets out the sort of social infrastructure that would need to be provided within the OA to support the needs of development. Applicants can only be required to provide infrastructure to mitigate against the impact of their development. It would contravene Section 122(2) of the Community Infrastructure Levy regulations to require infrastructure beyond this.
1076	Dahabo	Guled		09	<p>3.community hub</p> <ul style="list-style-type: none"> - affordable community and voluntary office spaces - Meeting halls - Praying spaces - Café - Space for drop - in information and culturally artefact exhibition centre - Café space - Youth club 	Change proposed. Youth space will be added to Key Principle SC6.
1077	Dahabo	Guled		09	<p>4.Leisure centre to combat the increasing obesity</p> <ul style="list-style-type: none"> - friendly gym - Swimming pool, free and gender friendly - Health facility. - Youth facilities 	Change proposed. Youth space will be added to Key Principle SC6. Key Principle SC2 sets out the requirements for development to deliver a health facility. Key Principle SC3 sets out the requirements for development to deliver a range of indoor and outdoor sports and leisure facilities and that the authorities will secure affordable access to these facilities. An audit of existing facilities has not thrown up a deficiency in swimming pools in the vicinity of the Opportunity Area. There is an existing swimming pool at Normand Park plus a planning application currently in at 100 West Cromwell road which proposes a new swimming pool. As a result, the authorities are not explicitly requiring the provision of a swimming pool as part of any comprehensive approach to redevelopment of Earl's Court. The SPD does not preclude the provision of a swimming pool and were development proposals to provide one, the authorities would look to secure affordable access to this, in line with the requirements of Key Principle SC3.
1078	Dahabo	Guled		09	<p>5.Nursery</p> <ul style="list-style-type: none"> - Family friendly drop-in centre for low income and vulnerable 	Change proposed. A children's centre will be added to Key Principle SC6. Key Principle SC1 sets out that the authorities will require applicants to deliver nursery space related to the needs of the new population. Key Principle UF16

						people. - Affordable nursery for working mothers with small babies - Children's play safe area is paramount importance	sets out the requirements in relation to children's play space and the need for this play space to be co-located where possible in order to make supervision more practical for families.
1080	Dahabo	Guled		09		7.Health Centre - NHC GPs space - Free Dental facilities - Consultants and specialists availability	Change proposed. Key Principle SC2 and the supporting text will be altered to make it more explicit that the health centre would be an NHS health centre. The SPD will also be altered to clarify that if an integrated Primary Care Centre needs to be provided, then it would need to include dental facilities and elements of specialist care.
1081	Dahabo	Guled		09		8. Schools - Primary schools for the increasing children - Secondary school in Earls Court is very essential as families travel either to Holland park or World's End Area	No change necessary. Key Principle SC1 sets out the requirements of any developer in the OA in relation to primary and secondary school provision.
1085	Dahabo	Guled		09		Community offices spaces at cheap rents are badly need, also other community services to be affordable too. Moreover affordable small business and restaurants which serve for non-European clothes, perfumes and food are important for people with other cultural skills.	No change necessary. Key Principle SC6 states that the authorities will secure the provision of a community hub and that this should include affordable and flexible office, training and meeting space. Key Principle RS7 states that the authorities will secure affordable shops to provide accommodation for retailers deemed essential for a good retail offer, but that are not able to afford full rents.
1119	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	09		- Schools in the borough are already oversubscribed, so the development must provide sufficient education provision for the OA and, if required, beyond	No change necessary. Applicants can only be required to provide infrastructure to mitigate against the impact of their development. It would contravene Section 122(2) of the Community Infrastructure Levy regulations to require infrastructure beyond this.
1120	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	09	Table 9.1 & 9.2	- Table 9.1 & 9.2 should use consistent terminology, as such 'private' on figure 9.2 should be changed to 'market' or at least '(market)' in brackets thereafter.	Change proposed.
1121	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	09	Para 9.7, Para 9.10	-9.7 & 9.10: Why use Wandsworth's calculations? It is not clear why these are included and why LBHF's calculations are not being used? If they are to remain, then please explain why.	No change necessary. The Wandsworth Housing Survey data is widely used across London and has indeed been adopted as best practice for child yield calculations by the GLA.
1122	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	09	SC2	- SC2 and 9.10 are not clear how many doctors surgeries are actually being required? We suggest the words a "minimum of" is included.	No change necessary. Health facility is referred to in the singular. It is therefore implicit that only one facility is being sought. This is in order to streamline management and maintenance costs of the facility for the NHS, who are going through a national process of consolidating premises.
1123	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	09	SC3	-SC3: Should a swimming pool be added as a requirement given the size of the OA?	No change necessary. An audit of existing facilities has not thrown up a deficiency in swimming pools in the vicinity of the Opportunity Area. There is an existing swimming pool at Normand Park plus a planning application currently in at 100 West Cromwell road which proposes a new swimming pool. As a result, the authorities are not explicitly requiring the provision of a swimming pool as part of any comprehensive approach to redevelopment of Earl's Court. The SPD does not preclude the provision of a swimming pool and were development proposals to provide one, the authorities would look to secure affordable access to this, in line with the requirements of Key Principle SC3.
1124	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	09	SC6	-SC6: It is not clear where the community facilities are to be sited. This should be more specific.	No change necessary. Para 9.22 states that the facility 'must be easily accessible to the new community and residents of both boroughs'. The SPD is not explicit about its exact location, but it can be inferred from this statement that the authorities would expect the facility to be located somewhere in centre of the OA near to the boundary of LBHF and RBKC.
1125	Cllr J.	Gardner	RBKC Public Realm	09	Para 9.22	- 9.22 (last sentence): What is meant by 'accessible to all'? Businesses may think this is an opportunity for cheap office /	No change necessary. This means that the spaces provided should be available without prejudice. They should be designed so as to be multi-faith, multi-ethnicity

			Scrutiny Committee			meeting space.	and useable for those with disabilities.
1150	Ali	Negyal		09		1. What is the anticipated increase in population from this redevelopment? (a) Local schools are known to already be at capacity (2.45) so what provision will be made for children moving in/natural family growth?	No change necessary. The new population would be dependent on the scale of development and size of units proposed. New development would need to be assessed against the 2004 Wandsworth New Housing Survey data in order to ascertain the likely population yield, as set out in the third bullet point in para 9.10. Key Principle SC1 deals with the authorities expectations in relation to education provision from any development in the OA.
1151	Ali	Negyal		09		b) Health centre developments (2.46) are not intended to meet additional healthcare needs, but simply to re-house GPs, so how will these be met for residents of the new development?	No change necessary. Key Principle SC2 sets out the authorities requirements in relation to health facilities.
1255	Jenny	Montefiore		09	Education	SERVICES The large increase in population will have an impact on all aspects and services in the area Approval should not even be considered if there is not provision for a secondary School as well as the planned for Primary and Nursery School.	No change necessary. Key Principle SC1 sets out the authorities requirements in relation to education provision in the OA.
1256	Jenny	Montefiore		09	Sports and Leisure	SERVICES A large community affordable Leisure and Sports Facility is needed, not just the private small gyms and healthclubs which are provided, this should not be confined to an underground hole in a basement and should not be an afterthought, but a provision. Chelsea and Westminster already has reported a 100% increase in appointments this year.	No change necessary. Key Principle SC3 sets out that the authorities will expect redevelopment to provide a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population. As part of this provision the authorities will look to secure affordable access as part of any relevant planning agreements.
1271	Brian	Coughlan	Met Police Authority & Met Police Services	09	Police Facilities	The Metropolitan Police Service provide a vital community service to the Royal Borough of Kensington and Chelsea and London Borough of Hammersmith and Fulham. This significant cross-borough development will lead to an increase in the number of people living, working and visiting the local area. This will have a direct impact on policing which should be mitigated by the development.	Noted.
1273	Brian	Coughlan	Met Police Authority & Met Police Services	09	Police Facilities	The representations outlined below, initially detail the MPA/S' operational needs in relation to ESB and outline why it is vital that this is protected. Secondly, the projected impact the overall development will have on policing is assessed and appropriate representations detail requested alterations to the draft SPD which will ensure the development impact upon policing is mitigated.	Noted.
1274	Brian	Coughlan	Met Police Authority & Met Police Services	09	Police Facilities	[bold] Protecting policing use in ESB [end bold] ESB is a significant landmark within west London, comprising 31 floors providing circa 48,000m2 floorspace. The building is occupied in its entirety by the Metropolitan Police. The Metropolitan Police Service (MPS) are one of the largest employers in London and occupy and manage circa 1,000,000m2 of property across London. The majority of the services required in order to ensure effective operational policing is delivered across London are based at ESB. These functions comprise both key policing and security operations. Essential policing services comprising Property Services, Corporate Real Estate, Procurement, Human Resources, Recruitment, Media Liaison, Officer and Staff Training, Communications, Archiving and Logistics are undertaken at ESB. These functions are served by essential car parking, good public transport links and the required	No change necessary. The authorities do not wish to be prescriptive about what use the Empress State building should be put to but in order to satisfy Policy LE1 in LBHF's Core Strategy, any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements of Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.

					<p>secure IT infrastructure close to ESB. Finally, ESB has recently served as a focus for the consolidation of other MPS offices, therefore adding weight to it's crucial role in delivering effective policing and a secure environment across London.</p> <p>Mindful of its role within strategic policing, the loss of ESB as a strategic policing facility may prejudice strategic policy objectives seeking to maintain a safe and secure environment in London. Our representations therefore seek proposed amendments to the draft SPD to protect the policing use within ESB. The following national guidance and statutory development plan policy demonstrate the planning policy support for these representations.</p>		
1275	Brian	Coughlan	Met Police Authority & Met Police Services	09	Police Facilities	<p>Protecting policing use in ESB National, Regional and Local Guidance</p> <p>The Crime and Disorder Act 1998 places a duty on the local planning authority to do all that it reasonably can to prevent crime and disorder in its area. The potential impact on policing operation through the loss of policing use in ESB through the draft SPD should be considered. The SPD must protect the policing use in ESB. By virtue of the Crime and Disorder Act 1988 the LPA have a statutory duty to ensure the policing impact is mitigated. The following national guidance and development plan policy is therefore relevant in determining this application.</p> <p>The draft National Planning Policy Framework (NPPF) was published by the Government in July 2011 and is intended to replace the current suite of Government Guidance. A strategic priority identified within the NPPF requires the provision of security and community infrastructure.</p> <p>Planning Policy Statement 1 (PPS1) - Delivering Sustainable Development requires authorities to ensure infrastructure is provided to support new and existing economic development and housing. PPS1 significantly raised the profile of policing as a material planning matter, with paragraph 1 recognising that 'poor planning can result in a legacy for current and future generations of run down town centres, unsafe and dilapidated housing, crime and disorder...'. PPS12 recognises the Police as one of the key social infrastructure delivery agencies.</p> <p>The draft SPD should also be aware of the strategic and local development plan. This is demonstrated immediately below.</p> <p>1. Adopted London Plan Policy 3.16 refers to</p>	<p>No change necessary. The authorities do not wish to be prescriptive about what use the Empress State building should be put to but in order to satisfy Policy LE1 in LBHF's Core Strategy, any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements of Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.</p>

					<p>provision of appropriate social infrastructure which by definition (paragraph 3.86) includes policing and states that proposals which result in a net loss without realistic proposals for re-provision should be resisted. It is thus clear that unless ESB is supported for continued policing use the SPD conflicts with the strategic development plan.</p> <p>2.[italics] Adopted London Plan Policy 7.13 [end italics] seeks to maintain a safe and secure environment at strategic level and that development should design out crime and assist detection of terrorist activity. Mindful of the essential role of ESB in delivering operational policing across London, the SPD should protect the policing use</p> <p>3.The Community Services chapter within the [italics] LBHF UDP [end italics] (Adopted 2003 and as 'saved' January 2011) defines 'Community Service Uses' to include 'operational facilities of public emergency services'. Policy CS8 states the Council will seek to ensure the availability of land or buildings required for the provision of community service uses, where proposals are programmed for implementation within the period of this Plan.</p> <p>4.The [italics] LBHF Core Strategy [end italics] was adopted in October 2011. The Strategic Objective dealing with community facility provision includes policing facilities within this definition. Policy CF1 states the Council will work with its strategic partners to provide borough-wide, accessible and inclusive community facilities by protecting existing premises that remain satisfactory for these purposes.</p> <p>5.Similarly, the Core Strategy highlights in Policy LE1 the importance of [italics] 'retaining [bold] premises [bold] capable of providing continued accommodation for local services or significant employment' [end italics] (my emphasis). It protects these premises unless the use would adversely impact on residential areas, an alternative use would give a demonstrably greater benefit; it can be demonstrated that the property is no longer required for employment purposes; or an alternative use would enable support for essential public services. The loss of the policing use in ESB would see the premises fall from providing significant employment. None of the exception criteria provided by policy LE1 are met in this case:</p> <ul style="list-style-type: none"> - No adverse impact upon residential amenity is caused by the current use; - Alternative uses comprising community/culture, residential or leisure use (as proposed) would not be of greater benefit that cannot be accommodated elsewhere within the application boundary; 	
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						<p>- No evidence is submitted to demonstrate ESB is no longer viable for office use;</p> <p>- The current use already provides vital support for essential public services.</p> <p>Mindful of the policy outlined above, and in support of the retention of ESB in policing use; the following changes to the document are recommended.</p>	
1279	Brian	Coughlan	Met Police Authority & Met Police Services	09	Police Facilities	<p>[bold] Impact of development on policing [end bold]</p> <p>Notwithstanding the requirement above to ensure ESB is retained within an employment use, it is further considered necessary to ensure that ESB is protected as a strategic policing facility, albeit in a B1 Use. This will ensure the draft SPD complies with relevant national guidance and strategic development plan policy in relation to policing and security, detailed on Page 3 above.</p> <p>In relation to the overall changes to the SPD which address the impact upon policing which the development will have, these are welcomed and it is anticipated they will be retained in the final/adopted version of the document. We recognise that the development will come forward over an extended period of time and policing terminology/circumstances may alter, therefore we would welcome some additional flexibility in the wording. In light of this and the policy background above the following minor changes are recommended.</p>	Noted.
1280	Brian	Coughlan	Met Police Authority & Met Police Services	09	Key Principle SC5	<p>[bold] Impact of development on policing [end bold]</p> <p>[italics] 9. Social & Community Facilities [end italics]</p> <p>Key Principle SC5 notes that the authorities will secure through any planning agreement(s) a police shop and financial contributions towards staffing the facility. It is recommended that a minor alteration is made to this to ensure that the wording is 'future proof' and it take into account new terminology now used by the MPA/S. The following changes are recommended to Key Principle SC5:</p> <p>[italics] Key Principle SC5:</p> <p>The authorities will secure, through any planning agreement(s):</p> <p>- [bold] Retention of Empress State Building within policing use; [end bold]</p>	Change proposed. The wording will be altered from 'police shop' to 'community policing facility'. The word 'of' will be inserted within the final bullet point of SC5. The additional bullet point on the Empress State Building will not be added to the Key Principle. The authorities do not wish to be prescriptive about what use the Empress State building should be put to but in order to satisfy Policy LE1 in LBHF's Core Strategy, any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements of Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.

						<p>- A community policing facility police shop and financial contributions towards staffing the facility;</p> <p>- Closed Circuit Television (CCTV) within the OA; and</p> <p>- Financial contributions towards the expansion of the boroughs' CCTV control centres</p>	
1281	Brian	Coughlan	Met Police Authority & Met Police Services	09	Para 9.18	<p>Impact of development on policing</p> <p>The supporting text in 9.18 should be similarly amended:</p> <p><i>9.18 The authorities will require development to deliver a community policing facility police shop, located within a retail frontage. It should operate a small base from which the police can launch patrols and at which the new community would be able to have day to day contact with the police service. It should be no less than 150m2 and provided at peppercorn rent for a period of not less than 25 years. Financial contributions will be sought towards the staffing of this facility'. <i></i></i></p>	Change proposed. 'Police shop' will be altered to 'community policing facility'. the authorities consider the additional wording to be too specific for the SPD. The exact size of the police facility and terms of rent would form part of the detailed discussions around any Section 106 agreement. It is felt disingenuous to set out minimums in the SPD, which may not be unattainable as a result of viability.
1283	Brian	Coughlan	Met Police Authority & Met Police Services	09	Police Facilities	I trust that the policing requirements in this area are clear and the importance of ESB for pan-London policing have been highlighted sufficiently above.	Noted.
1359	Dr. Ian	Sesnan	Archdeacon of Middlesex	09	Key Objective	<p>Need for rigour in analysis of social infrastructure needs - relating to Key Objective 9.</p> <p>The proposed social infrastructure is welcome but it appears from the SPD and the supporting documents that little analysis has been undertaken of what the needs actually will be. There is therefore no way of determining whether this provision is appropriate or adequate. There is also no explanation as to how this provision will be funded or governed so it is not clear how the SPD can be confident that needs will be met on a sustainable basis. Consideration should be given to ensuring that both through the s106 process and the Community Infrastructure Levy process an endowment is created to ensure sustainability of affordable community activities. It is noted that the Sustainability Appraisal finds that a needs assessment of community groups in the area is required.</p>	No change necessary. Key Principles SC1 and SC2 are dependent on formulas related to the scale of development. Key Principles SC3, SC4 and SC5 are not dependent on the scale of development, whilst the requirements set out in Key Principle SC6 are based on the assumption of a comprehensive approach to the redevelopment of the OA.
1360	Dr. Ian	Sesnan	Archdeacon of Middlesex	09	Key Objective	It is noted that the assessment of available community facilities includes those currently on the Gibbs Green and West Kensington Estates. These may be demolished but there does not seem to be provision for ensuring that they are replaced. The demolition of these estates even with the proposed re-housing will inevitably lead to the breakup of long standing local family and community networks and the infrastructure needs to be in place to ameliorate this.	Change proposed. A comprehensive approach to the redevelopment of the OA would require the demolition of the facilities on the West Kensington and Gibbs Green estates. The existing facilities have been factored into the calculation for the amount of community space needed were a comprehensive approach to the redevelopment of the OA to be taken. Wording will be inserted into the SPD to state that mechanisms will be put in place to ensure that the new community hub is available for hire before either of the existing community spaces are demolished or that temporary spaces of at least equivalent floorspace are provided free of charge to residents.
1361	Dr. Ian	Sesnan	Archdeacon of Middlesex	09	Key Principle	Faith - relating to Key Principle SC6.	Change proposed. The Social and Community Facilities Strategy sets out the community infrastructure deemed necessary from any development in order to

					SC6	We note that in the Equality Impact Assessment over 70% of people in the two Boroughs have declared religious affiliations and this makes it surprising that the SPD does not deal in any way with how such faith uses and spiritual needs are to be planned for. The sections marked "Religion" in the EIA are particularly weak. The reference on Page 40 to investigating the provision of a "multi-faith facility" seems not to have been carried forward into the SPD. We would predict a significant increase in the population requiring Church of England provision. We are also aware that for other faith groups there are difficulties in accessing suitably located provision. This important part of civic life requires more attention. At a minimum the investigation of one or more faith facilities appropriate to the different religions' needs to become a firm commitment.	make development acceptable in planning terms. Ecclesiastical premises are not considered to fall within this definition, nor would the authorities look to secure any ecclesiastical premises in any Section 106 agreement. However, the SPD does not preclude the provision of such premises and any application proposing the provision of places of worship would be assessed on its own merits. Space within the community hub identified in Key Principle SC6 could be used by faith groups for faith events. Wording will be inserted in the Key Principle and the supporting text to state that the space it the community hub should also provide for multi-faith space.
1362	Dr. Ian	Sesnan	Archdeacon of Middlesex	09	Key Principle S1	[bold] Schools - relating to Key Principal SC1. [end bold] Regarding schools we share the SPDs aspirations for expanding local provision and The London Diocesan Board for Schools is in touch with the developers and yourselves regarding this.	Noted.
1376	Eirik	Reddi	Residents of 67-70 Kensington Mansions	09		The proposed population densities are excessive and are not matched by facilities such as green space, health care and education, this will put an even greater strain on existing local facilities, with local residents bearing the brunt of this. Proposed facilities must match or exceed the needs of the new residents. Anything else is unacceptable.	No change necessary. Green space, health care and education are all closely tied to population increase. Key Principle UF14 requires any regeneration proposal to provide a minimum of 10sqm of publicly accessible green open space per child. Key Principle SC1 requires any education provision to relate to child yield. Key Principle SC2 requires the provision of a health facility, the size of which is related to population yield.
1479	Michael	Bach	Kensington Society	09	Key Principles SC6	[bold] 9. Social and Community Facilities [end bold] The Society [bold] strongly supports [end bold] the proposals made by the consortium of voluntary organisations for providing a community hub - [bold] Key Principle SC6. [end bold]	Noted.
1508	Mrs L.	Victor		09		The owners of the house, address above, agree totally with your points overleaf by Linda Wade. The services in this area, transport, nurseries, schools, doctors and dentists could not possibly cope with such a huge number of new residents.	No change necessary. The Social and Community Facilities Strategy sets out the authorities requirements in relation to nurseries, schools, doctors and dentists. The authorities requirements in relation to transport are set out in the Transport and Accessibility Strategy.
1530	Richard	Chute		09	Paras 9.12-9.14	Paragraphs 9.12 - 9.14 make no reference to the provision of a young people centre, including a full-sized football pitch. There is consensus that this is top priority.	Change proposed. Youth space will be added to Key Principle SC6. Play space for young adults and teenagers is dealt with in Key Principle UF16. Figure 3.3 shows an indicative masterplan for the OA, which includes four hard surfaced courts to cater for this age group.
1531	Richard	Chute		09	Health	Under 'Health' in Chapter 9: paragraph 9.10 makes no reference to additional dental surgery provision.	Change proposed. The SPD will be altered to clarify that if an integrated Primary Care Centre needs to be provided (see para 9.10), then it would need to include dental facilities and elements of specialist care.
1535	Richard	Chute		09	Para 9.20	In Chapter 9 "Community Space" paragraphs 9.20 on, there should be mention of the need to replace the loss of the Mund Street CAB advice centre. Also there should be a Post Office in the W14 postal district.	Change proposed. Wording will be inserted into the SPD to state that mechanisms will be put in place to ensure that the new community hub, which will be secured at peppercorn rent, is available for hire before the Citizens Advice Bureau on Mund Street is demolished or that temporary space of at least equivalent floorspace is provided at the same rent.
1634	John	Drake	Campaign to Protect Rural England	09		Social and Community Facilities With the level of development of the SPD sites and the surrounding sites these will be population equal to many small towns.	Noted.
1635	John	Drake	Campaign to Protect Rural England	09		Social and Community Facilities	No change necessary. The authorities will require only one health facility to be provided in order to streamline management and maintenance costs of the facility for the NHS, who are going through a national process of consolidating premises.

						i) NHS surgeries will be required in more than one part of the site to cover the expected influx	
1636	John	Drake	Campaign to Protect Rural England	09		Social and Community Facilities	No change necessary. Key Principle SC1 deals with the provision of primary and secondary school space.
1874	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	09		ii) Schools will be needed at both primary and secondary level 10. The Vision says (our brief comments are set out in italics and are expanded in the sections that follow): - 3.10 The reference to new community facilities and a community hub is welcome in principle -[itlaics] but such facilities already exist and are proposed to be knocked down; in the case of community space it appears the new space will be available for rent rather than being run by the local community as at present (see Para 45 below). [end italics]	No change necessary. The authorities will ensure that any community space is secured at peppercorn rent in order to ensure its affordability to any occupier. The existing community spaces on the estates total less than 1,000sqm. It is considered that a community hub of 4,500sqm will provide an adequate space for existing and new residents in the OA.
1922	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	09	SC1	50. [bold] Social and Community Facilities [end bold]. As with Cultural Facilities, the Key Principle for Social and Community Facilities is wholly inadequate; it merely refers to assessments of need being made. Para 9.9 refers to securing "the provision of floorspace to cater for the needs arising from any development... " This, more positive, wording should be used in SC1.	Change proposed. The wording in Key Principle SC1 will be amended.
1923	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	09	SC2, SC3, SC4, SC5, SC6	51. In a similar vein, the wording of Principles SC2, SC3, SC4, SC5 and SC6 should all read "must provide", as in SC3.	Change proposed. The wording will be altered where relevant in the Social and Community Facilities Strategy Key Principles so that the requirements are 'musts'.
1924	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	09	SC6	52. Key Principle SC6 needs altering. It ignores the fact that several such facilities already exist, most notably there is a publicly owned tenants available to the tenants of WK and GG estates. To offer a commercially rented replacement which is available for the tenants to hire is insufficient. Para 9.21 should also be altered to state that future provision should replace any existing provision, provide for any current shortage, as well as provide additional space to cater for the new population.	Change proposed. A comprehensive approach to the redevelopment of the OA would require the demolition of the facilities on the West Kensington and Gibbs Green estates. The existing facilities have been factored into the calculation for the amount of community space needed were a comprehensive approach to the redevelopment of the OA to be taken. Wording will be inserted into the SPD to state that mechanisms will be put in place to ensure that the new community hub is available for hire before either of the existing community spaces are demolished or that temporary spaces of at least equivalent floorspace are provided free of charge to residents.
1925	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	09	SC1	53. The child yield calculations referred to at SC1 are highly dependent upon the amount of affordable housing and should therefore reflect the LDF affordable housing targets in order to ensure that social and community provision is sufficient and accords with policy.	No change necessary. The educational facilities required can only relate to the needs of the development, as set out in Community Infrastructure Levy regulations.
1944	Andy	Slaughter	Labour MP for Hammersmith	09		It is still the case that very little thought appears to have gone into the implications for demand on public services generally, from schools and healthcare to transportation and utilities, that a development on this scale would impose.	No change necessary. the authorities will require the needs of development to be met, through any Section 106 agreement. No pressure should be put on existing facilities by the development and the authorities will require that each phase is self sufficient in terms of the infrastructure that it provides, as set out in the second Key Objective in the Phasing and Section 106 Strategy.
2078	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	09	Education	It is noted that the revised draft SPD still retains reference to the individual borough child yield formulae. It should be clarified that these are consistent with and reflect GLA guidance/advice. It is imperative that a consistent and agreed set of formulae are put in place for the purposes of assessing likely educational requirements across the ECWKO.	Change proposed. Clarification will be provided that these child yield formulas are consistent with GLA guidance and advice and are based in the 2004 Wandsworth child yield formulas.
2079	Matthew	Gibbs	CapCo/Earl's Court and Olympia	09	SC2	Whilst it is acknowledged that a planning application for comprehensive redevelopment in the ECWKO will need to provide a health facility, its location and timing of provision must be subject	No change necessary. the second Key Objective in the Phasing and Section 106 Strategy sets out the importance that the relevant infrastructure is delivered within the relevant phase(s) to support the needs of development. Existing health

			Group			to an assessment of feasibility/viability. The figure of 225 sq m per GP (paragraph 9.10) is considered too high and further detail should be set out to explain how this figure has been derived.	facilities in the vicinity of the OA are currently at capacity. It is therefore imperative that a new health facility is delivered in the OA within the early development phases. This facility can be designed so that it increases incrementally over time as the resident and worker population rises.
2080	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	09	Para 9.10	The Wandsworth 2007 New Housing Survey is quoted as the basis of population yield. The child yield figures, we understand, reflect 2004 data. Different data sets should not be used and this anomaly should be remedied.	Change proposed. The third bullet in para 9.10 will be amended to Wandsworth's 2004 New Housing Survey.
2081	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	09	SC3	Similar to the comments in respect of SC2. Whilst this provision is acknowledged as being required the precise type and quantum must be subject to viability/feasibility appraisals.	No change necessary. This is true with many of the asks in the SPD that would be secured through any Section 106 agreement. The position in the SPD is that the authorities will secure the provision of affordable sports provision. Were this not to be possible because of viability considerations, it would need to be justified within any planning committee report. Viability would be a legitimate consideration for not securing affordable sports provision; however, the authorities feel that every Section 106 ask should not need to be caveated with viability considerations.
2082	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	09	SC6	It is not clear how the figure of 4,500 m2 has been defined. It is considered inappropriate to specify a defined floor area as the precise figure will be dependant upon the nature of the residential population proposed as part of any planning application. It is considered that the figure is substantially in excess of that which is required. The delivery of such a facility will also be dependant upon the nature of any planning application and the feasibility/viability of providing it early in the development process.	No change necessary. The figure has arisen from discussions with borough borough's voluntary sector departments and is based on an identified need as well as the space deemed appropriate for the variety of different facilities that the community hub would need to provide. As with the affordable sports provision, viability is a legitimate consideration; however, the authorities feel that every Section 106 ask should not need to be caveated with viability considerations.