

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

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# CONSULTATION RESPONSES SCHEDULE: SUSTAINABILITY APPRAISAL

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SPD Supporting Evidence Document: Sustainability Appraisal

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
433	Nicholas	Fernley	Hammersmith & Fulham Historic Buildings Group	Sustainability Appraisal		<p>we have reviewed the revised draft Sustainability Appraisal for the Opportunity Area dated November 2011, and we are very disappointed that the comments made by English Heritage in their 5 May 2011 letter appear to have been largely disregarded. In particular (but not solely):</p> <p>- Although the ecological and open space benefits of Brompton Cemetery are noted, there is no mention in the section 2 'Sustainability objectives, baseline and context', 2.2.4 'Heritage' of PPS5 or of two forms of designated heritage assets - Registered Parks and Gardens of Historic Interest (Brompton cemetery) or Archaeological Priority Areas.</p>	<p>Change proposed.</p> <p>Section 2.2.4 will be revised to include reference to PPS5, the 'immunity from listing' for Earl's Court 1, the listed buildings / parks and gardens surrounding the OA (including Brompton Cemetery) and Archaeology.</p>
434	Nicholas	Fernley	Hammersmith & Fulham Historic Buildings Group	Sustainability Appraisal		<p>we have reviewed the revised draft Sustainability Appraisal for the Opportunity Area dated November 2011, and we are very disappointed that the comments made by English Heritage in their 5 May 2011 letter appear to have been largely disregarded. In particular (but not solely):</p> <p>- Indeed PPS5 is not mentioned at all, and neither is there a suggestion that what in PPS5 is named as undesignated heritage assets (so-called 'hidden heritage') should be sought, identified, and evaluated as part of the preliminary studies towards a scheme. Once again, we ask that reference be made in the SPD to PPS5.</p>	<p>Change proposed.</p> <p>Section 2.2.4 will be revised to include reference to PPS5, especially relating to considering proposals in the setting of heritage assets and unidentified heritage assets.</p>
435	Nicholas	Fernley	Hammersmith & Fulham Historic Buildings Group	Sustainability Appraisal		<p>we have reviewed the revised draft Sustainability Appraisal for the Opportunity Area dated November 2011, and we are very disappointed that the comments made by English Heritage in their 5 May 2011 letter appear to have been largely disregarded. In particular (but not solely):</p> <p>- Sustainability Objective 9 (page 28), Regeneration and Land Use, still refers to "maximising development on appropriate sites" rather than "optimising development" - the former regarded by English Heritage as seldom consistent with sustainable development.</p>	<p>Change proposed.</p> <p>'Maximising' will be replaced with 'optimising'.</p>
436	Nicholas	Fernley	Hammersmith & Fulham Historic Buildings Group	Sustainability Appraisal		<p>we have reviewed the revised draft Sustainability Appraisal for the Opportunity Area dated November 2011, and we are very disappointed that the comments made by English Heritage in their 5 May 2011 letter appear to have been largely disregarded. In particular (but not solely):</p> <p>- In 2.3, Task A3: Identifying sustainability issues and problems (page 26) the final issue - Heritage and the built environment - is commented on thus:</p> <p>[bold] Heritage and the built environment [bold]: Protection and enhancement of the existing built environment and surrounding conservation areas (including architectural distinctiveness, townscape, landscape and archaeological heritage) poses a challenge to the location and scale of future development.</p> <p>We would suggest that, in the context of sustainability, the challenge is the other way round! It is more common, in the Historic Buildings</p>	<p>Change proposed.</p> <p>Propose change to table 3 'Opportunity Area Issues' to identify the potential conflict between new development and enhancing and respecting the character and appearance of heritage assets.</p>

						Group's experience, for it to be a proposed development that poses a challenge to the existing built environment and its character.	
1560	Claire	Craig	English Heritage	Sustainability Appraisal		We consider that establishing design parameters is an important part of the function of this SPD and height is an important component of design. This part of West London is extremely fortunate in possessing remarkably well preserved historic townscapes; something of significant value in inner London. We recommend that a robust SA highlight, as integral to the sustainability of developing this site, the need to resolve issues involving potential impacts across the boundary of the site on the setting of heritage assets around the development. Once this is achieved and heritage assets are properly integrated into the Character Area and Townscape and Visual Analysis work, we consider there should be evidence of a sufficiently full understanding of local context to enable the SPD to provide effectively for the historic environment.	<p>Change proposed.</p> <p>Section 2.2.3 will be revised to include reference to the historic character of the surrounding area.</p> <p>Section 2.2.4 will be revised to include specific reference to PPS5, listed structures and buildings, registered parks and gardens and archaeological areas surrounding the OA in the baseline analysis.</p> <p>Propose change to table 3 'Opportunity Area Issues' to identify the potential conflict between new development and enhancing and respecting the character and appearance of heritage assets.</p>
1561	Claire	Craig	English Heritage	Sustainability Appraisal		English Heritage welcomes the recognition of the potential conflicts between the quantum of development and impacts on the environment in Section B on page 4. We note the removal of the assessment of the three development capacity scenarios in favour of a 'worst case' scenario, and consider that this removes the opportunity of testing the sustainability of less intensive development and adjusting the plan depending on the outcome of those tests.	<p>Change proposed.</p> <p>The SA uses the 'worst case' scenario to test the suitability of the Key Objectives in the SPD against a worst case scenario being the highest density capacity. However, table 8 assesses the Key Principles in the SPD against the SA objectives. This will be made clear in the section titled 'Developing the SPD options' in the SA.</p>
1562	Claire	Craig	English Heritage	Sustainability Appraisal		Otherwise, as noted above, we are [underline] very concerned [end underline] that the SA barely seems to have been amended to take account of the comments that we made in our 5 May response despite our very positive meeting with the Project Team. This is of particular concern in respect of the failure to identify the Grade I Registered Park and Garden of Historic Interest, Brompton Cemetery, as a heritage asset in paragraph 2.2.4.	<p>Change proposed.</p> <p>Section 2.2.4 will be revised to specify all heritage assets within and adjacent to the OA.</p>
1563	Claire	Craig	English Heritage	Sustainability Appraisal		The most significant concern about the SA, however, is its apparent unwillingness to develop solutions to areas of incompatibility identified between SA Objectives. English Heritage notes that incompatibilities are identified between heritage and transport, stable economy and regeneration without any explanation of those incompatibilities and without any proposal as to how the plan might seek to overcome them. In not undertaking this exercise, the SA largely abdicates its primary function, to identify ways in which to make the plan that is the subject of assessment more sustainable.	<p>Change proposed.</p> <p>Table 6 will be revised to specify the potential conflicts and highlight the importance of resolving these in the SPD.</p>
1564	Claire	Craig	English Heritage	Sustainability Appraisal		English Heritage recognises that the commentary for Heritage and the Built Environment in Table 7 on page 41 is designed to resolve potential conflict between the conservation and enhancement of the historic environment and new development. Regrettably, English Heritage considers that the SPD principles and the guidelines in the TVA require significant amendment before they can achieve the results suggested in Table 7 of the SA. If the SA examined the matter more carefully using a range of scenarios, English Heritage considers that a more coherent strategy for the development of tall buildings would be achieved by modelling impacts on key views. This would identify potentially appropriate locations for buildings of varied scale and places where tall building would be sensitive or inappropriate.	<p>Change proposed.</p> <p>We believe these comments relate to table 8, not table 7.</p> <p>As the SPD is a framework, it does not specifically identify maximum heights in areas for tall / taller buildings, as the authorities are concerned that development would then be built up to those heights. The authorities believe that it is better to control building heights by considering the impacts of such proposals on their</p>

					<p>Alternatively the SA could recommend the preparation of a specific tall building strategy for the OA, an approach that would also accord far better with our joint publication with CABE Guidance on Tall Buildings (July, 2007).</p>	<p>individual merits. The SPD includes various Key Principles in the Urban Form Strategy to control the impact of tall buildings, most importantly is UF21 which requires proposals to demonstrate that they do not have a negative impact on views identified and analysed in the Townscape Views Analysis. UF26 requires 'the height and massing of new buildings on the edges of the OA will be expected to respect the scale and massing of neighbouring buildings'.</p> <p>As a result of this consultation, several Key Principles relating to heritage assets have also been revised as follows:</p> <p>Key Principle UF19 requires that development preserves or enhances the character, appearance and setting of surrounding conservation areas and listed buildings. Key Principle UF20 requires development to preserve or enhance the character and appearance and setting of Brompton Cemetery and its listed buildings. Key Principle UF27 requires that development will be expected to preserve or enhance the character, appearance and setting of any listed buildings or conservation areas around the edges of the OA. In addition to this, para 4.11 refers to the English Heritage / CABE Guidance on Tall Buildings (2007) and para 41.2 refers to the EH document titled 'The Setting of Heritage Assets' (2011).</p> <p>These changes to the SPD will be reflected in the SA, which will also recommend that the Design and Access Statement submitted as part of the planning applications considers the impact of buildings on nearby heritage assets.</p>
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