

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

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# CONSULTATION RESPONSES SCHEDULE: INTRODUCTION

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## Chapter 01: Introduction

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
424	Nicholas	Fernley	Hammermsith & Fulham Historic Buildings Group	01		<p>the sheer volume of printed matter related to the redevelopment of the Opportunity Area continues to be something of a deterrent to informed comment, requiring considerable investment of time and thought by those of us concerned to see a pleasant and successful scheme implemented. We are disappointed that the revised draft SPD still contains neither an executive summary nor an index, while the Contents List identifies only chapter titles, not the chapter sub-headings that describe the specific topics being addressed. This makes the document much harder to absorb.</p> <p>Proposal: Please add an executive summary and index, and also expand the Contents List to include second-level sub-headings.</p> <p>Reason: for clarity and ease of use.</p>	No change necessary. Given the complexity of the issues addressed in this SPD, it was felt to be impractical to provide an executive summary. The chapter titles have been titled in such a way so as to make it as easy as possible to decipher where a particular topic would be addressed in the SPD.
442	Arthur	Tait	Friends of Brompton Cemetery	01	Para 1.0, Para 1.1	<p>We note in 1.0 and 1.11. that the SPD 'once adopted carries considerable weight when assessing planning applications'.</p> <p>'Once adopted' implies that it will not carry weight for the CapCo Planning Application if that is determined by the LBHF Planning Committee before the SPD is adopted. In that case surely the Application cannot be considered properly and should be rejected for the time being.</p>	No change necessary. Para 1.11 states 'The draft SPD is a material consideration for planning purposes, which, once adopted, can be given more weight when determining relevant planning applications' whilst para 1.0 does not refer to adoption. It is unclear where this specific quote comes from.
621	Alan	Tenenbaum	Under The Bridge	01	Para 1.16	<p>Whilst we appreciate that the Draft SPD has been produced as a response to the CapCo proposals (see paragraph 1.16 of the SPD), it is important that the SPD is not so inflexibly tied to that scheme that it is incapable of responding to the uncertainties of the present time, the challenges that will inevitably face the comprehensive redevelopment of this area and the opportunities that might present themselves to overcome such challenges.</p>	Change proposed. The SPD responds to the Capco proposals only in terms of the area of land which the Opportunity Area covers. The SPD has been drafted such that it would be used to assess any scheme coming forward within the Opportunity Area. Clarification on this will be added to para 1.16 of the SPD.
624	Alan	Tenenbaum	Under The Bridge	01	Para 1.15	<p>PURPOSE OF THE SPD - paragraph 1.15:</p> <p>Following the last bullet point and text in this draft paragraph, add the following words at the end of paragraph 1.15:</p> <p>[red bold underlined] "It recognises that, more than ever in the current time of economic uncertainties, flexibility will be needed to achieve the strategic vision of comprehensive redevelopment, as reflected in Key Principle HO1. This SPD is not intended to eliminate or constrain other acceptable development and/or strategies for achieving sustainable comprehensive regeneration in accordance with relevant London Plan and Core Strategy policies". [end red bold underlined]</p>	Change proposed. Text will be added to para 1.16 of the SPD.

						<p>This amendment is intended to emphasise the flexibility that will be needed in order to ensure that the OA vision is deliverable and to link the purpose of the SPD directly to the relevant policies of the London Plan and the Core Strategies.</p>	
						<p>We write on behalf of our client, Cockpit Hotel Group, the owners of the Ibis Hotel, Lillie Road, and to provide comments in relation to the above consultation.</p> <p>Figure 1.3</p> <p>Figure 1.3 illustrates the boundary of the Opportunity Area (OA). The OA comprises 37.2 hectares of land split between the London Borough of Hammersmith and Fulham (LBHF) and the Royal Borough of Kensington and Chelsea (RBKC), incorporating land within the Earl's Court Ward (LBHF). The OA is defined by Warwick Road and the West London Line to the South.</p> <p>The Opportunity Area presents significant opportunity for regeneration comprising estate renewal. Housing and employment growth. It is also an area where policy encourages additional hotel accommodation. For this reason, we request that the boundary of the Opportunity Area, as outlined in Figure 1.3, is modified to also include the Ibis hotel site on Lillie Road and the adjoining land (this is shown in the attached plan). The hotel is ideally located just outside a busy town centre. It provides convenient accommodation to visitors of Hammersmith and Fulham and helps to draw tourists into the immediate area thus encouraging economic development.</p> <p>Including the hotel site within the Opportunity Area boundary, will support the future expansion of the hotel in order to accommodate additional guests which in turn will increase employment growth in line with the objectives of the OA.</p>	
821	Claire	Buckley	Cockpit Hotel Group	01	Figure 1.3	<p>We trust that you will take these comments into consideration in progressing the LDF Development Management DPD.</p>	<p>No change necessary. The boundary of the Opportunity Area is set in the London Plan and borough Core Strategies and cannot be altered in this SPD.</p>
1286	Ben	Sawbridge		01	Para 1.17	<p>That raises the question of TfL's purpose in contributing its land to a potential comprehensive development. If it is to profit from the development, that would be a corrupt motive. TfL's raison d'etre is to carry passengers, not to collaborate in property speculation. The cobbler should stick to his last.</p>	<p>No change necessary. For the purposes of the SPD, TfL is subject to a strict protocol whereby there is complete separation between the organisation's land owning interests and its statutory role in preparing and assessing an evidence base for the SPD. All transport analysis contained in the SPD has been carried out without regard to any landowner or planning application.</p>
1397	Jane	Willmot	Hammersmith and Fulham Disability	01	Para 1.11	<p>1.3. We would accept this view if</p> <p>a) the SPD had specifically stated that the SPD should be read in</p>	<p>Change proposed. The SPD will be amended to state that the SPD should be read in conjunction with the Mayor's London Plan and the borough Core Strategies and other relevant Development Plan Documents and Supplementary</p>

			Forum			<p>conjunction with the London Plan 2011 and the H &amp; F Core Strategy and submission Development Management DPD etc and equivalent K&amp; C policies (this is not the case. The wording in para 1.10 just refers to supplementary detail to other policies and documents. In the next para 1.11 the SPD specifically states that it is a material consideration for planning purposes. We are not clear what this means.)</p> <p>b) no policies were duplicated in this SPD (this is not the case)</p>	<p>Planning Documents.</p> <p>'Material consideration' means that the SPD and the key principles contained within it must be considered by case officers when determining any planning applications.</p>
1398	Jane	Willmot	Hammersmith and Fulham Disability Forum	01		<p>1.4. The SPD is not explicit that it should be read in conjunction with other documents. CS 2011 also does not have an explicit policy that all development shall be accessible and inclusive. CS 2011 has a Strategic Policy A ... [italics] acceptability of any development will be dependent on... the creation of inclusive and accessible places that provide acceptable living environments.... [end italics]</p> <p>2. [underline] The status of the revised SPD [end underline]</p>	<p>Change proposed. The SPD will be amended to state that the SPD should be read in conjunction with the Mayor's London Plan and the borough Core Strategies and other relevant Development Plan Documents and Supplementary Planning Documents.</p> <p>Although LBHF's Core Strategy does not have an accessible and inclusive design policy, The Mayor's London Plan Policy 7.2 addresses this and the Policy will be added to the Policy Context section in the Urban Form Strategy.</p>
1935	Andy	Slaughter	Labour MP for Hammersmith	01		<p>Section 1.14 states that that the purpose of the SPD is to "establish detailed guidance on the application of policies within the London Plan and the Borough's Development Plan Documents (DPDs) that will be used to assess any planning applications in the OA". Section 1.16 states that the SPD "has been prepared in response to the development aspirations of one of the major landowners within the OA, Capital and Counties (Capco)". These aims are in direct conflict with each other: the SPD cannot both offer guidance on planning applications and simultaneously be a response to plans already submitted. This sets up a fundamental conflict of interest which undermines the credibility of the whole document.</p>	<p>Change proposed. The SPD will remove the reference to the SPD being produced in response to Capco.</p>
1998	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01		<p>Level of detail and prescription contained within the draft SPD</p> <p>The Development Capacity scenarios referred to in paragraph 1.47 of the revised draft SPD contain a variety of illustrative Masterplan images. Whilst Capco welcomes the placing of these images in a supporting document it is reiterated that it must be made clear in the text that these do not and will not 'fix' a design form and layout for the ECWKOA.</p>	<p>Change proposed. Text will be added to para 1.47 clarifying that any images do not and will not fix a design form and layout for the OA, but rather are a process of capacity testing.</p>
2000	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.19	<p>The case for a comprehensive approach to the ECWKOA including the regeneration of the West Kensington and Gibbs Green housing estates</p> <p>Chapter 1, paragraph 1.19, of the revised draft SPD describes the Councils' preference for including the estates and explains key reasons in support of estate regeneration. Capco support the inclusion of the estates and is of the strong opinion that the inclusion of the estates provides a series of benefits, including inter alia:</p>	<p>Noted.</p>

						- Maximising the potential for the ECWKOA to deliver significant new homes and jobs.	
2001	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.19	<p>The case for a comprehensive approach to the ECWKOA including the regeneration of the West Kensington and Gibbs Green housing estates</p> <p>Chapter 1, paragraph 1.19, of the revised draft SPD describes the Councils' preference for including the estates and explains key reasons in support of estate regeneration. Capco support the inclusion of the estates and is of the strong opinion that the inclusion of the estates provides a series of benefits, including inter alia:</p> <p>- Optimising the ability of ECWKOA to make a very significant contribution towards housing requirements.</p>	Noted.
2002	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.19	<p>The case for a comprehensive approach to the ECWKOA including the regeneration of the West Kensington and Gibbs Green housing estates</p> <p>Chapter 1, paragraph 1.19, of the revised draft SPD describes the Councils' preference for including the estates and explains key reasons in support of estate regeneration. Capco support the inclusion of the estates and is of the strong opinion that the inclusion of the estates provides a series of benefits, including inter alia:</p> <p>- Delivering new high quality and well designed development, comprising a variety of built form, streets and spaces.</p>	Noted.
2003	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.19	<p>The case for a comprehensive approach to the ECWKOA including the regeneration of the West Kensington and Gibbs Green housing estates</p> <p>Chapter 1, paragraph 1.19, of the revised draft SPD describes the Councils' preference for including the estates and explains key reasons in support of estate regeneration. Capco support the inclusion of the estates and is of the strong opinion that the inclusion of the estates provides a series of benefits, including inter alia:</p> <p>- Providing new better quality homes and environment for existing estate residents.</p>	Noted.
2004	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.19	<p>The case for a comprehensive approach to the ECWKOA including the regeneration of the West Kensington and Gibbs Green housing estates</p>	Noted.

						Chapter 1, paragraph 1.19, of the revised draft SPD describes the Councils' preference for including the estates and explains key reasons in support of estate regeneration. Capco support the inclusion of the estates and is of the strong opinion that the inclusion of the estates provides a series of benefits, including inter alia:  - Providing new homes of a type and design that is more able than existing stock to cater for housing needs.	
2005	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.19	The case for a comprehensive approach to the ECWKOA including the regeneration of the West Kensington and Gibbs Green housing estates  Chapter 1, paragraph 1.19, of the revised draft SPD describes the Councils' preference for including the estates and explains key reasons in support of estate regeneration. Capco support the inclusion of the estates and is of the strong opinion that the inclusion of the estates provides a series of benefits, including inter alia:  - Providing new commercial and social facilities.	Noted.
2006	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.19	The case for a comprehensive approach to the ECWKOA including the regeneration of the West Kensington and Gibbs Green housing estates  Chapter 1, paragraph 1.19, of the revised draft SPD describes the Councils' preference for including the estates and explains key reasons in support of estate regeneration. Capco support the inclusion of the estates and is of the strong opinion that the inclusion of the estates provides a series of benefits, including inter alia:  - Fostering the creation of new or enhanced communities.	Noted.
2007	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01		The supporting documentation  - At page 14 of the revised draft SPD is set out the timetable and consultation process of the SPD along with reference to "... supporting evidence documents... produced in order to inform... " the revised draft document. The documents are found on the websites of the three authorities.	Noted.
2010	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.11	The draft SPD should at this stage be afforded little weight owing to the consultation process that is ongoing.	No change necessary. The wording is relevant to the adopted version of the SPD. As there will be further draft before adoption, there is no necessity to change the wording.
2011	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.16	It should be emphasised that the SPD has been prepared to provide guidance to supplement the policy and objectives for the Opportunity Area set out in relevant development plan documents	No change necessary. This is set out in para 1.10.

2012	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.14 - 1.19	It is important that the document clarifies that:  - The chosen option for the Estates Regeneration is supported by both strategic adopted planning and housing policy (London-wide and local);	No change necessary. The policy position is set out in para 5.9 of the Housing Strategy and within the Appendix (Policy Context).
2013	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.14 - 1.19	It is important that the document clarifies that:  - There is a proportionate evidence base, including the "Economic Appraisal" but also a wide range of other socio-economic data, which demonstrates that this is the most appropriate approach from a planning policy point of view;	Noted.
2014	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.14 - 1.19	It is important that the document clarifies that:  - That this is without prejudice to consultation with residents and any final decisions on the CLSA, which will require appropriate additional information and or/evidence.	No change necessary. The current wording in para 1.18 is considered to be sufficient, which makes reference to the need for further consultation with local residents.
2015	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.17 Figure 1.3	Capco is the freehold owner of the Seagrave Road Car Park and joint owner of the Empress State building.	Change proposed.
2016	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.18	Capco welcomes and agrees with the conclusions in respect of the review undertaken of the economic benefits and disbenefits of estate regeneration which are, that estate regeneration as part of a wider masterplan delivers optimum benefits.	Noted.
2017	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.19	Capco welcome the authorities' preference that estate regeneration should form part of a comprehensive redevelopment.	Noted.
2018	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.20	Whilst reference is made at paragraph 1.11 to '... planning applications', the SPD should acknowledge that the 'comprehensive' development that is referred to at paragraph 1.20 could come forward over a number of years and be the subject of a sequence of planning applications that relate to different parts of the ECWKO. There is, and should be, no requirement for development proposals in the ECWKO to be put forward at the same time. The SPD will provide the context for the consideration of the applications relating to development in the ECWKO.	No change necessary. LBHF's Core Strategy refers to 'comprehensive development' whereas the Mayor's London Plan refers to a 'comprehensive approach'. The wording within para 1.20 is consistent with this. There is no requirement that all planning applications in the OA should be submitted at one time. The reference to comprehensive development instead refers to the need for a holistic approach to the design and use of the OA so that discrete sites can come forward in the OA, but that these have regard to the urban form and land use strategy as set out in this SPD. Each element should be designed in such a way that it does not impede other parts of the OA coming forward for redevelopment.
2019	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	01	Para 1.38	The supporting evidence documents that are referred to at page 14 (and it is stated are found on the authorities' website) fail to include the Economic Viability Summary that is found on the websites. The viability summary document is not referred to in the revised draft SPD; has not been contributed to by Capco (contrary to the manner in which the document is drafted); and should not be relied upon for the purposes of an assessment of viability associated with proposals that might be put forward pursuant to applications for planning permission.	Change proposed. The Viability Summary will be added to the list of documents on page 14 and the Viability Summary will be amended so that it is implicit that the document has not been contributed to by Capco.