

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

CONSULTATION RESPONSES SCHEDULE: TRANSPORT & ACCESSIBILITY STRATEGY

MARCH 2012

Chapter 10: Transport and Accessibility Strategy

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
4	Jane	Chaston		10		too many homes for the area to support: drainage, public transport, traffic congestion, air quality	<p>No change necessary.</p> <p>The revised draft SPD already contains a number of Key Objectives and Key Principles to ensure the area can support the number of homes proposed. The Phasing Strategy 'ensures that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development. Key Principles ENV5 to ENV9 specifically considers the impact of development on flood risk, including Key Principle ENV9 which seeks to improve drainage. The impact of development on public transport and congestion is considered in detail in the 'Transport and Accessibility' chapter of the revised SPD. Key Principles TRN1 and TRN2 consider the amount of development that can be accommodated on the transport network, and the remainder of the chapter sets out the required improvements to accommodate this level of development. Key Principle ENV16 requires redevelopment to be 'air quality neutral against existing levels' and 'should include mitigate measures to improve air q</p>
9	Jane	Chaston		10		the roads in the area already suffer with congestion and do not have the capacity for any more traffic - this will also effect the quality of air	<p>No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the second draft SPD (Key Principle TRN19-21, 23). Air quality is addressed in the Environmental Strategy.</p>
10	Jane	Chasten		10		our public transport service will suffer and will create additional pressure at peak times	<p>No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy in the second draft SPD (Key Principle TRN10-16).</p>
11	Jane	Chasten		10		noise and vibration during demolition will impact on the surrounding buildings and the resulting noise, dust and air quality will be affected	<p>Change proposed</p> <p>The Key Objective in the Environment Strategy requires development to minimise the impacts of demolition, excavation and construction on the surrounding community. However, this will be revised to require specific protection to the new and existing population.</p> <p>Key Principle ENV4 states that 'measures will be required at each phase to minimise and control the impact of demolition, excavation and construction on the environment and residents surrounding the OA.' Key Principle ENV2 requires construction, demolition and excavation logistics plans to be prepared for every phase of construction and demolition. Key Principle ENV3 requires Construction Environmental Management Plans, which must include information on how various impacts, including noise, vibration, dust and air pollution will be monitored and mitigated and how the local community will be kept in informed.</p>
16	Linda	Chasten		10		too many homes for the area to support: drainage, public transport, traffic congestion, air quality	<p>No change necessary.</p> <p>The revised draft SPD already contains a number of Key Objectives and Key Principles to ensure the area can support the number of homes proposed. The Phasing Strategy 'ensures that the appropriate mix of land uses and infrastructure are delivered within the relevant phases(s) in order to support the needs of</p>

						development. Key Principles ENV5 to ENV9 specifically considers the impact of development on floodrisk, including Key Principle ENV9 which seeks to improve drainage. The impact of development on public transport and congestion is considered in detail in the 'Transport and Accessibility' chapter of the revised SPD. Key Principles TRN1 and TRN2 consider the amount of development that can be accommodated on the transport network, and the remainder of the chapter sets out the required improvements to accommodate this level of development. Key Principle ENV16 requires redevelopment to be 'air quality neutral against existing levels' and 'should include mitigate measures to improve air q
21	Patricia	Rowley		10		too many homes for the area to support: drainage, public transport, traffic congestion, air quality No change necessary. The revised draft SPD already contains a number of Key Objectives and Key Principles to ensure the area can support the number of homes proposed. The Phasing Strategy 'ensures that the appropriate mix of land uses and infrastructure are delivered within the relevant phases(s) in order to support the needs of development. Key Principles ENV5 to ENV9 specifically considers the impact of development on floodrisk, including Key Principle ENV9 which seeks to improve drainage. The impact of development on public transport and congestion is considered in detail in the 'Transport and Accessibility' chapter of the revised SPD. Key Principles TRN1 and TRN2 consider the amount of development that can be accommodated on the transport network, and the remainder of the chapter sets out the required improvements to accommodate this level of development. Key Principle ENV16 requires redevelopment to be 'air quality neutral against existing levels' and 'should include mitigate measures to improve a
28	Stephen	Garside		10	TRN19	The traffic jams coming North are caused by restricted lanes and a right turn which is limited by the pedestrian crossing on Talgarth Road. Going south the problem is the too long period for right turn from Talgarth Road which over fills the road space so the south bound cannot move. This is caused by the pedestrian crossing at the top of North End Road and the restriction from 2 lanes becoming one. In all the junction is a mess. This is with current level of traffic. The new development needs an imaginative solution. My suggestion would be to split the south bound onto Edith Villas, currently a road cut off, and that to continue over the Talgarth Road on a new south bound only road. The North bound to split off after Muns Street which itself will be taken out by the proposed development. This will keep the North bound on the existing Victorian part of North End Road which is to be retained. At the junction on Talgarth Road this will give a space between the north bound and south bound which would pe No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the second draft SPD; this includes assessing the impact of traffic on the A4/North End Road junction (Key Principle TRN19-21, 23). Any planning application for the OA will need to demonstrate that this junction can work effectively and must work with TfL to ensure that this is the case. The Three Kings pub is considered to be a Building of Merit and its removal is not considered desirable
29	Stephen	Garside		10	TRN13	I would also suggest a redevelopment of West Kensington station to give pedestrian access without having to stop traffic at crossings. The station could have an entrance at each end. No change necessary. Reference is made within the Transport and Accessibility Strategy of the second draft SPD that capacity enhancements are required at West Kensington station, including the provision of a second entrance. (para 10.38).
30	Stephen	Garside		10	TRN24, TRN25	As Olympia will be getting more usage when earl's Court is demolished the parking needs to become Residents and their guests and the tube service reinstated and extended to Shepherds Bush. No change necessary. The Olympia branch of the District line continues to operate during weekends and during the busiest events at Olympia a weekday service operates. No decision has yet been made whether to reinstate peak services on this branch after the district

						Line upgrade. There are no plans to extend this service to Shepherds Bush.	
32	N	Shelton		10		<p>My number one concern about the construction work and new property appearing on the Car Park on Seagrave Road is not the amount of cars, rather than massively increased pedestrian traffic between this new complex and the London West Brompton and Earls Court stations and surrounding areas. Lillie Road is my primary concern - various council and independent research as well as advice from London Transport indicate the width of the pedestrian footpaths on Lillie Road are inadequate for the CURRENT levels of pedestrian traffic let alone the 100s of new residents who will now be living (and perhaps not driving but walking) between Seagrave Road, Lillie Road and West Brompton and Earls Court Stations. In particular the tight overpass bridge and the area immediately on the corner of Lillie Road and Seagrave Road</p> <p>The width of this path is tiny and with 1,000s of office workers, local residents and more importantly students at the local school (London Oratory School) on Seagrave Road pass here every school day at t</p>	No change necessary. The SPD has highlighted the pinch points on Lillie Road and identified that footway widening will be necessary as well as an internal network of streets through the OA to reduce demand on some of the boundary streets, such as Lillie Road (figure 10.10, KP TRN6). The SPD is a high level strategy document and it is for development proposals to demonstrate in detail how this will be achieved.
35	Philip	Walker		10	TRN19, TRN20	<p>I am broadly supportive of the scheme as I believe in increased densities in cities.</p> <p>However, I am currently unconvinced that you have a solution to the traffic the scheme will generate. Your traffic report highlights the congestion on the A4, Lillie road area and, to some extent Warwick Rd. Your report confirms that there is currently no adequate proposed solution to the A4 traffic.</p> <p>Further, there is always a massive gap between theoretical capacity and that experienced by users. I feel the Warwick Road is already at capacity at peak timers, yet your report suggest that 2031 peak time usage will only be c85% of theoretical capacity.</p> <p>As I have said, in principal I am a supporter but would revise my view of you were unable to produce a credible road traffic solution.</p>	No change necessary. The impact of development on the road network has been assessed in the Transport and Accessibility Strategy in the second draft SPD (Key Principle TRN19-21, 23). The SPD is a high level strategic document and does not seek to provide detailed mitigation proposals. The SPD acknowledges that development proposals would need to be supported by an acceptable package of measures that minimised the impacts of additional traffic on the A4 and that without such measures, the application would not be considered acceptable..
36	Kevin	McLoughlin		10	TRN22	<p>I'm disappointed that the new plans have not changed the one-way system for Earls Court Road going South and Warwick Road heading North. The Earls Court One-Way System precludes a residential, neighbourhood feel to the area. You simply can't have what feels like a highway running on both sides of the area and create a sense of community among the residents.</p> <p>The Earls Court One-Way System prioritizes cars and trucks over people. It should be returned to a two-way system to eliminate the 'urban highway' effect.</p>	No change necessary. It is not possible for development of the Opportunity Area to provide sufficient additional capacity to return the Earl's Court One way System to two-way operation. This is set out in the Transport and Accessibility Strategy (KP TRN22, para 10.68).
50	Peter	Verity		10		<p>It is self evident that traffic has had a major detrimental impact</p>	No change necessary. The impact of development on the road network is

					upon the area surrounding the OA in both RBKC and H&F. In addressing the issue of traffic the draft SPD is flawed as it does not have as a fundamental principle [italics] 'the removal of the existing traffic congestion caused by heavy through traffic in the area surrounding the OA and the elimination of the environmental degradation caused by this through traffic' [end italics]. The SPD must address this as a fundamental principle prior to there being any consideration of the development planning within the OA.	considered in the Transport and Accessibility Strategy in the second draft SPD (Key Principle TRN19-21, 23). The SPD cannot require development to fund measures that are not necessary as a result of development
51	Peter	Verity		10	The chronic problem of traffic congestion in the area is of long standing and in the late 1980s it was recognised by the Ministry of Transport as being of such a magnitude that they proposed the implementation of a Western Environmental Improvement Route (WEIR) to divert, at relatively low cost, north-south through traffic from the West Cross Route seamlessly through the area to the Embankment and potentially to cross the river. Under the Department of Transport's West London Assessment Study of December 1989 the advantages of WEIR were confirmed by Halcrow who stated the benefits as being: major reduction in noise and pollution, severance and impact of transportation in the Earls Court Corridor, the relatively low cost of implementation and the potential for Earls Court Road to be pedestrianised. In the subsequent 20 years the traffic congestion especially in the Earls Court Oneway System has got progressively so bad that there is now a barely functioning system. The virtual gridlock has more recently been ag	No change necessary. The introduction of a motorway relief road along the alignment of the West London Line (this is the alignment of the WEIR) would be prohibitively expensive, would perpetuate the problem of poor connectivity across the site and by potentially creating significant additional road capacity would encourage additional car use. Such a proposition is not supported. More generally the SPD cannot require development to fund measures that are not necessary as a result of development.
52	Peter	Verity		10	Any consideration of development within the OA would be totally inappropriate without first resolving the existing problems of traffic, let alone being able to accommodate the additional demand by an additional residential and commercial development and the consequential detrimental effect on the environment of the surrounding area. Yet the traffic model as used as the basis of the SPD is inadequate in that it only addresses the additional trips generated by the OA and does not address the fundamental inadequacies of the existing road structure to cope with the present or normal future additional incremental demand.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the revised draft SPD (Key Principle TRN19-21, 23). The transport models used to assess development impact and support the SPD have been independently verified and provide an accurate representation of the existing network, the limitations of which are clearly identified (para 2.16). All development impacts have been assessed against forecast demand in 2031 and thus account for incremental traffic growth outside the OA.
53	Peter	Verity		10	[Italics] The fundamental principles should be to ensure that by its realisation the Opportunity Area will reduce or mitigate against the impact of the existing and forecast increase in traffic levels as well as its own projected traffic demand. [End italics]	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the revised draft SPD (Key Principle TRN19-21, 23). It is not reasonable for the SPD to require reduced traffic levels from development of the OA. Neither is it technically possible for development of the OA to deliver this.
54	Peter	Verity		10	The remedy to the current problems lies in traffic management including the reinstatement of the Western Extension of the Congestion Charging Zone and the embracing of the principles of the Western Environmental Improvement Route to the River. In 1990 I was assured in a letter from the then Minister of Transport that the land easement that the Ministry of Transportation had acquired to facilitate WEIR would be retained in public ownership for future potential infrastructure needs. The reintroduction of a project such as WEIR may make development within the OA a sustainable proposition to which the developers of the OA and White City could be expected to contribute. On 21st November 2011 Mayor Johnson stated [italics] 'I am a passionate advocate of significant infrastructure development - if we don't do it now in fifteen years we will be	No change necessary. The introduction of a motorway relief road along the alignment of the West London Line (this is the alignment of the WEIR) would be prohibitively expensive, would perpetuate the problem of poor connectivity across the site and by potentially creating significant additional road capacity would encourage additional car use. Such a proposition is not supported. More generally the SPD cannot require development to fund measures that are not necessary as a result of development, including any reinstatement of the Western Extension of the Congestion Charging Zone.

					regretting it'. [end italics]	
					Here is an imaginative piece of possible infrastructure that would permit not only the significant improvement and upgrading of the exi	
55	Peter	Verity		10	From the draft SPD I have extrapolated the clear and unequivocal argument against development within the OA based on the inadequacies of the existing road infrastructure and the consequential detrimental effects on the physical and natural environment. I have several other concerns on the SPD and the development proposal, but the issue of traffic is so fundamental that everything else falls into insignificance by comparison. I am happy to assist further should you wish to make contact.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the revised draft SPD (Key Principle TRN19-21, 23).
56	Peter	Verity		10	From the draft SPD I have extrapolated the clear and unequivocal argument against development within the OA based on the inadequacies of the existing road infrastructure and the consequential detrimental effects on the physical and natural environment.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the revised draft SPD (Key Principle TRN19-21, 23).
57	Peter	Verity		10	[italics] Transportation model is inadequate as it [bold] only addresses anticipated additional trips [end bold] and does not address the inadequacies of the existing road structure to cope with the present demand [end italics]	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the revised draft SPD (Key Principle TRN19-21, 23). The transport models used to assess development impact and support the SPD have been independently verified and provide an accurate representation of the existing network, the limitations of which are clearly identified. All development impacts have been assessed against forecast demand in 2031 and thus account for incremental traffic growth outside the OA. (para 2.16).
58	Peter	Verity		10	'The vehicle flow plots and statistics indicate the [bold] greatest absolute increase in traffic [end bold] as a result of development occurs on the strategic road network (A4, [bold] Earls Court Oneway System [end bold])'	Noted.
59	Peter	Verity		10	Para 2.9 Local transportation facilities play an important role in connecting Earls Court to the rest of London but at a local level they do [bold] create significant severance [end bold] which [bold] impacts [end bold], [italics] negatively [end italics], [bold] on the local quality of life [end bold].	No change necessary. This quotes existing text within the SPD.
66	Peter	Verity		10	Para 10.57 Even without the development within the Opportunity Area [bold] traffic levels are forecast to increase significantly [end bold] from 2009-31 due to the [bold] removal of the Western Extension of the Congestion Charging Zone [end bold] as well as the growth of population and employment [italic] (including the development of White City). end italic]	No change necessary. The conclusions of the transport and accessibility strategy account for population and employment growth outside of the OA in line with GLA projections. These projections include development in other OA's including White City
67	Peter	Verity		10	Para 10.58 For the local highway network to operate at an acceptable level this level of growth would [bold] require additional highway capacity [bold], improvement and modal shift. In particular the journey time reliability on the highway network should not be unacceptably impacted by the development of the Opportunity Area. [italics] Because it is [bold] already totally unacceptable and it is hardly capable of being made worse. end bold italics]	No change necessary. The proposed changes are not accepted.
68	Peter	Verity		10	TRN20 Key Principle TRN20: [bold] Development proposals should [end bold] include deliverable and funded road network improvements that reduce delays to 2009 levels. [Italics] This is far too limited an	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the revised draft SPD (Key Principle TRN19-21, 23). It is not reasonable for the SPD to require reduced

					objective. It should be a firm principle to [bold] ensure the addressing of the underlying traffic problem [end bold] not just accept the problem at a 2009 level. [end italics]	traffic levels from development of the OA. Neither is it technically possible for development of the OA to deliver this.
69	Peter	Verity		10	Para 10.66 The Strategic Transport Study [bold] did not consider the impact of additional traffic volumes [end bold] on air quality, residential amenity... such impacts are likely to have a negative impact to the [italics] (already negative) [end italics] environment within and around the Opportunity Area.	Noted.
70	Peter	Verity		10	Para 10.68, TRN21 Development should [bold] not worsen traffic [end bold] conditions to unacceptable levels. [bold italics] (traffic is already at an unacceptable level) [end bold italics]	Noted.
71	Peter	Verity		10	Para 10.69 RBKC will continue to work with TfL to improve [italics] (to remove) [end italics] the Earls Court One Way System. [bold] RBKC State Principle... a design of the road network and connections with the surrounding area that significantly improves residential amenity, the pedestrian environment and public transport access in the area of the Earls Court Oneway System (return the roads of the one way system in to two way working) and does not have an unacceptable impact on traffic congestion. [end bold]	No change necessary. The proposed changes are not accepted. It is not possible for development of the OA to deliver the return of two-way working to the Earls Court One Way System. This is explained in the SPD (KP TRN22, para 10.68).
73	Ilse	Molino		10	I have lived in Earl's Court for more than 30 years and I very much object to the development, as it is far to big for this area to be absorbed without a very detrimental effect to existing residents, starting with public transport. I do believe Earl's Court Station, as is, will be able to cope with that increase of passengers. It will be like having Olympic Games every day, not to mention extra sewage and extra demand on water supply, people in top flats already have very low water pressure.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
76	M.M.	Deyes		10	TRN14 I note the remarks about increasing traffic capacity at the three Underground/Overground [underline] stations [end underline] in the area, and particularly that it should provide [underline] step-free access [end underline] to the street from the platforms. I am not (yet) a wheel-chair user, but I have visitors who are and step-free access is enormously important...	Noted and agreed.
81	Gems	Bonds		10	There is very limited parking in the area, either for residents or for visitors, short or long stay.	No change necessary. As set out in the SPD development of the OA will need to be accompanied by proposals to ensure that the existing parking situation is not adversely effected (KP TRN25).
82	Gems	Bonds		10	Traffic in the area's main roads is horrible, so it would be nice to find a solution for that.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy in the revised draft SPD (Key Principles TRN 19-21, 23).
94	Simon	Fisher		10	TRN13, TRN14, TRN15, TRN16 required improvements to West Brompton Station including additional entrance but reference should also be made to additional passenger shelter on the platforms	No change necessary. The SPD is a strategic document that sets out the high level requirements for the OA. The requirement for additional passenger shelters will be addressed in preparing the detailed design for the station.
95	Simon	Fisher		10	TRN21 SPD should include a requirement for new development to reduce existing pedestrian and vehicular rat-running in adjacent streets, most notably Eardley Crescent.	No change necessary. This is covered by Key Principle TRN21 and paragraph 10.22.
104	Barbara	Herbin		10	[Bold] Traffic [Bold ends] Attempts have been made to account for increased traffic throughout, while increasing access for pedestrians and cyclists, there are no Bike Lanes. However, some of this is contradictory; for example, increasing width of pavements to enhance pedestrian access would reduce traffic/cycle access.	No change necessary. The SPD is a strategic level document that does not consider the detail of possible local mitigations. General principles and key measures are presented in outline. A detailed level of information must be provided in support of development proposals.

105	Barbara	Herbin		10		[Bold] Transport [Bold ends] There will be an increase in capacity of the District Line of 24% by 2018 as well as some improved capacity upon completion of Crossrail 1. However, plans for upgrade of the Piccadilly Line have no definite date and improvements upon completion of the Chelsea/Hackney Line (Crossrail 2) and longer trains on the West London line are speculation at best (especially given to the time taken to complete Crossrail 1).	No change necessary. The Piccadilly line upgrade forms a key part of TfL's future investment programme and is estimated to be completed in the early to mid 2020s providing an approximate 25% increase in line capacity through enabling lower headways (more trains per hour) and providing more capacious rolling stock. Longer trains on the WLL are likely to be delivered between 2014-2019. There is no programmed date for Crossrail 2, however the earliest it could be delivered is the mid 2030's.
106	Barbara	Herbin		10		[Bold] Bus Services [Bold ends] A more concrete plan for increased bus routes within the area is needed, especially bridging the acknowledged gap between the south and north of RBKC.	No change necessary. The SPD is a strategic level document that does not consider the precise detail of possible local mitigations. General principles and key measures are presented in outline, including the proposed destinations for new/extended bus services. A detailed level of information must be provided in support of development proposals.
108	Simon	Grantham		10		This is the worst development plan in London. The area does not require redevelopment, has not the infrastructure to sustain, will not be able to begin to cope with the increased works traffic and does not take into account any of the needs of the existing population.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the second draft SPD (Key Principles TRN 10-17, 19-21, 23).
109	Simon	Grantham		10		Also how will they manage the increased traffic after the development and the displaced traffic during the works ?	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23). Development proposals will need to be accompanied by detailed assessments of construction traffic (KP TRN26).
111	Peter	Gordon		10		I am really concerned about the impact on transport, especially on the tube during the rush hour and potential crowding on the platform at Earl's Court. Do the plans for increasing capacity on the tube fit the planned timescale for building the new Earl's Court and West Kensington Opportunity Area? Flooding more people onto the tube platforms at Earl's Court - both District Line and Piccadilly Line - during the rush hour could be dangerous if added capacity is not in place to remove the extra pressure.	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The increased capacity at all three local stations must be implemented alongside development whilst, both the District and Piccadilly line capacity upgrades will be in place prior to the completion of OA the development. The more detailed phasing of development and how that relates to capacity increases will be dealt with as part of detailed development proposals.
112	Peter	Gordon		10		Secondly, I am concerned about more traffic entering Warwick Road, adding to congestion and increasing air pollution. Queues at the bus stop near to the Exhibition Centre close to the junction of Warwick Road and Philbeach Gardens also demonstrate how narrow the pavement can be. Warwick Road is already busy, especially at certain times of the day, and there must be a clear objective to reduce adding to local traffic volumes.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
113	Alex	Parker		10		Currently the tube stations of Earls Court and West Brompton are unable to handle the number of passengers using the station during the rush hour. This is particularly the case at West Brompton where the station entrance and barriers have not been enlarged since the addition of the Overground and the reopening of the Empress State building in recent years. Despite the transport studies done by EC Properties, the proposed development will generate a massive increase in the number of people using Earls Court and West Brompton Stations and generate further overcrowding. Extra platform space, station entrances and train frequency will be required in each station. This has not been put forward in the proposal, which instead has concentrated on maximising the commercial potential of each station.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). A key conclusion of the SPD is that the capacity of West Brompton station must be enhanced to accommodate additional passenger demand, including more ticket gates, a larger concourse and longer platforms. The SPD makes clear the requirement for increased station capacity at Earls Court, West Brompton and West Kensington stations. This includes additional station entrances, more ticket gates, larger station concourses and longer platforms at West Brompton. Increased trains service frequency will be provided by the London Underground line upgrades on the District and Piccadilly Lines. The SPD does not attempt to 'maximise the commercial potential' of the stations.
114	Alex	Parker		10		The pedestrian routes along the Lillie Road, particularly close to West Brompton station and specifically on the station bridge are currently insufficient and too narrow to manage the amount of	No change necessary. The SPD has highlighted the pinch points on Lillie Road and identified that footway widening will be necessary as well as an internal network of streets that serves to reduce demand on some of the boundary streets,

					<p>footfall generated by the Empress State Building, The Brompton Oratory School, The Lilly Hotel and the Hotel IBIS. Often people are forced to walk in the road and as a result incur danger, by risking a collision with either a car or bicycle. This is further exacerbated by pedestrians with suitcases walking to the hotels. The corner of Lillie Road and Seagrave Road is particularly dangerous.</p> <p>The development of Earls Court and the subsequent amount of housing will bring an increased footfall which will render these footpaths dangerous and un-navigable. Pedestrians will be forced to walk in the road on a regular basis and this will create needless hazards and present serious dangers to pedestrians.</p> <p>The roads around Fulham, particularly the North End Road are far too congested with cars and do not support the m</p>	<p>such as Lillie Road (figure 10.10, KP TRN6). The SPD has also assessed the crossings in the area and suggested improvements to them as well as the reopening of the Warwick Road tunnel that would link the site to the station (KP TRN 12 and 17). The SPD is a high level strategy document and it is for development proposals to demonstrate in detail how additional footfall would be accommodated.</p>
158	Mary Ann	Sieghart		10	<p>It would also make a big difference if the junction between North End Rd and Talgarth Rd were redesigned quickly, as in the plan, to take away the pedestrian crossing on Talgarth Rd on the west side of the lights. This currently holds up northbound traffic on North End Rd considerably, as vehicles can't turn left. Once construction traffic joins them, the congestion could become seriously bad unless that crossing is swiftly removed and the one on the east of the lights improved instead.</p>	<p>No change necessary. TfL are currently investigating the operation of this junction outside of the SPD process. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the second draft SPD (Key Principles TRN19-21, 23). The SPD is a high level strategic document and does not consider detailed junction design issues. Any Transport assessment for the OA will need to prove that construction traffic can be accommodated on the network.</p>
159	Andrew	Westoby	??	10	<p>Attempts have been made to account for increased traffic, but these attempts are token efforts at best. The efforts/proposals actually reduce the free-flow of traffic and will cause worse traffic conditions. The current system already in place is unacceptable with very high levels of traffic jams and congestion (Especially Warwick Road and Earls court Road), and the proposed future projects to increase the widths of the pavements to enhance pedestrian access will do nothing more than create more traffic congestion. Imagine putting properly functioning bus routes with bus lanes in the mix !! It would result in absolute traffic chaos/gridlock. All you need to do is look at Knightsbridge by the newly completed OneHydePark and by the Palace Gardens in Kensington to see how developers do not care about the surrounding area's infrastructure, all they care about is building a property they can sell and then leave. The Developers are after one thing - A short term financial gain. They do not have to live in the area,</p>	<p>No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23). It highlights that improvements to traffic flow can be secured at an aggregate level on the local network and that significant benefits can be provided to existing north-south traffic on Earls Court Road, Warwick Road and North End Road through OA development. (para 10.62). Development proposals will need to be supported by a detailed package of traffic management and network improvements that demonstrate how traffic flow can be accommodated on the local network and mitigate the impact of development to an acceptable level on all local roads. The only proposed projects for widening footways in the area are at existing pinch points as identified through the transport study. These need to be addressed as part of development proposals (figure 10.10).</p>
160	Andrew	Westoby	??	10	<p>To enable a properly functioning traffic system and also have wider pavements to enhance pedestrian access/mobility means that the only topic/area/category that would have to be reduced in size is the planned buildings... Which the Developers do not want to do. This traffic infrastructure/system project should be done in 2 phases, the 1st would be to develop the traffic system and after completion (when it is deemed to have been a success and improved on current traffic conditions) then, and only then, should the developers be allowed to build their developments. This would incentivise them to get it right the 1st time round, it would also mean the traffic system was developed quickly to avoid having to re-do/change/amend parts of it, which would potentially have a</p>	<p>No change necessary. The only proposed projects for widening footways in the area are at existing pinch points as identified through the transport study. These need to be addressed as part of development proposals. (figure 10.10). There is no planning justification for requiring the transport improvements to be implemented before development takes place. In addition any development proposal on this site is likely to be built out over 20 years and therefore creating extra capacity at year one is likely to encourage growth in car use that would erode the benefits of the additional capacity by the time the development itself adds demand to the network.</p>

						knock-on effect of reducing the footprint of the proposed building and requiring more time and work with engineers, architects, etc as the Developers really would be going back to the drawing-board because they'd gotten the transport/traffic infras	
161	Andrew	Westoby	??	10		The District Line is reportedly going to have a 25% increase in passengers by 2018, plans for an upgrade to the Piccadilly Line have no definite date and all the Crossrail plans are just rumours with nothing tangible produced yet. The Developers should be planning on how to confirm these will be addressed (and included in their plans) to ensure public transport is sufficient, and of an appropriate standard, for the increased population. Again the bus routes need to be looked into and planned accordingly.	No change necessary. The District and Piccadilly Line upgrades will increase capacity on each line by around 25%. The District Line upgrade will be complete by 1t least 2018 and the Piccadilly line upgrade is expected to be completed by the early/mid 2020's. Crossrail construction has begun and will be operational by 2019. Beyond these and other public transport improvements, and as set out in the SPD any development proposals will need to demonstrate in detail how the demand created can be accommodated on public transport networks (KP TRN 1).
175	Anonymou s			10		parking is already extremely difficult in Earl's Court; a new development with high rise buildings would make parking an utter nightmare.	No change necessary. The SPD requires new residential dwellings to be permit-free so that new residents cannot park on street (para 10.76).
189	Daniel	Benson		10		The final result is far too high and is bound to cause overcrowding and further traffic congestion, and to put stress over local services, with damaging consequences both environmentally and socially. The existing public transportation system is already overcrowded and will not be able to serve thousands more people.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD Any development in the OA must be fully justified through robust planning application(s) and transport assessment(s). (Key Principles TRN 10-17, 19-21, 23).
269	Silvia	Piva		10		The increased population would create serious traffic issues in an already busy area	No change necessary. The impacts of development on the road network are considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23).
270	Silvia	Piva		10		Public transport efficiency would also be affected by the increased population, further increasing the crowd utilising Earl's Court Road tube station	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17).
273	Silvia	Piva		10		Building works have only recently terminated in the area (181 Warwick Road) and a start of further works with all the consequent disruptions wouldn't be welcomed, in particular for such a big area: I note there is a plan to build an access road to facilitate the building works, the area is congested enough at all times, adding traffic of construction heavy vehicles can only worsen a fragile situation	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23). Development proposals will need to be accompanied by detailed assessments of construction traffic (KP TRN26).
274	Nicola	Pedroni		10		I use both the underground and a private car every day and the Earl's Court station is already saturated at peak times. I do have to queue sometimes. How will the station cope with additional residents and workers? Same reasoning for resident's parking	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). In particular the impact on Earls Court station has been considered and a number of measures proposed including the addition of a new station entrance, that along with the planning London Underground line upgrades will mitigate the impact.
275	Nicola	Pedroni		10		the Earl's Court One way system is also at capacity at peak times - why to add to a difficult situation?	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23).
279	Tom	Jestico	DRP	10		Transport studies undertaken by CapCo's consultants were based on 3 density scenarios. TfL has concluded that the CapCo road and public transport proposals for the upper two levels of density for not work without significant change. Even with the lower level of density (5500 homes and 12000 jobs) conditions will return to levels of congestion similar to today by 2031 i.e. no improvement in capacity. This suggests a cap on redevelopment significantly lower than the density proposed by CapCo. There are approximately 750 homes in the existing development area. (It was later confirmed that the Empress State building is approx. 40,000 sqm in size. At 15sqm pp this represents 2600 jobs. CapCo's Seagrave Road scheme has 800 homes).	No change necessary. The SPD cannot require development to fund improvements to capacity or other measures that are not necessary as a result of development.

					<p>The SPD proposes a number of East - West roads and staggered North - South roads, but still retains a new junction to Cromwell Road. The junction with Star Road is regarded as important.</p> <p>The Panel made few comments but were concerned about the Star Road / North End Road and Cro</p>	
294	Sally	Groenedijk-Trigues		10	It is essential that Transport and Traffic are considered in the light of other developments that are being proposed: new residents north of Cromwell Road and south of High Street Kensington, 44-acre expansion of Westfield, White City and Kensal Rise Opportunity Areas, particularly with reference to the already saturated Earl's Court One Way System and transport.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The assessment accounts for growth from new development as well as wider population and economic changes in line with GLA forecasts
295	Sally	Groenedijk-Trigues		10	The Transport section has not considered the fact that the three stations: West Kensington, West Brompton and Earl's Court Stations are already to capacity. The development will bring in approximately 14,000 new residents and 12,600 workers to the area from this site.	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The impact of development on each of the three local stations was considered as part of the study and measures proposed to mitigate any negative impact.
296	Sally	Groenedijk-Trigues		10	The increased traffic volumes within road management on Earl's Court One Way System do not consider pedestrians or cyclists and created additional 'severance' for residents west of Warwick Road.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23). Pedestrians and cyclist are considered in detail within the SPD (KP TRN 3-9).
301	Hugh	Lalor		10	it does not appear that any consideration has been given to the vastly increased Transport & Traffic requirements, with the existing underground stations already at over capacity.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
307	Shamyl	Saigol		10	Re transport - West Kensington, West Brompton and Earl's Court Stations are already to working to capacity. The development will bring in approximately 14,000 new residents and 12,600 workers to the area from this site. The existing stations cannot cope with this extra traffic.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The impact of development on each of the three local stations was considered as part of the study and measures proposed to mitigate any negative impact.
308	Shamyl	Saigol		10	Re transport and traffic - the extra traffic will increase air pollution, already very high, and local residents health will be adversely affected.	No change necessary. Key Principle ENV16 requires redevelopment to be 'air quality neutral against existing levels' and 'should include mitigate measures to improve air quality'.
313	Sherry	Kernan		10	This [start underline] development simply must be reviewed in concert with the several other building plans [end underline] ongoing in the area: the Homebase to High Street Kensington project, the area south of High St Ken, the Westfield Center and others. Collectively, they could add tens of thousands of people to an already densely populated area. Traffic and pollution are problems today and the [start underline] Traffic and Air Quality [end underline] parts of the SPD do not properly lay out the metrics which will measure all of this together.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The assessment accounts for growth from new development as well as wider population and economic changes in line with GLA forecasts.
314	Sherry	Kernan		10	The [start underline] Transport [end underline] aspects, with three tube stations already at capacity, suggest that the residential density proposed is not reasonable and the relevant sections of the SPD do not seem to deal with this capacity constraint. Even with tube expansion (unclear timing for the Piccadilly line), natural growth in the area would absorb this, so squeezing in nearly 20,000 more passengers into the system cannot work. I have been at Victoria station where the gates are routinely closed due to dangerous volumes of passengers trying to get into the station. Pushing and fights have occurred, stress levels soaring.	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The impact of development on each of the three local stations was considered as part of the study and measures proposed to mitigate any negative impact.
315	Sherry	Kernan		10	The developers glossed over this in presentations and when	No change necessary. The impacts of development on the road and public

						asked point blank by me and other residents. The numbers for public transport as well as traffic volumes within the area, particularly the Earl's court One way system, just do not work. The provision of .4 [start underline] parking [end underline] spaces per residential unit are a prescription for disaster and parking rage. The SPD should be very specific in its requirements on this and for the developer to suggest cycling will alleviate the demand is not realistic.	transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). Parking issues are considered in paragraphs 10.72-10.76 and KP TRN 24 and 25. The SPD requires parking rations to be significantly less than 0.4 spaces per unit. The precise level will be agreed as part of the planning application process.
323	Michael	Whittall		10		I have the following comments on the draft SPD for the Earls Court Development. As a local resident, I am still very unhappy with the lack of clarity in a number of areas: My main objections are the overcrowding of the site and the lack of real examination of and detailed plans for the large increase in traffic in an already congested area. My detailed comments are as follows:	No change necessary. The impact of development on the road networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23).
324	Michael	Whittall		10		No mention has been made that the 3 local underground stations are already at capacity: It seems that a further 14,000 residents and over 10,000 workers will be added to the existing capacity creating safety problems on platforms and further overcrowding.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The impact of development on each of the three local stations was considered as part of the study and measures proposed to mitigate any negative impact.
325	Michael	Whittall		10		The increased traffic within the Earls Court one way system has not been adequately or satisfactorily considered, given that the area is already over capacity - there is also no consideration for pedestrians or cyclists.	No change necessary. The impact of development on the road networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23). Pedestrians and cyclist are considered in detail within the SPD (KP TRN 3-9).
336	Geirgina	Donnelly		10		Earls Court Tube, West Brompton and West Kensington tubes are already running at capacity during peak travel times. They will become chaotic with the huge influx of working and school population that will be using them. The station platforms will become increasingly dangerous due to sheer numbers of bodies standing on them. There are to be some 14,000 new residents and an influx of over 12,000 workers to this site.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The impact of development on each of the three local stations was considered as part of the study and measures proposed to mitigate any negative impact.
337	Geirgina	Donnelly		10		The one -way systems on the Earls Court Rd and Warwick Road will be manic. As it is, they function more or less but as soon as one single car or bus stops in an awkward spot or if there is even the smallest bit of road works, the whole area, for many blocks around, grinds to a halt. Will a new series of roads be built to relieve this congestion? What about the cyclists and pedestrians? There will be constant gridlock at all times of the day. The loss of time and money due to delays is inestimable.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23).
341	Barbara	Herbin		10		Re transport - West Kensington, West Brompton and Earl's Court Stations are already to working to capacity. The development will bring in approximately 14,000 new residents and 12,600 workers to the area from this site. The existing stations cannot cope with this extra traffic.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23). The impact of development on each of the three local stations was considered as part of the study and measures proposed to mitigate any negative impact.
342	Barbara	Herbin		10		Re transport and traffic - the extra traffic will increase air pollution, already very high, and local residents health will be adversely affected.	No change necessary. Key Principle ENV16 requires redevelopment to be 'air quality neutral against existing levels' and 'should include mitigate measures to improve air quality'.
365	Timothy	Nodder	The Kensington and Chelsea Environment Round Table	10	Key Objectives	First key objective: after "to mitigate traffic impacts and congestion on the road network" add " and improve air quality".	No change necessary. The Transport and Accessibility Strategy is focused predominantly on transport matters, although the air quality benefits of reducing car trips is referred to at 10.66 and 10.74. Key Principle ENV16 requires redevelopment to be 'air quality neutral against existing levels' and 'should include mitigate measures to improve air quality'.
366	Timothy	Nodder	The Kensington and Chelsea Environment Round Table	10	Key Objectives	Second key objective: after " unacceptable impact on the transport network or wider environment" add " especially air quality".	No change necessary. The Transport and Accessibility Strategy is focused predominantly on transport matters, although the air quality benefits of reducing car trips is referred to at 10.66 and 10.74. Key Principle ENV16 requires redevelopment to be 'air quality neutral against existing levels' and 'should include mitigate measures to improve air quality'

367	Timothy	Nodder	The Kensington and Chelsea Environment Round Table	10	Key Objectives	Third key objective: after " improves local connectivity" add "and air quality".	No change necessary. The Transport and Accessibility Strategy is focused predominantly on transport matters, although the air quality benefits of reducing car trips is referred to at 10.66 and 10.74. Key Principle ENV16 requires redevelopment to be 'air quality neutral against existing levels' and 'should include mitigate measures to improve air quality'.
379	Cllrs	Buxton and Read		10		NEW KEY PRINCIPLE FOR NORTH/SOUTH ROAD The Strategic Transport Study assumes a North/South Road through OA, which will help reduce the impact of the development on the ECOWS especially Earl's Court Road. Whilst new North/South linkages through the OA are required it needs to be much more specific. A new key principle requiring a new North/South route between Lilley Road and the West Cromwell Road to reduce the impact of the development on the ECOWS.	No changes necessary. The SPD is a high level strategy document and it is for development proposals to demonstrate in detail how traffic impacts will be resolved (KP TRN19).
383	Francois	Dumonteil-Lagreze		10		The Transport section has not considered the fact that the three stations: West Kensington, West Brompton and Earl's Court Stations are already to capacity. The District Line has already added more trains [See article in Metro dated 7th Dec 2011] The development will bring in approximately 14,000 new residents and 12,600 workers to the area from this site. [No proper study has been made of the through traffic of people and of vehicles that is already going through Earls Court]	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The impact of development on each of the three local stations was considered as part of the study and measures proposed to mitigate any negative impact.
384	Francois	Dumonteil-Lagreze		10		The increased traffic volumes within road management on Earl's Court One Way System do not consider pedestrians or cyclists and created additional 'severance' for residents west of Warwick Road.	No change necessary. Pedestrians and cyclist are considered in detail within the SPD (KP TRN 3-9).
401	Lesley	Raymond		10		I attended the open evening on 30 November at which we examined the impacts of the proposed development on road traffic congestion, air quality and public transport. My area of particular concern is the potential for dangerous overcrowding on the underground system at Earls Court if this development goes ahead. It appeared that the TfL spokesman at the evening was not familiar with either Earls Court underground station nor with particular issues on the Piccadilly line. The talk of improved signalling in order to increase the number of Piccadilly line trains per hour during peak travel barely touches on the issue.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17).
413	Lesley	Raymond		10		I have been resident in Earls Court for over 30 years. This is a very special part of London and I can see the need for some urban regeneration and improvement. However, over the past 5 years I have become increasingly frustrated at the dangerous increase in numbers travelling on the underground and the lack of improved service to address the issues. Every morning it is a battle to force myself onto a train to get to work. At weekends, because the service is less frequent, the same problems apply. The TfL spokesman admitted that current investment plans on these lines would only maintain the current level of service and comfort for the projected normal increase in users, not allowing for the many thousands added from the OA development. It seems clear that the OA with its many thousands of new homes and even more thousands of people will add enormously to the congestion of the area, with impacts on air quality and general quality of life for everyone, and that these impacts have not been allowed for in the cu	No change necessary. The impact of development on the public transport networks and on air quality is considered in the Transport and Accessibility Strategy and the environmental strategy of the revised draft SPD (Key Principles TRN 10-17 and ENV 16).
418	Paul	Dumond		10		[bold] 2.Traffic and transport [end bold]	No change necessary. TRN1 and TRN2 and the supporting text consider the development scenarios tested as part of the Transport Study. This considers the

					<p>The Draft SPD now incorporates a transport and accessibility section and it is quite obvious that traffic and transport considerations are far and away the most important constraints on the scale of any future development of the OA.</p> <p>Specifically:</p> <p>1 TFL and the councils appear to have reached firm and clear conclusions that the maximum number of residential units that can be accommodated on the site is 5500 and the office capacity is similarly constrained. This capacity limit is such a pivotal finding [bold] but is not mentioned anywhere in the report. Transport capacity is so pivotal a consideration that it should be stated clearly up front as the primary constraining factor to any development and the TFL development capacity limits should be given at the start of the SDP and set out clearly in the traffic and accessibility sections.</p> <p>The Key principles at the start of the Transport and Accessibility section should include the statement "Ensure that no dev</p>	<p>impact of about 5,500 new homes and 12,000 new jobs on the transport network and proposes mitigation measures to ensure that this level of development can be accommodated. Para 10.14 shows that the strategic modelling also finds that two larger scenarios have unacceptable impacts. However, this does not preclude larger development proposals coming forward, as long as these are 'supported by robust Transport Assessments that set out phase by phase what the cumulative impact of development will be and how it will be mitigated at each phase' (Key Principle TRN2). The thrust of the suggested key principle is covered by the existing second key objective.</p>
419	Paul	Dumond		10	<p>[bold] 2.Traffic and transport [end bold]</p> <p>The Draft SPD now incorporates a transport and accessibility section and it is quite obvious that traffic and transport considerations are far and away the most important constraints on the scale of any future development of the OA.</p> <p>Specifically:</p> <p>2 The transport and accessibility studies appear to be flawed in relation to the OA and the wider area. The assumed number of incremental Piccadilly line journeys arising from the OA is far too low and ignores the 10,000 residents in the new developments further up Warwick Road (note that Olympia station is being shut down)</p> <p>Overcrowding on the underground is already a major problem in the area and it cannot be right that over 30,000 additional residents and office workers in the area will generate just 1500 Piccadilly line journeys in the rush hour.</p>	<p>No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The transport modelling includes trips generated by other development proposals, both in the local area such as on Warwick Road and across London in line GLA forecasts.</p>
420	Paul	Dumond		10	<p>[bold] 2.Traffic and transport [end bold]</p>	<p>No change necessary. The impact of development on the road and public</p>

					<p>The Draft SPD now incorporates a transport and accessibility section and it is quite obvious that traffic and transport considerations are far and away the most important constraints on the scale of any future development of the OA.</p> <p>Specifically:</p> <p>3 The SPD does not adequately address the parking problems in existing surrounding roads that would be caused by thousands of new dwellings. The notion that purchasers of upmarket properties and their visitors to the capital will mostly confine themselves to crowded public transport simply doesn't hold water. When parking restrictions end each evening and throughout much of the weekend the local roads will become even more clogged with parked cars on every available yellow line. A visit to Finborough Road on a Sunday provides incontrovertible proof of the problem that would arise every weekend and each morning and evening before 8.30am and after 6.30pm.</p>	<p>transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The mode split applied in the Transport Study is based on comparable sites and is considered robust. The detailed approach to parking will be agreed as part of any future planning applications, however the SPD is clear that car parking provision must be limited to lower than 0.4 spaces per unit.</p>
431	Nicholas	Fernley	Hammersmith & Fulham Historic Buildings Group	10	<p>March 2011 Comments: we noted at the presentation - and welcomed - the emphasis put on permeability (see Chapters 4 & 7) and overcoming the obstruction to west/east flow caused by the railway line. We believe this should focus on pedestrian and cycle routes (with possibly small low emission vehicles).</p> <p>We are also concerned that proposals for this OA fit with the urban and transport grain of neighbouring areas. A particular issue relates to connections to the south.</p> <p>The railway line was built on the line of the Kensington Canal which started in 1824. It converted the lower part of Counter's Creek from the present Olympia site to the Thames into a Canal. The Canal was not a financial success and was sold to the West London Railway who ran it until the railway was extended across the Thames in 1860-2. The canal has now been filled in down as far as the entrance to the gasworks dock and what remains is no known as Chelsea Creek. (See The Chelsea Creek Project Sept 2000)</p> <p>We very much welcome the Counter'</p>	<p>Change proposed. Amend paragraph 10.18 to include reference to wider pedestrian and cycle links, including south towards the Thames.</p>
439	Isabelle	Laborde		10	<p>The SPD does not address adequately the residents' concerns in terms of transport. The existing gridlock on the roads around the ECWKOA and the even greater gridlock on the public transport system at peak hours are barely mentioned. Given the current gridlocks, I fail to see how hypothetical improvements to the public</p>	<p>No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The existing conditions on the road and public transport networks are referred to in Chapter two and chapter ten.</p>

						transport network in the long term will in any way both address the current gridlocks and accommodate more than 6,000 new homes and about 7,000 new jobs which the Developer intends to deliver in the short term.	
481	Tony	Hunter		10		<p>The traffic situation at the junction of Warwick Road and the A4 and is already beyond capacity as a visit on most Friday early evenings and Sunday late afternoons makes all too clear. Similarly, the underground is already operating beyond any capacity that could be considered reasonable particularly around rush hour - I myself will not travel on it then. Any suggestion that affluent new residents of and visitors to expensive new houses and apartments in the OA will not make use of cars is, in my view, fanciful: they will and this inevitability should be planned for, not hopelessly ignored.</p> <p>For these reasons, the transport and road improvements must be undertaken towards the beginning on the development not towards the end. Otherwise we will have increased and possibly paralysing congestion as soon as the first phase is built with an uncertain solution at some indeterminate point in the future. The SPD should be updated accordingly.</p>	No change necessary. The mode split, including car driver, applied in the Transport Study is based on comparable sites and is robust. Any application proposals will need to assess development impact against available capacity. This is set out in the SPD at paragraph 10.15.
522	Malcolm	Spalding	Earl's Court Society	10		We consider that the transport study conclusion is flawed because it is based on only 2,700 extra journeys per hour peak time. Based on 12,000 new jobs and 15,000 new residents (in 6,000 new homes), that is only about 10% of residents travelling and workers commuting each rush hour. This cannot be correct - it is inconceivable 90% of residents and workers will not be using transport during the rush hour.	No change necessary. The figures quoted in the comment are for rail trips only. The total number of trips forecast in the AM and PM peak hours is 7,000 and over 12,000 in each three hour peak period. This is net of the existing trips which generate around 1000 trips in each peak. The figures are robust and an appropriate basis for assessment.
523	Malcolm	Spalding	Earl's Court Society	10		The study also estimates that there will be an extra 27,000 journeys per day by all methods - but this does not include the potential 10,000 new residents in Warwick Road and nearby developments.	No change necessary. The model used to generate the baseline trips includes assumptions for growth from development, including at Warwick Road. The assessment is robust.
524	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN1	TRN1 REPLACE "acceptable" with "positive and independently verified"	No change necessary. It is not reasonable to require development to improve the existing situation on the transport networks.
525	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN2	TRN2 REPLACE "mitigated" with "eliminated with improvements to existing transport capacity at each phase"	No change necessary. It is not reasonable to require development to improve the existing situation on the transport networks.
526	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN3	TRN3 ADD "with room for bicycle lanes" and "so that the Highway Authority will adopt them"	No change necessary. A blanket policy to require bicycle lanes on the highway is not supported. The detail of provision for cyclists will be agreed at planning application stage, as will the adoption strategy.
527	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN4	TRN4 ADD "making provision for safe cycle lanes on main routes and dog walking and dog loo facilities"	No change necessary. A blanket policy to require bicycle lanes on the highway is not supported. The detail of provision for cyclists and dog loos and other facilities will be agreed at planning application stage.
528	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN5	TRN5 AMEND to "pedestrian and cyclist wayfinding"	No change necessary. The Legible London scheme is primarily aimed at pedestrians although it does have benefits for cyclists, as acknowledged in paragraph 10.19.
529	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN6	TRN6 CHANGE "should" to "must"	No change necessary. 'Should' instead of 'must' is used throughout the transport chapter and most of the rest of the SPD.
530	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN6	"A4 improvement scheme" ADD "and improvements to Warwick Road and Earl's Court Road"	No change necessary. Warwick Road and Earl's Court Road are identified in paragraph 10.23.
531	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN7	TRN7 CORRECT "increase" to "increased"	Change proposed. This will be amended.
532	Malcolm	Spalding	Earl's Court Society	10	Figure 10.10, Page 133	Fig 10.10 p133 box identifies wrong end of Earls Court station - should be Warwick Road end.	Change proposed. This will be amended.
533	Malcolm	Spalding	Earl's Court	10	Key Principle TRN8	TRN8 ADD "not using on the lost river park but by making safe	No change necessary. This key principle refers to the need for onward

			Society		TRN8	provision on the main routes"	connections and not internal routes. The potential for cyclist use of the proposed route above the West London Line is supported in paragraph 10.18.
534	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN10	TRN10 ADD "and supply new stations in the middle of the site and on the King's Road and linkage to the Thames river transport" "improving the existing, and creating new, interchanges between existing lines" and "funding a new station"	No change necessary. The creation of new stations within the site is not supported due to the disruption to existing services, high cost and little justification based on the work undertaken in the ECTS, which demonstrates that development impacts can be accommodated by improving existing services. Two new station entrances to existing stations are proposed for the OA in the SPD.
535	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN11	TRN11 DELETE "compared to predicted levels in 2031" Excessive crowding and delay already exists. ADD "and should reduce existing baseline levels"	No change necessary. It is not reasonable to require development to improve the existing situation on the transport networks.
536	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN12	TRN12 ADD "and improve where possible" ADD "Renovate the existing unused ticket hall" ADD "Open up the Warwick Road entrance to mirror the entrance at Earl's Court Road"	No change necessary. The key principle already requires the reopening of the unused ticket hall and improvements to capacity. Requirements for the Warwick Road entrance to mirror the existing Earl's Court entrance would involve extensive decking over the Earl's Court platforms, which would be costly, and involve significant alterations to the Listed entrance at Warwick Road. The authorities can only request such infrastructure improvements if this is required to mitigate the impact of the development, which would be subject to detailed modelling as part of the planning application.
537	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN13	TRN13 CHANGE "should" to "must" AMEND "at West Brompton and West Kensington" by ADDING "and Warwick Road entrance to Earls Court station"	No change necessary. 'Should' instead of 'must' is used throughout the transport chapter and most of the rest of the SPD. Improvements to capacity at Earl's Court are dealt with in TRN12 and include reopening the unused ticket hall to provide additional capacity at the Warwick Road end of the station .
538	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN14	TRN14 CHANGE "should" to "must"	No change necessary. 'Should' instead of 'must' is used throughout the transport chapter and most of the rest of the SPD.
539	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN15	TRN15 AMEND to "platform lengthening and broadening by adding new platforms in parallel" AMEND to read "eight and twelve car trains"	No change necessary. The provision of eight car platforms is supported by Network Rail and will provided sufficient capacity to accommodate demand.
540	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN16	TRN16 ADD "or at one new station linked to the other three existing stations"	No change necessary. The creation of new stations within the site is not supported due to the disruption to existing services, high cost and little justification based on the work undertaken in the ECTS, which demonstrates that development impacts can be accommodated by improving existing services.
541	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN18	TRN18 CHANGE to "taxi rank within the OA and coach parking facilities to be located at Olympia"	No change necessary. The demand for coach parking generated by the development proposals should be met on site.
542	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN19	TRN19 ADD "so there is no impact on existing roads and no increases in congestion"	No change necessary. It would not be reasonable to require no impact on local roads. TRN19-21 and 23 cover impact on the road network.
543	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN20	TRN20 CHANGE "2009 levels" to "1970s levels" ADD "at the start of the development"	No change necessary. This cannot be delivered by development.
544	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN21	TRN21 DELETE "to unacceptable levels" INSERT "to any level" CHANGE "mitigations" to "improvements"	No change necessary. It is not possible to require no impact on the road network from development. Mitigations is appropriate wording as any improvements will be required to mitigate the impact of development.
545	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN22	TRN 22 AMEND to read "New development should investigate improvements to the Earls Court one-way system including the pedestrian environment , by means of an independent professional investigation, in consultation with local residents and stakeholders, and should fund a package of measures as identified in the investigation"	No change necessary. In accordance with Key Principle TRN22 'new development should investigate improvements to the Earl Court One Way System, including to the pedestrian environment, and should fund a package of measures as identified in the investigation'. The Council will ensure that the investigation undertaken is independent and professional. However, this does not need to be explicit in the SPD.. Consultation with local residents and stakeholders will be undertaken as part of the investigation and does not need to be explicit in the SPD.
546	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN23	TRN23 DELETE "no unacceptable impacts" INSERT "only positive impacts"	No change necessary. This cannot be delivered by development. Reference to motorcycle parking will be added to paragraph 10.73. Electric car charging is referred to in paragraph 10.73.
547	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN24	TRN24 ADD "and motorcycles, scooters, and electric vehicles" after "car club vehicles"	Change proposed. Reference to motorcycle parking will be added to paragraph 10.73. Electric car charging is referred to in paragraph 10.73.
548	Malcolm	Spalding	Earl's Court Society	10	Key Principle TRN25	TRN25 AMEND "on-street" to "on- off- and under-street"	No change necessary. This section refers to the potential for impact on existing parking and the need to manage any new controlled parking zones.
549	Malcolm	Spalding	Earl's Court	10	Key Principle	TRN26 ADD "by rail and a single control distribution point near or	No change necessary. The detail of how freight will be managed will be

			Society		TRN26	on the A4"	established at application stage. A single central distribution point may not be the best way of managing freight.
562	Malcolm	Spalding	Earl's Court Society	10		It is our belief that revision of the transport and traffic infrastructure over the whole of west London will be required in the context of the minimum and maximum number of new residents on each of these developments, which must be explicitly stated in this document.	No change necessary. The SPD sets out the level of intervention needed to accommodate the development quantum assessed. Any different levels of development must be supported by appropriate assessments at application stage.
563	Elizabeth	Harrap		10		The increased traffic volume within the existing Earl's Court one-way system will cause chaos. The existing traffic is such that as a resident I expect to wait in a queue and travel very slowly down the Earls Court road by car at present. I often walk to High Street Kensington, Notting Hill gate and South Kensington as the traffic is bad and the underground is crowded.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23).
564	Elizabeth	Harrap		10		I understand that Earl's Court Rd has a weakness around the underground station and therefore cannot be widened at that part. I assume that the same weakness exists for West Kensington station and West Brompton station making it inevitable that there will be bottlenecks at West Brompton and at the Earls Court stadium exit.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17).
565	Elizabeth	Harrap		10		Earl's Court underground station often seems to have problems and delays, perhaps due to the old signal box, but it certainly won't be able to cope with approximately 14,000 new residents and 12,000 workers in the area, even if these are spread out over the three stations I cannot see how the present infrastructure can cope with the added number of residents and workers.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). Both the District and Piccadilly Lines are scheduled to be upgraded over the next twelve years including a new signalling system enabling a higher frequency service on both lines.
570	Gennaro	Castaldo	Kensington Mansions Residents Association	10		This development simply must be reviewed in concert with the several other building plans ongoing in the area: the Homebase to High Street Kensington project, the area south of High St Ken, the Westfield Centre and others. Collectively, they could add tens of thousands of people to an already densely populated area. Traffic and pollution are problems today and the Traffic and Air Quality parts of the SPD do not properly lay out the metrics which will measure all of this together.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The extra trips generated by development in the area and across London as a whole are included within the modelling assumptions underpinning the ECTS.
571	Gennaro	Castaldo	Kensington Mansions Residents Association	10		The Transport aspects, with three tube stations already at capacity, suggest that the residential density proposed is not reasonable and the relevant sections of the SPD do not seem to deal with this capacity constraint. Even with tube expansion (unclear timing for the Piccadilly line) , natural growth in the area would absorb this, so squeezing in nearly 20,000 more passengers into the system cannot work. I have been at Victoria station where the gates are routinely closed due to dangerous volumes of passengers trying to get into the station. Pushing and fights have occurred, stress levels soaring. The developers glossed over this in presentations and when asked directly by local residents.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17).
572	Gennaro	Castaldo	Kensington Mansions Residents Association	10		The numbers for public transport as well as traffic volumes within the area, particularly the Earl's court One way system, just do not work.	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
573	Gennaro	Castaldo	Kensington Mansions Residents Association	10		The provision of .4 parking spaces per residential unit are a prescription for disaster and parking rage. The SPD should be very specific in its requirements on this and for the developer to suggest cycling will alleviate the demand is not realistic.	No change necessary. Low car parking levels are suitable in an area of high public transport accessibility such as this. Permit-free arrangements will ensure there is no overspill parking and future residents will be aware of the restriction before they purchase properties.
580	Michele	Gorgodian		10		- [bold] Additional stress on our public transportation and road networks, which are already stretched. [end bold]	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).

						Not only do our roads, buses and tube struggle to cater to the volume of commuter traffic, the area is already one of the most densely populated in Europe. I am concerned that a big increase in the local population will reduce ease of movement and quality of transportation for all: local residents, commuters and vehicular traffic.	
619	Bernard	Selwyn	Open Spaces Society	10	Para 10.19	12. [bold] Para 10.19 [end bold] It is thought that a case can be made out for direct but landscaped paths for foot and cycle traffic between Earls Court Station and North End Road.	No change necessary. Improved east-west connectivity is an important part of the strategy of the SPD and is covered in detail throughout the transport and urban form strategies.
659	Keith	Barker-Main		10		The Victorian road and transport system, already over-capacity, will simply not be able to cope and cogent workable transport solutions are non-existent. The effect of site traffic throughout the build period has the capacity to reduce West London in its entirety to gridlock at regular intervals with all the adverse environmental and economic implications attendant. The extreme length of the proposed build must be taken into account. The havoc it could visit on West London has been totally misunderstood by developers and Councils.	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). A construction plan must be provided with any planning application for the area and this will be assessed by both the council and TfL to ensure that it does not have a negative impact on the road network.
660	Keith	Barker-Main		10		The Strategic Transport Study assumes a North/South Road through the Opportunity Area, which will help reduce the impact of the development on the Earl's Court One-Way system, especially Earl's Court Road. It will not. All it will do, is decant traffic out onto Lillie Rd which has only one lane in each direction. The inability to ring the area with an adequate new road system indicates that a development of this scale is not compatible with such a built-up area.	No change necessary. The impact of development on the road and network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23). It has not been assumed that north-south route will substantial relief to Earl's Court Road. This is covered in paragraph 10.68.
822	James	Tynte-Irvine		10		1. Transport: The impact of the development on the already overloaded transport infrastructure has not been given sufficient consideration. Given the development may bring in 14,000 new residents and 12,600 workers to the area there must be adequate planning to deal with the increased traffic volumes on Earl's Court's already congested one way system.	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
823	James	Tynte-Irvine		10		More consideration must be given to facilities for pedestrians and cyclists.	No change necessary. Walking and cycling are considered in detail in paragraphs 10.16 – 10.31.
824	James	Tynte-Irvine		10		There must be provisions made to tackle the fact that West Kensington, West Brompton and Earl's Court tube stations are already at capacity. If the development goes ahead as planned these will be stretched beyond breaking point.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The SPD proposes measures at all three tube stations to ensure that they will be able to function at an acceptable level.
832	K.A.	Courtenay		10		The SPD should make it clear that a housing density limit will be set, based upon the available capacity of the transport (and other) infrastructure. The Transport studies were limited to the 5,560 homes and 12,165 jobs scenario (Scenario 1) as the higher scenarios cannot be accommodated even after implementation of improvements. East-West road traffic, particularly on the A4 (see article 10.65), will be unacceptably impacted by development at the Scenario 1 level which would suggest that housing density in the OA should be even lower than this.	No change necessary. The development quanta assessed by the ECTS is set out clearly in paragraphs 10.13 and 10.14. Housing density is only one part of the assessment and development proposals could be submitted with a different mix of residential and commercial uses. The SPD makes is clear at paragraph 10.15 that all development must be supported by robust Transport Assessments.
838	Cllr Linda	Wade		10		While many of the points raised during the earlier Consultation process have been incorporated into this document, the Transport, Traffic and Air Quality sections need considerably more detailed studies on the impact on existing residents and the surrounding areas to be convincing.	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The ECTS, which informed the SPD, is comprehensive and robust.
852	Cllr Linda	Wade		10		There is also the issue of when a building/street straddles the Boroughs' boundary, and the allocation of parking permits. It is understood that LBHF will provide parking permits and RBKC will not, also of the potential risk of discrimination against Social Affordable Housing units against the Open Market housing, where	No change necessary. New residents will not be eligible for parking permits to existing on-street parking in RBKC or LBHF, This is set out in paragraph 10.76. The restriction applies to all tenures.

						there is the possibility of multiple car ownership per unit.	
915	Cllr Linda	Wade		10		<p>The report notes that two previous development scenarios have been rejected (for more homes and jobs than are proposed in this document) due to their negative impacts on the transport networks. The principles in this JSPD still do not go far enough to protect the amenity of existing residents with regard to the impact on the transport networks they rely on, many of which are already over capacity.</p> <p>This suggests that overall the JSPD continues to contemplate an overdevelopment of the site in terms of the number of residential units and level of commercial floor space. The detail of this argument is set out in the sections below.</p>	Noted.
916	Cllr Linda	Wade		10	TRN10, TRN11	<p>Key principles of the JSPD (numbers TRN10 and TRN11) are significantly weaker guarantees than are needed. TRN10 suggests that physical improvements to local train and tube stations are needed to accommodate growth in passenger numbers, however this does not guarantee that such improvements will fully alleviate increased overcrowding nor does it assess whether even improved stations can possibly accommodate the growth, particularly given the overcrowded nature of station platforms in the area at present.</p>	No change necessary. The impact of development on the public transport network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The SPD is clear in paragraphs 10.32 - 10.49 on what the scope of improvements would need to be at each station to accommodate development levels of demand.
917	Cllr Linda	Wade		10	TRN11	<p>TRN11 attempts to limit excessive overcrowding or delay for passengers on train and tube services to no more than that predicted for 2031. This is far too weak a statement to offer local residents in the area any comfort. There is no assessment as to what the maximum capacity on the local rail and tube lines could be or what could reasonably be expected to be delivered in the next twenty year period. The JSPD should instead require that development has no negative impact on overcrowding or delay on tube and rail networks allowing only development that is matched by required investment to achieve this.</p>	No change necessary. In assessing the impact of OA development on both the local stations and the lines that serve them, total forecast passenger demand was measured against capacity to ensure that each would be able to function. The required increases in capacity at each of the station is set out in the SPD, whilst the provision of the London Underground upgrades to both the Piccadilly and District Lines will increase capacity by around 25% respectively, equivalent to six additional trains an hour on the Piccadilly line.
918	Cllr Linda	Wade		10		<p>There should have been an Origin/Destination study conducted as part of the traffic studies for the Traffic and Transport Consultation. The model of the full traffic counts were based on extensive Origin and Destination surveys, 'although none specifically on the ECOWS. No investigation was made to identify whether HGV's could or should be diverted from using the ECOWS as the study was concerned with the impacts OA development only and did not have a wider remit.' [footnote] No direct origin/destination surveys were carried out on the ECOWS as part of the Earl's Court & West Kensington JSPD transport study, however full traffic counts including turning movement surveys were undertaken to ensure that the transport models used to generate future forecasts validated to current conditions. The models themselves are based on extensive Origin and Destination surveys, although none specifically on the ECOWS. No investigation was made to identify whether HGV's could or should be diverted from using the ECOWS as the</p>	No change necessary. The methodology for the ECTS is considered robust and has been agreed by TfL, LBHF and RBKC. The study used TfL's suite of sub-regional models and the methodology and data underpinning the models used are the same that are used to inform all major transport projects and Opportunity Area Planning Frameworks in London. The use of origin/destination surveys, traffic counts and turning movement surveys ensures the model represents accurately vehicle movements in the local area.
920	Cllr Linda	Wade		10	Para 10.2	<p>10.2 The document concedes that 'The OA is a transport-dominated site with a mix of transport infrastructure adjoining or running through and under it. The local transport facilities play an important role in connecting Earl's Court to the rest of London and the UK as a whole but these connections also create significant local severance across the area particularly for pedestrians and cyclists, which impacts on local quality of life and accessibility to goods, services and employment.' But severance is also caused</p>	No change necessary. The issue of severance is covered in the transport chapter of the joint SPD and recommendations are made to reducing the severance caused by Warwick road including the reintroduction of the Earls Court station exhibition entrance and urban realm initiatives.

						by the traffic volumes on Warwick Road, 'separating' residents of Kempsford Gardens, Eardley Crescent and Philbeach Gardens from the rest of Earl's Court.	
921	Cllr Linda	Wade		10	Para 10.3	10.3 Warwick Road, with its high traffic flows is not an attractive pedestrian environment and with the projected figures indicated in 10.57 will be less so: 'Even without development in the OA, traffic levels in the local area are forecast to increase significantly from 2009 to 2031. This is due to both the recent removal of the Western Extension of the Congestion Charging Zone as well as forecast growth in 'population and employment'. The strategic nature of the A4 means it draws significant traffic volumes through the area and is particularly affected by background increases in traffic volumes. In this chapter the '2031 base' refers to forecast traffic levels in 2031 without development.'	No change necessary.
922	Cllr Linda	Wade		10	Para 10.5	10.5 'The London Underground lines serving the OA are some of the most congested in London, with crowding levels in excess of four people per square metre in some sections of both the District and Piccadilly Lines in the AM peak period. Significant increases in capacity are planned and funded for the District and Piccadilly Lines as part of the London Underground upgrades. The District Line upgrade is planned to be complete by 2018 and will increase capacity by 24%. There is no definite date for the upgrade of the Piccadilly Line, with 2 additional trains per hour mentioned at the Consultation Meeting at St Cuthbert's Hall on Wednesday 30 November, which would provide a capacity increase of 24%, although it is expected to be complete prior to 2031. Crossrail 1 is planned to open in 2019, which will release capacity on the Central Line, which in turn will draw passengers from the Piccadilly Line, thereby releasing some limited capacity.' [footnote] 'The Piccadilly Line upgrade will be delivered alongside the	No change necessary. It is anticipated that the Piccadilly line upgrade will provide around six additional trains per hour during peak periods.
923	Cllr Linda	Wade		10		Earl's Court Station The improvements to Earl's Court Station set out in the relevant section of the JSPD do not assess or take into account any limiting factors that may prevent capacity at the station being increased. Platforms are already seriously overcrowded at peak times and introduction of longer trains and longer platforms would require massive investment along the whole line – something that is not realistic to include. Consequently the JSPD should limit development to that which it can be reliably proved can be accommodated at Earl's Court.	No change necessary. The impact of development on the public transport networks including Earls Court station is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The assessment of impact and mitigations at Earl's Court is based on the capacity of station, forecast future year demand from both OA development and broader growth across London and the programmed capacity increases already agreed by TfL. London Underground have been involved in the production of the SPD and are satisfied with the accuracy of the outputs. It is considered that with the interventions proposed Earls Court station will be able to accommodate OA growth.
924	Cllr Linda	Wade		10		The capacity of the existing station at Earl's Court is a major concern for residents, and this section of the JSPD is inadequate to provide reassurance that the matter has been addressed satisfactorily. The capacity of both public transport and the roads to cope with the introduction of a new residential and worker community should be the main factor in determining the density of the site. Although this draft of the JSPD suggests that the site could be limited to 5,560 homes and 12,165 jobs, the overall potential increase to the area, ignoring the new developments north of Cromwell Road (approximately 7,000 new residents) would conservatively increase the combined population by 24,957. This is still too high for the area to be able to absorb. The density of the site should be determined by the capacity of the infrastructure to absorb with negative impact on the existing residents. It has been indicated that the new residents north of Cromwell Road would access the tube network at Olympia, will	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The methodology used takes into account background growth from other developments across London in line with GLA forecasts.

					further press	
925	Cllr Linda	Wade		10	In the figures supplied by LUT for 2010, Earl's Court station had 21.21 million entries and exits, with 19 million interchange passengers, as the station is a interchange hub for Wimbledon, Richmond, Ealing Broadway, Edgware Road and Olympia trains as well as the Piccadilly line trains, there is routine overcrowding of the east bound platform of the District line at AM peaks and west bound platform at PM on the District line platforms, as well as poor connectivity to the Piccadilly line platforms with one escalator, two lifts, and stairs down to the Piccadilly line from the District line platforms. The introduction of a tunnel from the site to the station will be of benefit to the residents and employees of the site, but will not substantially reduce the existing problem or necessarily serve residents on that side of the station, as this would appear to be based on the fact that all tunnel passengers will be using the Piccadilly line and not the District line branches. Also it is not clear whether the project	No change necessary. The reopening of the tunnel will help to ease pressure on the District line platforms by allowing some of those passengers who must currently use the District line platforms to access the Piccadilly line to use the tunnel. This will benefit all users of the station by providing relief to some of the most congested parts of the station. The methodology used takes into account background growth from other developments across London in line with GLA forecasts. The transport modelling informing the SPD also takes account of passenger preferences such as a desire to use zone 1 stations or stations that provide more services in its validation. Future projections with OA development do take account of the increased permeability of the site.
926	Cllr Linda	Wade		10	West Brompton Station Unlike the section of the JSPD concerning Earl's Court Station, the section of the JSPD concerning West Brompton Station is more realistic, noting that investment in the station is required to allow platform lengthening which would mean it could accommodate longer trains and therefore a significant increase in passenger capacity. The failure to include such guarantees at other stations is therefore highlighted by this section of the JSPD. Nonetheless it offers no certainty that longer trains would in fact be run along the whole line by the train operators even if platforms at this particular station were lengthened. Development that has a negative impact on local railway stations should only be permitted by the JSPD where increased capacity can be guaranteed through properly secured infrastructure and operational improvements.	Noted. Such commitments must be secured before any development proposals are permitted.
927	Cllr Linda	Wade		10	Para 10.25 10.25 'The level of pedestrian footfall set out in Figure 10.6 will also have an impact on pedestrian crossings in the area. The crossing on Old Brompton Road has insufficient width to accommodate the predicted development footfall and will need to be widened. To help relieve the crossing at Warwick Road and reduce congestion within Earl's Court station, new development should refurbish and reopen to the public the existing pedestrian tunnel beneath Warwick Road to allow direct access to the Underground station. A new pedestrian crossing will be necessary on the A4 and should be incorporated into a new junction into the site.	Noted.
928	Cllr Linda	Wade		10	The existing crossings on the A4 at North End Road and Warwick Road would be improved by the introduction of straight ahead crossings instead of the staggered arrangements that currently exist. However, such changes, including a crossing at the new A4 junction, are likely to have an impact on traffic capacity and will need to be carefully reviewed to ensure an appropriate balance of users' needs is achieved.'	Noted.
929	Cllr Linda	Wade		10	There are several areas of narrow pavement that should have to been considered: outside West Brompton Station, north of Warwick Road exit from the station, these are not mentioned. The re-opening of the tunnel from the site to the station will serve the new residents and not the existing residents, and the benefit	No change necessary. The ECTS was informed by an extensive assessment of footway conditions on the streets surrounding the site. Paragraph 10.21 highlights some locations where problems were identified, including those referred to in the response. Paragraph 10.25 refers to the Cromwell Road / Warwick Road junction.

						unquantifiable. No mention of the traffic island at the junction of Warwick Road and Cromwell Road opposite Tesco's, and the acknowledgement of an increase in traffic volumes on Warwick Road.	
930	Cllr Linda	Wade		10	Para 10.27	10.27 'The development is forecast to generate around 600 cycle trips in the peak hours. The creation of a new network of cycle friendly streets within the OA will mean that cycling will be safer and more attractive for all. It should be noted that as the local cycling environment is enhanced, cycling will become ever more attractive and therefore these forecasts should be regarded as the minimum that could be expected.'	Noted.
931	Cllr Linda	Wade		10		There is nothing in this JSPD about Cycle lanes and routes on the roads surrounding the OA, and it is presumed that as this put forward as a Sustainable Transport option that they will have to go onto Warwick and Earl's Court Roads.	No change necessary. The SPD is a high level document. The detail of how cycling will be provided for will be determined at application stage. However, the SPD refers to cycle routes in paragraph 10.28 and general principles for improvements are set out in paragraphs 10.28 - 10.31.
932	Cllr Linda	Wade		10	Para 10.31	10.31 'The Mayor's Cycle Hire Scheme already extends to the eastern edge of the OA and Phase Three of the Mayor's Cycle Hire Scheme will extend it west, beyond the OA. Docking stations should be provided within the OA with several new docking stations required to meet the likely demand. The cost will be borne by the developers.' [footnote] Metro, 22 November Just 8% of those who live in the capital have ridden the bikes available in the hire scheme championed by mayor Boris Johnson. It has been more popular with younger Londoners – just over a fifth of 18- to 24-year-olds and 11 per cent of 25- to 34-year-olds have used the bikes, a survey showed. Last month, figures showed the bikes had been used for 7million journeys and 140,000 people had become members, with a third of journeys made by casual users. Tim Bellenger, director of policy at London TravelWatch, said the scheme was aimed at a 'niche market' and that 8% was a 'large number of people'. More men (12%) than women (4%) questioned in the s	No change necessary. The figures quoted only refer to entry and exit flows from the station. Interchange flows are not quoted.
933	Cllr Linda	Wade		10	Para 10.36	10.36 'By 2031 passenger movements into and out of Earl's Court station in the AM and PM peaks will be at least 20% higher than existing movements (2009 figures). Development would add an additional 10% in both peaks.' This would indicate that there would be a 30% increase of traveller flow in and out of the station, but it is not clear as to whether this includes the interchange traffic	No change necessary. The 30% is trips into and out of the station. The modelling also includes the origin and destination of trips and therefore increases in interchange flows are included when assessing the impact of development on the station.
934	Cllr Linda	Wade		10		There are no figures to substantiate the reduction that is promoted by Crossrail 1 in the summary. Reliance is placed in 10.34 on 'the proposed Chelsea/Hackney Line , which would offer relief to the Wimbledon branch of the District Line', but this is at present unfunded and the current plan would appear to be that the trains would almost certainly serve Clapham Junction. 'The route between Victoria and Clapham Junction could be via Battersea (to serve the new development at Battersea Power Station) or via the King's Road in Chelsea and Imperial Wharf station and so it is not clear that there would be a reduction on the Wimbledon branch line'. [footnote] 'Crossrail 2 is not likely to be operational until 2030 at the earliest. TfL is currently undertaking a rigorous option analysis to select a route that best meets the objectives set for Crossrail 2, including significant crowding reduction to the Tube and National Rail network and improving connectivity. Further work will continue through 2012 to id	No change necessary. No reliance is placed on the transport improvements set out in paragraph 10.34 by the ECTS. However the SPD offers policy support to these schemes due to the additional benefit that they would bring to the OA.
935	Cllr Linda	Wade		10	Para 10.37	10.37 Increasing the capacity of the Warwick Road entrance will	Noted.

						have to be sensitive to the fact that the ticket hall is listed.	
936	Cllr Linda	Wade		10		There has been no investigation into a new ramped area over the District line in the area adjacent to the Warwick Road, behind the area of the hoardings, which could serve as an area where a new entrance to the ticket hall could be made, stands for cycles and motor bikes could be housed, a meeting point, evacuation point, and the LUT/TfL buildings to the north could be converted into retail spaces.	No change necessary. The options set out in the response are out of scope for the ECTS. LUL/TfL may wish to consider such options in the future but such changes are not necessary to accommodate development of the OA.
937	Cllr Linda	Wade		10		The interventions indicated in the JSPD are based on widened pavements, increasing the green light signalling, opening the tunnel at the station; this simply will not cope with the projected capacities. Too much reliance has been placed on unfunded projects, or projects unlikely to materialise such as the Chelsea/Hackney line.	No change necessary. No reliance is placed on the transport improvements (including Chelsea – Hackney line) set out in paragraph 10.34 by the ECTS. All interventions referred to within the SPD are tested within the ECTS.
938	Cllr Linda	Wade		10		Walking and Cycling The JSPD notes that in some parts of the local area the footway capacity will be insufficient to meet the growth in use but the JSPD does not go far enough in requiring this lack of capacity to be addressed. For example, it already signals that required pedestrian crossing improvements cannot be implemented where they are expected to impede traffic on the A4 making pedestrians the losers in the area.	No change necessary. The SPD does not say that pedestrian crossing improvements cannot be implemented where they have an impact on the traffic. Paragraph 10.25 refers to the need for an appropriate balance of users' needs.
939	Cllr Linda	Wade		10		The recommendation of increasing the width of some pavements to encourage the pedestrian environment will reduce the flow of road traffic. There is no mention of cycle lanes on the roads immediately adjacent to the OA, some of which are the most dangerous in London.	No change necessary. The SPD refers at paragraph 10.21 to the need to increase the clear footway width in a number of locations. This can be achieved by rationalising street furniture. In some locations it may be possible to widen footways such as where land can be used within the OA.
940	Cllr Linda	Wade		10		The JSPD acknowledges the need to make significant investment in cycling facilities in the area but limits on-street improvements to new streets within the development area. Once again, cycling is given a lower level of importance than motorised traffic in the area. It also falls short in requiring good cycle links to local streets offering only the promise of investigations rather than action for improvements.	No change necessary. The SPD is a high level document. The detail of how cycling will be provided for will be determined at application stage. However, the SPD refers to cycle routes in paragraph 10.28 and general principles for improvements are set out in paragraphs 10.28 – 10.31.
941	Cllr Linda	Wade		10	Para 10.28	10.28 'To the east of the site in particular there are several one-way streets that are designed to discourage vehicles from rat running but that also cause significant inconvenience, making cycling less attractive. In order to accommodate the increased demand from development any new development should identify cycle routes based on the likely origin and destination of trips through the area and fund appropriate improvements, such as allowing cycling in both directions in one-way streets and improvements to junctions and crossings, to make those routes as attractive and convenient as possible.'	Noted.
942	Cllr Linda	Wade		10	TRN8	Key Principle TRN8 relates to onward connections for cyclists into the streets surrounding the OA, but all the emphasis is on west-east routes. The north-south Grand Union Canal to Thames routes are forgotten again.	No change necessary. Improvements to north and south connections are referred to in paragraph 10.28 and an amendment is proposed to paragraph 10.18 to highlight north- south connections.
943	Cllr Linda	Wade		10		It is important that the schools children go to, especially the secondary schools north and south of the OA have safe cycle routes to really encourage teenagers cycling to school. Cardinal Vaughan and both Academies (existing in the south and proposed in the north) in RBKC, plus Burlington Dane and other LBHF secondary schools could all use north-south safe cycle paths or routes.	Noted. Such matters are out of scope for this SPD.

944	Cllr Linda	Wade		10		At the east end of Trebovir Road where it meets outgoing traffic from Nevern Square south, cyclists are already presenting problems for drivers, and cyclists are unaware of the potential for cars who will not be looking right for cyclists. This is potentially dangerous.	Noted. This is out of scope for the SPD but the Council is assessing options for cyclists on Trebovir Road as part of a separate work stream.
945	Cllr Linda	Wade		10		Furthermore, there are already concerns about pedestrian-friendly phasings along Earl's Court and Warwick Roads.	Noted.
946	Cllr Linda	Wade		10	Para 10.57	10.57 Even without development in the OA, traffic levels in the local area are forecast to increase significantly from 2009 to 2031. This is due to both the recent removal of the Western Extension of the Congestion Charging Zone as well as forecast growth in population and employment. The strategic nature of the A4 means it draws significant traffic volumes through the area and is particularly affected by background increases in traffic volumes. In this chapter the '2031 base' refers to forecast traffic levels in 2031 without development. The Strategic Transport Study has assessed the impact of this growth on the road network as well as the additional impacts of OA development.	Noted.
947	Cllr Linda	Wade		10	Para 10.58	10.58 The strategic transport study estimates that development would increase traffic levels within the OA by around 3% in the AM Peak and 2% in the PM peak. For the local highway network to operate at an acceptable level, this level of growth would require additional highway capacity improvements and modal shift to walking, cycling or public transport. In particular journey time reliability on the highway network should not be unacceptably impacted by development in the OA. But 10.58 is predicated by the interventions proposed such as changing the green light signing and widening the pavements, which are not pedestrian friendly, and if undertaken might undermine the flow of traffic. These interventions are indications and not specific and therefore unproven. [footnote] 'The transport study has identified the key constraints to development for all highway users including pedestrians and cyclists. It has proposed mitigation measures to improve pedestrian movement, such as widening pavements and rem	Noted.
949	Cllr Linda	Wade		10	Para 10.59	10.59 Alterations to the signal timings at the A4/ Warwick Road junction to accommodate pedestrian crossings in each signal cycle and to remove periods where there are no green signals, which means traffic is given more time to move through the junction.	Noted.
950	Cllr Linda	Wade		10		Increasing the length of green time at the traffic signals at Old Brompton Road's junctions with Finborough Road and Earl's Court Road, to allow more traffic to pass through the junctions.'	Noted.
951	Cllr Linda	Wade		10		Crossing at junction of Cromwell Road/Earl's Court Road junction. This is too close to the junction, and there have been incidents due to the combination of traffic not stopping and the length of time that the pedestrian priority lights are on for. There are no sound indicators for this light.	No change necessary. The SPD is a high level document and is not the appropriate location to consider issues at specific crossings. Where relevant such issues will be picked up at the application stage and improvements secured as necessary.
952	Cllr Linda	Wade		10		Earl's Court Road, opposite the station, is a very busy crossing, and there is insufficient time for many pedestrians to cross within the time allocated particularly older residents, people with shopping, children and luggage.	No change necessary. The SPD is a high level document and is not the appropriate location to consider issues at specific crossings. Where relevant such issues will be picked up at the application stage and improvements secured as necessary.
953	Cllr Linda	Wade		10		The junction of Old Brompton Road, Redcliffe Gardens and Earl's Court Road, into Old Brompton Road west. There is no pedestrian priority indicator and traffic can turn right at speed.	No change necessary. The SPD is a high level document and is not the appropriate location to consider issues at specific crossings. Where relevant such issues will be picked up at the application stage and improvements secured as necessary.

954	Cllr Linda	Wade		10		The junction of Old Brompton Road, Finborough Road and Warwick Road is particularly dangerous. There is no pedestrian priority and there is traffic travelling north-south, east-west, and a feed in from Old Brompton Road east into Warwick Road. Close by is a residential unit for older people and a primary school close by.	No change necessary. The SPD is a high level document and is not the appropriate location to consider issues at specific crossings. Where relevant such issues will be picked up at the application stage and improvements secured as necessary.
955	Cllr Linda	Wade		10		Warwick Road and Cromwell Road junction, with a feed off lane to the A4 and a small, unlevel Pedestrian Island opposite Tesco's.	No change necessary. The SPD is a high level document and is not the appropriate location to consider issues at specific crossings. Where relevant such issues will be picked up at the application stage and improvements secured as necessary.
956	Cllr Linda	Wade		10		<p>Another pedestrian crossing mentioned by residents as being dangerous is the crossing on Cromwell Road opposite Sainsbury's.</p> <p>There are no cones on these pedestrian crossings for the sight impaired. [footnote] 'A key aim of the JSPD is to reduce local severance caused by transport infrastructure. To this end a number of interventions have been proposed to better link the communities to the east and west of Warwick Road.</p> <p>Increased green light phasing for traffic has been tested to improve road network performance as part of the transport study; however it is not explicitly supported and must be considered further, including the impacts on all road users as part of any planning application(s) for the site.</p> <p>As part of any planning application and transport assessment the pedestrian environment will be assessed and any proposed changes will have to be included in the mitigation for the development.' (TfL Response to queries raised on the Earl's Court & West Kensington JSPD transport chapter by CI</p>	No change necessary. The SPD is a high level document and is not the appropriate location to consider issues at specific crossings. Where relevant such issues will be picked up at the application stage and improvements secured as necessary.
957	Cllr Linda	Wade		10	Figure 10.10	[italics] Correction: Fig.10.10 the panel indicating crossing facilities, footways and open space of the Warwick Road access is pointing to Earl's Court Station. [end italics]	Change proposed. This will be corrected.
958	Cllr Linda	Wade		10	Para 10.51	<p>Bus Services</p> <p>10.51 'There are a number of locations that have poor bus connectivity to Earl's Court. These include the King's Road, Battersea and Vauxhall, Richmond (London Bus Route 190 from West Brompton goes to Richmond) and south-west London. Routes that connect the south of RBKC to the north are currently very limited and new services should help to bridge this gap. Any new routes should help to fill these and other gaps.'</p>	Noted.
959	Cllr Linda	Wade		10		Mitigation measures for bus services in the area appear to be capped at a 5-year contribution. This statement is not accompanied by any justification for this limit and makes no assessment of whether the negative impact of the development on public transport will last longer than this - an entirely possible outcome.	No change necessary. The contribution outlined for bus services is in line with similar agreement s agreed between TfL and developers. Funding for five years allows sufficient time for the new services to become an established part of the local network and generate their own demand. After the initial five years the new services provided by the developme6tn will be judged on it's own merits in line with the rest of the network.
960	Cllr Linda	Wade		10		The JSPD should require a long-term funding structure to be put in place, perhaps through payments to be made by future occupiers of the development, to ensure bus services are not impacted negatively for local people.	No change necessary. Appropriate funding mechanisms will need to be secured as part of any planning permission granted for planning applications within the OA.
961	Cllr Linda	Wade		10		Has there been an examination of a bus stand within the site to increase ease of inter-linking with the tube system? At present	No change necessary. The issues of bus stands are referred to in paragraph 10.54.

						some of the congestion on Warwick Road is caused by the C1, C3, 328 and 74 stopping, which effectively closes off one lane of traffic and there is a bus from West Brompton to Richmond already in operation.	
962	Cllr Linda	Wade		10		Road Network, Car Parking and Freight The JSPD sets out a number of suggestions to increase traffic flows at key junctions in the local area. These minor measures, unproven in their individual or collective impact, make extravagant claims for additional capacity which defy much experience of traffic management: significant increases in capacity come only with additional road-space and not through traffic-light re-timings alone. Even with these speculative improvements, the JSPD accepts that east-west traffic will experience decreased performance – though the degree of this decrease is not quantified in the text of the JSPD.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23). The performance improvements delivered by the mitigations set out in paragraph 10.59 have been rigorously assessed as part of the ECTS.
963	Cllr Linda	Wade		10		Overall the JSPD should set a specific and realistic limit on the number of new vehicle movements that can be accommodated in the local area – if any can in fact be accommodated – while setting out clearly the improvements to the road network that are required. This limit may well prove to be substantially lower than the traffic generated on-site envisaged for the new homes and businesses contemplated by the JSPD.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The SPD sets out in paragraph 10.65 that any application for development would need to demonstrate in detail what mitigations are necessary to accommodate development.
964	Cllr Linda	Wade		10		The Earl's Court Redevelopment, as proposed by the JSPD, will effectively undermine any future potential to fulfil the long-term objective of the restoration of two-way working..	No change necessary. By providing additional road capacity within the OA some relief is possible on Earl's Court Road and Warwick Road. The limitations of this are set out in paragraph 10.68.
965	Cllr Linda	Wade		10		The startling prospect of 1,500 parking spaces for new residents in the proposed development, with a further 200 spaces for their visitors demonstrates the severe impact that there could be on local residential amenity. Statements in the JSPD that the number of spaces that should be permitted ought to be well below this level are unhelpfully vague. Clear limits are needed to protect the interests of local people. The JSPD also highlights the negative impact of additional car movements in the local area on air quality but offers no controls on the level of diminishing air quality that should be accepted. In fact the JSPD should take the opportunity to limit traffic generation so that air quality is not reduced for local residents.	No change necessary. The SPD refers to the need to limit traffic generation throughout the Transport and Accessibility Strategy. The control of car parking is only part of achieving this. Para 12.75 identifies vehicles using the surrounding roads as one of the main sources of air pollution in the area. Key Principle ENV16 states that redevelopment must be air quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. Para 12.83 sets out potential measures to improve air quality in the area, such as limiting off street parking, encouraging electric car charging, implementing 20mph zones and encouraging walking and cycling.
966	Cllr Linda	Wade		10		Promises to reduce freight movements in the area by offering central delivery points and moving construction material by rail are limited only to their investigation and not implementation and overall the JSPD carries only the requirement for servicing and delivery plans to be drawn up without saying what reductions in traffic movements they should achieve.	No change necessary. The SPD is a high level document and sets out general principles. The feasibility of a rail depot and central servicing facility will need to be assessed in support of any planning applications.
967	Cllr Linda	Wade		10	Para 10.57	10.57 'Even without development in the OA, traffic levels in the local area are forecast to increase significantly from 2009 to 2031. This is due to the recent removal of the Western Extension of the Congestion Charging Zone as well as forecast growth in population and employment. The strategic nature of the A4 means it draws significant traffic volumes through the area and is particularly affected by background increases in traffic volumes. In this chapter the '2031 base' refers to forecast traffic levels in 2031 without development. The Strategic Transport Study has assessed the impact of this growth on the road network as well as the additional impacts of OA development.	Noted.
968	Cllr Linda	Wade		10		ECOWS and the A4 are to capacity, and it will be hard even with the interventions proposed for the roads to cope with much more	Noted.

						additional traffic with the 'around 3% in the AM Peak and 2% in the PM peak' indicated in 10.58.	
969	Cllr Linda	Wade		10		(Also, there is concern over the long-term condition of the Hammersmith flyover, and whether this will have an impact on the short, medium and long-term projections for the area.) [footnote] Evening Standard 20 December 2011 'Creaking Hammersmith flyover 'in dire need of reinforcement' [end footnote]	Noted.
971	Cllr Linda	Wade		10		' Significant changes to traffic signal phasing to give more 'green light' time to traffic on the roads surrounding the A4. This creates more capacity on the surrounding roads and is possible because the A4 is currently given significant priority.' This would appear to be contrary to the promotion of sustainable transport such as cycling and is non-pedestrian friendly, as are the 2 points below. - Alterations to the signal timings at the A4/Warwick Road junction to accommodate pedestrian crossings in each signal cycle and to remove periods where there are no green signals, which means traffic is given more time to move through the junction.' - Increasing the length of green time at the traffic signals at Old Brompton Road's junctions with Finborough Road and Earl's Court Road, to allow more traffic to pass through the junctions.'	No change necessary. The alteration of signal phasing on junctions on the A4 involves amending the allocation of green time between the A4 and the side roads and reviewing the phasing and adding additional pedestrian phases where possible. It does not involve giving more time overall to traffic or extending the signal cycle times. The mitigations described on Old Brompton Road would involve some increase in cycle times, which would increase delay to pedestrians. It should be noted that the mitigations set out in the SPD are indicative and detailed proposals would need to be set out with any planning application. This is set out at paragraph 10.65.
972	Cllr Linda	Wade		10		The proposed increase in green lights to facilitate the smooth flow of traffic will further compound the non-resident friendly environment of Warwick Road.	No change necessary. The measures included in the SPD are indicative only and detailed proposals would need to be set out with any planning application.
973	Cllr Linda	Wade		10	Para 10.60	10.60 'The impact of the capacity improvements set out above is to improve overall network performance, allowing around 15% more traffic to be accommodated. Even with the forecast growth and additional development traffic, average journey times across the local network are comparable to the 2009 base and are significantly improved in comparison to the 2031 base with no capacity improvements.'	Noted.
974	Cllr Linda	Wade		10		The roads are acknowledged as being to capacity, any increase from this and other developments will have show an increase. This requires further examination and inclusion of a wider area.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
975	Cllr Linda	Wade		10	Para 10.61	10.61 'However, despite the overall road network performance benefits and the increased capacity primarily brought about by the new link road, this does create some significant variations in performance across the local network. The north-south routes generally experience improved performance and the east-west routes experience decreased performance.'	Noted.
976	Cllr Linda	Wade		10	Para 10.61	10.61 'However, despite the overall road network performance benefits and the increased capacity primarily brought about by the new link road, this does create some significant variations in performance across the local network. The north-south routes generally experience improved performance and the east-west routes experience decreased performance.' This would further diminish the pedestrian-friendliness of the environment, and have an impact on the retail, bar and restaurant	Change proposed. The SPD acknowledges that these impacts are not acceptable. Paragraph 10.65 will be amended to make this clearer.

					trade along Old Brompton Road.	
977	Cllr Linda	Wade		10	Para 10.62 10.62 North End Road, Warwick Road and Earl's Court Road experience reductions in journey time and delay due to the extra road capacity provided by the north-south route and some re-phasing of traffic signal timings. Traffic on these north-south routes moves faster and more smoothly, despite overall increases in traffic flow as some demand flows through the OA. The figures show a pattern of increasing journey time from the 2009 base to the 2031 base and then a reduction in journey times once the interventions are added. These occur despite the addition of development traffic. [footnote] Section 10.62 of the JSPD identifies that the addition of development in the OA has some beneficial impact on north-south journey times. This is due to the provision of new north-south connectivity through the site as part of the development, which has the effect of taking some traffic away from the existing local north-south routes such as North End Road and Warwick Road. This beneficial effect mitigates the impact of addit	Noted.
978	Cllr Linda	Wade		10	With the restrictions on turning points for HGV traffic, which would continue to use ECOWS. The north-south road has to be straight at present, and that with the 20 mph speed limit, different road surfaces may not be as attractive as an alternative route.	Noted.
979	Cllr Linda	Wade		10	Para 10.64 10.64 'On Old Brompton Road journey times in the AM peak remain broadly unchanged in comparison to the 2031 base, but are increased from the 2009 base. In the PM peak the delays are greater at around 100 seconds eastbound and 210 seconds westbound in comparison to the 2009 base. The increase from the 2031 base is more modest, though still significant, at around 90 seconds in both directions. The greater impact in the PM is due to the larger overall increase in background traffic volume between 2009 and 2031.'	Noted.
980	Cllr Linda	Wade		10	Old Brompton Road is partly residential, with some entrances directly onto the street, increased traffic will decrease the air quality, increase the congestion around the junctions of Old Brompton Road, Redcliffe Gardens and Earl's Court Road, and Old Brompton, Finborough, and Warwick Roads. Pedestrian crossings at these junctions are not satisfactory at present, and have an impact on the viability of businesses along this road.	Change proposed. The SPD acknowledges that the impacts on Old Brompton Road are not acceptable. Paragraph 10.65 will be amended to make this clearer.
981	Cllr Linda	Wade		10	Para 10.71 10.71 '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. A vehicle route from Star Road has been assessed and does not create additional congestion on North End Road. 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.'	Noted.
982	Cllr Linda	Wade		10	It is hard to see how the traffic movement within the site could be achieved without exit/entry on Warwick Road, particularly if the tenants of the West Kensington and Gibbs Green estate achieve their desire to self-manage.	No change necessary. If the access via Warwick Road where pedestrian only vehicles would need to access the local road network at the A4, Old Brompton Road, Lillie Road or North End Road.
983	Cllr Linda	Wade		10	Para 10.74 Car Parking 10.74 'one car parking space for every 200m2 of commercial floor space and 0.4 spaces per residential units means 1500 spaces'.	No change necessary. Providing additional car parking spaces will encourage higher car ownership and increase car use in the area, this is not acceptable as set out in paragraph 10.74. The Opportunity Area is highly accessible by public transport, in combination with the difficulty of parking within the Royal Borough car

						What measures are going to be included to prevent the use of pay and display spaces until 9.30am and after 5.30pm and the use of single yellow lines in the adjacent RBKC area? This area has an under-provision of car parking spaces per permits provided. The lack of parking unfortunately does not stop people from owning cars. The allocation is simply not enough; at least one car space should be supplied per residential unit. Off-street visitors parking needs to be provided as well to relieve the pressure to pay and display bays at street level.	ownership will be discouraged. A review of controlled parking zones and appropriate mitigations is required at paragraph 10.75 and Key Principle TRN25.
1011	Cllr Linda	Wade		10		<p>Conclusion</p> <p>That the Transport, Traffic and Air Quality studies are insufficiently developed and are not fit for purpose, there needs to be considerably more detail in the reports. That despite the interventions and mitigations indicated in the Transport and Traffic sections that the population should be determined by the capacity of the infrastructure to support the new development without being detrimental to existing residents. [footnote] London Plan 2011 3.28 A rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimizing potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.18) and play (Policy 3.6). It is impo</p>	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The methodology for the ECTS is robust and the methodology and data underpinning the models used are the same that are used to inform all major transport projects and Opportunity Area Planning Frameworks in London.
1045	Mary	Gardiner	Kensington and Chelsea Social Council	10	TRN4, TRN7	<p>Key Principle TRN4 +TRN7</p> <p>We seek reference to local residents concerns regarding existing road safety and how this will be improved by Section 106 support. There should be safe green routes for children to travel to school and to play spaces (which is also a requirement for the open space strategy). There should be pedestrian crossings directly opposite each school.</p> <p>The road network already exceeds capacity, making pedestrian use of the roads feel very unsafe. For example the crossings on Warwick Road, West Cromwell Road Earls Court Road and Old Brompton Road are dangerous, confusing and the time for crossing too short for those with pushchairs and people with less than perfect mobility.</p>	No change necessary. The need for road junctions and links to be safe is covered in Key Principle TRN23. Paragraph 10.70 will be amended to include additional reference to Road Safety Audits. The SPD is a high level document and specific treatments around schools and at individual crossings will be identified at planning application stage.
1047	Mary	Gardiner	Kensington and Chelsea Social Council	10	TRN17	<p>Key Principle TRN 17</p> <p>There should be additional buses up North End Road and north-south travel should be made easier. For example, by extending buses 31, 328 and 390. Better bus provision will reduce car use and improve air quality.</p>	No change necessary. The need for improved bus services, including improved north-south connections is acknowledged in the SPD. Detailed consideration of bus improvement must be made in the Transport Assessments supporting development.
1048	Mary	Gardiner	Kensington and Chelsea Social Council	10		<p>Walking routes through the site should be a priority and signage to all routes should be made clearer. Traffic planners should ensure routes connect places of interest and where people need to go to visit families, not just connecting shopping centres.</p>	No change necessary. A coherent wayfinding strategy is required by Key Principle TRN5.
1049	Caroline	Pidgeon	Liberal Democrat London	10	TRN6	<p>Pedestrians</p> <p>Principle TRN 6 from the SPD clearly states that the developers</p>	No change necessary. The SPD is a high level document that contains general principles. The information set out in the response is too detailed for SPD but will be required in support of any detailed planning applications and should be

			Assembly Group.			must fund "wider, clearer and higher quality footways". However the proposals that underpin this principle seem unlikely to deliver this objective. They suggest that the removal of street furniture, limited repaving and removal of hoardings will be enough to meet the increased demand. Given the figures set out in figure 10.6 of the SPD (which shows the increased foot flow around the sites of up to 1600 people at some points) we urge the council to demand more comprehensive improvements for pedestrians in the development plans. These should include, but not be limited to, details of exactly which pavements will be widened.	included within Transport Assessments.
1050	Caroline	Pidgeon	Liberal Democrat London Assembly Group.	10		Cycling We welcome the SPD's commitment to cycling particularly the statement that cycling is key to a successful transport plan. Principle TRN8 commits to improved connections for cyclists into the opportunity area. However the SPD is not clear about what improvements the developer will fund outside the opportunity area. If cycling is to be an integral part of the areas transport plan the developer must ensure that there are safe and easily accessible routes for cyclists beyond the opportunity area.	No change necessary. The SPD is a high level document that contains general principles. The SPD requires improvements to onward connections in paragraph 10.28 and Key Principle TRN8. The detailed improvements will be agreed as part of future planning applications.
1051	Caroline	Pidgeon	Liberal Democrat London Assembly Group.	10	TRN19, TRN20	Roads Principle TRN19 and TRN20 commit to improving the capacity of the road network and reducing delays on the strategically important A4. However the proposals in the SPD focus exclusively on reducing the impact in the immediate area of the development. We therefore recommend that the council investigates how the development is likely to affect the rest of the A4. The council should then identify any further work that needs to be undertaken to prevent additional congestion further down the network.	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The study area is broad enough to capture all affected junctions and road links.
1052	Caroline	Pidgeon	Liberal Democrat London Assembly Group.	10		Underground and Rail The SPD states that any development would add passengers to the District line which is already the most overcrowded London Underground line in West London. The proposed changes to Earls Court, West Kensington and West Brompton will improve entrances, interchanges and exits from the stations. However there are few concrete proposals to reduce platform and carriage overcrowding.	No change necessary. Detailed mitigation proposals will be developed as part of any planning application. The SPD sets out mitigations that improve platform congestion – platform lengthening at West Brompton, a new entrance at West Kensington and a reopened third ticket hall at Earl's Court all of which help to disperse passengers and reduce overcrowding. Carriage overcrowding is addressed through TfL's planned capacity increases and platform lengthening at West Brompton.
1053	Caroline	Pidgeon	Liberal Democrat London Assembly Group.	10	TRN11	TRN11 states that the development should not lead to excessive crowding on London Underground or National Rail. The SPD relies on the Piccadilly upgrade, West London Line extension and Cross rail 2. These schemes are as yet unfunded yet they appear to be integral to the success of the project. We are therefore very concerned that the SPD does not commit the developers to help fund these schemes. Equally, even with funding, it is unlikely that these schemes would be completed before the proposed development opened. We therefore think it vital that planning permission is only granted if the developer comes up with sufficient contingency plans to deal	No change necessary. No reliance is placed on Crossrail 2 in the ECTS. The Piccadilly line upgraded is funded. The SPD requires platform lengthening to be delivered at West Brompton on the West London Line. Any planning permission granted for development within the OA would need to contain sufficient controls to ensure that development did not take place until there was sufficient capacity available on the public transport network (Key Principle TRN2 and paragraph 10.15).

					with this eventuality.	
1054	Caroline	Pidgeon	Liberal Democrat London Assembly Group.	10	<p>Bus services</p> <p>The SPD commitment to increase bus services in the area is welcomed. However the council needs to explain why additional bus services will be only funded for five years. The additional passenger numbers that the development will bring to the area will be permanent. We therefore urge the council to ensure that adequate bus services are provided for considerably longer than five years.</p>	Change proposed. The paragraph will be amended to make it clear that the subsidy is required for five years after which time the services are expected to be revenue neutral.
1056	Katherine	Alexander		10	<p>TRANSPORT - In order to accommodate the approx. 14,000 new residents and 12,600 workers to the area, station expansions would need to be made in particular to West Brompton and West Kensington. The WLL is already full at peak times as is the Piccadilly line at Earls Court Station, which could potentially be dangerous on platforms and with escalator overspill. However, I feel wider thinking beyond ward boundaries is required to adequately tackle the issue of transport in what is already now the most crowded ward in Western Europe.</p>	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). Improvements to stations has been considered in paragraphs 10.36 – 10.47.
1057	Katherine	Alexander		10	<p>TRAFFIC/AIR QUALITY - Increased volumes of traffic on red routes and the Earls Court Rd will do nothing to integrate the area. Anything West of the Earls Court Road remains segregated by major traffic arteries and and the resulting pollution and traffic danger: the SPD does not consider pedestrians or cyclists. Greater thinking needs to go into easing this choked up North to South funnel to improve life for those West of the Earls Court Road. Air quality around the Cromwell, Earls Court Road and Lillie Road already falls below EU standards and can only worsen with a further influx of people and vehicles.</p>	No change necessary. Pedestrians and cyclists are considered in paragraphs 10.16 – 10.31. Para 12.75 identifies vehicles using the surrounding roads as one of the main sources of air pollution in the area. Key Principle ENV16 states that redevelopment must be air quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. Para 12.80 requires a Low Emission Strategy with consideration for health impacts. Para 12.83 sets out potential measures to improve air quality in the area, such as limiting off street parking, encouraging electric car changing, implementing 20mph zones and encouraging walking and cycling.
1079	Dahabo	Guled		10	<p>6.Suitable transport</p> <ul style="list-style-type: none"> - Increases to reduce use of cars and pollution - Bus 31 or 328 to extend to Ladbroke Sainsbury - Increase bus route signs to link South and North 	No change necessary. General improvements are included within the SPD. Detailed proposals will be worked up as part of the work supporting any planning proposals in the OA.
1082	Dahabo	Guled		10	<p>9.Zebra crossings or Traffic lights</p> <ul style="list-style-type: none"> - Nursery and primary school entrances' should have Zebra crossings - School Children safety should be safeguard 	No change necessary. The SPD is a high level document that contains general improvements and principles. Detailed proposals will be worked up as part of the work supporting planning proposals in the OA. The location of zebra crossings must be considered on a site by site basis.

1090	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10		-The group were very concerned about the lack of transport capacity in the area and the ability of the current network to absorb the proposed usage generated by the OA.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
1126	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10		- As mentioned about the group were very concerned about the lack of transport capacity in the area and the current networks ability to absorb the proposed increased usage due the development in the OA. Can anything be added to the SPD to state that a developer should contribute to train service improvements, rather than just physical access to transportation;	No change necessary. The ECTS did not find any requirement for additional train service improvements, above and beyond those already committed to, as a result of the development quantum assessed.
1127	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	TRN1, TRN2	-TRN1 and TRN2: By 2031 there will be a huge increase in overcrowding on all transport modes even without the development. The sub group is very concerned about the impact of the development on transport capacity, especially if TfL withdraws funding for planned improvements. The SPD is very weak on requirements for extra capacity provision to be funded by the developers.	No change necessary. The ECTS does not suggest there will be a huge increase in overcrowding on all transport modes. The ECTS did not find any requirement for additional train service improvements, above and beyond those already committed to, as a result of the development quantum assessed. Paragraph 10.15 requires that appropriate measures are put in place to ensure development is not implemented until there is sufficient capacity.
1128	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.14	-10.14 Development capacity is a real concern. Does the Transport Study take into account the impact of cumulative developments in the area, such as Warwick Road? If not, we suggest it does.	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The modelling includes trips generated by other development proposals, such as on Warwick Road.
1129	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	TRN8, TRN9	TRN8 and TRN9: Cycling is too dangerous on the roads, yet on pavements cyclists are dangerous to pedestrians. The development must provide segregated pedestrian, cycle and vehicle space, to be clear who has priority and reduce any potential conflict. The SPD should encourage developers to propose ways of making cycle parking more attractive, whilst also catering for a high number of cycle parking spaces, as often the two are mutually exclusive.	No change necessary. The SPD seeks to ensure that all streets are safe and attractive to use for cyclists (Key Principle TRN4, paragraphs 10.28, 10.29) by way of low traffic speeds and good design rather than through segregation.
1130	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.44	- 10.44: The 'tunnel' and District Line platforms are on different levels so step free access will need to be provided up to the platforms and maybe even funded by the developer.	No change necessary. This is required in Key Principle TRN14.
1131	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.49	- 10.49 Moving street furniture, etc, to the edges should not be detrimental to existing residents at the edges of the OA. It is important that the OA does not impact negatively on its neighbours.	Noted.
1132	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.55	- 10.55: typo 'provided to'	Change proposed. This will be corrected.
1133	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.56	- 10.56: Coach movements and parking should be located near to cultural sites to have a minimal impact on nearby residents and their amenities.	Change proposed. Paragraph 10.56 will be amended to highlight that coach parking should be provided within the vicinity of demand.
1134	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.58	- 10.58: The sub group found it hard to believe the increases in traffic will be as low as 3% in AM peak and 2% in the PM peak, especially compared to the 98% increase in public transport.	No change necessary. The figures quoted in the SPD are correct and relate to the additional growth, on top of substantial background growth, as a result of the development quantum tested. The figure of 98% increase in public transport is not recognised.
1135	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.58	- 10.58: typo 'within the'	Change proposed. This will be corrected.
1136	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.67	- 10.67: This seems remarkably brief.	Noted.
1137	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	10	Para 10.77	- 10.77: It is not clear if the onsite local delivery centre is intended during or after construction.	No change necessary. Paragraph 10.77 refers to the situation after occupation. Paragraphs 10.78 and 10.79 refer to arrangements during construction.
1167	Virginia	Morck		10		1. As a frequent user of Earl's Court tube station, I am well aware that it - particularly the Piccadilly line - is already at capacity. To	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised

					expect anything other than hellish - indeed extremely dangerous - conditions when c. 14,000 new residents and over 12,000 new working people are added is a fantasy. I simply do not see how such a problem can be resolved, given as I understand it the impossibility of lengthening the platforms or increasing the volume of trains. The nearby stations of West Kensington and West Brompton - even if expanded - won't take any of the flow from the east side of the Earl's Court area.	draft SPD (Key Principles TRN 10-17).
1188	Ilse	Molino		10	Basically in my opinion, a resident of 30+ years, I object to this development for being too big for the area's infrastructure. Earl's Court Station as it is, has already reached very much full capacity at peak times	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
1189	Ilse	Molino		10	Traffic in the one way system of Earl's Court Road and Warwick Road is now reaching rush hour traffic capacity most of the day, where are the thousands of new residents to go?	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The distribution of traffic and impacts is considered at paragraphs 10.61- 10.65.
1193	Paul	Morice		10	The revised draft SPD does not consider the Transport and Traffic aspects of all the other developments that are being proposed. These developments are: the new residential area north of Cromwell Road and south of Kensington High Street, the 44 acre expansion of Westfield, White City and Kensal Rise Opportunity Areas. All these will depend on the already saturated Earl's Court One Way System which will need to accommodate the extra traffic flowing to and from London areas south of the river Thames. These extra traffic volumes within road management of this one way system fail to consider cyclists and pedestrians and the further isolation of residents west of Warwick Road.	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The modelling includes trips generated by other development proposals, such as on Warwick Road. Pedestrians and cyclists are considered at paragraphs 10.16 – 10.31.
1194	Paul	Morice		10	The Transport section has failed to address the inadequacy of the three London Underground stations which currently exist and are already at maximum capacity.	No change necessary. The impact of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17).
1198	David	Trodden		10	2) Transport. This subject has not been addressed satisfactorily for the numbers of people involved. The Transport section has not considered the fact that the three stations: West Kensington, West Brompton and Earl's Court Stations are already near to capacity. The development will bring in approximately 14,000 new residents and 12,600 workers to the area from this site.	No change necessary. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). West Kensington, West Brompton and Earl's Court stations are considered at paragraphs 10.36 - 10.49.
1199	David	Trodden		10	Greater consideration also needs to be given to cyclists and pedestrians.	No change necessary. Pedestrians and cyclists are considered in paragraphs 10.16-10.31.
1205	David	Trodden		10	6) Quality of life Both for natives and newcomers it will be low. An overpopulated area with impassable and sluggish traffic, very poor air quality, few open spaces, overcrowded public transport and few leisure facilities is what is being planned.	No change necessary. No change necessary. Key Principle ENV16 states that redevelopment must be air quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. Key Principles UF12 to UF18 set out requirements for increased open space provision. The Social and Community Facilities section sets out requirements for leisure facilities, include a library, a community hub and sports and leisure facilities. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD Key Principles TRN 10-17, 19-21, 23 seek to ensure the impact of development is controlled.
1213	Amy	Jones	Spen Hill Developments	10	[bold] Previous Representations [end bold] The previous representation registered objection to the SPD as it went beyond its remit on two grounds relating to [bold] Paragraph 7.56 [end bold] which required the retention of the coach park at	No change necessary. The reference to coach parking outside the Opportunity Area has been removed. The SPD refers to cyclist access under the A4 to Warwick Road at paragraph 10.28. No use for traffic relief is otherwise referred to.

						<p>100 West Cromwell Road;</p> <ul style="list-style-type: none"> - the 100 West Cromwell Road site is located outside of the defined boundary of the Opportunity Area, as defined by [bold] PPS12 [end bold] an SPD is not able to make allocations outside of its defined boundary; and - this requirement would create further protection for the coach park than is afforded in adopted Policy, this again goes beyond the remit of an SPD. <p>In addition to the above objections the previous representations stated support for the proposal to create new roads within the Opportunity Area including a north-south road link to connect to West Cromwell Road and the restoration of the Earls Court one-way system to two-way traffic. It was also requested that the need for a relief road under the 100 West Cromwell Road site be struck</p>	
1214	Amy	Jones	Spn Hill Developments	10		<p>[bold] Response to Previous Representations [end bold]</p> <p>Having reviewed the Consultation Responses Schedule we understand that there is now agreement that the retention of the 100 West Cromwell Road coach park is not directly relevant to the redevelopment of the Opportunity Area, subsequently reference to this has been removed from the current consultation draft. We welcome and support this change to the draft SPD. In relation to our comments on the relief road the Consultation Responses Schedule states that</p> <p>excavated material should be treated and reused on site, with rail being the preferred method of transportation off site. The response however also states that the relief road route has the potential to relieve traffic on the Earls Court one-way system until the connection from the Opportunity Area to the A4 is made, the engineering and access issues will need to be investigated.</p>	No change necessary. The reference to coach parking outside the Opportunity Area has been removed. The SPD refers to cyclist access under the A4 to Warwick Road at paragraph 10.28. No use for traffic relief is otherwise referred to.
1215	Amy	Jones	Spn Hill Developments	10	Key Principle TRN18	<p>[bold] Current Representations [end bold]</p> <p>As noted we support the removal of [bold] Paragraph 7.56 [end bold] from the SPD and the requirement to retain the 100 West Cromwell Road coach park. We also support Key Principle [bold] TRN18 [end bold] of the current consultation which states that coach parking will be provided within the Opportunity Area and also Paragraph 10.56 of the current consultation which states that sufficient coach parking and drop off facilities will be required within the Opportunity Area to meet development demand.</p>	Noted.
1221	Amy	Jones	Spn Hill Developments	10		<p>[bold] Conclusions [end bold]</p> <p>We support the removal of a requirement to retain the coach park at 100 West Cromwell Road from the current draft of the SPD.</p>	Noted.
1234	Hilary	Mackay		10	Key Principle TRN24	<p>TRN24</p> <p>Strongly support. As the OA has so many transport options in close proximity it is vital that public transport use, cycling and walking lie at the heart of the transport strategy. Clearly, there is merit in some parking spaces for visitors/family, deliveries and emergency use, but no more than absolutely necessary.</p>	Noted.

1242	Alex	Fraser		10	<p>* sections 10-72 to 10-76 address car parking.</p> <p>As a resident living just west of the area, I am a little concerned that well-meaning intentions to limit car use by limiting available car parking will put greater pressure on surrounding existing residential parking.</p> <p>I recognise that this development will not be the same kind of attraction as say, Westfield London, but expecting car use to be so drastically reduced merely because parking will be non-existent suggests a naive outlook. Thanks largely to tax and running costs, it seems to me that people are moving towards low-pollution, more efficient cars - and in so doing are expecting to be able to use them. It's true that cycling is booming, and it's true that the Opportunity Area is surrounded by Tube stations (and improved bus routes are suggested in the document), but I think some provision - particularly for short-term parking (quick shopping stops or 1hr-max short visits) should be considered.</p>	No change necessary. Road capacity is limited in the area surrounding the Opportunity Area and therefore car parking must be minimised, especially for commercial uses. As set out in paragraphs 10.73 and 10.74 the SPD does not preclude the provision of some commercial car parking.
1245	Jenny	Montefiore		10	This SDP admits to the fact that there will be an increase in tube use which the system will be very hard pressed to deal with and there will be an increase in traffic and pollution and carbon admissions (the first SDP seemed to pass this off as minimal and perfectly acceptable),	Noted.
1250	Jenny	Montefiore		10	TRANSPORT - In order to accommodate the approx. 14,000 new residents and 12,600 workers. The WLL is already full at peak times as is the Piccadilly line at Earls Court Station, which could potentially be dangerous on platforms and with escalator overspill. The proposed increase in Piccadilly Line trains will only just about cope with the present overcrowding , and will not deal with the projected increase in use both from Earl's Court and further beyond . The problems that this causes is not confined to Earl's Court but means that people can't get on trains at Gloucester Road or South Kensington. I have also checked with residents who cannot get on District Line Trains either at the moment. TFL and transport reports and projections often seem to be two steps behind and I feel wider thinking beyond ward boundaries is required to adequately tackle the issue of transport in what is already now the most crowded ward in Western Europe.	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The scope of the ECTS was blind to ward boundaries.
1251	Jenny	Montefiore		10	TRAFFIC/AIR QUALITY - The decrease of car parking provision is definitely a plus. However Increased volumes of traffic on red routes and the Earls Court Rd will do nothing to integrate the area. Anything West of the Earls Court Road remains segregated by major traffic arteries and the resulting pollution and traffic danger: the SPD does not consider pedestrians or cyclists. Greater thinking needs to go into easing this choked up North to South funnel to improve life for those West of the Earls Court Road. Much was made in the workshops about keeping Cromwell Road, and its arteries moving ,which is good. However Earl's Court Road, Warwick Road and North End Road are already over congested and often at a standstill and this development will can only increase the problem. Lily Road is relatively free moving at the moment this development will probably cause this East West artery to become another traffic hotspot.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). Pedestrians and cyclist are considered in paragraphs 10.16 – 10.31.

1265	Wanda	Rostowska		10		As a long term resident, while welcoming improvement to the area around the railway lines, I do want it to be - transport must be improved. This should be done [bold] ahead of [end bold] any influx of new inhabitants.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). Key Principle TRN1 and TRN2 require any development proposals to be supported by robust transport assessments and only delivered once appropriate mitigations are in place.
1297	Geraldine	Winkler	Mrs Fay Winkler	10		Earl's Court's road systems are already very busy, with heavy traffic day and night, coming from the arterial M4, A4 and Shepherds Bush and Chelsea, in other words from North, South, West and East, as are the local bus and underground services at West Kensington, Earl's Court and West Kensington stations.	Noted.
1298	Geraldine	Winkler	Mrs Fay Winkler	10		Traffic volumes to and in the area will be increased. This will effect not just existing traffic but pedestrians and cyclists, as well. The community will become more fragmented, American style, carved up by busy roads.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). Pedestrians and cyclist are considered in paragraphs 10.16 – 10.31.
1299	Geraldine	Winkler	Mrs Fay Winkler	10		Increased traffic creates increased pollution, noise, and damages the character of an area.	No change necessary. Para 12.75 identifies vehicles using the surrounding roads as one of the main sources of air pollution in the area. Key Principle ENV16 states that redevelopment must be air quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. Para 12.80 requires a Low Emission Strategy with consideration for health impacts. Para 12.83 sets out potential measures to improve air quality in the area, such as limiting off street parking, encouraging electric car charging, implementing 20mph zones and encouraging walking and cycling. ENV17 requires development to be designed and constructed to mitigate and adequately control noise and vibration, which includes noise and vibration from roads.
1300	Geraldine	Winkler	Mrs Fay Winkler	10		There is insufficient car parking.	No change necessary. Road capacity is limited in the area surrounding the Opportunity Area and therefore car parking must be minimised, especially for commercial uses.
1306	Sibylle	Mitnacht		10		Excessive density of occupation, likely to exacerbate the already considerable pressure on roads and public transport	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
1313	Linda	Wade	Nevern Square Conservation Residents' Association	10		It is acknowledged that many of the points raised during the Consultation process have been incorporated, but, need to be strengthened as there is concern that the essential studies such as the Transport and Traffic were included, in their expanded forms, at such a late stage in the process, which many considered to be inadequate to safeguard services and the quality of life for existing residents.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD, which is robust and complete.
1319	Linda	Wade	Nevern Square Conservation Residents' Association	10		If there is going to be further pressure on the roads and transport systems, a reduction in the value of their properties, loss of local amenities: shops, bars and restaurants Earl's Court will cease to be such an attractive place to live in, and residents will move.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The SPD identifies the potential for development in the Opportunity Area to deliver new facilities, including retail to meet the day to day needs of development, publicly accessible open space and play space and a number of social and community facilities, including, nursery, primary and secondary schools, health facilities, sports and recreation facilities, policing facilities and a new community hub. Key Principle RS6 sets out that the authorities will look to control the nature of retail in the OA such that it does not impact negatively on the vitality and viability of existing retail in the vicinity of the OA
1324	Linda	Wade	Nevern Square Conservation Residents' Association	10		The road system, is already at over-capacity, and will simply not be able to cope and the 'interventions' are woefully inadequate. The effect of site traffic throughout the construction period will have the capacity to reduce West London in its entirety to gridlock at regular intervals, with adverse environmental and economic implications. The 10-20 years of the proposed build must be taken into account. The havoc it could create in West London has been	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23).

						totally misunderstood by the Council.	
1325	Linda	Wade	Nevern Square Conservation Residents' Association	10		The pressure on Warwick Road is well documented but not understood in this report. The removal of street furniture and cycles might improve the pedestrian environment but it only takes one bus to cause a traffic hold up on Earl's Court Road, so any large-scale increase is considered unrealistic.	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23).
1326	Linda	Wade	Nevern Square Conservation Residents' Association	10		The Strategic Transport Study assumes a North/South Road through the Opportunity Area, which will help reduce the impact of the development on the Earl's Court One-Way system, especially Earl's Court Road. It will not but it will decant traffic out onto Lillie Road, which only has two lanes. This development has failed to take the opportunity of creating an effective road solution to the problems of Earl's Court, with the removal of ECOWS, and of the wider West London area.	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23).
1327	Linda	Wade	Nevern Square Conservation Residents' Association	10		The Pedestrian crossings are thought to be inadequate at present, with the timing of the lights, the crossings too narrow to accommodate the volume of pedestrians at present, the 'intervention' of changing the phasings will reduce further the quality of the pedestrian environment.	No change necessary. The SPD is a high level document and the detail of individual crossings will need to be assessed as part of any planning proposals.
1328	Linda	Wade	Nevern Square Conservation Residents' Association	10		The idea that not having a dedicated cycle lane in Warwick Road was considered to be ludicrous, using cyclists on this road, with projected increases in traffic, as a means of slowing down traffic is simply putting cyclists in danger.	No change necessary. The SPD is a high level document. Specific cycle measures will need to be assessed as part of any planning proposals.
1335	Linda	Wade	Nevern Square Conservation Residents' Association	10		The studies and presentations put forward to residents was considered to be sub-standard and unworkable. These studies need to come back with a far more detailed and realistic approach to what the situation is at present.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
1336	Linda	Wade	Nevern Square Conservation Residents' Association	10		That there should be a bus stand on the site, to relieve the traffic congestion, and to create a link with the underground network, but the proposed opening of the existing tunnel might not met the volume of pedestrian footfall.	No change necessary. Bus stands are required in paragraph 10.54. The capacity of the existing tunnel is sufficient to accommodate the estimated footfall.
1337	Linda	Wade	Nevern Square Conservation Residents' Association	10		The amount of space allocated, within the JSPD, for new residents causes an enormous amount of concern, and there is a fear that our streets will be used for overflow car parking reducing the already limited spaces available for residents.	No change necessary. All new residential units will be subject to a permit-free agreement to ensure there is no parking overflow.
1346	Jonathan	Green		10		1. Transportation - underground system: as a local resident I would like to point out that West Kensington, West Brompton and Earls Court stations are already at saturation point. With approximately 14,000 new residents and 12,500 workers coming to this new site, the Area needs a totally new stand alone station plus a serious upgrade for Earls Court station in particular;	No change necessary. The creation of a new station within the site is not supported due to the disruption to existing services, high cost and little justification based on the work undertaken in the ECTS, which demonstrates that development impacts can be accommodated by improving existing services. Improvements to Earl's Court station are proposed at paragraphs 10.36 – 10.37.
1347	Jonathan	Green		10		2. Traffic volume - I do not feel that enough consideration has gone into the impact the new development is going to have on an already choked Earls Court / Warwick Road system. Major tunnels should be considered to relieve what is a major residential area to the east of the Warwick Road;	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23).
1369	Eirik	Reddi	Residents of 67-70 Kensington Mansions	10		We also feel that the SPD fails to provide any real solutions or realistic answers to the impact on the three nearest tube stations, which are already at saturation point. Adding 14,000 residents and 12,000 workers a day to this is an incredibly serious safety risk and adds still further to the stressful environment already faced by local residents. What do LRT have to say on the matter? We are certainly not convinced anything we have read in the draft.	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). TfL are a co-author of the SPD and therefore support the recommendations.
1370	Eirik	Reddi	Residents of 67-70 Kensington Mansions	10		During the proposed 20 years of development we can also look forward to a vast amount of site traffic, mostly lorries, that will effectively clog the already overloaded artery that is Warwick	No change necessary. The detailed arrangement for construction traffic will be agreed as part of development proposals. Access via Fenelon Place in the first instance and then via the A4 directly for construction vehicles is preferred.

						Road. Congestion is a daily nightmare that adversely effects all Earl's Court residents, but especially those that actually live on the Road. How is it supposed to cope with this extra and excessive burden?	
1371	Eirik	Reddi	Residents of 67-70 Kensington Mansions	10		With the other building sites being proposed within a few miles of each other, West London will inevitably grind to a halt having a negative impact on residents and commerce within the whole Borough. We can find nothing within the SPD that flags up a viable and workable solution to this issue. Why not?	No change necessary. The impacts of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23).
1372	Eirik	Reddi	Residents of 67-70 Kensington Mansions	10		Ditto to this on the impact of car ownership within the site and the impact of thousands of extra vehicles on one of the busiest residential roads in Britain. There seems to be no thought for pedestrians and cyclist in regard to the increased traffic levels and inevitable congestion, in fact, given the increased use of bicycles in London the plan is rather regressive and car centric.	No change necessary. Pedestrians and cyclists are considered in paragraphs 10.16 -10.31.
1373	Eirik	Reddi	Residents of 67-70 Kensington Mansions	10		We have a bus stop that is located exactly by our front door step and suffer the daily ritual of having to squeeze through a crowd or people just to get in and out of our building.in fact the bus stop is sited in one of the narrowest parts of Warwick Road and at times, especially 'rush hour', can be nigh on impassable, forcing pedestrians out on to the road. Additional bus traffic and potentially thousands of new passengers will make our lives impossible and create real hazards for all concerned. We believe the pragmatic solution is to resite the bus stop within the development and to temporarily resite the stop during the works. Once again, there is nothing in the SPD to allay our fears or to even raise the issue in any meaningful way. We hope you are able to do so.	No change necessary. The SPD is a high level document. Arrangements at specific bus stops will be considered as part of future development proposals.
1378	Sandra	Yarwood		10		Though much improved, I still have major concerns over certain aspects of the framework as I feel it does not sufficiently take into account the impact on the wider surrounding area or take into account all the other development schemes being proposed and some already going ahead for nearby sites. An Area Action Plan is urgently needed to make sure that there is joined-up, strategic thinking regarding the impact and future needs of such a large new population (the size of a small town) being dropped into an area with serious existing problems of road and public transport congestion. The A4/M4 Cromwell road is the gateway to the West and Heathrow airport, and the ECOW system is the North-South arterial route in West London. An inappropriate level of development could have a crippling impact on this vital road network, with important consequences for London's reputation and economic functioning.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23). The modelling includes trips generated by other development proposals, such as on Warwick Road. The authorities have considered that an AAP is not necessary as up to date strategic policies for the Opportunity Area are already set out in the London Plan and Borough Core Strategies. In addition to this, the London Plan endorses the production of a planning framework, not AAP, and both Core Strategies endorse the production of an SPD.
1380	Sandra	Yarwood		10		PUBLIC TRANSPORT - The demands on the developer to mitigate the large increase in pressure put on public transport services by the development seem inappropriately small. A development of this size will require considerable reconstruction at West Brompton and West Kensington, and a complete re-design and re-construction of the Warwick Rd exit of Earls Court tube station as the present ticket area is extremely narrow and only has 2 ticket gates in each direction. The transport study's estimate of 2,700 additional journeys per peak hour seems unrealistic when considering a proposed population of 14, 000 inhabitants and a workforce of 12, 000 plus all the new inhabitants generated by the North Warwick Rd developments. It seems to assume that a large number of people will either be economically inactive or will be walking/cycling/driving to work/school. Planned capacity increases	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17).

						for the tubes (platform lengths and train lengths) are already needed to alleviate the existing congestion and are not all definite, ye	
1381	Sandra	Yarwood		10		<p>TRAFFIC/AIR QUALITY - There is no obligation on the developer to truly look into mitigating the resultant increased volumes of traffic on red routes and arterial roads. At least a bus stop on the so called Exhibition square would alleviate the problems caused when buses stop on the Warwick rd. Some arrangement like in front of Euston station, but more aesthetic, would at least help. The North-South road through the development won't help as Lillie Rd is too narrow and will only displace the problem onto the Old Brompton Rd and particularly the junctions with Redcliffe Gardens and North End Rd.</p> <p>Air quality around the Cromwell, Earls Court Road and Lillie Road already falls below EU standards and can only worsen with a further influx of people and vehicles.</p>	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23). There is a clear obligation on the developer to mitigate the impacts of development (Key Principle TRN1 and TRN2).
1385	Sandra	Yarwood		10		<p>Lastly I think it would very unwise not to insist that the developer provide at least one parking space per unit. This will put pressure on the already scarce parking spaces in the surrounding areas, particularly at night. You only need to look at the Warwick Rd at night with its packed cars the full length it is allowed to see the extent of the problem. It should also be built in that residents will not be offered RBK&C parking spaces.</p>	No change necessary. Parking levels of one space per unit would provide parking above background car ownership levels and would not be supported given the congested nature of the road network. All new residential units would be parking permit-free.
1387	Cllr. Charles	Williams	Redcliffe Ward	10		<p>[bold] Impact on the local road network [end bold]</p> <p>It is important that the impact of the Scheme on the local road network in Redcliffe Ward is minimised. The roads likely to be most affected are, Old Brompton Road, Redcliffe Gardens and Finborough Road. These are already extremely busy and additional traffic will lead to increased congestion resulting in air pollution and "rat running" through side streets. Traffic from the new development should as far as possible use the new junction with the A4 and that this should be an objective of the design and timing of signals of the new junction with the Old Brompton Road/Lillie Road.</p>	Noted. Key Principle TRN21 and paragraph 10.67 refers to the need for development proposals to review local traffic management arrangements to minimise impact on local roads.
1388	Cllr. Charles	Williams	Redcliffe Ward	10	Key Principle TRN15, Key Principle TRN16	<p>[bold] Public Transport [end bold]</p> <p>The proposed improvements to West Brompton Station are welcome. TRN15 should state clearly that the Development should deliver the improvements set out in 10.47 as well as platform lengthening since TRN16 lacks precision.</p>	Change proposed. TRN15 will be amended to better reflect the requirements in 10.47.
1389	Cllr. Charles	Williams	Redcliffe Ward	10		<p>[bold] Public Transport [end bold]</p> <p>The Earl's Court Society questions the forecasts for increased public transport use, suggesting that they may be too low. There needs to be a robust independent assessment of these predictions.</p>	No change necessary. The ECTS has been independently assessed as well as being reviewed by officers from TfL, LBHF and RBKC.
1390	Cllr. Charles	Williams	Redcliffe Ward	10		<p>[bold] Public Transport [end bold]</p> <p>Although increased capacity on the District line will come from the current modernisation programme, in the longer term further investment will be needed to relieve the lines serving Earl's Court. A developer contribution towards a study on the most cost effective way of doing this should be considered.</p>	No change necessary. Increased capacity on the Piccadilly line also forms part of TfL's modernisation programme. The ECTS has tested what additional capacity will be needed to accommodate development demand and this is set out in the SPD. All development proposals will need to be accompanied by a detailed assessment and funded mitigation measures.
1403	Jane	Willmot	Hammersmith and Fulham	10	Key Principle TRN2,	<p>1.9. We also welcome the expectation that all 3 tube stations should be step free throughout (TRN 14): we assume the</p>	No change necessary. Step-free access at the new Earl's Court entrance is required at TRN14 and paragraph 10.44.

			Disability Forum		TRN4, TRN14	pedestrian tunnel under Warwick Road will also be step free (TRN12); pedestrian environment be accessible to all (TRN4).	
1404	Jane	Willmot	Hammersmith and Fulham Disability Forum	10		1.10. Some areas of concern remain: - blue badge parking for both residents and blue badge holders visiting specific retail or community services; drop off and pick up points for taxis and community transport close to specific retail or community services. These issues are not mentioned in this SPD. We are not clear which other policies the SPD is relying on to achieve this. These are important points for disabled people and should be clarified in the SPD.	Change proposed. Amendment made to paragraph 10.73 to emphasise need for blue badge parking and 10.55 regarding community transport.
1405	Jane	Willmot	Hammersmith and Fulham Disability Forum	10	Para 10.18	1.10. Some areas of concern remain: - Shared space: We did not notice consideration of the impact of routes for pedestrians and cyclists on disabled people in this SPD e.g. in para 10.18.	No change necessary. Paragraph 10.49 refers to single surface treatments and states that they should be accessible to all.
1406	Jane	Willmot	Hammersmith and Fulham Disability Forum	10		We understand that recent Department of Transport guidance (Shared space: Local Transport Note 1/11) discourages shared space schemes unless there is a specific reason for them; proposals should not discriminate against people with protected characteristics under the Equality Act 2010; disabled people including blind and visually impaired people must be consulted to ensure shared space schemes are acceptable to them. The SPD should draw the developer's attention to this guidance.	No change necessary. DfT's note states that 'shared space' should not be pursued for its own sake. The use of single-surface within the OA is promoted in order to improve pedestrian movement and comfort and to create a vibrant space. These are appropriate objectives. The SPD does not provide detailed advice to developers on what other guidance, legislation or advice they must refer to. It is the developer's responsibility to engage suitably qualified, experienced and competent professionals when developing their proposals.
1417	Paul	Kennedy		10		The plan grossly understates the amount of extra traffic that will be generated (both in its assumption about cars for the 13,000 extra residents and ignoring the impact of 13,000 extra visitors), and misses an opportunity to improve the terrible traffic congestion in our area. There will be congestion on the tube, buses, roads and even pavements. Air quality, which is already unlawfully high and causing thousands of premature deaths across London, will deteriorate still further. It is outrageous that the Council is not even measuring air quality in the local area. The proposals in relation to cycling are pathetic. Why is there no provision for extra cycle lanes, particularly in the very dangerous roads around Earl's Court?	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). Improved cycle routes outside of the OA are required at Key Principle TRN8. Para 12.75 identifies vehicles using the surrounding roads as one of the main sources of air pollution in the area. Key Principle ENV16 states that redevelopment must be air quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. Para 12.80 requires a Low Emission Strategy with consideration for health impacts. Para 12.83 sets out potential measures to improve air quality in the area, such as limiting off street parking, encouraging electric car charging, implementing 20mph zones and encouraging walking and cycling. Air Quality in RBKC is measured in several places across the borough and reported in the annual Air Quality Management Report.
1437	Michael	Bach	Kensington Society	10		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 more progressive and forward-looking approach to transport and car use [end bold] that recognises the limits to catering for car use, seeks to improve the public realm and opportunities for walking and cycling and improve both public transport accessibility levels and public transport capacity; and	No change necessary. The objectives of this comment runs throughout the Transport and Accessibility Strategy of the SPD.
1480	Michael	Bach	Kensington Society	10	Key Objectives	[bold] 10.Transport and Accessibility Strategy [end bold]	Noted.

						<p>The Society [bold] strongly endorses [end bold] the Key Objectives</p> <ul style="list-style-type: none"> - to maximise the number of trips by walking and cycling and ensuring excellent access to public transport; - to ensure that the travel demand created by the development does not have an unacceptable impact on the transport network; and -to deliver a high-quality public realm and improved local connectivity. 	
1481	Michael	Bach	Kensington Society	10	TRN5, TRN6, TRN7, TRN8, TRN9.	The Society is concerned that the scale of the barriers/severance of the railway and the appalling pedestrian conditions on the A4 and Warwick Road will require a major commitment to creating both the level of connectivity and quality of public realm to which the development will need to secure. The Society [bold] strongly supports [end bold] Key Principles TRN 5, 6, 7, 8 and 9.	Noted.
1482	Michael	Bach	Kensington Society	10		The Society is [bold] concerned [end bold] that a large amount of investment will be required to secure a significant increase in public transport accessibility levels to raise the current level (PTAL2) in the centre of the OA. A large part of the OA is currently PTAL 2 and 3, but even with accessibility there still needs to be capacity to absorb a significant growth in demand —and not just from within the OA, but along the underground line further west and south of the OA.	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The ECTS includes assumptions that include significant background growth in demand.
1483	Michael	Bach	Kensington Society	10	TRN10, TRN11, TRN12, TRN13, TRN14, TRN15, TRN16	The Society is [bold] concerned [end bold] about the lack of any certainty about dealing with the current and future levels of overcrowding on the underground and at stations in the rush hour even before the proposed scale of development. There is too much uncertainty. The development of the area needs to follow, not be followed by, capacity improvements. Thus, while supporting Key Principles TRN 10, 11, 12, 13, 14, 15 and 16, all of these will need to be programmed in any overall strategy for developing the OA.	Noted. Key Principle TRN1 and TRN2 require any development proposals to be supported by robust transport assessments and only delivered once appropriate mitigations are in place.
1484	Michael	Bach	Kensington Society	10	TRN1, TRN2	[bold] Key Principle TRN1 and TRN2 [end bold]: The Society is concerned that not only the transport impact of individual developments is assessed, but the cumulative effect of successive proposals, as suggested by TRN2.	Noted.
1485	Michael	Bach	Kensington Society	10		The Society has doubts about providing additional capacity in the road network or planning to accommodate additional rush hour road traffic. Over the next 20 years we will need to approach the issue of demand management more imaginatively and not rely on increased road capacity.	Noted. The SPD seeks to balance demand management with focused capacity increases, This is set out at paragraphs 10.59 and 10.72 - 10.74.
1486	Michael	Bach	Kensington Society	10		The bottom line is that the SPD needs to be far more ambitious and radical in its approach and seek to produce an exemplar development of an Opportunity Area.	Noted. Chapter three contains the Vision and Objectives that seek to create a “world class, environmentally sustainable new urban quarter”.
1487	Michael	Bach	Kensington Society	10	TRN21	[bold] Key Principle TRN21 [end bold] is typical of the "old", unambitious thinking - we want to achieve much better conditions not merely no worsening!	No change necessary. It is not reasonable for the SPD to require reduced traffic levels below existing levels from development of the OA. Improvements to the environment are required by Key Principle TRN6.
1488	Michael	Bach	Kensington Society	10	TRN22	[bold] Key principle TRN22 [end bold] should focus on the achievable - especially to change the balance between traffic domination and better conditions for pedestrians.	Change proposed. Key Principle TRN22 has been amended to include reference to reducing the dominance of vehicles.
1489	Michael	Bach	Kensington Society	10	TRN24	[bold] Key principle TRN24 [end bold]: The Society strongly supports minimising car parking levels in the OA and a strict on-	Noted.

					street parking strategy (Key Principle TRN25)	
1503	Dr M.	Eileen Magnello		10	<p>TRANSPORT - In order to accommodate the approx. 14,000 new residents and 12,600 workers to the area, station expansions would need to be made in particular to West Brompton and West Kensington. The WLL is already full at peak times as is the Piccadilly line at Earls Court Station, which could potentially be dangerous on platforms and with escalator overspill. However, I feel wider thinking beyond ward boundaries is required to adequately tackle the issue of transport in what is already now the most crowded ward in Western Europe.</p>	No change necessary. The impacts of development on the public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The scope of the ECTS was blind to ward boundaries.
1504	Dr M.	Eileen Magnello		10	<p>TRAFFIC/AIR QUALITY - Increased volumes of traffic on red routes and the Earls Court Rd will do nothing to integrate the area. Anything West of the Earls Court Road remains segregated by major traffic arteries and the resulting pollution and traffic danger: the SPD does not consider pedestrians or cyclists. Greater thinking needs to go into easing this choked up North to South funnel to improve life for those West of the Earls Court Road. Air quality around the Cromwell, Earls Court Road and Lillie Road already falls below EU standards and can only worsen with a further influx of people and vehicles.</p>	No change necessary. Pedestrians and cyclists are considered in paragraphs 10.16 – 10.31. Para 12.75 identifies vehicles using the surrounding roads as one of the main sources of air pollution in the area. Key Principle ENV16 states that redevelopment must be air quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. Para 12.80 requires a Low Emission Strategy with consideration for health impacts. Para 12.83 sets out potential measures to improve air quality in the area, such as limiting off street parking, encouraging electric car charging, implementing 20mph zones and encouraging walking and cycling.
1520	Richard	Chute		10	The proposed road accesses have not been considered in any detail. Fundamental examinations of the details of the major new road junctions should precede decisions on the capacity of the site.	No change necessary. The SPD is a high level document and specific junction treatments will be identified at planning application stage. The ECTS has identified in general terms the scale of junctions needed. Where these are unacceptable, such as discussed in 10.68, options have been disregarded.
1524	Richard	Chute		10	Para 10.63 Paragraph 10.63 refers to the predicted deterioration of performance on the east-west routes. Has proper consideration been given to the suggestion of a new vehicle access at Warwick Road opposite the Earl's Court station entrance, as mentioned in paragraph 10.71? (Notwithstanding the compromise on the quality on public space.)	No change necessary. Given the importance of the Warwick Road access to the OA for pedestrian movement it is not an appropriate location for a major vehicle access.
1546	Jonathan	Choat	Orpen House Tenants' Compact	10	10. The one way road systems around Earl's Court is already substantially over-capacity and will not be able to cope with the proposed massive increase in population on the site, all with cars, as well as commercial vehicle deliveries. The 'interventions' proposed are woefully inadequate.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23). The indicative mitigations proposed and their effects on capacity are set out in paragraphs 10.59 and 10.60.
1547	Jonathan	Choat	Orpen House Tenants' Compact	10	<p>11. The extent and effect of site traffic throughout the 10-20 years long construction period, will have the capacity to reduce the Earl's Court one way system and site access along from North End to gridlock at regular intervals, with highly adverse environmental and economic implications for residents and local businesses. .</p> <p>The traffic pressure on Warwick Road is already well documented, but not given any due weight in this report. The removal of street furniture and cycles might improve the pedestrian environment, but currently it only takes one bus to cause a traffic hold up on Earl's Court Road, so any large-scale increase in site traffic is totally unrealistic. This must be taken into consideration as a</p>	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23). The general principles for construction vehicles, including minimising the impact on the road network is considered at paragraph 10.79. The traffic pressure on Warwick Road and other roads in the area is set out in paragraphs 2.15 – 2.17, 10.7 and 10.8.

						major factor by RBKC planners and the Planning Committee.	
1548	Jonathan	Choat	Orpen House Tenants' Compact	10		12. The Strategic Transport Study assumes a North/South Road through the Opportunity Area, which it erroneously assumes will help reduce the impact of the development on the Earl's Court One-Way system, especially Earl's Court Road. In effect this proposal will divert traffic out onto Lillie Road, which only has two lanes. This development has failed to take the opportunity of creating an effective road solution to the problems of Earl's Court, with the removal of ECOWS and of the wider West London area.	No change necessary. The impact of development on the road and network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 19-21, 23). It has not been assumed that the north-south route will provide substantial relief to Earl's Court Road. This is covered in paragraph 10.68.
1549	Jonathan	Choat	Orpen House Tenants' Compact	10		13. The Pedestrian crossings are inadequate at present, with the current population of the area. The timing of the lights and the narrow crossings, which are unable to accommodate the volume of pedestrians at present, will not be solved or alleviated by the 'intervention' of changing the phasings and this will only reduce further the quality of the pedestrian environment in Earl's Court - particularly with a massive increase of thousands more residents. Similarly, the proposal to eliminate a dedicated cycle lane in Warwick Road is ludicrous. With the projected increases in traffic, using cyclists on this road as a means of slowing down other motorised traffic, is cavalier and irresponsible.	No change necessary. The SPD is a high level document and the detail of individual crossings will need to be assessed as part of any planning proposals. Similarly, specific cycle measures will need to be assessed as part of any planning proposals.
1552	Jonathan	Choat	Orpen House Tenants' Compact	10		16. Transport; The studies and presentations put forward by the developer are very sub-standard and unworkable. These studies need to come back with a far more detailed and realistic approach to alleviate the substantial problems which are already apparent and will be exacerbated and increased many times with the proposed massive increase in residents. what the situation is at present - for example the proposed opening of the existing tunnel exhibition will not alleviate the increase in the volume of pedestrian footfall or the overcrowding on Earl's Court station platforms.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
1553	Jonathan	Choat	Orpen House Tenants' Compact	10		17. Car Parking; The amount of space allocated, within the JSPD, for large numbers of new residents will mean that RBKC local existing streets will be used for overflow car parking reducing the already limited spaces available for current residents.	No change necessary. All new residential units will be subject to a permit-free agreement to ensure there is no parking overflow.
1603	Claire	Craig	English Heritage	10	TRN12	In addition, English Heritage: - Requests recognition of the listed status of Earl's Court station in Key Principle TRN12 on page 135	Change proposed. An amendment has been made to paragraph 10.37 to highlight the listed status of Earl's Court station.
1638	John	Drake	Campaign to Protect Rural England	10		TRANSPORT i) It is doubtful whether the major roads on all sides of the development will cope with the increase of traffic not only from this site but the other developments in the area. At present they are at saturation point in the 'rush hours' and when events are on at the Exhibition Centre or Stamford Bridge. With TfL a scheme must be developed to divert through traffic away from the area.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
1639	John	Drake	Campaign to Protect Rural England	10		TRANSPORT ii) It is unfortunate that a two lane relief road could not be built north/south linking the A4 to Lillie Road. It would have relieved the Earl's Court One Way System which could have returned to two way working and possibly relieve the traffic described in (i).	No change necessary. This point is dealt with in paragraph 10.68.
1640	John	Drake	Campaign to	10		TRANSPORT	No change necessary. It is highly unlikely that a pedestrian tunnel linking Earl's

			Protect Rural England			iii) There are three underground stations surrounding the site but they are highly crowded as is the West London Line. There needs to be coordination. A semi underground pedestrian route could be constructed beneath Earls Court and West Brompton stations to even out the passenger levels. West Brompton /West London Line Station could be more easily used.	Court and West Brompton stations would be an attractive alternative to interchange at Earl's Court.
1641	John	Drake	Campaign to Protect Rural England	10		TRANSPORT iv) With development electric buses could be used with a route also linking Earl's court and West Kensington Stations.	No change necessary. The SPD requires bus access through the OA in paragraph 10.52. The details of any new route and the buses used would be the subject of negotiation during any future planning application process.
1642	John	Drake	Campaign to Protect Rural England	10		TRANSPORT v) A high level link could be made from Earl's Court floor level to the top of the rotunda at Warwick Road entrance. TfL are keen to take out the 1950s top part. There could be a lift and stairs at each end. It is possible a high level way through Earl's Court Station could be made.	No change necessary. It is not clear from this comment what is proposed.
1643	John	Drake	Campaign to Protect Rural England	10		TRANSPORT vi) A coach park should be built in one of the underground car parks on site to replace that lost on the Tesco site. It should have direct links to the A4.	No change necessary. It is not appropriate for the SPD to require a coach park to be provided with in the OA that is not justified by development and is the result of the due to a loss of coach parking off-site.
1644	John	Drake	Campaign to Protect Rural England	10		TRANSPORT vii) The parking spaces for both residents and visitors should be limited to discourage car use in the area. Electric cars should be encouraged with re charging points at strategic points on site.	No change necessary. This is set out in paragraph 10.73 and 10.74.
1872	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		10. The Vision says (our brief comments are set out in italics and are expanded in the sections that follow): - 3.7 The vision also says that "many people will choose to both live and work in the area, reducing the need for commuting" and "improvements to the road and public transport networks will be made to ensure that the impacts of development are minimised" - [italics] this is at best a pious hope; nowhere is it demonstrated how people will be encouraged (made to?) to live and work locally (any more or less that they do elsewhere in London) and Chapter 10 falls far short of demonstrating that a development of this size can be accommodated in terms of its transport impact (see Section C below). [end italics]	No change necessary. The proposed mixture of commercial and residential uses increases the opportunities for living and working within the OA. The details for delivering this are set out in the Key Objectives and Key Principles for each chapter. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
1875	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		There are four important issues in this respect that are not clarified or resolved in the SPD - it says that there should be: - and the whole issue of accessibility and the transport network, which is referred to frequently in the Transport Chapter, but is not resolved.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).

1891	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		[bold] C. Transport. [end bold] 25. The information provided on this topic is a great deal more helpful than we have previously seen and this is to be welcomed. That said, fundamental problems remain which go to the heart of the question: Whether or not the capacity of the local, district and sub regional transport system can support the proposed quantum of development.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23).
1892	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		26. [bold] Overcrowding. [end bold] The basic problem stares us in the face. The local transport networks are already over crowded, beyond capacity and mostly they will not gain any increased capacity by 2031 in real terms. The Chapter therefore calls for radical measures to constrain travel, switch modes, reduce car parking, introduce car clubs, ingenious local delivery schemes etc. However, there is no hiding the fact that the network is highly unlikely to cope, that the desired modal shift is unprecedented and probably unachievable and that the overall quantum of development must therefore be reduced and land use mix altered to remove car dependent uses such as office headquarters, hotels and non-local retail. We welcome the conclusion that any applications for development should demonstrate that they "can be accommodated on the transport networks. Appropriate controls need to be agreed to ensure development is not implemented until capacity improvements and other measures are implemented" (Para10.15	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). In order to ensure a robust assessment the ECTS has not assumed any substantial modal shift as a result of demand management measures. The mode splits applied are taken from the London Transportation Studies model and have been verified against a range of sources depending on the land use and include surveys of comparable developments. The methodology and outputs have been independently verified. Those development scenarios that could not be supported due to their impact on the transport networks have been discounted (paragraph 10.14).
1893	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		27. [bold] Complacency. [end bold] We are, however, deeply concerned that the Chapter frequently refers to outcomes that are not designed to secure improvements, but merely to avoid making things significantly worse (see TRN 21).	No change necessary. It is not reasonable to require development to improve the existing situation on the transport networks.
1894	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10	TRN1	- TRN1 fails to support a comprehensive approach, an essential component of which is a comprehensive approach to the transport assessment of all applications. It appear to us that only a comprehensive approach to transport, in the SPD and with regard to all the applications, can properly determine what impacts will and will not be acceptable and determine the 'tipping point' at which the cumulative impact of the quantity of development tips from being acceptable to unacceptable.	Change proposed. This is the intention of TRN1 and TRN2. TRN1 will be amended to make this clearer.
1895	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10	TRN1	- TRN 11 says that "development in the OA should not result in excessive crowding or delay" on the public transport network. However Para 10.32 admits that "development will add a significant number of additional trips to the rail network" and goes on to say "Crowding on the Wimbledon Branch of the District Line is likely to be even higher (in 2031)than it is today and this line will remain the most over-crowded in West London".	No change necessary. TRN11 uses 2031 as the base year. Paragraph 10.32 will be amended for clarity.
1896	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10	Para 10.56	- Para 10.56 says that "journey time reliability on the highway network should not be unacceptably impacted by development in the OA".	Noted.
1897	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10	Para 10.70	- Para 10.70 says that "new North/South connections through the OA are essential" (we note here that the Vision does not say this - it refers to the need for East/West connections) and says that the connections onto Lillie Road and the A4 "should be configured so that the impact on the existing highways is minimised".	No change necessary. The Vision discusses the authorities' aspiration to connect the two boroughs (RBKC and LBHF) through an east- west connection, rather than the transport network implications that the Transport Chapter addresses. Both north-south and east-west connectivity are established as important in the Transport Chapter and the Urban Form chapter (see Key Principle UF1).
1898	Jonathan	Rosenberg	WK/GG Community	10	Para 10.59	- Para 10.59 again says, in even stronger language, that a North/South link "is essential for the development to take place."	Noted.

			Homes, WK TRA, GG/Dieppe Close TRA				
1899	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10	Para 10.63	- Para 10.63 goes on to illustrate the impact by 2031 on the "strategically important A4", including the obvious impact of a new junction on the A4 (see Para 27 below).	Noted.
1900	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		28. The complacent approach taken in all these examples is completely unacceptable. The crucial role of the SPD in determining what transport and capacity impacts will or will not be acceptable, as a foundation for the proposed development quantum, has been ducked, because the transport assessments signal clearly that the impact will be unacceptable. Looking ahead over such timescales to 2031, the SPD must seek, and demand, improvements— or else it should scale down the size, and therefore impact of, the development considerably.	No change necessary. The Transport and Accessibility Strategy of the SPD sets out what the impacts will be of the quantum of development assessed and what mitigations are likely to be required. Where further work is necessary in relation to the highway network this is clearly set out (paragraph 10.65).
1901	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		29. [bold] Funding. [end bold] The Chapter goes on to list a large number of potential improvements that would need to be funded by the developments. These however remain un-costed (to our knowledge) and there is no current reason to believe that the funding would be feasible or forthcoming. The list of demands has an increasing sense of unrealism about it as one reads through the Chapter, and it is not claimed that even those improvements would result in an overall improvement to the transport network in this part of London. Para 10.64 makes this clear, saying that increased delays (2009-2031) on the A4 will occur, lengthening journey times by 3 ½ minutes Westbound in the evening. Not good news if you are on your way to Heathrow to catch your flight! Para 10.65 admits "Given that the A4 is a strategic trunk road and part of the TfL Road Network such an impact is not acceptable." It goes on to say that any proposed development would need to demonstrate how these impacts could be mitigated. Frankly, t	No change necessary. The Transport and Accessibility Strategy of the SPD sets out what the impacts will be of the quantum of development assessed and what mitigations are likely to be required. Any future development proposals will need to assess the impacts of the development quantum they propose and will need to demonstrate that funded mitigation measures are possible to ensure the impacts are acceptable.
1902	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10	Para 10.42	30. Similarly, Para 10.42 refers to the physical constraints of West Kensington and West Brompton stations and says that "any new development should be able to demonstrate clearly how increased capacity will be achieved". We have serious doubts that the required increased capacity can be achieved, particularly given the heritage considerations at West Brompton.	Noted.
1903	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10	TRN 19	31. TRN 19 refers to the fact that development traffic simply cannot be accommodated on the existing road network - significant capacity improvements will be needed. Para 10.57 says that even without development in the OA, "traffic levels in the area are likely to increase significantly from 2009 to 2031".	Noted.
1904	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		32. What comes across strongly in all this is that traffic is bad now, the tube and rail network is completely over-crowded, opportunities for improvement are very limited - and development will make it worse. The clear conclusion is the development of anything like the scale proposed cannot be accommodated - and therefore should not proceed.	No change necessary. This is not the conclusion drawn by the Transport and Accessibility Strategy of the SPD.
1905	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		33. Caught up in this is the notion of connectivity across the OA. We have pointed out that the SPD is confused in which direction connectivity is most needed. The Vision says East/West, the transport Chapter says North/South. It would be helpful if this contradiction could be resolved and a justification for it be given. In any event, we believe that there is a fundamental difference	No change necessary. No change necessary. The Vision discusses the authorities' aspiration to connect the two boroughs (RBKC and LBHF) through an east- west connection, rather than the transport network implications that the Transport Chapter addresses. Both north-south and east-west connectivity are established as important in the Transport and Accessibility Chapter and the Urban Form chapter (see Key Principle UF1).The Transport and Accessibility Strategy of

						between connectivity (increasing access and allowing ease of movement across an area by different modes) and creating a through route for motor traffic. The first, subject to details, we welcome in principle. The second we oppose totally, both for its disruption through the OA, and for its hugely negative impact on the A4. It is also odd that the SPD sees connectivity in this way, given its supposed support for increased walking and cycling and restraint on car usage. Why is such connectivity needed?	the SPD supports improved east-west connections as an important part of the strategy for improving pedestrian and cyclist access and access to public transport services. The Transport and Accessibility Strategy also refers to the need to provide a north-south route from the A4 to Lillie Road and Old Brompton Road. This is necessary in order to provide additional capacity to the local road network. Both east-west and north-south access improvements are needed and they serve different purposes.
1906	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		34. [bold] Strategic Context [end bold]. The OA Strategic Context diagram at page nineteen highlights the fact that the transport case is founded upon future infrastructure, which does not directly serve the OA and is either aspirational and unplanned, planned but unfunded, or likely to be delivered very many years after all of the phases of the development have been completed.	No change necessary. This comment has misinterpreted the purpose of figure 2.2. The Transport and Accessibility Strategy of the SPD provides the detail in relation to the 'transport case' for the OA.
1907	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10		35. [bold] North south link and the A4 junction. [end bold] The off-set 'ladder' form of the proposed north south road links and the vague 'area with potential vehicular connection to A4 (on page 46) hint at a crucial but unsolved transport and access dilemma. Does the scheme depend upon duplicating north south links and relieving/ supplementing capacity at the A4/ Earls Court Gyratory: What will be the role, impact, and capacity of the new junctions on the A4 and on Lillie Road? Such a road function blows apart the suggestion that this will be a new district where most people will walk and cycle and where no significant impacts of the development will be transferred onto the surrounding road network.	No change necessary. Additional north-south road capacity is essential to allow development to take place. This is stated at paragraph 10.59. The form this takes will need to be determined by future development proposals. Figure 3.1 provides an illustrative plan that seeks to highlight graphically some of the key principles that are established later in the SPD, it is not a detailed plan for development. For example Key Principle UF3 states that the pattern of new streets in the OA should be inspired by the street types and patterns identified in the surrounding area. 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 preclude any other approach to a north-south connectivity that would meet the requirements set out in the Transport Chapter.
1908	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	10	TRN8	36. Other transport issues. Providing coach parking facilities, as set out in policy TRN 8, will attract traffic to the site and it conflicts with both the findings that the traffic impacts are very great and that the strategy should therefore focus upon walking and cycling, limiting 'unessential' motorised traffic.	No change necessary. Paragraph 10.56 makes it clear that TRN18 refers to coach parking to accommodate development demand, rather than a commercial coach park.
1942	Andy	Slaughter	Labour MP for Hammersmith	10		The loss of Lillie Bridge Depot has not been adequately addressed. This is an important employment and workshop site in the borough and will be required for the foreseeable future to station the new London Underground 'S' class rolling stock.	No change proposed. A replacement stabling facility will create jobs in construction and operation, however it is not clear at this stage how many jobs will be created or displaced as part of the closure of the existing depot. In any event TfL will continue to require staff on the operational network.
1943	Andy	Slaughter	Labour MP for Hammersmith	10		As far as rail and road transport generally is concerned, the best the SPD can offer is the hope that overcrowding will be contained within current levels (10.6 and passim) In the context of such a huge and thoroughgoing development strategy, this is a serious flaw and a missed opportunity to offer West London an improvement in its transport infrastructure.	No change necessary. The SPD requires improvements to the road and public transport infrastructure as set out in chapter ten and in Key Principle TRN10, TRN12, TRN13, TRN14, TRN15, TRN16, TRN19 and TRN20. By far the most substantial increases in demand on the transport networks come from background growth rather than development. It is not reasonable to require, or possible for development to deliver, mitigations that would remove the impacts of this growth.
2083	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN3	It is suggested that the key principle be revised to include the words 'should aim' to be built to adoptable standards. It should also be noted that, where appropriate, roads should be designed to these standards. The proposed requirement for all streets within the OA to be adopted should be reviewed, as at this stage the eventual layout and built form is not known with certainty and so there should be some flexibility to consider the appropriateness of adopting every street at a later stage	Change proposed. TRN3 will be amended to include a reference to design. The Local Authorities and TfL require high quality design and construction in order to ensure that spaces used by the public are safe and attractive. The reference to all streets being built to adoptable standards is appropriate. The wording of TRN3 is already sufficiently flexible regarding adoption and no change is proposed.
2084	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN6	The principle to "fund environmental improvements and deliver wider, clearer and higher quality footways" is agreed. In the interests of flexibility when applying this Key Principle in the future, the word "the" should be omitted from "the existing streets", and reference to the A4 improvement scheme (which is not defined) should be removed. The A4 is one of the existing streets and so this re-wording would not undermine the objective of improving the A4 frontage.	Change proposed. TRN6 will be amended to remove word 'the' before 'existing streets'. The reference to the A4 improvement should remain. TfL and the boroughs are developing a scheme that will improve the environment of the A4 to better accommodate increased footfall from the OA and other developments in the area. This is referred to in paragraph 10.23.

2085	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	Para 10.23, Figure 10.10	It is recognised that development in the Opportunity Area may give rise to a requirement to provide mitigation to those streets that immediately surround the Opportunity Areas. It is, however, inappropriate for the revised draft SPD to define perceived areas for 'improvements'. Any planning application will need to demonstrate its likely impact on the surrounding road/street network and provide the appropriate mitigation measures.	No change necessary. Paragraph 10.23 makes it clear that the improvements are necessary to accommodate increased footfall.
2086	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN9	The delivery of the cycle hire scheme into the Opportunity Area is an aspiration that is acknowledged. It can, however, only be realised with the 'buy in' of the relevant authorities, namely TfL and GLA. It is of course appropriate for new development to provide cycle parking in accordance with London Plan and Local Development Plan standards for all the relevant land uses, and "particularly at key public transport interchanges" should be omitted.	No change necessary. TfL and the GLA are co-authors of the SPD and therefore are committed to extending the Mayor's Cycle Hire Scheme. There is a shortage of cycle parking in the area surrounding the OA, particularly at the key public transport interchanges. Therefore the text should remain.
2087	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN10	It must be made clear that physical improvements to all three stations will be required on the back of analysis which demonstrates that this is necessary.	No change necessary. This is implicit within TRN10 and follows on from explicit references to the need for analysis, in the form of Transport Assessments, at TRN1 and TRN2.
2088	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN12	Improvements to Earls Court Station maybe appropriate, subject to analysis. The reopening of the existing pedestrian tunnel underneath Warwick Road will provide an added benefit but is something that is not fundamental to the development of the OA. Greater flexibility should therefore be incorporated to the wording of the Key Principle.	No change necessary. It is the view of TfL and the boroughs, based on the ECTS, that the reopening of the pedestrian tunnel is necessary to support the development quantum tested for the SPD.
2089	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN15	Any requirements to provide platform lengthening at West Brompton Station must be related in scale and kind to the development. The Key Principle should be reworded as new development can fund but not "deliver" such alterations.	Change proposed. Key Principle TRN15 will be amended as suggested.
2090	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN20	A requirement to reduce delay on the A4 to 2009 levels is not appropriate given the decision to remove the congestion charging Western Extension Zone with effect from December 2010 - requiring a new development to reverse the impact of this would be unreasonable. The Key Principle should be more flexible on this point, recognising that reducing the environmental impact of A4 traffic and improving pedestrian facilities may involve some minor changes to A4 journey times	Change proposed. TRN20 will be amended to read "2012 levels" in place of "2009 levels".
2091	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN22	Improvements to the Earls Court one way system can of course be investigated. A requirement to fund a package of measures as identified in the investigation must, however, relate to the redevelopment that is proposed and its likely impact.	Noted.
2092	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	10	TRN24	It is accepted that the car parking levels should be minimised where this would restrain car trips. It is important that the revised draft SPD provides a flexible approach to the proportion of car parking to be provided (paragraph 10.74). It is for individual applications to demonstrate the appropriateness of parking levels. A proposed level of 0.4 spaces per residential units is substantially below the figures adopted in the Core Strategy's of both boroughs and within the London Plan. The level of car parking to be provided must reflect likely demand and car usage. In seeking to restrict car parking too much this has the potential to result in additional parking issues elsewhere in the areas that surround the Opportunity Area. The Strategic Transport Study tested a range of development scenarios, and the content of specific development proposals is likely to vary from those, so the proposed parking level for specific development proposals needs to be agreed in the context for the proposals and their specific	No change necessary. The context of the OA, in terms of the quantum of development proposed and the congested nature of the road network, is such that car parking levels must be minimised and application of the maximum standards included within the London Plan and borough Core Strategies is not appropriate. The ECTS demonstrated that the quantum of development tested produced some unacceptable impacts on the highway network, particularly on the A4. It is not therefore appropriate to increase parking levels above those assumed in the ECTS.
2104	Geraldine	Kelly		10		Among the points which need to be considered are:	No change necessary. The impacts of development on the public transport

					1. The Transport section has not considered the fact that the three stations: West Kensington, West Brompton and Earl's Court Stations are operating at capacity. The development will bring in approximately 14,000 new residents and 12,600 workers to the area from this site.	networks are considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17).
2105	Geraldine	Kelly		10	Among the points which need to be considered are: 2. The increased traffic volumes within road management on Earl's Court One Way System do not consider pedestrians or cyclists and created additional 'severance' for residents west of Warwick Road.	No change necessary. The impact of development on the road network is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). Pedestrians and cyclists are considered in paragraphs 10.16 – 10.31 and in Key Principle TRN22 in relation to the Earl's Court One Way System.
2111	Sandro and Jelena	Guadagnini		10	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: 1) Transportation: the additional residents and workers would put additional strain to the already saturated tube stations in the area.	No change necessary. The SPD is not an application for development but rather it sets out the principles that need to be met by any development proposals in the future. The impacts of development on the public transport networks are considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17).
2112	Sandro and Jelena	Guadagnini		10	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: 2) Traffic: Warwick road and surrounding areas are already significantly congested. Additional traffic as a result of the development would worsen this situation and add unacceptable pollution to the area, which as a parent is a significant concern to us. Additional consideration needs to be given to the other nearby development areas already adding additional pressure the the Earls Court one way system.	No change necessary. The SPD is not an application for development but rather it sets out the principles that need to be met by any development proposals in the future. The impacts of development on the road network are considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN19-21, 23). The modelling includes trips generated by other development proposals, such as on Warwick Road.
2127	Suky	Macpherson		10	I continue to object to the revised plans on the following grounds: 2) Transport. This subject has not been addressed satisfactorily for the nos of people involved. Planned tube changes will not enable the nos planned for warwick rd and the capco dev to be accommodated; it is simply not feasible, will cause chaos and may become dangerous. As rush hour travel on the Piccadilly line is already very unpleasant, it will become untenable. New buses are irrelevant for most city and West End workers.	No change necessary. The impacts of development on the public transport networks are considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17). The modelling includes trips generated by other development proposals, such as on Warwick Road.
2130	Suky	Macpherson		10	I continue to object to the revised plans on the following grounds:	No change necessary. Key Principle ENV16 states that redevelopment must be air

					6) General quality of life for natives and new comers will be low. An overpopulated area with impassable and sluggish traffic, very poor air quality, few open spaces, overcrowded public transport and few leisure facilities is what is being planned. Nobody gains apart from CAPCO.	quality neutral against existing levels (therefore being no worse) and should include mitigation measures to improve air quality. Key Principles UF12 to UF18 set out requirements for increased open space provision. The Social and Community Facilities section sets out requirements for leisure facilities, include a library, a community hub and sports and leisure facilities. The impact of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD Key Principles TRN 10-17, 19-21, 23 seek to ensure the impact of development is controlled.
2132	Pamela and Michael	O'Hagan		10	1. DENSITY - We are already hugely overstretched in traveller density in the tubes and car density on the roads. I myself have had to WALK to Knightsbridge from Earls Court before I could find a tube I was able to ENTER on a Chelsea home game day. Plans MUST be put in place for alternative routes for travelling or a serious and dangerous incident could result from overcrowding.	No change necessary. The impacts of development on the road and public transport networks is considered in the Transport and Accessibility Strategy of the revised draft SPD (Key Principles TRN 10-17, 19-21, 23). The strategy sets out the impacts of development and what mitigations will be needed.