



AWR/CDT/DP2077

2 September 2010

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Dear Sir

**RBKC LDF CORE STRATEGY EXAMINATION IN PUBLIC  
RBKC SCHEDULE OF CHANGES – POST SUBMISSION  
RESPONSE BY CAPITAL & COUNTIES  
PARTICIPANT REF: 139439**

Please find enclosed the response submitted by Capital & Counties, on behalf of Earls Court & Olympia Group (Participant No. 139439) to the RBKC Schedule of Changes – Post Submission. The responses in the enclosed schedule reflect the Position Statement between RBKC and C&C (29 July 2010) submitted to the Examination. This follows C&C's submission of representations at all stages of Core Strategy preparation which are supported by a suite of key topic related evidence base documents as follows:

**Representations**

C&C has submitted representations at all stages of Core Strategy preparation, as follows:

- Core Strategy Issues and Options – representations submitted in April 2008
- Core Strategy “Towards Preferred Options” – representations submitted in October 2008
- Places and Strategic Sites – representations submitted in June 2009
- Draft Core Strategy – representations submitted in September 2009
- Proposed Submission Core Strategy – representations submitted in December 2009

**Evidence Base**

Evidence Base Documents submitted in support of C&C's representations to Places and Strategic Sites – representations submitted in June 2009:

- Earls Court Regeneration Area: Planning Policy Summary (June 2009).

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- Earls Court Regeneration Area Framework (June 2009).
- Earls Court Regeneration Area: Design Principles Summary Study (June 2009).
- Earls Court Regeneration Area: Summary Townscape and Tall Building Study (June 2009).
- Earls Court Regeneration Area: Summary Socio Economic Study (June 2009).
- Earls Court Regeneration Area: Retail Land Use Summary Study (June 2009).
- Earls Court Regeneration Area: Hotel Land Use Summary Study (June 2009).
- Earls Court Regeneration Area: Summary Culture, Destination and Leisure Land Uses Study (June 2009).
- Earls Court Regeneration Area: Housing Land Use Summary Study (June 2009).
- Earls Court Regeneration Area: Summary Transport Study (June 2009).
- Earls Court Regeneration Area: Summary of Sustainability Approach (June 2009).
- Earls Court Regeneration Area: Summary Infrastructure and Waste Study (June 2009).

Evidence Base Documents submitted in support of C&C's representations to the Draft Replacement London Plan in January 2010 and issued to RBKC as evidence also relevant to the Core Strategy:

- Earls Court & West Kensington Opportunity Area: Place Making Report (January 2010).
- Earls Court & West Kensington Opportunity Area: Housing Capacity (January 2010).
- Earls Court & West Kensington Opportunity Area: Employment Capacity (January 2010).

Evidence Base Documents submitted in support of C&C's written statements to the Draft Replacement London Plan examination in June 2010. These documents have also been submitted to form part of the RBKC Core Strategy examination library:

- Earls Court & West Kensington Opportunity Area: Transport Report (June 2010).
- Earls Court & West Kensington Opportunity Area: Retail and Leisure Assessment (June 2010).
- Earls Court & West Kensington Opportunity Area: Office Assessment (June 2010).



Should you have any queries on the submission at this stage, please do not hesitate to contact Craig Tabb or Alex Walker-Robson of this office.

Yours faithfully

DP9

**DP9**

ROYAL BOROUGH OF KENSINGTON AND CHELSEA

SCHEDULE OF CHANGES – POST SUBMISSION

RESPONSE TO PROPOSED CHANGES BY CAPITAL & COUNTIES ON BEHALF OF EARLS COURT AND OLYMPIA GROUP

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
1.2.8 and new paragraph	1.2.8 The Consultation draft replacement Plan, published in October 2009, proposes some changes that are particularly relevant to the Borough (...).	1.2.8 The Consultation draft replacement London Plan was published in October 2009. <u>The Examination in Public of the London Plan is taking place in the summer and autumn of 2010. It is likely that the adoption of the Core Strategy for the Royal Borough will precede the adoption of the revised London Plan. In the event that the revised London Plan when adopted differs to any large extent from the draft, such that the Royal Borough's Core Strategy would no longer be in 'general conformity', and early review of the relevant parts of the Royal Borough's Core Strategy would be undertaken.</u>  <u>The revised London Plan</u> proposes some changes that are particularly relevant to the Borough (...)	RBKC. Hearing discussions.	C&C agree with this additional wording.
CV1	Stimulate regeneration in North Kensington through the provision of better transport, better housing and better facilities.	Stimulate regeneration in North Kensington through the provision of better transport, better housing and better facilities, <u>aiding better health.</u>	RBKC. Clarification purposes and hearing discussions.	

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>By 2028 regeneration in North Kensington will have resulted in significantly improved transport, with a new Crossrail station at Kensal, better links to Hammersmith and Fulham across the West London line and improved north-south bus links overcoming the generally lower levels of accessibility in the north.</p> <p>2-3000 new homes will have been built, both private market and affordable, addressing the serious shortfall in housing need, and helping to diversify supply.</p> <p>It will be of a high quality design, well integrated into its context, overcoming some of the barriers to movement by which the North of the Borough is characterised.</p> <p>Better facilities will have been provided by the building of a new academy to serve the communities of North Kensington to address the serious shortage of secondary school places in the borough, helping to make life more local for residents. The deficiency in local shopping will have been addressed with two new town centres at Kensal and Latimer.</p>	<p>By 2028 regeneration in North Kensington will have resulted in significantly improved transport, <b>including</b> with a new Crossrail station at Kensal, better links to Hammersmith and Fulham across the West London line and improved north-south bus links overcoming the generally lower levels of accessibility in the north.</p> <p>2-3000 new homes will have been built, both private market and affordable, addressing the serious shortfall in housing need, and helping to diversify supply.</p> <p>It will be of a high quality design, well integrated into its context, overcoming some of the barriers to movement by which the North of the Borough is characterised.</p> <p>Better facilities will have been <b>including</b> by provided the building of a new academy to serve the communities of North Kensington to address the serious shortage of secondary school places in the borough, helping to make life more local for residents. The deficiency in local shopping will have been addressed with <b>two</b> new town centres at Kensal and Latimer <b>and the Earl's Court Opportunity Area</b></p>		<p>C&amp;C agree with this additional wording.</p>



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>The unique character of Portobello Road will have flourished, including the antiques and street market, adding to the vitality of the area.</p> <p>Jobs will be readily available as the Employment Zones will have been protected from encroaching residential and be thriving centres for small businesses and the cultural industries sector.</p> <p>The north of the Borough will be at the heart of environmental sustainability with the combined heat and power network extending from the hubs at the major new developments at Kensal, Latimer and Wornington Green</p> <p>Enhance the reputation of our national and international destinations – Knightsbridge, Portobello Road, South Kensington, the King’s Road, Kensington High Street, and Earl’s Court – by supporting and encouraging retail and cultural activities in particular;</p> <p>In the Borough as a whole our reputation as a national and international destination will have been further enhanced. The Borough will have avoided becoming little</p>	<p>The unique character of Golborne and Portobello Roads will have flourished, including the antiques and street market, adding to the vitality of the area.</p> <p>Jobs will be readily available as the Employment Zones will have been protected from encroaching residential and be thriving centres for small businesses and the cultural industries sector.</p> <p>The north of the Borough will be at the heart of environmental sustainability <b>including with the</b> combined heat and power network extending from the hubs at the major new developments at Kensal, Latimer and Wornington Green</p> <p>Enhance the reputation of our national and international destinations – Knightsbridge, Portobello Road, South Kensington, the King’s Road, Kensington High Street, and Earl’s Court – by supporting and encouraging retail and cultural activities in particular;</p> <p>In the Borough as a whole our reputation as a national and international destination will have been further enhanced. The Borough will have avoided becoming little</p>		

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>more than a residential suburb, with a flourishing and rich variety of retail and cultural activities adding so much to the quality of life of the residents.</p> <p>Our top retail destinations of Knightsbridge, King's Road, Kensington High Street and Portobello will have been maintained and enhanced.</p> <p>Opportunities to expand retail floorspace in Knightsbridge, King's Road, Fulham Road and South Kensington will have been taken up.</p> <p>Earl's Court will remain an important cultural destination, as well as providing offices and around 2000 new dwellings on surrounding sites.</p> <p>Exhibition Road in South Kensington will be providing a first class experience to visitors to the national institutions, and have set a new standard nationally of streetscape design.</p> <p>The Royal Marsden and Brompton hospitals will continue to further its</p>	<p>more than a residential suburb, with a flourishing and rich variety of retail and cultural activities adding so much to the quality of life of the residents.</p> <p>Our top retail destinations of Knightsbridge, King's Road, Kensington High Street and Portobello will have been maintained and enhanced.</p> <p>Opportunities to expand retail floorspace in Knightsbridge, King's Road, Fulham Road and South Kensington will have been taken up.</p> <p>Earl's Court will remain an important cultural destination, as well as providing offices <del>and</del> <u>at least around</u> 2,000 new <u>homes within the Borough and a new town centre to address local shopping deficiency within the Opportunity Area.</u> <del>dwellings on surrounding sites.</del></p> <p>Exhibition Road in South Kensington will be providing a first class experience to visitors to the national institutions, and have set a new standard nationally of streetscape design.</p> <p>The Royal Marsden and Brompton hospitals will continue to further its</p>		<p>C&amp;C agree with this revised wording.</p>

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>international reputation for delivering world class health care, education and research activities.</p> <p>Uphold our residential quality of life so that we remain the best place in which to live in London, through cherishing quality in the built environment, acting on environmental issues and facilitating local living, including through strengthening local neighbourhood centres.</p> <p>Our residential quality of life will be improved for everyone and we will remain the best place to live in London with our glorious built heritage protected and improved, the removal of eyesores, and new buildings of exceptional design quality.</p> <p>New homes will have further diversified housing tenure, and provide high standards of environmental performance.</p> <p>The waste we produce will be re-used, recycled or disposed of in or very near to the borough.</p>	<p>international reputation for delivering world class health care, education and research activities.</p> <p>Uphold our residential quality of life so that we remain the best place in which to live in London, through cherishing quality in the built environment, acting on environmental issues and facilitating local living, including through strengthening local neighbourhood centres <u>and maintaining and updating social infrastructure.</u></p> <p>Our residential quality of life will be improved for everyone and we will remain the best place to live in London with <u>our network of local neighbourhood centres offering a wide range of everyday services within easy walking distance</u>, our glorious built heritage protected and improved, the removal of eyesores, and new buildings of exceptional design quality.</p> <p>New homes will have further diversified housing tenure, and provide high standards of environmental performance.</p> <p>The waste we produce will be re-used, recycled or disposed of in or very near to the borough.</p>		



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>Sustainable Urban Drainage systems will be commonplace throughout the borough, reducing the risk of flood events, especially in the west of the Borough when combined with the upgrading of Counters Creek sewer and storm drain.</p> <p>Green links will help to improve biodiversity and air quality and noise will have been significantly improved.</p>	<p>Sustainable Urban Drainage systems will be commonplace throughout the borough, reducing the risk of flood events, especially in the west of the Borough when combined with the upgrading of Counters Creek sewer and storm drain.</p> <p>Green links will help to improve biodiversity and air quality and noise will have been significantly improved.</p>		
4.3.4	<p>In broad spatial terms, half of this housing will be located in the north of the Borough, and half in the Earl's Court area, on the western borough boundary. The housing in the north is expected to be spread evenly over the plan period. In the Earl's Court area, the vast majority is expected in the first half of the plan period.</p>	<p>In broad spatial terms, half of this housing will be located in the north of the Borough, and half in the Earl's Court area, on the western borough boundary. The housing in the north is expected to be spread evenly over the plan period. <u>The redevelopment of Wormington Green will take place up to about 2020, with the first phase being completed by 2015. Planning consent for this redevelopment was granted in March 2010. At Kensal, phase 1 is expected to be developed before 2017, with phase 2 following on to 2027. In the Earl's Court area, the vast majority is expected in the first half of the plan period. <u>The Warwick Road sites are at an advanced stage of negotiation – some sites have Planning Permission, others are at the stage of pre-application discussion. It</u></u></p>	RBKC. Hearing discussions.	

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
4.3.7	<p>Turning to infrastructure, the Council is planning for a Crossrail Station at Kensal, which would transform accessibility in the north of the Borough, as well as unlock significant development potential on the Kensal Gas Works Sites. A new academy to serve the communities of North Kensington will also be built in the north of the Borough. Thames Water is planning to undertake a major upgrade of the Counters Creek Sewer (which runs along the western Borough boundary), to resolve current flooding issues. In addition, work is planned to the Thames Tunnel to address London-wide infrastructure needs. A new area of public open space is to be</p>	<p><u>is therefore expected that these sites will be built out in the next 5-10 years. Likewise, it is expected that the redevelopment of the Earl's Court Exhibition Centre site will start in 2013. The whole development will take many years, but it is expected that the part of the site within the Borough will be towards the beginning of the phasing programme.</u></p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C agree with this additional wording apart from in the penultimate sentence the date referred to for the start of the redevelopment of Earls Court Exhibition Centre should be 2012 to remain consistent with the rest of the Core Strategy.</p>
	<p>Turning to infrastructure, the Council is planning for a Crossrail Station at Kensal, which would transform accessibility in the north of the Borough, as well as unlock significant development potential on the Kensal Gas Works Sites. <u>Crossrail is timetabled to open in 2017.</u> A new academy to serve the communities of North Kensington will also be built in the north of the Borough, <u>to open during 2014.</u> Thames Water is planning to undertake a major upgrade of the Counters Creek Sewer (which runs along the western Borough boundary), to resolve current flooding issues, <u>although this will not start construction until 2015, and is</u></p>			



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>provided in the Earl's Court area as part of the Warwick Road developments. A great deal of smaller infrastructure is required, and is set out elsewhere in Chapter 37.</p>	<p><u>likely to be a 3 year construction programme. However, much of the work is taking place in neighbouring boroughs. In the interim Thames Water are fitting 'flip valves' to vulnerable properties. In addition, work is planned to the Thames Tunnel to address London-wide infrastructure needs, with construction taking place between 2013 and 2020, although there is insufficient detail at present to know when the work will be undertaken in the Royal Borough. A new area of public open space is to be provided in the Earl's Court area as part of the Warwick Road developments which are likely to be built out in the next 5-10 years. The Council is also undertaking a radical redesign of Exhibition Road to be implemented before 2012. It is also the ambition of the Council to return the Earl's Court one-way system to two-way working. However, further detailed work will identify the extent and timescales to which this can be achieved. A great deal of smaller infrastructure is required, and is set out elsewhere in Chapter 37.</u></p>		<p>C&amp;C agree with this additional wording proposed.</p>
4.4.1	<p>4.4.1 The Place Profiles provide the <b>integrating</b> function of the spatial strategy. They take the 'what', 'when', 'where' and 'how', and bring these together</p>	<p>4.4.1 The Place Profiles provide the <b>integrating</b> function of the spatial strategy. They take the 'what', 'when', 'where' and 'how', and bring these together</p>	<p>RBKC. Clarification purposes.</p>	

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>to show, through a vision, how that Place will develop over the lifetime of the plan. There are 14 Places identified (see Plan). The Borough comprises many more places than these. The Places selected for the Core Strategy are those where significant change is planned, and the district, major and international which are town centres which are the focus for activity. The one exception to these criteria is the Westway. This has been included because of its particular negative impacts, which need to be addressed as part of the programme of regeneration in North Kensington.</p>	<p>to show, through a vision, how that Place will develop over the lifetime of the plan. There are 14 Places identified (see Plan). The Borough comprises many more places than these. <u>The places mainly relate to the two spatial themes of the Vision for the Borough (CV1): the regeneration of North Kensington, and enhancing the reputation of those places in the Borough with a national or international reputation – by and large our town centres.</u></p> <p><u>There are some exceptions to these two groups. We have also included other places where either significant change is planned, or and the district, major and international which are town centres which are the focus for activity not otherwise picked up in the spatial categories of the Vision. The one exception to these criteria is We have also included the Westway. This has been included because of its particular negative impacts, which need to be addressed as part of the programme of regeneration in North Kensington.</u></p>		



Paragraph No.	Original Wording	New Wording				Reason	C&C Response														
10.1.6	<p>(...) After 2012, however, the landowners plan to redevelop the site. The Earl's Court Exhibition Centre Site extends (...)</p>	<table border="1"> <thead> <tr> <th data-bbox="169 1193 357 1238">Chpt</th> <th data-bbox="169 1093 357 1193">Place</th> <th data-bbox="169 902 357 1093">Spatial theme within the Borough Vision</th> <th data-bbox="169 741 357 902">Area of change or Town Centre?</th> </tr> </thead> <tbody> <tr> <td data-bbox="357 1193 528 1308">11</td> <td data-bbox="357 1093 528 1193">Earl's Court</td> <td data-bbox="357 902 528 1093">Place with National or International Reputation</td> <td data-bbox="357 741 528 902">Both an Area of Change and a Town Centre</td> </tr> </tbody> </table>	Chpt	Place	Spatial theme within the Borough Vision	Area of change or Town Centre?	11	Earl's Court	Place with National or International Reputation	Both an Area of Change and a Town Centre				<p>Within most of the places listed above as <u>Areas of Change</u> we have identified significant sites for redevelopment. These are called the Strategic Sites, and they are allocated in this plan (Section 2A, Chapters 20-26) for specific uses. The table below shows which Places also have a <u>Strategic Site Allocation</u>.</p> <table border="1"> <thead> <tr> <th data-bbox="528 1193 643 1308">Chpt</th> <th data-bbox="528 1093 643 1193">Place</th> <th data-bbox="528 902 643 1093">Strategic Site</th> </tr> </thead> <tbody> <tr> <td data-bbox="643 1193 778 1308">11</td> <td data-bbox="643 1093 778 1193">Earl's Court</td> <td data-bbox="643 902 778 1093">Warwick Road (Chapter 25) Earls Court Exhibition Centre (Chapter 26)</td> </tr> </tbody> </table>	Chpt	Place	Strategic Site	11	Earl's Court	Warwick Road (Chapter 25) Earls Court Exhibition Centre (Chapter 26)	<p>C&amp;C agree with this additional wording proposed.</p> <p>C&amp;C agree with this additional wording proposed.</p>
Chpt	Place	Spatial theme within the Borough Vision	Area of change or Town Centre?																		
11	Earl's Court	Place with National or International Reputation	Both an Area of Change and a Town Centre																		
Chpt	Place	Strategic Site																			
11	Earl's Court	Warwick Road (Chapter 25) Earls Court Exhibition Centre (Chapter 26)																			
	<p>(...) After 2012, however, the landowners plan to redevelop the site. It is allocated as a <u>strategic site in this Core Strategy</u>, see</p>				<p>RBKC. Clarification purposes.</p>	<p>C&amp;C agree with this additional wording proposed.</p>															

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
CV10	<p>By returning the one-way system to two-way working, reducing the traffic flow, and improving the pedestrian environment, the western edge of the Borough will be reintegrated and Earl's Court Neighbourhood Centre will be able to blossom, offering an attractive 'urban-village' environment which local residents can enjoy. (...)</p>	<p><u>Chapter 26.</u> The Earl's Court Exhibition Centre Site extends (...)</p> <p><del>By returning the one-way system to two-way working, reducing the traffic flow, and improving the pedestrian environment,</del> The western edge of the Borough will be reintegrated <u>with the and</u> Earl's Court Neighbourhood Centre <u>so that the centre is</u> <del>will be</del> able to blossom, offering an attractive 'urban-village' environment which local residents can enjoy. <u>Crucial to this is reducing the impact of the one-way system on residential amenity, the pedestrian environment and public transport users, preferably by returning the one-way system to two-way working or other significant environmental improvements.</u></p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C agree with this revised wording proposed.</p>
10.3.10	<p>(...) Community facilities will be provided as part of the developments at 100 West Cromwell Road and the Warwick Road sites, including a new primary school at the northern end of Warwick Road. (...)</p> <p>(...)The area of Earl's Court and West Kensington Opportunity Area is currently deficient of access to neighbourhood or</p>	<p>(...) Community facilities will be provided as part of the developments <u>on the Earl's Court and West Kensington Opportunity Area,</u> at 100 West Cromwell Road and the Warwick Road sites, including a new primary school at the northern end of Warwick Road. (...)</p> <p>(...)The area of Earl's Court and West Kensington Opportunity Area is currently deficient of access to neighbourhood or</p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C agree with the proposed changes except for reference to small scale retail. C&amp;C consider that small scale retail implies that the type, nature and amount of retail provision will be limited and restricted. It is</p>



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>higher shopping facilities. The Council will therefore support a new neighbourhood centre in this location, supporting the day to day needs of the development. However, this new centre must not compete with other existing centres.</p>	<p>higher shopping facilities. The Council will therefore support a new <del>neighbourhood</del> centre in this location, <del>which includes small scale retail provision</del> supporting the day to day needs of the development <del>and other acceptable town centre uses identified in Policy CA7.</del> However, <del>this new centre must not compete with other existing centres.</del> <u>The size and function of the centre will be confirmed through the joint planning brief, having regard to the up-to-date evidence.</u> <u>The extent to which there is scope for a larger centre within the Opportunity Area will depend on a detailed analysis of retail and leisure need, taking account of the vitality and viability of existing centres (both in this and within neighbouring Boroughs) both at the time of the development and in the longer term.</u></p>		<p>unnecessary and overly prescriptive at this stage to limit and restrict retail provision. The appropriate provision of retail floorspace will be determined through the preparation of the SPD, masterplanning and supporting assessment and evidence.</p>
CP10	<p>The Council will ensure an attractive 'urban-village' environment in Earl's Court by supporting improvements to the public realm, pedestrian environment and open space and resist proposals which prejudice the realisation of the full potential of opportunities in the area.</p>	<p>The Council will ensure an attractive 'urban-village' environment in Earl's Court by supporting improvements to the public realm, pedestrian environment and open space. <u>The Council will <del>and</del> resist <del>ing</del> development proposals which prejudice the opportunities for wider regeneration of the area and compromise delivery of the vision <del>realisation</del> of the <del>full</del> <del>of</del> opportunities <del>in the area</del>.</u></p>	RBKC. Hearing discussions.	C&C agree with this revised wording.

Paragraph No.	Original Wording	New Wording	Reason	C&C Response						
10.4.2	<p>(...)The Council will also support a new neighbourhood centre in the Earl's Court and West Kensington Opportunity Area, to serve the day-to-day needs of the development. (...)</p>	<p>(...)The Council will also support a new neighbourhood centre in the Earl's Court and West Kensington Opportunity Area, with <u>small scale retail provision</u> to serve the day-to-day needs of the development. (...)</p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C disagree with the reference to small scale retail. C&amp;C consider that small scale retail implies that the type, nature and amount of retail provision will be limited and restricted. It is unnecessary and overly prescriptive at this stage to limit and restrict retail provision. The appropriate provision of retail floorspace will be determined through the preparation of the SPD, masterplanning and supporting assessment and evidence.</p>						
19.1.2	<p>Kensal Wormington Green Land Adjacent to Trellick Tower North Kensington Sports Centre Commonwealth Institute Warwick Road Earls Court</p>	<table border="1"> <tr> <td data-bbox="1054 1189 1086 1308"><b>Chpt</b></td> <td data-bbox="1054 1066 1086 1189"><b>Place</b></td> <td data-bbox="1054 732 1086 1066"><b>Strategic Site</b></td> </tr> <tr> <td data-bbox="1086 1189 1118 1308">11</td> <td data-bbox="1086 1066 1118 1189">Earl's Court</td> <td data-bbox="1086 732 1201 1066">Warwick Road Earls Court Exhibition Centre</td> </tr> </table>	<b>Chpt</b>	<b>Place</b>	<b>Strategic Site</b>	11	Earl's Court	Warwick Road Earls Court Exhibition Centre	<p>RBKC. Clarification purposes.</p>	<p>C&amp;C agree with this additional wording proposed.</p>
<b>Chpt</b>	<b>Place</b>	<b>Strategic Site</b>								
11	Earl's Court	Warwick Road Earls Court Exhibition Centre								



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	Lots Road Power Station (not allocated, but for information only)			
Earl's Court Strategic Site Allocation Map	Earl's Court Strategic Site	Amend map to correctly define the Strategic Site to include the property at the junction of Warwick Road and the A4	RBKC requests this change to ensure redevelopment takes every opportunity to improve the pedestrian environment at this junction.	C&C agree that the Earl's Court Strategic Site Allocation Map should be amended to correctly the Strategic Site.
26.2.1	It is clear that the site has considerable potential. The draft London Plan states that the Earl's Court & West Kensington Opportunity Area has the capacity to accommodate over 2,000 dwellings and 7,000 jobs along with leisure, cultural and visitor attraction uses. Within the Royal Borough it is anticipated the scheme will be residential-led, although the full development capacity and exact disposition of uses across the Opportunity Area should be considered as part of the spatial planning for the Opportunity Area, through the joint Supplementary Planning Document prepared by both boroughs, in consultation with the GLA.	It is clear that the site has considerable potential. The draft London Plan <u>indicates</u> <del>states</del> that the Earl's Court & West Kensington Opportunity Area has <u>the potential to provide the capacity to accommodate</u> over 2,000 dwellings and <u>approximately</u> 7,000 jobs. <u>The draft London Plan further states that "the potential for a strategic leisure, cultural and visitor attraction and strategically significant offices should be explored together with retail, hotels and supporting social infrastructure". along with leisure, cultural and visitor attraction uses.</u> Within the Royal Borough it is anticipated the scheme will be residential-led, <u>as the</u>	RBKC. Hearing discussions.	C&C agree with this revised wording.

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
26.2.2	<p>(...) The area of the Strategic Site is deficient in access to neighbourhood or higher order centre facilities. The Council will therefore support the designation of a neighbourhood centre within the Earl's Court Opportunity Area. (...)</p>	<p><u>Strategic Site can comfortably accommodate over 500 new homes.</u> <del>although</del> The full development capacity, and exact disposition of uses across the Opportunity Area should be considered as part of the spatial planning for the Opportunity Area, through the joint Supplementary Planning Document (SPD). <u>This SPD will be prepared and adopted by both boroughs, and be capable of being adopted by, in consultation with the GLA as an Opportunity Area Planning Framework.</u></p> <p>(...) The area of the Strategic Site is <u>outside 400m or 5mins walk of a</u> deficient in access to neighbourhood or higher order centre facilities. The Council will therefore support the <u>establishment designation of a new neighbourhood centre within the Earl's Court and West Kensington Opportunity Area, with small scale retail provision to serve the day-to-day needs of the development and of a scale that does not have an unacceptable impact on short and longer term vitality and viability of existing centres in RBKC and LBHF. (...)</u></p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C agree with the proposed changes except for reference to small scale retail. C&amp;C consider that small scale retail implies that the type, nature and amount of retail provision will be limited and restricted. It is unnecessary and overly prescriptive at this stage to limit and restrict retail provision. The appropriate provision</p>



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
26.2.3	<p>(...) A new cultural facility that is a national or international destination is required. This may be in the form of an International Convention Centre. The preferred location for the International Convention Centre is as part of a major refurbishment and/or development within the existing Earl's Court and Olympia complexes. However, if that facility is located at Olympia in the same ownership as Earl's Court Exhibition Centre, then significant cultural use that is at least a national destination should be provided in the Earl's Court and West Kensington Opportunity Area to continue the long standing brand. It is expected this will be located within the most public accessible part of the Opportunity Area. The exact location of any cultural or destination uses or attractions will be determined through the Supplementary Planning Document to be prepared jointly by the Royal Borough, the London</p>	<p>(...) A new cultural facility that is a national or international destination is required. <del>This may be in the form of an International Convention Centre. The location for the International Convention Preferred Centre is as of a major refurbishment and/or part development within the existing Earl's Court and Olympia complexes.</del> However, if that facility is located at Olympia <del>(in the London Borough of Hammersmith and Fulham) which is</del> (in the same ownership as Earl's Court Exhibition Centre, <del>and is likely to be refurbished and extended to accommodate some of the cultural, conference and exhibition uses at Earl's Court then a significant cultural use that is of at least a national identity destination</del> should <u>also</u> be <u>retained</u> <del>provided</del> in the Earl's Court and West Kensington Opportunity Area to continue the long standing <u>Earl's Court</u> brand. It is expected this will be located within the most public</p>	<p>RBKC. Hearing discussions.</p>	<p>of retail floorspace will be determined through the preparation of the SPD, masterplanning and supporting assessment and evidence.</p> <p>C&amp;C agree to this revised wording except for reference to 'national' identity. C&amp;C consider 'national' should be removed as the term is ambiguous, uncertain and cannot be readily defined. The nature / size / visitor draw of cultural facilities can vary enormously, as well as evolve over many years. Reference to 'national' will create uncertainty and will place an onerous constraint on future redevelopment proposals. C&amp;C</p>

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	Borough of Hammersmith and Fulham.	transport accessible part of the Opportunity Area. The exact location of any cultural or destination uses or attractions will be determined through the Supplementary Planning Document to be prepared jointly by the Royal Borough, the London Borough of Hammersmith and Fulham <u>and the Greater London Authority.</u>		propose that the word 'national' is replaced with 'significant'.
CA7(a)	a minimum of 500 homes within the Royal Borough, which could be increased, if (b) to (e) below are provided within LBHF as part of the masterplanning process conduction in the preparation of the SPD;	a minimum of 500 homes within the Royal Borough, which could be increased, <u>in particular</u> if (b) to (e) below are provided within LBHF as part of the masterplanning process conduction in the preparation of the SPD	RBKC. Hearing discussions.	C&C agree with this additional wording proposed.
CA7(c)	small scale retail uses (A Classes of the Use Classes Order 1987 (as amended)) to serve the day-to-day needs of the new development;	small scale retail <u>and associated other</u> uses <u>within the</u> <del>(A Classes</del> of the Use Classes Order 1987 (as amended)) to serve the day-to-day needs of the new development;	RBKC. This change assumes that all retail is from the A Class, which is incorrect.	C&C agree with the proposed changes except for reference to small scale retail. C&C consider that small scale retail implies that the type, nature and amount of retail provision will be limited and restricted. It is unnecessary and overly prescriptive at this stage to limit and



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
CA7(d)	<p>a cultural facility, of at least national significance, to retain Earl's Court's long standing brand as an important cultural destination, located on the area of the Opportunity Area nearest to public transport accessibility;</p>	<p>a cultural facility, of at least national <b>identity significance</b>; to retain Earl's Court's long standing brand as an important cultural destination, located on the area of the Opportunity Area nearest to public transport accessibility;</p>	<p>RBKC. Hearing discussions.</p>	<p>restrict retail provision. The appropriate provision of retail floorspace will be determined through the preparation of the SPD, masterplanning and supporting assessment and evidence.</p> <p>C&amp;C agree to this revised wording except for reference to 'national' identity. C&amp;C consider 'national' should be removed as the term is ambiguous, uncertain and cannot be readily defined. The nature / size / visitor draw of cultural facilities can vary enormously, as well as evolve over many years. Reference to 'national' will create uncertainty and will place an onerous</p>

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
CA7(e)	other non-residential uses required to deliver a sustainable and balanced mixed-use development, such as hotel, leisure and social and community uses;	other non-residential uses required to deliver a sustainable and balanced mixed-use development, such as hotel, <u>and</u> leisure <del>and social and community uses;</del>	RBKC. Hearing discussions.	constraint on future redevelopment proposals. C&C propose that the word 'national' is replaced with 'significant'. C&C agree with this revised wording.
CA7 (after point e)		Add new point. <u>f. social and community uses;</u>	RBKC. Hearing discussions.	C&C agree with this additional wording.
CA7(h)	a design of the on-site road pattern and connections which significantly improve traffic circulation in the surrounding area, and on primary routes in the London Borough of Hammersmith and Fulham and the Royal Borough, providing a key component in returning the one-way system to two-way working;	a design of the <del>on-site road pattern network</del> and connections <del>with the surrounding area that which significantly improves residential amenity, the pedestrian environment and public transport access in the area of the one-way system, and does not have an unacceptable impact on traffic congestion eirculation in the surrounding area, and on routes in the primary London Borough of Hammersmith and Fulham and the Royal Borough, a key component in returning providing the one-way system to two-way working;</del>	RBKC. Hearing discussions.	C&C agree with this revised wording.
CA7(j)	community and health facilities;	<u>social and community</u> <del>and health</del> facilities;	RBKC. Hearing discussions.	C&C agree with this revised wording.

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
CA7(l)	<p>securing highway contributions including the investigation and implementation of measures to return the Earl's Court one-way system to two-way working and improve the pedestrian environment;</p>	<p>securing highway contributions including the investigation, <u>in consultation with TfL and the Boroughs, into returning the Earl's Court one-way system to two way working; and implementation of those measures identified during the investigation commensurate to the development proposal; to return the Earl's Court one-way system to two-way working and significant improvements to quality of residential amenity, the pedestrian environment and public transport access in the area of the Earl's Court one-way system;</u></p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C agree with this revised wording.</p>
CA7(m)	<p>improvements to tube, bus and rail access, including accessibility from the West London Line to the underground network and the extension of bus services into the site;</p>	<p>improvements to tube, bus and rail access, including <u>accessibility-interchange</u> from the West London Line to the underground network and the extension of bus services into the site;</p>	<p>RBKC. Hearing discussions. Not in PS</p>	<p>C&amp;C agree with this revised wording.</p>
26.3.1		<p>Add at the end of the paragraph:  <u>There is also a risk that the SPD is not adopted in advance of a planning application being submitted for the Strategic Site. If this risk is realised, the planning application will be considered in accordance with Policy CA7 and any material planning considerations, which</u></p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C agree with this additional wording proposed.</p>



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
<p>P. 170 Corporate and Partner Actions. Add a new point.</p>		<p><u>may include up to date evidence and viability being prepared for the SPD and a planning application.</u> Add a new point. <u>The Directorate of Planning and Borough Development will work with LBHF and the GLA to prepare a Supplementary Planning Document / Opportunity Area Framework to bring forward the redevelopment of the Earls Court, including social and community uses as required to sustain a balance community.</u></p>	<p>RBKC. Hearing discussions. Not in PS</p>	<p>C&amp;C agree with this additional wording proposed.</p>
<p>31.3.5</p>	<p>The Keeping Life Local Strategic Objective (Chapter 30) introduces the concept of walkable neighbourhoods, and includes a map which shows those parts of the Borough that are not within five minutes walk of a centre. The main areas of deficiency are in the Kensal and Latimer areas. New centres in these areas will meet this deficiency, with the scale of development within these new centres reflecting the nature of the proposed development in the wider area.</p> <p>A significant amount of development is expected within the plan period in the Earl's Court and West Kensington Opportunity Area. This site, designated within the draft London Plan as an Opportunity Area, straddles the boundary</p>	<p>The Keeping Life Local Strategic Objective (Chapter 30) introduces the concept of walkable neighbourhoods, and includes a map which shows those parts of the Borough that are not within five minutes walk of a centre. The main areas of deficiency are in the Kensal and Latimer areas <u>and the area of the Earl's Court Exhibition Centre Strategic Site.</u> <del>New centres in these areas will meet this deficiency, with the scale of development within these new centres reflecting the nature of the proposed development in the wider area.</del> <u>In addition; a significant amount of development is expected within the plan period in the Earl's Court and West Kensington Opportunity Area. This site, designated within the draft London Plan as</u></p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C agree with this revised wording.</p>

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
	<p>with Hammersmith and Fulham. Both the quantum of development, and its detailed nature (including whether the constituent parts lie in this Borough or within Hammersmith and of housing, as well as business uses, leisure and hotel floorspace, and a destination cultural facility. This development is likely to generate some retail need.</p> <p>A neighbourhood centre in this area, will therefore, be appropriate, as long it is of a scale which does not harm the vitality of nearby centres. A new centre is 'supported' rather than 'required' as it is possible that its eventual location may be in Hammersmith &amp; Fulham.</p>	<p>an Opportunity Area, straddles the boundary with Hammersmith and Fulham. Both the quantum of development, and <u>the distribution of land uses across the Opportunity Area its detailed nature (including whether the constituent parts lie in this Borough or within Hammersmith &amp; Fulham)</u> will be established within a future planning brief. <u>This brief will be prepared jointly by LBHF, this Borough and the GLA. However, It is likely that the wider area Opportunity Area will include a significant amount of housing, as well as business uses, leisure and hotel floorspace, and a destination cultural destination facility.</u> This development is likely to generate some retail need <u>in its own right.</u></p> <p><u>The new centres at Kensal, Latimer and Earl's Court will serve a localised retail catchment, providing the convenience goods and services required by the local communities. The extent to which, from a retail perspective, there is scope for a larger centre on any of these sites, will depend on a detailed analysis of retail need, taking account of the vitality and viability of existing centres (both in this and within neighbouring Boroughs) both at the time of the development and in the</u></p>		



Paragraph No.	Original Wording	New Wording	Reason	C&C Response
CF1	<p>d) require the establishment of new centres in the Latimer and Kensal areas to address identified retail deficiency;</p> <p>(e) support the establishment of a new neighbourhood centre in the Earl's Court Opportunity Area, to serve the day-to-day needs of the development.</p>	<p><u>longer term.</u></p> <p><del>A neighbourhood centre in this area, will therefore, be appropriate, as long it is of a scale which does not harm the vitality of nearby centres.</del> A new centre is 'supported' rather than 'required' <u>within the Earl's Court wider area</u> as it is possible that its eventual location may be in Hammersmith &amp; Fulham.</p> <p>d) require the establishment of new centres in the Latimer and Kensal areas to address identified retail deficiency, and support the establishment of a new <u>centre in the Earl's Court &amp; West Kensington Opportunity Area, with small scale retail provision to serve the day-to-day needs of the development. Any new centre must comply with the requirements of PPS4, and be of a scale that does not have an unacceptable impact on existing centres.</u></p> <p><del>(e) support the establishment of a new neighbourhood centre in the Earl's Court Opportunity Area, to serve the day to day needs of the development.</del></p>	<p>RBKC. Hearing discussions.</p>	<p>C&amp;C agree with the proposed changes except for reference to small scale retail. C&amp;C consider that small scale retail implies that the type, nature and amount of retail provision will be limited and restricted. It is unnecessary and overly prescriptive at this stage to limit and restrict retail provision. The</p>



Paragraph No.	Original Wording	New Wording	Reason	C&C Response						
Chapter 37 Infrastructure	Infrastructure table	<table border="1"> <tr> <td data-bbox="180 1133 501 1294">Place</td> <td data-bbox="180 936 501 1133">Not in the infrastructure table in Chapter 37 (but listed in the 'Place' infrastructure section)</td> <td data-bbox="180 719 501 936">Not in the 'Place' infrastructure section (but listed in the infrastructure table) in Chapter 37</td> </tr> <tr> <td data-bbox="509 1133 794 1294">Earl's Court</td> <td data-bbox="509 936 794 1133">Additional new public open space, including consideration opportunities to create biodiversity</td> <td data-bbox="509 719 794 936">CCHP network or similar</td> </tr> </table>	Place	Not in the infrastructure table in Chapter 37 (but listed in the 'Place' infrastructure section)	Not in the 'Place' infrastructure section (but listed in the infrastructure table) in Chapter 37	Earl's Court	Additional new public open space, including consideration opportunities to create biodiversity	CCHP network or similar	RBKC. For clarification purposes.	appropriate provision of retail floorspace will be determined through the preparation of the SPD, masterplanning and supporting assessment and evidence. C&C agree with this additional wording proposed.
Place	Not in the infrastructure table in Chapter 37 (but listed in the 'Place' infrastructure section)	Not in the 'Place' infrastructure section (but listed in the infrastructure table) in Chapter 37								
Earl's Court	Additional new public open space, including consideration opportunities to create biodiversity	CCHP network or similar								
Chapter 37 several pages		<p>Pg248 (where): <del>Community facilities in Earl's Court area, as of 100 West Cromwell Road Earl's Court 'Place'.</del></p> <p>Pg248 (where): Earl's Court <u>Exhibition Centre Strategic Site</u></p>	RBKC. Hearing discussions.	C&C agree with this revised wording.						

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
		<p>Pg249 (where): Earl’s Court <u>‘Place’</u></p> <p>Pg249 (where): Earl’s Court <del>One Way System</del> <u>‘Place’</u></p> <p>Pg249 (where): Earl’s Court <u>‘Place’</u> / <del>Warwick Road area: NHS K&amp;C requirements:</del></p> <p>Pg249 (where): Earl’s Court <u>‘Place’</u> <del>and West Brompton Stations interchange</del></p> <p>Pg249 (what): Potential for improved public transport interchange <u>at Earl’s Court and West Brompton Stations</u></p> <p>Propose change to risk 7(b) Risk (ii) in Chapter 39 to become Risk 7(c) to the following:</p> <p>Column 3: Dependency – <u>n/a</u></p> <p>Column 4: Central to the delivery – <u>yes</u></p> <p>Column 5: Risk – Risk (ii) The different sites are not developed comprehensively but come forward in a piecemeal manner</p> <p>Column 6: Likelihood – <u>low med</u></p> <p>Column 7: Impact on strategy – med</p> <p>Column 8: Plan B – yes</p> <p>Column 9: Alternatives – <u>Strategic Site comes forward on its own. The policy and supporting text in chapter 26 takes this in</u></p>		

Paragraph No.	Original Wording	New Wording	Reason	C&C Response
		<u>to account.</u>		

2 SEPTEMBER 2010