

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

CONSULTATION RESPONSES SCHEDULE: ENVIRONMENTAL STRATEGY

MARCH 2012

Chapter 12: Environmental Strategy

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
12	Jane	Chasten		12		the developer has not yet provided detailed proposals for the removal of asbestos and the residents should be included in any consultation before building work is granted	<p>No change necessary.</p> <p>The authorities anticipate that asbestos materials are likely to be present in the exhibition centre complex and therefore will be dealt with by a registered contractor. However, this is beyond the control of the planning system and therefore beyond the scope of the SPD. The enforcement of the legislation for construction site safety and handling asbestos is the responsibility of the Health and Safety Executive (HSE) although the borough's Environmental Health Departments liaise with HSE officers to ensure that the Councils fully understand the methodology being adopted, including air sampling. Information relating to asbestos can be requested from the Council's Environmental Health departments.</p>
13	Jane	Chasten		12		adverse pressure on Victorian drains which do not cope with the current heavy rainfall	<p>No change necessary.</p> <p>The 'Environmental Strategy' sets out specific requirements in relation to drainage, flood risk and water use.</p> <p>Paras 12.32 and 12.33 acknowledge that there is limited capacity on the existing combined storm sewer network, especially Counters Creek. Key Principle ENV5 therefore requires that 'total flows entering any combined sewer will either be matched or reduced in comparison to existing flows'. ENV9 requires the installation of Sustainable Urban Drainage measures, which seek to reduce the amount of surface water runoff entering the combined sewer network.</p>
14	Jane	Chasten		12		flood risk - the area is already at Flood Risk Zone 3.	<p>No change necessary.</p> <p>Figure 2.7 shows the floodrisk zones in and around the OA. This shows that much of the OA in LBHF is located within floodrisk zone 3. However, there are also parts of the OA located in floodrisk 2 and 1.</p>
78	M.M.	Deyes		12	ENV16	The Planning Document now says that re-development must be air quality neutral. Does this mean it should be no worse? Why not improved?	<p>No change necessary.</p> <p>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.</p>
96	Simon	Fisher		12	ENV3	<p>the SPD should adopt a more robust approach to the impact of demolition on adjoining residents and the associated asbestos health risks.</p> <p>Demolition of ECEC will involve major works above the tube/rail tracks which must not be permitted between midnight and 0700 hrs on any night.</p>	<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</p>

					<p>If some demolition work cannot be carried out whilst trains are operating, then periodic line closures should be required. The developer should be required to submit an asbestos assessment for approval by the planning authorities before any planning application involving demolition of ECEC or Gibbs Green/West Kensington Estates is approved. Demolition of these buildings should be controlled by planning conditions, planning obligation agreements and environmental health notices.</p>	<p>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 and air pollution will be monitored and mitigated and how the local community will be kept in informed. Para 12.80 requires a Low Emission Strategy with consideration for health impacts.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>The authorities anticipate that asbestos materials are likely to be present in the exhibition centre complex and therefore will be dealt with by a registered contractor. However, this is beyond the control of the planning system and therefore beyond the scope of the SPD. The enforcement of the legislation for construction site safety and handling asbestos is the responsibility of the Health and Safety Executive (HSE) although the borough's Environmental Health Departments liaise with HSE officers to ensure that the Councils fully understand the methodology being adopted, including air sampling. Information relating to asbestos can be requested from the Council's Environmental Health departments.</p>
107	Barbara	Herbin		12	<p>[Bold] Air Quality [Bold ends] In the first 5-10 years of the development there is likely to be an increase of particulate matter pollution due to construction and an increase in NO2 levels due to works traffic and works. Therefore it is essential that there is day-to-day monitoring on site and that contractor data on Air Quality monitoring are available to the Councils at all times. This extra pollution is of particular concern to residents who live in Eardley Crescent and Philbeach Gardens. What reassurances are we going to be given re noise and air pollution?</p>	<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</p>

							various impacts, including noise, vibration and air pollution will be monitored and mitigated and how the local community will be kept informed.
143	David	Hammond	Natural England	12	ENV9	Key Principle ENV 9 - Consideration of SUD's is welcomed and to be encouraged, linking into Green Infrastructure provision.	Noted.
144	David	Hammond	Natural England	12	Para 12.43, Para 12.44	Green Infrastructure proposals as referenced under paragraphs 12.43 and 12.44 are welcomed.	Noted.
145	David	Hammond	Natural England	12	ENV18, ENV19	Key Principles ENV 18 and ENV 19 are welcomed and supported.	Noted.
147	David	Hammond	Natural England	12		<p>Protected species</p> <p>If representations from other parties highlight the possible presence, or the Council is aware of a protected or Biodiversity Action Plan (BAP) species on the site, the Council should request survey information from applicant before determining applications.</p> <p>Paragraph 98 and 99 of ODPM Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 provide information on BAP and protected species and their consideration in the planning system.</p> <p>We would draw the Council's attention to our protected species standing advice, which provides guidance on when protected species may be impacted by a proposal. The advice can be found at: http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx</p>	<p>Change proposed.</p> <p>The supporting Ecological Aspirations report identifies known species in the OA. This is summarised in paras 12.108 and 12.109 of the revised draft SPD, together with approaches to protect and enhance biodiversity within the OA. However, the revised draft SPD (ENV19) will be revised to specifically require an ecological survey as part of the Ecological Impact Assessment. The revised draft SPD will also include reference to Circular 06/2005 (para 98 and 99) and Natural England's standing advice.</p>
162	Andrew	Westoby	??	12	Demolition, Excavation and Construction Impacts	<p>There is already a pre-existing history of vibration issues from vibration coming from the Earl's Court Exhibition Centre, there should be a survey of the affected properties to ensure there is a baseline for determining any structural changes in these buildings during the course of the project. There should be an Environmental Pollution, Noise and Nuisance Team to respond to residents' concerns and liaise with the developers. This Team should also have powers, and or access to people with powers to halt Development work if necessary. This same Team should also control and monitor the increased pollution and noise levels that will result from traffic and works.</p>	<p>No change necessary.</p> <p>The Earl's Court Exhibition Centres will be demolished and will therefore no longer hold events that may cause noise and vibration. In terms of future development and occupation, ENV17 requires new development to be designed and constructed to mitigate and adequately control noise and vibration.</p> <p>In terms of noise caused during the demolition and construction, Key Principle ENV3 requires a Construction Environmental Management Plan (CEMP), which requires information on noise including noise monitoring, likely sources of noise, approaches to minimise noise and information on traffic logistics. Key Principle ENV3 also requires developers to keep the new and existing population informed of periods of noise. Key Principle ENV4 requires measures at each phase to minimise and control the impact of demolition, excavation and construction on the environment and residents surrounding the OA, which includes requirements for a Community Liaison Group that includes members of the Council, developer and local community.</p> <p>The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of</p>

						noise and vibration levels during the works.
223	Una	Hodgkins	12		<p>Why do you think that we have to have the "Super sewer"?</p> <p>Answer: because the existing sewers cannot cope.</p> <p>The next problem will be the mains water supply: Thames Water are talking about a winter drought in the South East.... and about using desalinated water, which is much more expensive than from the existing sources.</p> <p>When will the Leaders of Hammersmith and Kensington realise that there is a limit to the water supply in the Thames Valley?</p> <p>There is no more water. Therefore: STOP BUILDING!</p>	<p>No change necessary.</p> <p>The 'Environmental Strategy' sets out specific requirements in relation to drainage, flood risk and water use.</p> <p>Paras 12.32 and 12.33 acknowledge that there is limited capacity on the existing sewer network, especially Counters Creek. Key Principle ENV5 therefore requires that 'total flows entering any combined sewer will either be matched or reduced in comparison to existing flows'. Key Principle ENV8 requires that mains water consumption is limited to 105 litres per person per day. Paras 12.37, 12.38 and 12.39 set out approaches to limiting mains water consumption, such as borehole abstraction, rainwater harvesting and using water efficient appliances. Key Principle ENV9 requires the installation of Sustainable Urban Drainage measures, which seek to reduce the amount of surface water runoff entering the combined sewer network.</p>
276	Nicola	Pedroni	12		<p>there is already high pollution level (I notice the amount of dust on cars and inside my home) -the development will make things worse</p>	<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 informed.</p>
357	Christine	Powell	12	Para 12.11	<p>The use of the existing rail and water network during the development stage for the transportation of construction waste and other waste is strongly supported</p>	<p>Noted.</p>
358	Christine	Powell	12	Para 12.25, Para 12.32	<p>The use of Counters Creek as a combined sewer, already serving areas as far afield as Brent and Camden, needs to be reviewed.</p>	<p>No change necessary.</p> <p>The 'Environmental Strategy' sets out specific requirements in relation to drainage, flood risk and water use. Paras 12.32 and 12.33 acknowledge that there is limited capacity on the existing sewer network, especially Counters Creek. Key Principle ENV5 therefore requires that 'total flows entering any combined sewer will either be matched or reduced in comparison to existing flows'. Key Principle ENV9 requires the installation of Sustainable Urban Drainage measures, which seek to reduce the amount of surface water runoff entering the combined sewer network.</p>
359	Christine	Powell	12	Para 12.38	<p>There should be an alternative source for potable water should the bore holes not be feasible.</p>	<p>No change necessary.</p>

							Key Principle ENV8 sets out requirements for residential development to be designed to limit water consumption to 105 litres per person per day or less. Approaches to achieve this are suggested in para 12.38 and 12.39, which include the consideration of bore hole abstraction, rainwater harvesting and using water efficient appliances.
360	Christine	Powell		12	Para 12.44	The encouragement of green roofs and walls is applauded but who will maintain them? How can routine maintenance be carried out?	Change proposed. Green roofs and green walls will need to be maintained by the body responsible for maintaining the building and this could be secured through planning conditions. This will be made clear in the final SPD.
361	Christine	Powell		12	Para 12.54	How will the recycling of kitchen waste at source be managed?	No change necessary. The planning system cannot specify the type of waste management system installed in each property, but encourages systems that make it easier for people to sort waste 'at source' and thus changing habits to encourage recycling. The Envac system is very successful at this and given the nature of the OA, para 12.55 states that the Envac system would be most suited to development in the OA.
362	Christine	Powell		12	Para 12.58	The use of non-regulatory and education based approaches for reuse and recycling waste is optimistic. There is already a major problem with people dumping their rubbish on street pavements.	No change necessary. The non-regulatory and education based approaches to reuse and recycling are 'encouraged'. The SPD cannot control 'fly tipping', but para 12.54 requires 'sufficiently sized and easily accessible refuse and recycling storage areas'.
363	Christine	Powell		12	Para 12.83	West Cromwell Road and Cromwell Roads, at their junctions with Warwick Road and Earl's Court Road, are amongst the most polluted areas in London. Everything must be done to mitigate any increase of this caused by the resultant increase in traffic during the demolition and construction phases.	Change proposed. 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. Key Principle ENV1 requires demolition and excavation waste to be treated and reused onsite or transported in a sustainable manner, where rail is the preferred transportation method. 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. 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.
364	Christine Powell			12	Para 12.91, Par 12.98	There must be care when permitting licenses as not only can there be noise and vibrations from such premises but there is also the problem caused by customers as they leave restaurants, pubs and clubs late at night.	No change necessary. The SPD will not be enforced through licensing, but through the planning process. Key Principle ENV17 requires new development to be designed and constructed to mitigate and adequately control noise and vibration.
368	Timothy Nodder		The Kensington and Chelsea Environment Round Table	12	Key Objectives	Chapter 12 Environmental Strategy Key Objectives - Replace "minimise the impacts of demolition, excavation and construction on the surrounding community" with "Protect the surrounding community, residents, workers and visitors from all impacts of demolition, excavation and construction." We think that "minimise" is too vague. Also, it should be made clear that the surrounding community includes all persons living, working or visiting the area.	Change proposed. 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. 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 informed.
369	Timothy Nodder		The Kensington and Chelsea Environment Round Table	12	Key Objectives	Replace "Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised;" with "Ensure that the surrounding community is fully protected from the environmental impacts of air pollution, noise and vibration." The words "adequately controlled and minimised" are too vague and restrictive. Protection should be complete.	Change proposed. 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. The Key Objective controls the environmental impacts on the new and existing population. The detail for 'adequately controlling and minimising' impacts is set out in the relevant section and subject to advice from the Council's Environmental Health departments as they will enforce the targets.
370	Timothy Nodder		The Kensington and Chelsea Environment Round Table	12	Key Objectives	Add after "West Brompton Station" the words "and the Brompton Cemetery". The ecology and biodiversity of this important green area could be adversely affected by nearby development, shading etc..	Change proposed. As Brompton Cemetery is not located within the OA, it is not appropriate to mention this in the Key Objective. However, para 12.100, which sets out the context, will be revised to make specific reference to Brompton Cemetery being adjacent to the OA. Key Principle ENV18 will also be revised to include reference to SNCIs adjacent to the OA.
380	Cllrs Buxton and Read			12		DEMOLITION AND CONSTRUCTION Key Objective 1 concerning demolition and construction needs	Change proposed. The Key Objective in the Environment Strategy requires development to

					<p>considerable strengthening together with the Key principles ENV1, ENV2, ENV3 AND ENV4 to protect the amenity of residents.</p> <p>In recent years increasing concerns have been expressed in the Royal Borough about construction sites in RBKC especially construction of Basements. As mentioned above there is no other OA in London that is as close to and directly affects some many residents. Hundreds of residents in Philbeach Gardens and Eardley Crescent including Kensington Mansions Warwick Road directly back onto the OA. The close by tube lines means that work near to and above them will very likely to happen at night. We appreciate the planning constraints that Planning Authorities are under, but there must be specific S106 requires and conditions to address this.</p>	<p>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> <p>The Council will use conditions and planning obligations to control specific proposals relating to demolition, excavation and construction. However, this does not need to be explicit in the SPD as these are controlled through the Development Management process.</p>
382	Cllrs	Buxton and Read		12	<p>IN CONCLUSION THE ISSUE OF DEMOLITION AND CONSTRUCTION HAS THE POTENTIAL TO COMPLETELY NEGATE ANY POSITIVE ASPECTS TO THIS DEVELOPMENT AS FAR AS THE NEIGHBOURING RESIDENTS ARE CONCERNED.</p>	<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>
396	Yvonne	Birch	Kensington and Chelsea TMO	12	<p>A working group of the board has considered the revised Supplementary Planning Document and how the development proposals may have an impact for residents of TMO managed properties who live very close to the edges of the OA. They raised the following concerns:</p> <p>Demolition, Excavation and Construction Impacts</p> <p>12 Environmental Strategy</p> <p>Key Objective- Minimise the impact of demolition, excavation and construction on the surrounding community</p>	<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</p>

						<p>There was concern that there will be noisy working outside permitted hours and this will have an impact on the quiet enjoyment of the properties. There is also concern about the effects of dust and debris associated with demolition will have on the air quality and the necessity for increased cleansing of communal area and windows. The Group wanted to know if these increased costs will be compensated for and whether the residents who will be subject to the noise associated with night working could be offered double glazing in order to mitigate the effects.</p> <p>The working group appreciated that many of these details are not yet available for consultation but ask that the TMO is included in any further consultation opportunities.</p>	<p>various impacts, including noise, vibration, dust and air pollution will be monitored and mitigated and how the local community will be kept informed.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Compensation arrangements would only be negotiated once the works are underway, taking into account the duration and level of exposure to noise and vibration.</p>
430	Nicholas	Fernley	Hammersmith & Fulham Historic Buildings Group	12		<p>We are also concerned at the loss of the current bio-diversity that currently exists in the green corridor along the railway line because of the work proposed. Similar loss has been noted in the past along the railway green corridor in White City as a result of nearby development.</p>	<p>No change necessary.</p> <p>Para 12.109 acknowledges the ecological value along the railway lines. However in order to achieve improved east west connectivity, the SPD makes provision for this ecological habitat to be relocated to a significantly higher standard within the OA.</p>
461	Arthur	Tait	Friends of Brompton Cemetery	12	Page 175	<p>5. KEY OBJECTIVE ON PAGE 45 - THE LAST IN 3-21, AND ON PAGE 175 -- 'Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station'.</p> <p>It is unclear how the mass of buildings (and therefore people) along the eastern side of the Car Park will achieve protection and enhancement. Surely their impact will be harmful, and will neither protect nor enhance.</p>	<p>No change necessary.</p> <p>The SPD is a framework which will be used to assess planning applications within the OA. It is up to the developer to propose a scheme that reflects the requirements of the SPD, and therefore incorporate measures to protect and enhance this ecological area.</p>
552	Malcolm	Spalding	Earl's Court Society	12	Key Objectives	<p>ADD new Key Objective "Demolition and building work that generates high levels of noise, vibration and air pollution (exceeding defined measurements) cannot be accepted during night hours and week-ends adjacent to existing residential buildings. Alternative accommodation arrangements must be provided as a condition and s106 requirement"</p>	<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</p>

						<p>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> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Compensation arrangements would only be negotiated once the works are underway, taking into account the duration and level of exposure to noise and vibration.</p>
553	Malcolm	Spalding	Earl's Court Society	12	Key Objectives	<p>AMEND "adequately controlled" to read "fully controlled within set limits"</p> <p>No change necessary.</p> <p>The Key Objective controls the environmental impacts on the new and existing community. The detail for 'adequately controlling and minimising' impacts is set out in the relevant section and subject to advice from the Council's Environmental Health departments as they will enforce the targets.</p>
554	Malcolm	Spalding	Earl's Court Society	12	Key Principle ENV3	<p>ENV3 ADD "...predicted noise levels, pollutants and other potential nuisances. The developers should be conditioned to fund EHOs to monitor and control noise, vibration, pollution, general nuisance and vermin problems on a daily on-site basis, with immediate enforcement powers"</p> <p>Change proposed.</p> <p>Key Principle ENV3 will be revised to require information 'on all environmental impacts' not just predicted noise levels.</p> <p>Requirements to fund additional Environmental Health Officers will be considered on a case by case basis and subject to negotiation as part of the planning application.</p>
555	Malcolm	Spalding	Earl's Court Society	12	Key Principle ENV3	<p>ENV3 Air Quality. There are strict laws about not exceeding previously established levels of air quality. Is it known if any of the existing peripheral roads have exceeded the legal limit? Peripheral roads need baseline measurements to establish current levels of air pollution - not just major roads and current measurement sites. It is illegal to make the current exceedences worse.</p> <p>No change necessary.</p> <p>Figures 12.6 to 12.8 show the predicted air quality levels in 2008 and how these relate to the Government's objective levels.</p> <p>ENV16 states that redevelopment must be air quality neutral against existing</p>

							levels (therefore being no worse) and should include mitigation measures to improve air quality.
556	Malcolm	Spalding	Earl's Court Society	12	Key Principle ENV9	ENV9 define what is meant by a "brown roof" for water run off. ADD "and all hard surfaces".	<p>No change necessary.</p> <p>Brown roofs are the same as green roofs, but do not contain evergreen vegetation. This does not require defining in the SPD.</p> <p>In some instances 'brown roofs' are not appropriate on all hard surfaces. However, at least one of the SUD measures listed in para 12.43 will be appropriate for nearly all hard surfaces.</p>
557	Malcolm	Spalding	Earl's Court Society	12	Key Principle ENV17	ENV17 AMEND "to acceptable levels" to read "to ensure minimal levels"	<p>No change necessary.</p> <p>Key Principle ENV17 states that mitigation measures will be used to reduce noise and vibration to 'acceptable levels'. These levels are set out in the chapter and subject to advice from the Council's Environmental Health departments as they will enforce the targets.</p>
583	Michele	Gorgodian		12		<p>- [bold] What benefit to us? [end bold]</p> <p>It seems to me that we will be negatively impacted, both during the demolition and building process, and from the result. I anticipate the development will have a damaging effect on my property's value. For residents living nearby, it will clearly damage their quality of life.</p>	<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>The impact of development on neighbouring property values is not a material planning consideration.</p>
664	Keith	Barker-Main		12	Demolition, Excavation and Construction Impacts	<p>The demolition and build process is likely to be a 24/7 process due to the problems of building over a working railway system. This has now been acknowledged by local councillors. The pontoon on which EC 1 is built will act as a funnel amplifying noise and directing it into properties in surrounding streets. Councils must mitigate against disruption to residents' peaceable enjoyment of their premises. A condition of any build should be that any affected residents should be compensated and that the developers be made to pay for/ install air conditioning and acoustic solutions compatible with a conservation area in the case of Kensington Mansions. People cannot be moved in and out of temporary accommodation to permit night-time work like they were livestock.</p>	<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 informed.</p>

						<p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Compensation arrangements would only be negotiated once the works are underway, taking into account the duration and level of exposure to noise and vibration.</p>
665	Keith	Barker-Main	12	Demolition, Excavation and Construction Impacts	<p>The implications for the health of local residents should their homes be blighted by noise, vibration, pollution or other must be seriously addressed in advance. K&C's response to the night-time rebuild of Earl's Ct station was utterly inadequate. This cannot be allowed to be repeated for a developer's commercial interests.</p>	<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 informed. Para 12.80 requires a Low Emission Strategy with consideration for health impacts.</p> <p>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.</p> <p>Key Principle ENV17 requires new development to be designed and constructed to mitigate and adequately control noise and vibration</p> <p>The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of</p>

						noise and vibration levels during the works.
667	Keith	Barker-Main	12	Air Quality	Brownfield site it may be, but the current EC/ W Ken area to be lost acts as a vital lung in one of the most polluted urban areas in Europe. Lose that and EU pollution levels will be even more regularly breached. The Council has a duty of care to protect existing residents' health .	<p>No change necessary.</p> <p>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.</p> <p>The Urban Form Strategy (Key Principles UF12 to UF15) sets out requirements for green open space provision to fulfil a number of functions, including passive recreation, gardening and nature conservation. Key Principle ENV18 requires improved open space, landscaping and tree planting.</p>
828	James	Tynte-Irvine	12		5. Flood Risk: There seems to be inadequate planning for the fact that the majority of the development will be in a flood risk zone. Concrete provisions for this should be made before any development is permitted.	<p>No change necessary.</p> <p>Figure 2.7 shows the flood zones in and around the OA. This shows that much of the OA in LBHF is located within flood zone 3. However, there are also parts of the OA located in flood zone 2 and 1. Key Principles ENV5 to ENV9 set out requirements for the development to mitigate any potential flood risk.</p>
829	James	Tynte-Irvine	12		6. Demolition and Construction Impacts: There must be clarity on the demolition plans and strict rules governing the hours of work, noise, and effect on air quality to minimise as far as possible the impact of the development on existing residents. Such a large and lengthy development has the potential to blight adjacent residents lives for years to come if appropriate safe guards are not put into place. Precautionary surveys of nearby properties should be taken to determine any structural impact caused by the development and it is critical that there is a 24/7 environmental health, noise and nuisance team to respond to residents' concerns and liase with developers.	<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. Para 12.80 requires a Low Emission Strategy with consideration for health impacts.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced</p>

						<p>by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Precautionary surveys are sometimes negotiated as part of Party Wall agreements, however this is beyond the control of the planning system.</p> <p>Requirements to fund additional Environmental Health Officers will be considered on a case by case basis and subject to negotiation as part of the planning application.</p>
831	K.A.	Courtenay	12	<p>The demolition, particularly of the Earl's Court One building, will have an immediate and early impact on me as a resident of Philbeach Gardens and could completely overshadow any long term benefit of the regeneration of the OA. I realise that it will not be possible to avoid any impact on my quality of life from noise, vibration, air pollution and light spillover during the process; but I don't know how much of an impact there will be, for how long it will last (comment at paragraph 12.3 that the work will be phased over 20 years makes me fear the worst) or if my sleep will be disturbed to such an extent that I will not be able to live in my flat.</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." However, there need to be stronger safeguards for residents to provide redress in case of physical damage to our property and if the impact of the work on our quality of life exceeds limits, which must be defined. My bedroom window is less than 20 metres from the boundary fence of EC1. There should be a prohibition of work by night that would disturb the sleep of residents on the boundary of the OA; failing that an obligation to provide alternative accommodation where necessary if work can only be done during night hours.</p>	<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 informed.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Safeguards to minimise damage of adjoining properties is sometimes negotiated as part of Party Wall agreements. However, this will be included as a possible impact of development in para 12.3.</p>	

						Compensation arrangements would only be negotiated once the works are underway, taking into account the duration and level of exposure to noise and vibration. However, these are beyond the control of the planning system and the scope of this SPD.
833	Candice	Beard	Environment Agency	12		Overall we are very supportive of the contents of the document. We support the Environment Key Objectives listed in Section 3 of the document and the positive Environmental Principles set for the Opportunity Area (OA) included in Section 12. Noted.
834	Candice	Beard	Environment Agency	12	Key Principle ENV5 The text accompanying this Principle highlights the issue this OA faces from flooding due to a sewer that has limited capacity to take anymore storm and sewer water. This issue is also documented in the Boroughs Strategic Flood Risk Assessment, Surface Water Management Plan and Preliminary Flood Risk Assessment. You need to decide if an issue as important as this requires a stronger worded policy that will require new developments in the OA to address this issue and reduce the flows or if you are satisfied that the flows may be maintained as existing. The impact of climate change needs to also be carefully considered as this is predicted to make the situation worse. It is considered that the requirement set out in this Principle is a Borough requirement rather than an Environment Agency requirement. We might be able to provide advice and guidance, with Thames Waters help, on the design, capacity, size and construction of the proposed stormwater and sewer network but you should lead on this as you are the determining authorities for any planning applications. This needs to be made clear in the Principle. We recommend you add a sentence to the Principle or the text below it advising that the flows enter the sewer network through gravity drainage and not through pumping, which is an unsustainable method and could lead to flooding if the pumps failed.	Key Principle ENV5 Change proposed. Key Principle ENV5 makes provision for reducing flows. However, the boroughs consider that requirements to match existing flows are reasonable, as existing flows are predominantly related to the use of the site being an exhibition centre. Key Principle ENV5, 12.32 and 12.33 will be revised to take account of climate change and ensure that if sewer and surface water is directed to the Counters Creek, gravity based systems will be prioritised and any pump systems must be well maintained and sustainable. Key Principle ENV5 will also be revised to require developers to consult with TW and EA.
835	Candice	Beard	Environment Agency	12	Key Principle ENV9 We support the aim to reduce the amount of surface water run-off that enters the system and for it to be attenuated on site. Key Principle ENV9 Sustainable Urban Drainage Systems (SUDS) covers this.	Noted.
836	Candice	Beard	Environment Agency	12	Key Principle ENV6 Key Principle ENV 6 Flood Risk Assessment, Mitigation and Adaptation There is no definition in the text for this Principle on what classifies as a 'major' application. The requirement for a FRA needs to be in line with guidance in PPS25 and our Flood Risk Standing Advice http://www.environment-agency.gov.uk/research/planning/82584.aspx This will include more than just 'major' planning applications. The Principle needs to be amended to reflect this.	Change proposed. Key Principle ENV6 and para 12.35 will be revised to clarify that Flood Risk Assessments will be required in accordance with PPS25.
837	Candice	Beard	Environment Agency	12	Key Principle ENV9 Key Principle ENV9 Sustainable Urban Drainage Systems (SUDS)	Change proposed.

					ENV9	<p>The wording of this Principle needs rearranging slightly. It could be reworded to 'Development in the OA should aim to reduce the volume of the undeveloped site's surface water run-off at peak times to Greenfield run-off rates or better. Where possible developments should aim to achieve 100% attenuation or at the very least 50% attenuation on site, ensuring that surface water run-off is managed as close to its source as possible. SUDS must be incorporated into the design of buildings and public realm.'</p> <p>The Principle should aim for the highest standard first and then state what would be acceptable at the very least. If you felt that 50% attenuation still was not high enough then you can recommend a higher percentage. This Principle is particularly important in helping achieve Principle ENV 5 because by maximising the use of SUDS on site, the rate of surface water entering the near capacity stormwater and sewer system will be reduced.</p>	Key Principle ENV9 will be revised as suggested.
984	Cllr Linda Wade			12	Para 12.3	<p>Demolition, Excavation and Construction Impacts</p> <p>12.3 Given the size and shape of the OA – together with the nature of existing buildings and railway infrastructure – demolition, excavation and construction are likely to be phased over a 20-year period. The impact of these activities, together with associated transport, on existing and new residents will have to be mitigated. These impacts might include:</p> <ul style="list-style-type: none"> • Construction traffic, including noise, vibration, emissions, loss of amenity, highway safety, congestion, parking and pedestrian safety; - Light spill; - Damage to heritage and archaeological assets; - Ground movement; - Disturbance of unexploded ordnance; - Creation and exposure of contaminated land leading to pollution of land, air and water; - Generation of waste; - Dust and other emissions affecting air quality; - Energy consumption; - Noise and vibration; and - Impacts on ecology - Wear and tear to the adjacent buildings and dust to the interiors 	<p>Change proposed.</p> <p>Para 12.3 will be revised to include consideration of damage to neighbouring structures. However, dust is already listed in this para.</p>
985	Cllr Linda Wade			12		<p>This section needs to be more robust, and stipulate safeguards for all residents within the area in particular: Eardley Crescent, Philbeach Gardens, Kensington Mansions, Warwick Road, Kensington Mansions, Trebovir Road, Nevern Mansions, Warwick Road and Nevern Square, Langham Mansions, Earl's Court Square and Wetherby Mansions, Earl's Court Square. There needs to be detailed outline of what these safeguards are, and</p>	<p>Change proposed.</p> <p>The Key Objective will be revised to strengthen protection for surrounding population.</p>

					that the most affected residents are consulted.	
986	Cllr Linda Wade	Wade	12		<p>This is not only a complex site but there are also long-term residents who will have to endure night-time working for prolonged periods of time for the course of 10 years. It is essential that as much work as possible is completed off-site, and that measures which might include double-glazing, dust guards, air conditioning units or other minimising devices are undertaken for the protection of residents in Philbeach Gardens and Eardley Crescent (Phases 2, 4 and 4b). The developer should not be allowed to close off lanes due to loading, cranes etc. Allowance needs to be made for this on-site and off-road.</p>	<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 informed.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Compensation arrangements would only be negotiated once the works are underway, taking into account the duration and level of exposure to noise and vibration. However, these are beyond the control of the planning system and the scope of this SPD.</p>
987	Cllr Linda Wade	Wade	12		<p>Also, it is essential that within the Planning Application, funding should be provided (S106 Agreement) by the developer for a dedicated 24/7 Environmental Health Noise and Nuisance team to support residents and liaise with the developer's construction crews. In this report there are decibel levels for day-time working but no indication of what would be acceptable to residents during night-time working, which should be lower than what would be considered acceptable during the day. These should be included in the next draft.</p>	<p>No change necessary.</p> <p>Requirements to fund additional Environmental Health Officers will be considered on a case by case basis and subject to negotiation as part of the planning application.</p>
988	Cllr Linda Wade	Wade	12		<p>There is some degree of protection for properties eligible for a party wall agreement, but given the existing history of vibration issues in Nevern, Kensington and Wetherby Mansions from rhythmic motion from the Earl's Court Exhibition Centre, there needs to be a survey of these properties to ensure that there is a baseline for determining any structural changes in these buildings also indemnities for damage caused by construction to other buildings in the area.</p>	<p>No change necessary.</p> <p>Precautionary surveys are sometimes negotiated as part of Party Wall agreements. However these are beyond the control of the planning system.</p>
989	Cllr Linda Wade	Wade	12		<p>Flood Risk and Sustainable Water Management</p> <p>Residents have expressed concern over RBKC's apparent refusal to update the Core Strategy to include the 2009 flooding from Counter's Creek of basement properties, so there is a lack of</p>	<p>No change necessary.</p> <p>Para 12.32 acknowledges the potential of the Counters Creek to cause flooding</p>

						belief about impact assessments on Counter's creek flooding.	and mentions the flooding that occurred in 2007. However, the SPD does not need to specify all occurrences of flooding as Key Principle ENV6 requires flood risk assessments to assess all potential risks of flooding. Key Principle ENV5 requires development to match or reduce the amount of water entering the sewer network and Key Principle ENV9 requires SUDs which reduces or slows the amount of surface water entering the storm water network.
990	Cllr Linda	Wade		12	Para 12.24	12.24 'Surface water historically drained into the Counter's Creek, located in the general area of the existing railway corridor. Counter's Creek was then moved to become a combined sewer located under Warwick Road. Given the substantial level changes across the site, surface water at EC1 and EC2 drains eastwards into the Counter's Creek sewer. All other former surface drainage ditches are located in sewers, predominantly flowing westwards across the site towards North End Road.'	No change necessary. Counters Creek does not have an apostrophe as it's not a possessive noun.
991	Cllr Linda	Wade		12	Para 12.25	12.25 Sewerage infrastructure within the area is largely Victorian and contained within a combined storm water and foul water sewer system. The Counters Creek sewer is the most significant combined sewer in the area, serving an area as far north (upstream) as Brent and Camden. In addition to this, an integrated network of sewers and combined sewers traverse the OA. There are issues related to the capacity of this combined sewer in severe storms, which affect properties north of Counter's Creek.	Change proposed. Para 12.25 will be revised as suggested. However, this will need to be clear that the sewer has the potential to affect properties in the area of the sewer. Para 12.35 will also be revised to require that the FRA considers the impact of floodrisk on the surrounding area including upstream of sewer infrastructure.
992	Cllr Linda	Wade		12		What is the position and attribution of costs for any works undertaken on the site, and what safeguards are in place to protect, and potentially improve, the delivery of water, water pressure, sewerage and drain-away in the surrounding areas?	No change necessary. The developer is financially responsible for delivering the infrastructure on site. The developers would then discuss with Thames Water whether the infrastructure would be transferred to them or managed by the developers. This, together with ongoing maintenance and service delivery, is beyond the control of the planning system. Key Principle ENV8 seeks to limit water use to 105 litres person per day. Key Principle ENV9 requires sustainable urban drainage throughout the OA, which will reduce and slow the amount of surface water entering the combined sewer network. However, the planning system cannot control water pressure.
993	Cllr Linda	Wade		12	Para 12.27	12.27 A joint Strategic Flood Risk Assessment (SFRA) was carried out for RBKC and LBHF in June 2010. The SFRA identifies that the majority of the OA in LBHF is located within Flood Zone 3, as defined by the Environment Agency. The area identified as Flood Zone 3 has a high probability of annual flooding of 0.5%, or 1 in 200 years. Has the existing flooding caused by Counter's Creek been considered in this analysis?	Change proposed. Yes, this is mentioned in chapter 6 of the SFRA. However, the date of RBKC's SFRA will be corrected in the SPD.
994	Cllr Linda	Wade		12	Para 12.32	12.32 'The combined sewer network (owned and operated by Thames Water) and in particular the Counter's Creek sewer, poses the greatest risk of flooding in the OA. This is mainly due to the vast catchment area and the limited capacity of the sewer, which has the potential to back up during extreme rainfall events. This has occurred on several occasions, most recently in July 2007, when several properties along Counter's Creek in LBHF and RBKC reported localised flooding.'	Change proposed. 'S' added to Counters Creek. However, Counters Creek does not have an apostrophe as it's not a possessive noun.
995	Cllr Linda	Wade		12	Para 12.33	12.33 'Thames Water is preparing a bid to Ofwat for funding of the Counter's Creek Sewer Alleviation Scheme, which will increase the capacity of the Counter's Creek sewer. Subject to securing	No change necessary.

						<p>funding from Ofwat and any necessary planning permissions and consents, construction could commence in 2014 with completion likely in 2018. However, the scheme is not yet confirmed. Regardless of the outcome, development must still meet the principles set out above. Thames Water is working with the developer to assess the impact of the development on surface water and foul water drainage.'</p>	Counters Creek is the correct spelling, as it's not a possessive noun.
996	Cllr Linda	Wade		12	Para 12.34	<p>12.34 'In accordance with the Government's Planning Policy Statement 25, RBKC and LBHF have both produced 'Sequential Tests', which seek to prioritise development in Flood Zone 1, then Flood Zone 2 and lastly Flood Zone 3. As 60% of LBHF lies within Flood Zones 2 & 3, LBHF's Core Strategy (2011) states that it would be unreasonable to restrict development to the remaining 40%. Development proposals within the RBKC portion of the OA will need to have regard to findings and recommendations contained within the Council's Sequential Test for the Earl's Court Strategic Site allocation, June 2009.'</p>	<p>Change proposed.</p> <p>Will use % instead of percent.</p>
997	Cllr Linda	Wade		12		<p>Given the pre-existing problems due to flooding caused by Counter's Creek, it is not indicated whether this has been included in this assessment, nor whether this includes the existing problem of low water pressure. It should be mandatory that the funding and planning were to have been approved before the start of the project.</p>	<p>No change necessary.</p> <p>Para 12.35 requires site specific floodrisk assessments, which will need to consider all potential sources of flooding including flooding to the combined sewer. However, water pressure is not considered as a source of flood risk and therefore does not need to be included in the floodrisk assessment.</p>
998	Cllr Linda	Wade		12	Para 12.35	<p>12.35 'As the majority of the OA is located with Flood Zone 3 and the site is larger than 1-hectare a site specific FRA is required. The FRA must identify all potential sources of flood risk within the OA, including the impacts of climate change, and consider approaches to mitigate any risks identified. The Environment Agency and Thames Water must be consulted on the FRA, and their comments will be taken into account when determining planning applications. Furthermore, as much of the OA is located within Flood Risk Zone 3 and contains land uses classified as "more vulnerable" an exception test is required as part of the planning application.'</p> <p>Where are the projections of probable outcomes and impacts of flooding, and will the fact that ground that was previously unbuilt on, therefore providing drain away, and will be built on increase the potential area for flooding?</p>	<p>No change necessary.</p> <p>The outcomes and impacts of flooding will be identified through the site specific FRA required in accordance with Key Principle ENV6. Key Principle ENV9 requires sustainable urban drainage throughout the OA, which will reduce and slow the amount of surface water entering the combined sewer network.</p>
999	Cllr Linda	Wade		12	Para 12.62	<p>Land Contamination and Remediation</p> <p>12.62 'A rich history of industrial land uses and practices has resulted in the potential contamination of land within the OA. These land uses include a former coal and goods depot, railway sidings, a brewery, laundries, an in-filled canal and some works and factories that included chemical and fuel storage. Adjacent to the OA, potentially contaminative uses include a former brickfield (in-filled with unknown material), a rifle range and a hospital. Current potentially contaminative uses include the TfL depot, laundries, dry cleaners and a mannequin manufacturer. Nearby off-site potential sources include a petrol station.'</p>	<p>Change proposed.</p> <p>In-filled will be revised to include a hyphen,</p>
1000	Cllr Linda	Wade		12	Para 12.63	<p>12.63 'The portion of the OA within LBHF and some parts within RBKC are therefore identified as potentially contaminated (under Part IIA of the Environmental Protection Act 1990) due to the probable risks associated with the past and present uses of the</p>	No change necessary.

					site.'	This comment seems to repeat 12.63.
1001	Cllr Linda Wade		12	Para 12.64	12.64 'Land within the OA must be suitable for use prior to development and all potential contamination must be identified, assessed and remediation must be implemented. Remediation should be sustainable and not adversely impact the environment.'	No change necessary. This comment seems to repeat 12.64.
1002	Cllr Linda Wade		12		What are the procedures for the removal of the contaminated waste, including the debris from the Exhibition Centres, which might contain Asbestos? Could these be removed by train rather than using lorries?	No change necessary. Key Principle ENV1 already states that rail is the preferred option for transporting demolition and excavation waste and construction materials. The authorities anticipate that asbestos materials are likely to be present in the exhibition centre complex and therefore will be dealt with by a registered contractor. However, this is beyond the control of the planning system and therefore beyond the scope of the SPD. The enforcement of the legislation for construction site safety and handling asbestos is the responsibility of the Health and Safety Executive (HSE) although the borough's Environmental Health Departments liaise with HSE officers to ensure that the Councils fully understand the methodology being adopted, including air sampling. Information relating to asbestos can be requested from the Council's Environmental Health departments.
1003	Cllr Linda Wade		12	Para 12.75	Air Quality 12.75 'LBHF and RBKC are both designated as Air Quality Management Areas (AQMA). This designation is due to levels of nitrogen dioxide (NO2) and particulate matter (PM10) in both boroughs that breach the Government's air quality objectives. Vehicles using Talgarth Road/West Cromwell Road (A4), Warwick Road, North End Road and Lillie Road are one of the main sources of NO2, PM10 and PM2.5 emissions affecting the OA. Buildings are also responsible for a significant amount of local emissions, especially NO2 from gas boilers. Figs. 12.6 and 12.7 show the predicted annual mean levels of PM10 and NO2 in 2008 respectively. Figure 12.8 shows the number of days per year (in 2010) that PM10 exceeded the Government's objectives.' [footnote] Figures 12.6 and 12.7 in the draft JSPD show predicted emissions in 2008, using data from http://data.london.gov.uk/laei-2008 . In terms of real time emissions, there are six monitoring stations in RBKC, of which one (at about 312 Earl's Court Road) is the closest to the OA. Information from the monitoring stations in RBKC is available to view and interrogate at http://www.londonair.org.uk/LondonAir/Default.aspx . More detailed borough-wide air quality information can be found in the RBKC Air Quality Management Progress Report 2011, available at http://www.rbkc.gov.uk/environmentandtransport/airquality/reportsanddocuments.aspx [end footnote]	Change proposed. Agree to include reference to the source of the air quality monitoring data. However, the SPD does not need to provide detailed information on monitoring of air quality, as the developers will be required to conduct more detailed air quality monitoring in accordance with para 12.16 of the SPD. The SPD will also make reference to RBKC's Air Quality Management Progress Report, which is updated annually.
1004	Cllr Linda Wade		12		The figures in the JSPD are based on 2008-based computer generated projections, and there are no actual figures for that period are included in the JSPD. This indicates that Warwick Road exceeded the current levels on 35-58 days a year. However, significantly, the junction of Cromwell Road and Warwick Road failed the standard between 81-184 days a year.	Change proposed. Figure 12.6 shows predicted concentrations of annual mean nitrogen dioxide and figure 12.7 shows both daily and annual mean concentrations of particulate

						<p>There are no representations for NO2 in 2010, and there are no representations for Earl's Court Road or the West Cromwell Road.</p>	<p>matter for 2008, which were both modelled in 2010.</p> <p>Figure 12.8 will be corrected to read: 'Predicted number of days in 2008 that PM10 exceeds the government's objectives, which are shown in a blue line'.</p> <p>Maps of hourly mean concentrations of nitrogen dioxide have not been produced as this is a more difficult parameter to predict with a reasonable level of accuracy.</p> <p>Please note that the levels are predictions and some values such as those at the junction of Cromwell Road and Warwick Road may not be representative. Also the legend applies to the whole borough and not just the map of the OA. The highest predicted level on the Cromwell Road covered within figure 12.8 for daily mean exceedences of PM10 is up to 162 days and is limited to a small area.</p> <p>All figures will be revised to include Earls Court Road.</p>
1005	Cllr Linda Wade		12			<p>Despite, the strategies in place to minimise the pollution within the site, this site will contribute to an overall rise in the existing pollution in the area, which is already above the Mayor's Guidelines. This combined with the projected increase in traffic is unsustainable for the surrounding area for the site. The Air Quality has to be assessed over a wider area than just the OA. There needs to be day-to-day on-site monitoring of Air Quality throughout the entire progress of any works. This is in part due to the first 5-10 years of construction; goods traffic to and from the site and dust, and it is not anticipated that 'cleaner' cars will be universally used until the second decade of the project.</p>	<p>No change necessary.</p> <p>In accordance with the London Plan, 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.</p> <p>Key Principle ENV3 states that Construction Management Plans (CEMPs) will be required. Para 12.15 states that the CEMP must include measures to prevent and control dust and other emissions to air. Para 12.16 of the revised draft SPD states that CEMPs will need to identify measures to control and monitor air pollution caused during construction and demolition.</p>
1006	Cllr Linda Wade		12	Para 12.84		<p>Noise and Vibration</p> <p>12.84 'The main sources of noise and vibration in the OA are from road traffic, London Underground trains, West London Line trains (including freight trains) and aircraft on the Heathrow flight paths. The use of the TfL Lillie Road Depot for emergency track repairs and events at the Exhibition Centres also causes noise and vibration although these two sources of noise will be discontinued with redevelopment of the OA.'</p>	<p>No change necessary.</p> <p>This comment repeats para 12.84</p>
1007	Cllr Linda Wade		12			<p>Adjacent properties in Philbeach Gardens experience high levels of vibration from the Olympia bound tube and freight trains, to the extent that house 'shake'. It should be anticipated that there will be some vibration during the course of the demolition and construction phases on the raft over the railways lines, and consideration of possible damage to houses in Philbeach Gardens, Kensington Mansions, Warwick and Trebovir Roads, Nevern Mansions, Warwick Road and Nevern Square, and Wetherby Mansions, Earl's Court Square.</p>	<p>Change proposed.</p> <p>The development cannot be expected to resolve existing problems which are not a result of that development.</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> <p>The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>
1008	Cllr Linda Wade		12		<p>A condition or reference should be included that if any development were to proceed that there would be a dedicated team of Environmental Health Noise and Nuisance officers for the duration of the works, funded by the developer, to deal with the day-to-day problems that might arise. A pre-development survey needs to be undertaken via an external party prior to the works and post the works with all costs being borne by the developer</p>	<p>No change necessary.</p> <p>Requirements to fund additional Environmental Health Officers will be considered on a case by case basis and subject to negotiation as part of the planning application.</p> <p>Precautionary surveys are sometimes negotiated as part of Party Wall agreements. However these are beyond the control of the planning system.</p>
1009	Cllr Linda Wade		12	Para 12.100	<p>Ecology and Biodiversity</p> <p>12.100 'Ecology and biodiversity within the OA is predominantly found in a semi-natural green corridor running along the West London Line. There are two Sites of Nature Conservation Importance (SNCI) within this corridor (both Borough Grade I), and a further 12 SNCI's within 1km of the OA (all Local). The 'Earl's Court and West Kensington OA - Ecological Aspirations report', which supports this JSPD, sets out details on the ecological value of these SNCIs, including details of species found within 1km of the OA.'</p>	<p>No change necessary.</p> <p>This comment repeats para 12.100</p>
1010	Cllr Linda Wade		12		<p>The Brompton Cemetery and the 'Wetlands' site along side the western West Brompton platform should be preserved, not over shadowed and the 'Wetland' has a programme of maintenance.</p>	<p>Change proposed.</p> <p>Key Principle ENV18 requires development to protect and enhance ecology and biodiversity within the OA. This already requires the protection and enhancement of the SNCI adjacent to West Brompton Station, but will be revised to take into account of SNCIs adjacent to the OA. Issues to do with overshadowing and financial contributions to maintain the areas are already contained within this principle. Although specific impacts will be considered as part of the planning application process.</p>
1012	Cllr Linda Wade		12		<p>There should be the provision from the developer to fund</p>	<p>Change proposed.</p>

					<p>Environmental Health officers to deal with Noise, Nuisance, plus systemic rodent baiting for the surrounding areas on demolition and construction. That there should be the provision for day-to-day monitoring of the site with data provided to the local Authorities at the same time as the developer. It will also be of importance to alert the local doctors so that any increase of asthma or other respiratory diseases can be monitored.</p>	<p>Requirements to fund additional Environmental Health Officers will be considered on a case by case basis and subject to negotiation as part of the planning application.</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> <p>The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Consideration of vermin and warning doctors of the development is beyond the scope of this SPD.</p>
1013	Cllr Linda Wade			12	<p>From the experience of residents in Kensington Mansions, we have to learn the lessons of the impact on residents of night-time working. That project over the station was for a couple of months but this is for a considerably longer period. Given the projected 10-year period of any construction work alongside existing homes, there must be a strategy in place to protect residents from the intrusive impact of construction, particularly of night-time construction: dust panels, enclosure of demolition area, enclosure of works on site, double-glazing and air conditioning for properties that will back onto the site, the provision for re-location during extensive periods in suitable accommodation, this should be regarded as a final option as this would prove to be extremely disruptive for residents. The quality of the alternative accommodation should be appropriate. Also there needs to be consideration for sellers of their properties, whose properties values will be adversely affected by the construction on site.</p>	<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>

						<p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Compensation arrangements would only be negotiated once the works are underway, taking into account the duration and level of exposure to noise and vibration.</p> <p>The impact of development of neighbouring house prices is not a material planning consideration and therefore beyond the control of the planning system.</p>
1046	Mary	Gardiner	Kensington and Chelsea Social Council	12	<p>Related to this, there is a problem now of children's asthma created by very poor air quality and lack of green space and we are concerned at how extra road traffic will impact on children's health.</p>	<p>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.</p>
1055	Caroline	Pidgeon	Liberal Democrat London Assembly Group.	12	<p>Air quality</p> <p>As you are no doubt aware the current breaching of air quality limits has serious public health implications and further action must be taken to tackle air pollution. Recent research shows that poor air quality in London contributes to over 4200 premature deaths per year in London, and adversely affects the health of many thousands more with chronic health conditions such as asthma.</p> <p>In light of this the developers must be required to provide detailed plans that explain how they will minimise the development's impact on air quality. We recommend the developers invest in measuring air quality. Alongside this they should also be required to produce comprehensive plans that demonstrate that the development will not further damage air quality in the area.</p>	<p>No change necessary.</p> <p>In accordance with the London Plan, 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.</p> <p>Key Principle ENV3 states that Construction Management Plans (CEMPs) will be required. Para 12.15 states that the CEMP must include measures to prevent and control dust and other emissions to air. Para 12.16 of the revised draft SPD states that CEMPs will need to identify measures to control and monitor air pollution caused during construction and demolition.</p>
1138	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	12	<p>Para 12.17</p> <p>- 12.17: If works are required to be carried out at night or during anti-social hours, the SPD should require measures to ensure the work is done as quickly as possible to minimise the impact on residential amenity. There should be at least 1 night a week without work so residents can sleep without interruption and</p>	<p>Change proposed.</p> <p>The Key Objective in the Environment Strategy requires development to</p>

						<p>technology should be used to speed up construction (eg use of pre-cast concrete which is then bolted together on site etc) so as to reduce the need for night time/anti social hours construction work.</p>	<p>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 informed.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Requirements not to work for 1 day a week is too detailed for inclusion in the SPD, but subject to negotiation once the works are ongoing.</p>
1139	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	12	ENV16	<p>- ENV16: The group were concerned that with the increase in population and traffic air quality would be worsened and whether the requirement for 'air quality neutral' was reasonable? RBKC did not support the Mayor of London's Air Quality Strategy, yet is proposing it here.</p>	<p>No change necessary.</p> <p>In accordance with the London Plan, 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. This takes into account air pollution from traffic and heating. The exact details of air pollution and mitigation measures will be considered as part of the planning application, which is determined against the Development Plan and other material planning considerations, such as this SPD.</p>
1140	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	12	Para 12.27	<p>- 12.27: Please explain what a 'medium probability of annual flooding' is, using the same description (ie 1 in 200) as per high probability.</p>	<p>Change proposed.</p> <p>The definitions of each flood zone from PPS25 will be included in this para.</p>
1141	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	12	Para 12.37	<p>- 12.37: It is not clear how water consumption will be monitored.</p>	<p>No change necessary.</p> <p>For the purposes of planning, water consumption is modelled taking into account the new population, the water efficiency of appliances and any water recycling measures. To get the required environmental standard, the development will</p>

							need to be constructed to meet the required water consumption rates.
1142	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	12	Para 12.57	- 12.57: Any centralised facility located on the periphery of the OA should not be to the detriment of existing residential housing.	Change proposed. Para 12.57 will be revised to ensure that any waste management facility does not impact on residential amenity.
1143	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	12	Para 12.98	- 12.98: Need to define 'noise sensitive' uses and at the end of the sentence add "especially residential premises".	Change proposed. Examples of noise sensitive uses will be provided.
1144	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	12		- Add a provision to require "community kitchen gardens" plots for growing vegetables, etc.	No change necessary. Key Principle UF11 already makes provision for 'community gardening' to be provided in new public open space.
1190	Ilse	Molino		12		Air quality in our area is already one of the worst in London and many elderly people already suffer with breathing problems, and not many have the luxury to choose where to live and move out.	No change necessary. In accordance with the London Plan, 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.
1197	David	Trodden		12		1) Air quality. Warwick Road already has poor air quality and the area has a high rate of asthmatic children and adults. Air quality is at its worst when traffic slows down. The increase in traffic to Warwick Rd and the opportunity area will further damage air quality. This impacts on the rights of a child to a healthy life under the law.	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 changing, implementing 20mph zones and encouraging walking and cycling.
						3) Disturbance during both demolition and building. Noise and pollution (day or night) breach adults and childrens' rights to a healthy life and a good night's sleep under the European convention on human rights. CAPCO could be challenged in the courts for this (and air quality as above). Residents forced to vacate their properties will be entitled to compensation for the upheaval caused and this will impact severely on quality of life. Many residents already experience underground noise and vibration at disturbing levels. It is totally unacceptable that more noise/vibration is added to this.	Change proposed. 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. 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
1200	David	Trodden		12		Very strict controls are needed as the site is adjacent to one of the	

					highest density areas in London, namely Philbeach Gardens, Eardley Crescent, etc.	<p>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 informed. Para 12.80 requires a Low Emission Strategy with consideration for health impacts.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Compensation arrangements would only be negotiated once the works are underway, taking into account the duration and level of exposure to noise and vibration.</p>
1207	Carmelle	Bell	Thames Water Utilities Ltd	12	<p><u>Key Principle ENV5</u></p> <p>Within our previous comments we highlighted that it is the peak flows into the sewer which are of particular concern. In order to make this key principle more robust it is considered that the wording should be revised to read as follows:</p> <p><i>"Development in the OA will need to ensure that the peak flows will either be matched or reduced in comparison to the existing peak flows. Developers ment proposals must consult with and meet the requirements of Thames Water and the Environment Agency on the design, capacity, size and construction of the proposed stormwater and sewer network."</i> [end italics]</p>	<p>Change proposed.</p> <p>Propose change as suggested. Although Key Principle ENV5 will need to point out that peak flows will relate to combined sewers.</p>
1208	Carmelle	Bell	Thames Water Utilities Ltd	12	<p>Paragraph 12.33</p> <p>This text has been partially revised to take into account our previous comments. However, the text now refers to the <i>"Counters Creek Sewer Alleviation Scheme which will increase the capacity of the Counters Creek sewer"</i>. This text provides the impression that the Counters Creek Sewer Flood Alleviation Scheme would consist of upsizing of the Counters Creek sewer itself. Modelling and optioneering work is currently</p>	<p>Change proposed.</p> <p>Propose change as suggested</p>

					<p>being undertaken to inform a submission to Ofwat to obtain funding for the scheme and it is likely that the scheme will result in works that will provide additional capacity within the sewerage network as a whole rather than specifically within the Counters Creek sewer. Consequently it is suggested that the wording is altered to read as follows:</p> <p>[italics] "Thames Water is preparing a bid to Ofwat for funding for the Counters Creek Sewer Flood Alleviation Scheme which will increase the capacity of the sewerage network. Subject to securing funding from Ofwat and any necessary planning permissions and consents, construction could commence in 2014 with completion likely in 2018..." [end italics]</p>	
1209	Carmelle	Bell	Thames Water Utilities Ltd	12	<p>Paragraph 12.35</p> <p>Under Section 12.35 it is stated that Thames Water must be consulted on the FRA and their comments will be taken into account when determining planning applications. Given the scale of the developments we would expect to be consulted on any planning applications for development within the opportunity area. We will look for support from the Local Planning Authorities to ensure that any necessary water and wastewater infrastructure is provided ahead of the occupation of development. Where necessary this could include the use of Grampian conditions.</p>	<p>Change proposed.</p> <p>Propose change to require that Thames Water is consulted on planning applications. The use of conditions will be considered as part of the determination on the planning application as this is dependent on the specific details of the proposal.</p>
1216	Amy	Jones	Spem Hill Developments	12	<p>[bold] Current Representations [end bold]</p> <p>As a neighbour to the Opportunity Area our clients also support the principles of proposed Policy ENV1 which seeks to ensure that excavated waste and construction materials are treated and reused on site and also notes rail as the preferred method of transportation. We also support the proposed policy TRN26 which seeks to minimise the impact of freight including during construction.</p>	<p>Noted.</p>
1217	Amy	Jones	Spem Hill Developments	12	<p>[bold] Current Representations [end bold]</p> <p>In addition we also support the requirement under Policy ENV2 for construction, excavation and demolition logistics plans to be prepared for each phase of development. However we have concerns regarding the environmental receptors that may be effected by the nature of construction traffic. Policy ENV2 only states a requirement for highway safety and impact to existing residents to be assessed, we recommend that other factors are included such as air quality, noise and vibration and also amenity for residents, businesses and community facilities.</p> <p>[bold] PPG13 [end bold] notes that air quality is a key consideration in the integration of planning and transport, equally it is noted that the needs and safety of the community should be considered. In addition [bold] PPS23 [end bold] states that air quality and any impacts arising from development which could possibly have an impact to human health is capable of being a</p>	<p>Change proposed.</p> <p>In accordance with the London Plan, 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.</p> <p>Propose change to Key Principle ENV2 to include reference to air quality, noise and vibration and impacts on new and existing population.</p>

						material planning consideration.	
1218	Amy	Jones	Spen Hill Developments	12	Key Principle ENV2	<p>[bold] Current Representations [end bold]</p> <p>Considerable progress has been made on the application at 100 West Cromwell Road which is scheduled to be determined in early 2012, we therefore consider that any assessment of potential impacts from construction routes should include the proposed scheme at 100 West Cromwell Road (Ref: PP/11/00107) as a committed development and consider all future occupiers of the scheme, air quality and noise and vibration.</p> <p>On the basis of the above concerns we [bold underline] object [bold underline] to the current consultation version of the SPD and request that Policy [bold] ENV2 be amended to include reference to air quality, noise and vibration and also amenity for residents, businesses and community facilities. Our suggested wording for the Policy is below:</p> <p>[italics] "Construction, demolition and excavation logistics plans must be prepared for every phase of construction and demolition. Access points into the site must be assessed in terms of highway safety, [bold] impacts to air quality, noise and vibration and also amenity for residents, businesses and community facilities." [end bold] [end italics]</p>	<p>Change proposed.</p> <p>Propose change to Key Principle ENV2 to include reference to air quality, noise and vibration and impacts on new and existing population.</p>
1222	Amy	Jones	Spen Hill Developments	12		<p>[bold] Conclusions [end bold]</p> <p>We do still however have concerns regarding the potential development and use of the relief road in relation to development of the site. We request the wording of proposed Policy [bold] ENV2 [end bold] be widened to ensure a robust set of criteria are assessed including air quality, noise and vibration and also amenity for residents, businesses and community facilities. Until these changes are made and included as Policy we [bold underline] object [end bold underline] to Policy [bold] ENV2 [end bold] of the SPD.</p>	<p>Change proposed.</p> <p>Propose change to Key Principle ENV2 to include reference to air quality, noise and vibration and impacts on new and existing population.</p>
1235	Hilary	Mackay		12	Key Principle ENV1	<p>Key Principal ENV1</p> <p>Recycling and reuse is mentioned. I am interested in whether this can be pushed to encourage as much recycling of materials in the OA as possible. EC2 is a comparatively new building with potential to offer materials in near new condition, while EC1 could be used as a source of materials eg bricks. Agree to encourage use of rail for delivery and removal of materials - makes obvious sense to reduce congestion and dust spread.</p>	<p>Change proposed.</p> <p>Propose change to Key Principle ENV1 to require demolition and excavation waste to be treated, recycled and reused on site as much as possible.</p>
1236	Hilary	Mackay		12	Key Principle ENV2, Key Principle ENV11	<p>Key Principal ENV2/11</p> <p>Agree principal of exploring borehole and gravity rainwater harvesting. Can excess water usefully be collected as source water for fire engines/street cleaning equipment? Is provision of biogas units for extracting energy from solid waste viable over time? Aerators and low flow water may encourage installation of individual pumps to raise flow and pressure.</p> <p>A waste facility may encourage better individual waste minimisation, recycling maximisation if it is accessible to residents</p>	<p>No change necessary.</p> <p>The SPD does not preclude excess water being used for fire engines or street cleaning. However, these functions require significant water pressure, where the SPD states a preference for gravity fed rainwater systems.</p> <p>Para 12.57 states that energy from waste should be explored and where</p>

						and has an element of freecycle thinking to it.	appropriate incorporated. Aerators and low flow water does not necessarily result in low pressure, but water conservation as required in Key Principle ENV8 should result in more efficient use of water. The SPD cannot control measures installed once residential units are occupied. The SPD makes provision for space for storage and recycling of bulky waste, which could be used for a 'free cycle' type of scheme.
1237	Hilary	Mackay		12	Key Principle ENV9	Good execution of green roofs which do not leak would be admirable.	Change proposed. Propose change to para 12.44 to ensure well maintained green / brown roofs.
1238	Hilary	Mackay		12	Key Principle ENV16	I see this as a crucial point - levels of air pollution on the highlighted main streets seriously deter walking and cycling on these streets never mind cluttering of street furniture or street widths. Overall levels need to be reduced for local health and for the unpleasant smell of traffic pollution.	No change necessary. Para 12.75 identifies vehicles using the surrounding roads as one of the main sources of air pollution in the area. In accordance with the London Plan, 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, including several transport based measures. 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. Several Key Principles (TRN3 to TRN9) in the Transport Strategy require improvements to encourage walking and cycling.
1252	Jenny	Montefiore		12		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. Since we are meant to be reducing carbon emissions and are all being taxed accordingly what justification is there for any increase in traffic.	No change necessary. Para 12.75 identify vehicles using the surrounding roads as one of the main sources of air pollution in the area. In accordance with the London Plan, 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, including several transport based measures. 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.
1305	Geraldine	Winkler	Mrs Fay Winkler	12		Finally, I am concerned about the impact of the extensive building programme required on the area. There will be a substantial increase in noise.	Change proposed. 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

						<p>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> <p>The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>
1318	Linda	Wade	Nevern Square Conservation Residents' Association	12	Demolition, Excavation and Construction Impacts	<p>The length of the construction period will, in many residents' opinions, reduce the value of their properties. Prolonged periods of night-time working are also considered to be detrimental to the quality of residents' lives. Not being able to leave a window open during the summer months due to dust, dirt, additional pollution and noise has been raised by some residents as being unreasonable as the noise and vibration will extend along the track lines affecting a wider area than just the limited area of the JSPD.</p> <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> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>

							The impact of development of neighbouring house prices is not a material planning consideration and therefore beyond the control of the planning system.
1338	Linda	Wade	Nevern Square Conservation Residents' Association	12		Without a comprehensive water management plan in place, any application should be rejected.	<p>No change necessary.</p> <p>Key Principle ENV6 requires Flood Risk Assessments in accordance with Planning Policy Statement 25. Key Principle ENV8 seeks to limit water consumption to 105 litres per person per day. The calculations for achieving this requirement will be set out in the Code for Sustainable Homes Assessment, required in accordance with Key Principle ENE4.</p>
1339	Linda	Wade	Nevern Square Conservation Residents' Association	12	Air Quality	Without plans to reduce the existing levels of pollution in the area, and at the junctions, no development should be considered. The impact of 10-20 years of demolition and construction will contribute to an increase in pollution, and have particular impact on residents in Warwick Road.	<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> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>However, Key Principles ENV 2 and ENV3 will be revised to make specific reference to consideration of air quality impacts.</p>
1340	Linda	Wade	Nevern Square Conservation Residents' Association	12	Air Quality	The illustrations were too small to read properly, and did not include Earl's Court Road.	<p>Change proposed.</p> <p>The figures will be revised to include Earl's Court Road. However, owing to the scale of the data used, the figures will not be any clearer.</p>

1341	Linda	Wade	Nevern Square Conservation Residents' Association	12	Air Quality	<p>The implications on the health of residents of pollution needs to be monitored and causes controlled.</p>	<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. Para 12.80 requires a Low Emission Strategy with consideration for health impacts.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>
1342	Linda	Wade	Nevern Square Conservation Residents' Association	12	Noise and Vibration	<p>No building site can be noise free, and given the length of time that this development will be for, this will become create problems for residents. There is concern as to what would be considered as a Statutory Nuisance for an incoming officer and the accumulated affect on the lives of residents.</p>	<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>

							<p>Key Principle ENV17 requires new development to be designed and constructed to mitigate and adequately control noise and vibration.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>
1343	Linda	Wade	Nevern Square Conservation Residents' Association	12	Noise and Vibration	The exhibition halls are built on a raft, and vibration has to be monitored throughout the course of the construction period.	<p>No change necessary.</p> <p>Key Principle ENV3 states that Construction Management Plans (CEMPs) will be required. Para 12.15 states that the CEMP must include noise monitoring proposals.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>
1344	Linda	Wade	Nevern Square Conservation Residents' Association	12	Noise and Vibration	Kensington and Nevern Mansions should be surveyed prior to any application, and an undertaking that any cost of structural damage caused by the demolition and construction should be covered by the developer.	<p>No change necessary.</p> <p>Precautionary surveys are sometimes negotiated as part of Party Wall agreements. However these are beyond the control of the planning system.</p>
1363	Dr. Ian	Sesnan	Archdeacon of Middlesex	12	Key Objective	<p>[bold] Environment - relating to Key Objective 12. [end bold]</p> <p>We welcome the attention given to the special quality of purpose and place of the Old Brompton Cemetery. However, we are still concerned this important environmental and community space may be unnecessarily compromised by over-development. Likewise the areas of nature conservation interest around the cemetery, Seagrave Road car park and railway line need protection.</p>	<p>Change proposed.</p> <p>Brompton Cemetery is not contained within the OA, but adjacent to it. UF20 requires development to preserve or enhance the character and appearance of the cemetery.</p> <p>Key Principle ENV18 requires development to protect and enhance ecology and biodiversity within the OA, but will be revised to take into account of SNCIs adjacent to the OA. Key Principle ENV18 already requires the protection and enhancement of the SNCI adjacent to West Brompton Station. Issues to do with overshadowing and financial contributions to maintenance the areas are already contained within this principle. Although specific impacts will be considered as</p>

							part of the planning application process.
1367	Eirik	Reddi	Residents of 67-70 Kensington Mansions	12	Demolition, Excavation and Construction Impacts	Our first concern is about the very real damage to the health and welfare of the residents that will result from up to five years of night time working that have been discussed. This is a catastrophic prospect and one that needs to be legally challenged. There appears to be no thought given to how miserable our lives will be made and to the very real physical and mental health issues at stake. This stands side by side with living next to a building site that will take 20 years to complete.	<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 informed. Para 12.80 requires a Low Emission Strategy with consideration for health impacts.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>
1368	Eirik	Reddi	Residents of 67-70 Kensington Mansions	12	Demolition, Excavation and Construction Impacts	Our next concern is about the physical effect of the works on the fabric of our building. Given the complexities of the structure of the site we want to know how our building will be protected, monitored and if damage does occur, who is responsible and how it will be rectified as there has been nothing mentioned in this or the previous draft.	<p>No change necessary.</p> <p>Precautionary surveys are sometimes negotiated as part of Party Wall agreements. These are beyond the control of the planning system. However, the impact to neighbouring structures will be included in the list of potential impacts in para 12.3.</p>
1391	Cllr. Charles	Williams	Redcliffe Ward	12	Demolition, Excavation and Construction Impacts	<p>[bold] Impact of Construction Work [end bold]</p> <p>We strongly support the recommendations of Cllrs. Buxton and Read, that the S106 agreement should ensure that the demolition and construction process has no unacceptable impact on residents especially during night time working.</p>	<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 informed.</p> <p>The Council will use conditions and planning obligations to control specific proposals relating to demolition, excavation and construction. However, this does not need to be explicit in the SPD as these are controlled through the Development Management process.</p>
1392	Cllr. Charles Williams	Redcliffe Ward	12	Demolition, Excavation and Construction Impacts	<p>[bold] Impact of Construction Work [end bold]</p> <p>We are concerned about the impact of construction traffic on the residents of Redcliffe Ward. All construction and demolition traffic be routed via the A4.</p>	<p>No change necessary.</p> <p>Key Principle ENV2 requires construction, demolition and excavation logistics plans to be prepared for every phase of construction and demolition, which would need to include specific details about transport logistics. Key Principle ENV3 states that Construction Management Plans (CEMPs) will be required and para 12.15 states that these need to include information on traffic and construction logistics.</p> <p>Exact details on construction transport logistics, such as requiring the use of the A4, is too detailed for the purposes of this SPD, as it depends on the timing and location of each phase.</p>
1393	Cllr. Charles Williams	Redcliffe Ward	12	Key Principle ENV1	<p>[bold] Impact of Construction Work [end bold]</p> <p>There should be no difficulty in providing a rail-connected site for handling construction waste and materials so ENV1 should be strengthened to make clear that rail is the required method for transport of bulk waste. Rail should also be used for the delivery of bulk materials for the construction of much of the new developments</p>	<p>No change necessary.</p> <p>ENV1 states that transportation of demolition and construction waste and construction materials by rail is the preferred method.</p>
1420	Paul Kennedy		12	Demolition, Excavation and Construction Impacts	<p>The works themselves will cause even more disruption than this, and there are no safeguards to ensure that the developer will keep any promises to the community. Hammersmith & Fulham Council are guilty of double-standards, complaining about the impact of the proposed super-sewer construction project in Sands End, while ignoring the far bigger impact of its own planned construction works on local residents, which will last much longer, affect a much larger area, involve more lorry journeys, cause far more congestion and pollution, and cause far more adverse impact on health.</p>	<p>Change proposed.</p> <p>LBHF's position on the proposed super sewer is beyond the scope this SPD.</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</p>

							<p>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 informed. Para 12.80 requires a Low Emission Strategy with consideration for health impacts.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>
1490	Michael	Bach	Kensington Society	12	Key Objectives	The Society [bold] strongly endorses [end bold] the Key Objectives with regard to construction, flood risk, waste generation, air pollution, noise and vibration and ecology and biodiversity and their associated Key Principles.	Noted.
1491	Michael	Bach	Kensington Society	12	ENV5	[bold] Key Principle ENV5 [end bold]: The Society is [bold] very concerned [end bold] that the total flows entering the combined sewer are [bold underlined] reduced [bold underlined]. Since the whole area is being redeveloped the aim of reducing total flows should be easily achievable. Change wording in line 3 to read: "will be reduced in comparison with existing flows".	<p>No change necessary.</p> <p>Disagree that achieving a reduction in existing flows entering the combined sewer is reasonable, as the existing flows take account of the current land uses which are likely to change considerably.</p>
1492	Michael	Bach	Kensington Society	12	ENV7	[bold] Key Principle ENV7 [end bold] The Society [bold] strongly supports [end bold] this and proposes that this be supported by an alteration to the RBKC Core Strategy to provide the policy support for this. See also Key Principle ENV9.	<p>No change necessary.</p> <p>RBKC Core Strategy Policy CE2a resists self contained basements dwellings in Flood Zone 3.</p>
1493	Michael	Bach	Kensington Society	12	ENV8	[bold] Key Principle ENV8 [end bold]: Is this sufficiently ambitious given that this is essentially a new quarter with the opportunity to adopt best practice?	<p>No change necessary.</p> <p>This Key Principle is in accordance with London Plan Policy 5.15B and RBKC Core Strategy CE1. SPDs cannot create new policy, but must supplement existing policy.</p>
1494	Michael	Bach	Kensington Society	12	ENV9	[bold] Key Principle ENV9 [end bold]: The Society [bold] strongly supports [end bold] this principle and proposes that this be promoted as an alteration to the RBKC Core Strategy.	<p>No change necessary.</p> <p>This requirement is consistent with the London Plan and RBKC Core Strategy Policy CE2e. Amendments to Core Strategy policies are beyond the scope of the consultation on the SPD.</p>
1495	Michael	Bach	Kensington Society	12	ENV16	[bold] Key Principle ENV16 [end bold]: The Society [bold] strongly supports [end bold] this principle, and proposes that it be promoted as an alteration to the RBKC Core Strategy.	<p>No change necessary.</p> <p>This requirement is consistent with the London Plan and RBKC Core Strategy Policy CE5. Amendments to Core Strategy policies are beyond the scope of the consultation on the SPD.</p>
1541	Jonathan	Choat	Orpen House Tenants' Compact	12		5. Prolonged periods of night-time working are also considered to be detrimental to the quality of residents' lives. Not being able to leave a window open during the summer months due to dust, dirt, additional pollution and noise is unreasonable as the noise and vibration will extend along the tube track lines affecting a wider area than just the limited area of the JSPD. This will have a	<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</p>

					direct effect on Trebovir Road properties.	<p>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> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p>
1554	Jonathan	Choat	Orpen House Tenants' Compact	12	18. Water, Water Pressure, Surface Flooding ; There is no proposed comprehensive water management plan and without this , any application should be rejected.	<p>No change necessary.</p> <p>Key Principle ENV6 requires site specific Flood Risk Assessments in accordance with Planning Policy Statement 25. Key Principle ENV8 seeks to limit water consumption to 105 litres per person per day. The calculations for achieving this requirement will be set out in the Code for Sustainable Homes Assessment, required in accordance with Key Principle ENE4.</p>
1555	Jonathan	Choat	Orpen House Tenants' Compact	12	19. Air Quality, Noise and Vibration; There are no plans put forward by the developer to reduce the existing levels of pollution in the area generally and at major intersections of roads . The impact of 10-20 years of demolition and construction will contribute to an increase in pollution, and have particular impact on residents in Warwick Road , Lillie Road and Earl's Court Road and the surrounding streets. The building site will be noisy inevitably and given the length of time that this development will cover of 10/12 years , this will become create substantial problems for residents in the immediate vicinity . The RBKC should be prepared to invoke penalties against Statutory Nuisance by the developer without delays and obfuscation particularly as the exhibition halls are built on a raft and vibration has to be monitored throughout the course of the construction period. Kensington and Nevern Mansions should be surveyed prior to any application, and an undertaking that any cost of structural damage caused by the demolition and construction should be covered by the developer.	<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>

							<p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Precautionary surveys and compensation arrangements are sometimes negotiated as part of Party Wall agreements. These are beyond the control of the planning system. However, the impact to neighbouring structures will be included in the list of potential impacts in para 12.3.</p>
1607	Claire	Craig	English Heritage	12	Para 12.15	<p>In addition, English Heritage:</p> <p>- Welcomes paragraph 12.15 concerning the inclusion of heritage asset protection and procedures in respect of archaeological sites in Construction Environmental Management Plans. We consider, however, that this is another area that could be more plan-led if there was recognition of any known archaeological potential. This again highlights the absence of baseline information in the SA concerning archaeological priority areas.</p>	<p>Change proposed.</p> <p>A new para will be included after para 12.16 to highlight the archaeological potential. The SA will also be revised to include information on archaeological priority areas.</p>
1612	John	Drake	Campaign to Protect Rural England	12		<p>(D) Sustainability should be the key for this scheme. This can be defined as "making the smallest carbon footprint on the site and surroundings; from site demolition, site preparations, construction, including methods of construction used, the building in use, its subsequent demolition and disposal of demolition material in a sustainable manner". Ideally the development would be carbon neutral.</p>	<p>No change necessary.</p> <p>The SPD must supplement existing policy and therefore must be consistent with the environmental standards in the London Plan and Borough Core Strategies.</p> <p>The SPD requires consideration of sustainability during the demolition and construction, especially in Key Principles ENV1 to ENV4, which includes preferences for reusing construction waste on-site, moving waste and materials by rail, and controlling noise / vibration and air pollution.</p>
1645	John	Drake	Campaign to Protect Rural England	12		<p>Environment</p> <p>i) Reduction of pollution must be encouraged in London over 4,000 people unnecessarily die each year. The wording for particulates and NO2 do not meet EU standards at present. This development must be carbon neutral. Provision should be made in properties facing the major roads around the site to filter the air. Within the site there should be a 20 mph speed limit with solar powered warning signs.</p>	<p>No change necessary.</p> <p>Para 12.75 identify vehicles using the surrounding roads as one of the main sources of air pollution in the area.</p> <p>Key Principle ENV2 requires construction, demolition and excavation logistics plans to be prepared for every phase of construction and demolition. Key Principle ENV3 states that Construction Management Plans (CEMPs) will be</p>

						<p>required. Para 12.15 states that detailed information on noise, vibration and air quality must be included in the CEMPs, including requirements for screening. Para 12.16 of the revised draft SPD states that CEMPs will need to identify measures to control and monitor air pollution caused during construction and demolition.</p> <p>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.</p> <p>Key Principle ENE1 requires all residential development from 2016 being zero carbon and non residential development from 2019 being zero carbon.</p> <p>Key Principle UF37 requires streets to be designed to keep vehicle speed under 20mph. However, the SPD cannot specify that warning signs need to be solar powered.</p>
1646	John	Drake	Campaign to Protect Rural England	12	Environment	<p>ii) Where possible on public and private properties in the development should have green roofs to reduce the water flow at peak times and it gives extra insulation.</p>
1928	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	12	ENV6	<p>56. [bold] Flood risk [end bold]. The aim of reducing flood risk falls far short of a requirement to follow a sequential approach to site selection, avoiding development on the tidal flood plain. The 'exceptional test' referred to at ENV6 should be applied to the SPD, which clearly fails to meet the test, as well as any subsequent application.</p>
2096	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	12	ENV1	<p>Whilst the principles of sustainable treatment and reuse are acknowledged the actual approach in this respect must be the subject of individual planning application proposals. The wording of the Key Principle should reflect this.</p>

2097	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	12	ENV7	It is not clear if the reference to habitable basement rooms applies to all dwellings across the ECWKOA or simply those in Zone 3 - this should be clarified.	Change proposed. Reference to habitable basement rooms applies to all habitable basement rooms in the OA, as basements along the Counters Creek have experienced flooding in the past and therefore new basement rooms must plan for the likelihood that this may happen again. Key Principle ENV7 will be revised to make this clear.
2098	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	12	ENV8	This is inflexible and unreasonable and should be revised to, for example, insert the word "normally" between "should" and "be".	No change necessary. This requirement is consistent with London Plan Policy 5.15Bb, which states that "Development should minimise the use of mains water by ... b) designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day. This is also consistent with RBKC Core Strategy Policy CE1 requiring New Development to meet CfSH Level 4 in 2012. This requirement is made easier given the presence of an aquifer beneath the OA.
2099	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	12	ENV9	The desire to achieve the management of surface water run-off is acknowledged but, similarly, it is too specific to require that set percentages are achieved in this respect. The wording should be amended to include the word "normally" before the percentage values that are set out.	Change proposed. As a result of the comment from the EA, this Key Principle ENV9 will be revised to ensure development meets Greenfield run-off rates or better. The percentages for water attenuation in Key Principle ENV9 should be seen as a framework. Any planning applications will need to set out how this will be met or any material considerations demonstrating that this is not possible, which will be considered on a case by case basis.
2100	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	12	ENV16	As currently drafted this is inflexible. Reference to 'must' should be removed and replaced by 'should aim to achieve' air quality neutral.	Change proposed. Propose change from 'must' to 'should' and the inclusion of 'at least' to better align with London Plan Policy 7.14B(c).
2115	Dora	Bertolutti Howard		12		I am writing to object to the revised SPD for Earls Court. I am particularly concerned with the effects of the proposals on the environment in terms of increased air pollution from the extra traffic	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. 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.
2117	Dora	Bertolutti Howard		12		The new proposals are not environmentally sound and the council should be working to improve the environment not make it worse for Local residents.	No change necessary. The SPD considers the impact of development, including the construction and demolition, on the environment within the Energy and Environment Section. The SPD has also been subject to a Sustainability Appraisal. All Key Principles in the SPD have been carefully drafted in accordance with existing policy to ensure that the impacts of the development are mitigated or not made any worse. However, the SPD cannot create new policy and cannot resolve existing problems not related to the development of the OA.
2119	Emir	O'Sullivan		12		[bold] Earl's court - Exhibition Centre Demolition [end bold]	No change necessary.

	Katherine					The residents of Earl's Court demand assurances that access to legal documents stating how Asbestos, should any be found, will be dealt with. This information must be broadcast so that every resident in this area is informed personally.	The authorities anticipate that asbestos materials are likely to be present in the exhibition centre complex and therefore will be dealt with by a registered contractor. However, this is beyond the control of the planning system and therefore beyond the scope of the SPD. The enforcement of the legislation for construction site safety and handling asbestos is the responsibility of the Health and Safety Executive (HSE) although the borough's Environmental Health Departments liaise with HSE officers to ensure that the Councils fully understand the methodology being adopted, including air sampling. Information relating to asbestos can be requested from the Council's Environmental Health departments.
2120	Emir Katherine	O'Sullivan		12		Furthermore, guarantees should be made, stating that residents will be disturbed as little as possible by demolition and building works and a draft schedule of works be produced for public consultation.	No change necessary. 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 ENV3 requires Construction Environmental Management Plans, which need to set out how various impacts will be mitigated and how the local community will be kept informed.
2121	Emir Katherine	O'Sullivan		12		Also the council and developers must have regular meetings with residents and with our local councillors to discuss the development and any impact the build is having on their everyday lives, e.g. air pollution, traffic etc. Please advise on the above matter which is of a great concern to me and to all my neighbours in Nevern Mansions.	No change necessary. This is addressed in Key Principle ENE3.
2126	Suky	Macpherson		12		I continue to object to the revised plans on the following grounds: 1) Air quality. Warwick Rd already has poor air quality and the area has a high rate of asthmatic children and adults. Air quality is at its worst when traffic slows down. The increase in traffic to Warwick Rd and the opportunity area will further damage air quality. This also impacts on the rights of a child to a healthy life under the law.	No change necessary. Para 12.75 identify vehicles using the surrounding roads as one of the main sources of air pollution in the area. In accordance with the London Plan, 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.
2128	Suky	Macpherson		12		I continue to object to the revised plans on the following grounds: 4) Demolition and disturbance. Noise and pollution (day or night) breach adults and children's rights to a healthy life and a good night's sleep under the European convention on human rights. CAPCO could be challenged in the courts for this (and air quality as above). Residents forced to vacate their properties will be entitled to compensation for the upheaval caused and this will impact severely on quality of life. Many residents already experience underground noise and vibration at disturbing levels. It is totally unacceptable that more noise/vibration is added to this.	Change proposed. 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. Key Principle ENV4 states that 'measures will be required at each phase to

						<p>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. Para 12.80 requires a Low Emission Strategy with consideration for health impacts.</p> <p>Paragraph 12.17 of the revised draft SPD acknowledges that some demolition and construction work affecting the railway lines will need to be carried out outside of permitted hours. The SPD will be revised to ensure that where works are carried out outside of the permitted hours, this is kept to a minimum and the surrounding community are given prior notice.</p> <p>Many of the impacts of construction and demolition are controlled and enforced by each Council's Environmental Health teams. The councils will be negotiating s61 Prior Consents under the Control of Pollution Act 1974 with the constructors in order to control and minimise noise and vibration as far as practicable. This will include continuous monitoring of noise and vibration levels during the works.</p> <p>Compensation arrangements would only be negotiated once the works are underway, taking into account the duration and level of exposure to noise and vibration.</p>
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