

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

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# CONSULTATION SUMMARY REPORT

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# **Earl's Court West Kensington Opportunity area Draft Supplementary Planning Document**

## **Consultation Summary Report**

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# **1. Introduction**

## **Overview**

This report summarises the outcome of consultation on the Earl's Court West Kensington Opportunity Area (OA) Draft Supplementary Planning Document (SPD). The consultation period ran from Friday 11 March 2011 to 5pm on Tuesday 26 April 2011, although representations made after this date were accepted.

The SPD is being prepared jointly by the London Borough of Hammersmith and Fulham (LBHF) and the Royal Borough of Kensington and Chelsea (RBKC) in partnership with the Greater London Authority (GLA). The overarching objectives of the SPD are to:

- establish detailed guidance on the application of policies within the London Plan and the boroughs' Development Plan Documents (DPDs) that will be used to assess any application in the Opportunity area;
- establish and provide guidance for masterplanning of the Opportunity area;
- bring forward partnership working in redeveloping the Opportunity Area and maximise public and private resources in regeneration; and
- bring consultation forward in the planning process by engaging the public and stakeholders as early as possible in the development process.

## **Consultation Status**

Consultation on the draft SPD is in advance of the statutory public consultation required in accordance with Regulation 17 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and section 30 and 34(1) of the Greater London Authority Act 1999 (as amended). Once prepared, the second draft SPD will be published for this statutory consultation and is anticipated to commence in November 2011.

## **The Earl's Court and West Kensington Opportunity Area**

The Opportunity Area comprises 37.2 hectares of land split between LBHF and RBKC, incorporating land within the Earl's Court Ward (RBKC), the North End Ward (LBHF) and the Fulham Broadway Ward (LBHF). 27.8 hectares of the site is situated within LBHF and the remaining 9.4 hectares is contained within RBKC. The Opportunity Area boundary is defined by Warwick Road and the West London Line to the east, West Cromwell Rd (A4) to the north, North End Road to the west and Old Brompton Road/Lillie Road to the south. The Seagrave Road car park is a parcel of land within the Opportunity Area situated south of Lillie Road bounded by Seagrave Road and the West London Line. 27.8 hectares of the site is contained within LBHF and the remaining 9.4 hectares is contained within RBKC comprising the Earl's Court 1 Exhibition Building site. The Opportunity Area in the context of the surrounding area is shown in Figure 1 below.

## **Existing Land Use**

The Opportunity Area currently features a range of land uses. The Earl's Court 1 and 2 Exhibition Centres and ancillary servicing areas dominate the eastern side of the Opportunity Area, rising to a height equivalent to 18 stories and covering an area of 5.3 ha. The 33-storey Empress State building is situated immediately to the west of Earl's Court 2 and is the tallest building within the Opportunity Area and is currently occupied by the Metropolitan Police. To the north of Earl's Court 2, the TfL Lillie Bridge Depot covers a substantial area of 7.3ha comprising marshalling yards, engineering workshops and Ashfield House; a 9-storey training facility that dominates the northern boundary of the Opportunity Area along the A4.

The West Kensington and Gibbs Green Housing Estates lie to the west of the Earl's Court Exhibition Centre and the TfL Lillie Bridge Depot. The larger West Kensington Estate contains 604 properties and includes several blocks of 9, 10 and 11 storeys along with low rise flats, maisonettes and terraced houses. The smaller Gibbs Green Estate features 98 properties comprising 7 medium-rise blocks. Overall the estate accommodation is primarily low and medium density housing. There are also a number of smaller ancillary land uses within the Opportunity Area.

### **Preliminary Consultation - October and November 2010**

In late October and early November 2010 a consultation leaflet and questionnaire entitled 'Earl's Court and West Kensington Opportunity Area Joint Planning Framework – consultation leaflet' was distributed to addresses within a 650m radius of the boundary of the Opportunity Area within both LBHF and RBKC. Copies of the leaflet and questionnaire were also made available from the Fulham Broadway and West Kensington libraries and the Earl's Court Exhibition Centre. The questionnaire was published on both LBHF's and RBKC's websites and the consultation was also advertised in local newspapers. A total of 35,000 leaflets were distributed.

The preliminary consultation had three key objectives:

1. to introduce the community to the potential redevelopment of the Opportunity area;
2. to identify the key issues affecting the Opportunity Area and its surroundings; and
3. to identify what changes the community would like to see through the redevelopment of the Opportunity area.

A report was prepared summarising the outcome of the preliminary consultation, This report is titled the 'Preliminary Consultation Report, January 2011' and was published on the RBKC and LBHF website as a supporting document to the SPD consultation.





**Figure 1: The Earl's Court West Kensington Opportunity Area**

## 2. Method of Consultation

### Overview

Several consultation techniques were used to engage the public and interested parties and encourage feedback, namely;

- Consultation leaflet distributed to surrounding properties;
- Consultation letter mail-out to interested parties;
- Public notice in local newspapers;
- Press release sent to a range of media organisations along with publication on the LBHF, RBKC, and GLA (Mayor of London) websites;
- SPD Distribution to interested parties (both hardcopy and CD formats);
- Availability of the SPD for inspection at several public locations;
- Public 'Drop-In' sessions;
- Comment forms made available at drop-In sessions and online;
- Dedicated consultation email address;
- Dedicated consultation phone numbers for both LBHF and RBKC, allowing members of the public to speak directly to the SPD team; and
- Presentations to interested parties and a workshop event with the Earl's Court Society.

Further details of the various consultation techniques are provided below:

### Consultation Leaflet

A consultation leaflet was distributed to nearly all properties within 650m of the Opportunity Area boundary within each borough on 11 March 2011. A total of 35,000 leaflets were distributed. A copy of the leaflet is provided in Appendix 1, and the distribution area is shown in Figure 2 below.

The leaflet invited people to 'have their say' on the future of the Earls Court and West Kensington Area, and introduced the Opportunity Area as "*West London's New Urban Quarter*". The leaflet introduced the SPD, invited comments, set out the dates and venues for public drop-in sessions, and provided links to the SPD, supporting documents and electronic comment forms. It also provided an email address and postal address to send comments to along with phone numbers for the SPD team. A timetable setting out the indicative dates and stages leading to adoption of the SPD was also provided, along with the progress of the Landowners masterplan and the proposed submission date for a planning application.

Copies of the leaflet were also made available at West Kensington, Brompton, Chelsea, Kensington and Fulham Broadway libraries and the Earl's Court Exhibition Centre. The leaflet was also published on LBHF's and RBKC's websites.



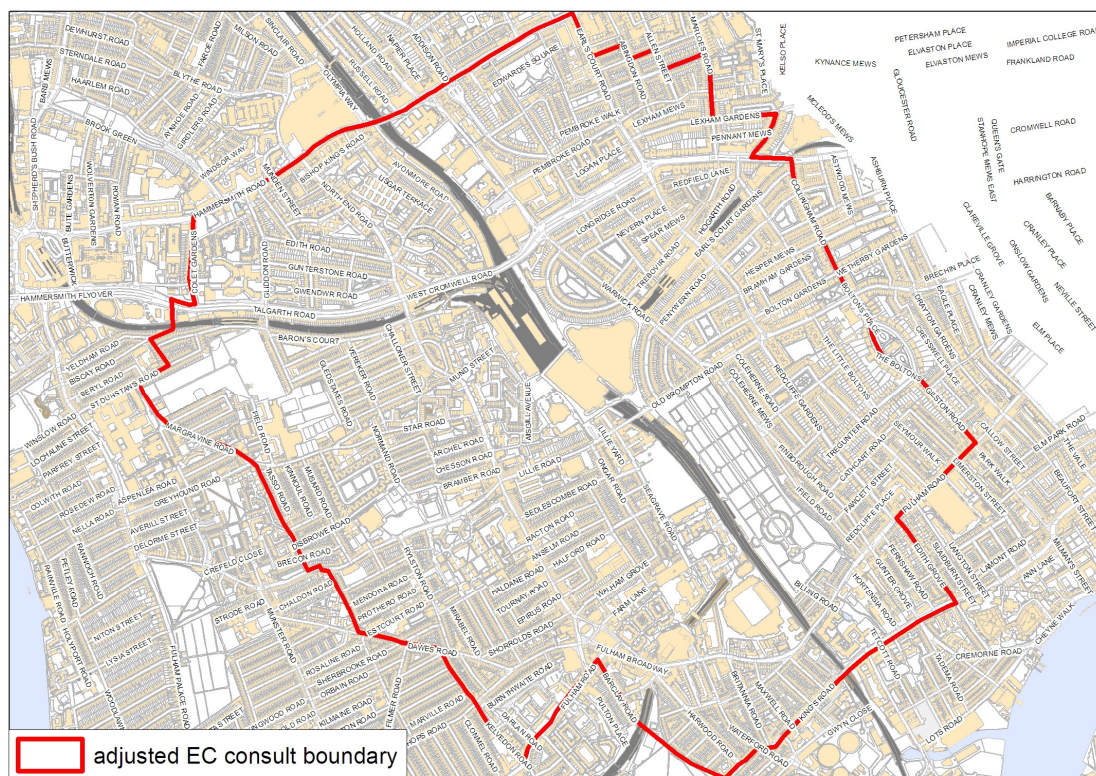


Figure 2:

## Consultation Letter

In addition to the leaflet distribution, 1900 individually addressed letters and leaflets were sent to all individuals and groups on the RBKC and LBHF Local Development Framework database along with those who commented on the Oct / Nov 2010 consultation. The letter introduced the draft SPD and invited comments. Some special interest groups were also sent a letter and leaflet.

## Public Notice

A public notice was placed in the Kensington and Chelsea Chronicle (page 30) and the Hammersmith and Fulham Chronicle (page 30) on Friday 11 March 2011. The public notice introduced the subject matter and area covered by the SPD, the period in which representations can be made, the address to which representations must be sent and locations where the SPD was available for inspection during the consultation period.

## Press Release

A press release summarising the key points of the SPD and encouraging feedback was sent to all local and major daily newspapers along with radio, television and internet based media websites, and also appeared on the LBHF, RBKC and GLA (Mayor of London) websites. As far as the boroughs are aware no media groups ran stories on the draft SPD, although there was some coverage of the Landowner's masterplan at the time.

## SPD Distribution



A hardcopy and/or CD of the draft SPD and all supporting information was sent to statutory organisations and other selected interested parties. The draft SPD was also sent to people or organisations who requested copies.

Copies of the draft SPD were also made available for inspection at the following locations:

- Duty Planning Office, Hammersmith Town Hall Extension;
- Planning Information Office, Kensington and Chelsea Town Hall;
- Housing Office, Fulham Town Hall;
- Hammersmith Library;
- Barons Court Library;
- Brompton Library;
- Kensington Central Library;
- Chelsea Library;
- Fulham Library;
- Earls Court Exhibition Centre; and
- Greater London Authority, City Hall.

The draft SPD was made available online for viewing and downloading from the LBHF, RBKC and GLA websites (as set out in the front of the SPD and consultation leaflet) at [www.lbhf.gov.uk/earlscourtspd](http://www.lbhf.gov.uk/earlscourtspd), [www.rbkc.gov.uk/earlscourtspd](http://www.rbkc.gov.uk/earlscourtspd), and [www.london.gov.uk/consultation/earls-court-and-west-kensington-opportunity-area](http://www.london.gov.uk/consultation/earls-court-and-west-kensington-opportunity-area).

### Drop-In Sessions

Five drop-in sessions were held (two in RBKC and three in LBHF) at locations surrounding the Opportunity area, with each session based around a display summarising the key principles of the draft SPD. Hardcopies of the draft SPD and other supporting documents were made available, along with comment forms for attendees to provide comments. RBKC, LBHF and GLA staff were on hand to provide further information to attendees, answer queries, encourage feedback and receive comments. A total of 129 people attended the drop-in sessions, with details below:

Date	Time	Venue	Attendance
Thursday 17 March	14:30 to 18:30	The Westminster Suite, Earls Court Exhibition Centre, Warwick Road, SW5 9TA	14
Monday 21 March	17:00 to 21:00	St Cuthberts Church Hall, 51 Philbeach Gardens, SW5 9EB	50
Saturday 26 March	11:00 to 15:00	Holiday Inn Express, 295 North End Road, W14 9NS	18
Tuesday 29 March	11:00 to 15:00 and 27:00 to 21:00	Holiday Inn Express, 295 North End Road, W14 9NS	47

### **Comment Forms**

Comment forms were available at the drop-in sessions. These could either be returned during the session or via post. An electronic response form was also produced to record comments made online at [www.lbhf.gov.uk/earlscourtspd](http://www.lbhf.gov.uk/earlscourtspd) or [www.rbkc.gov.uk/earlscourtspd](http://www.rbkc.gov.uk/earlscourtspd).

### **Email Address**

A dedicated email address was set up so that respondents could email comments directly to the SPD team. The email address [earlscourtspdconsultation@lbhf.gov.uk](mailto:earlscourtspdconsultation@lbhf.gov.uk) was included on consultation materials and the 'how to comment' page at the front of the draft SPD.

### **Contact Phone Numbers**

Dedicated consultation phone numbers (one for LBHF and one for RBKC) were publicised in the consultation leaflet, public notice and LBHF and RBKC websites, allowing members of the public to speak directly to the SPD team during office hours.

### **Presentations**

The SPD team also made presentations to organisations who requested them. Presentations were given to the joint Design Review Panel, Friends of Brompton Cemetery, English Heritage, RBKC Disability Forum, RBKC Councillors, RBKC Officers, xxxx.

### **Planning Workshop**

In RBKC, the Earl's Court Society also requested, and offered to host, a planning workshop. The workshop was held in the St. Cuthbert's Church hall on 12 April 2011. Nearly 100 residents from the local area attended. RBKC Council Planning Officers introduced the draft SPD and described how it would be used as a material planning consideration when determining planning applications in the Opportunity Area. Attendees were asked "what they would like to see" under each of the headings of the SPD. The comments were then fed back to the group before being written up. The full schedule of comments was supplied to the Earl's Court Society for consideration and submission as part of their comments on the draft SPD.

### **3. Consultation Objectives**

Consultation on the draft SPD had four key objectives:

1. To introduce the SPD and key principles of development to interested parties at a very early stage;
2. To identify and refine key issues associated with redevelopment of the Opportunity Area and surrounding area;
3. To engage the public and interested parties in drafting the SPD by encouraging comments and feedback; and
4. To identify what changes and improvements should be made to the revised draft SPD.

## **4. Consultation Findings**

### **4.1 Overview**

83 written responses were received from a wide range of respondents including local Councillors, local amenity societies, residents and other interested individuals, landowners, businesses, developers, statutory organisations and a range of special interest groups. Responses were further broken down into 1295 separate comments. Each comment was assigned to a specific chapter, section and/or key principle of the draft SPD. Comments of a broad nature and/or that applied to several topic areas were assigned to more than one chapter in many cases.

The SPD team has considered and responded to each comment and this is set out in a detailed consultation schedule, which will be published separately. This schedule should be used for in-depth analysis of raw comments and officer responses. In many cases, the responses were noted and have assisted in the redrafting of the SPD.

The following summary of comments by chapter of the SPD identifies themes and trends, especially where large numbers of comments were received on specific issues. and where there was particular interest (or otherwise) in certain topics.

### **4.2 Introduction and Policy Context**

#### **Overview**

A total of 50 comments were received on the introduction and policy context summarised under the following topics:

- Policy Status of the Document
- Purpose of the Document
- Structure of the Document
- SPD Timetable and Supporting Information
- Summary of Preliminary Consultation
- Contextual Overview
- Historical Development

A summary of the key issues and themes raised by respondents in relation to these topics is set out below. Note that the summary of comments received on the policy context has been combined with the summary of comments on the introduction as there was much overlap and repetition of comments on both chapters.

#### **Policy Status of the Document**

Several comments were received questioning the legal status of the SPD. Some comments queried the usefulness of an SPD for the Opportunity Area given a

separate masterplan has been developed by the landowner Capco. One respondent commented that it appeared out of sequence for an application to come forward prior to the SPD being adopted. Some respondents also thought that the planning framework should be produced as Area Action Plan (AAP), instead of an SPD.

The relationship of the SPD to the Draft Replacement London Plan was also questioned. Specifically, the housing figures for the Opportunity Area, as set out in Annex 1 of the Draft Replacement London Plan, were questioned.

### **Purpose of the Document**

Few comments were made with regard to the purpose of the document although many did question its relationship with other policy documents such as the LDF for both LBHF and RBKC. The potential for a major stadium as part of redevelopment was raised as an alternative to a residential led scheme, although concern for a stadium in this location was also raised by some respondents.

The potential for the SPD and masterplan approach to stifle organic redevelopment of the area was also raised. The overall quantum of development being considered was questioned in terms of overall sustainability. The relationship of the SPD with the Draft Replacement London Plan was also questioned. Specifically, housing numbers within the Opportunity Area were questioned in terms of the housing numbers set out for the Opportunity Area in the Draft Replacement London Plan.

### **Structure of the Document**

There were a number of comments raising concern that the document was too long, confused, repetitive, complicated and not written in plain English. Some respondents also thought that the document was well laid out, logical and necessarily detailed.

### **SPD timetable and Supporting Information**

Questions were also raised over the timetable for completing the SPD, especially considering the incomplete technical reports and imminent planning applications. The relationship between the SPD timetable and the planning applications was also questioned by some respondents.

Several comments were made with regard to the incomplete technical studies underpinning the development capacity scenarios and SPD as a whole. Specific mention was made of the Transport Capacity Study, Viability Study and Energy Strategy.

### **Summary of the Preliminary Consultation (October and November 2010)**

No comments were raised with regard to the preliminary consultation however a number of comments were made on the future consultation process, and overlaps with consultation on the recently submitted planning applications for the Earls Court main site and Seagrave Road site.

### **Contextual Overview**



English Heritage commented that they would like the heritage value of the Brompton Cemetery identified and acknowledged.

### **Historical Development**

No comments were received with respect to the outline of historical development.

## **4.3 Vision and Objectives**

### **Overview**

A total of 55 comments were received on the vision and objectives from 12 separate respondents. A summary of the key issues and themes raised by respondents in relation to the vision and objectives are set out below.

### **Comments Summary**

A number of comments were made with respect to the complexity of the SPD and its comprehensive approach to guiding redevelopment, and as such the all inclusive nature of the vision and objectives. There were also comments regarding the purpose of the document and whether or not it is seeking to establish new policy. Concerns were also raised by some respondents that the vision doesn't represent the views of constituents or surrounding communities for redevelopment of the Opportunity area. A desire for more involvement by local people in formulation of a vision for redevelopment of the Opportunity Area was expressed.

One respondent made lengthy comments on the need for the vision and objectives to be flexible to enable the development of a football stadium within the Opportunity Area as part of regeneration.

Several comments expressed a desire for specific parameters to be included in the objectives relating to matters such as building height, set backs, open space the need to respect existing context etc. .

Numerous comments were received requesting rewording of passages of the vision, in some cases specific wording or more general changes.

Natural England and other respondents concerned with ecological considerations made comments in support of objectives protecting and creating open space within the vision and objectives, along with protection of existing areas of ecological value. There were comments requesting that the objectives also be strengthened in this respect.

Two comments were made expressing a need for objectives relating to art and culture to be strengthened, particularly in the context of the public realm.

A number of respondents also commented that the quantum of development being considered in the Vision and Objectives is unsustainable. In relation to this, piecemeal or organic redevelopment of the Opportunity Area was proposed as a more sustainable and viable alternative.

There were also several comments made with respect to requiring development to be 'world class' in nature with respect to quality of facilities, residential accommodation and public spaces. Building to a high environmental standard was also a common theme in comments.

## **4.4 Urban Design Strategy**

### **Overview**

A total of 430 comments were received on the Urban Design Strategy, summarised under the following topic headings:

- UD1 Making Connections
- UD2 Moving Around
- UD3 Places for People
- UD4 Urban Form
- UD5 Building Heights
- UD6 A Vibrant Mix of Issues
- UD7 Comments unrelated to key principles

A summary of the key issues and themes raised by respondents in relation to these topics is set out below.

### **UD1 Making Connections**

Support was expressed for breaking down the severance across the site however the need for and viability of a north south link were queried by some. Some concerns were raised about vehicular traffic rat running across the area and the negative impact on neighbourhoods. Some respondents raised the question of whether pedestrians could be given more priority over vehicles and whether walking could be encouraged to encourage healthy lifestyles. Conflict between vehicles and cyclists was raised several times with some respondents asking for separate clearly designated cycle lanes.

The SPD encourages the decking over of the railway lines as a means of providing links across the site but the economic viability of doing so was queried.

Capco called for the removal of the diagonal link from the Avenue to the Lillie Road/North End Road junction which they see as over prescriptive, ill founded and having a detrimental effect on the ability to regenerate North End Road. They also stated that Lillie Road square is too prescriptive as there are alternative spaces that could be provided for a potential street market and there are also land ownership constraints.

### **UD2 Moving Around**

Comments were limited in number with few strong themes emerging. There was some questioning of the hierarchy of streets and whether primary streets in the site should be no more than local distributors for getting around the site rather than facilitating through traffic. Comment was also favourable towards routes and activities which support existing centres.

There was some concern that the SPD's support for landmark buildings should not result in more tall buildings and a further comment that tall buildings are not needed to aid navigation around the Opportunity Area.

### **UD3 Places for People**

Several respondents pointed to the local deficiency of open space and a need for a large consolidated public open space big enough to be able to accommodate outdoor sports pitches and other amenity spaces. The adequacy of the contiguous open space along the Counters Creek corridor was questioned in terms of whether it was wide enough and large enough to accommodate useable amenity and play spaces and whether it would be hemmed in/overshadowed by tall buildings lining its sides.

Support was expressed for the idea of creating open spaces in the form of garden squares and some respondents were clearly concerned that the size of such spaces should reflect local character and be large enough to provide for a range of recreational needs.

With regard to other public spaces the concept of station squares was generally supported although several respondents were concerned about potential pedestrian/vehicle conflicts at Warwick Road Square.

With regard to disabled access in public places a number of concerns were expressed about the design of the public realm focussing on detailed design issues such as shared surfaces, pavement and carriageway widths and gradients across the site.

Some doubt was expressed about the functioning of a public space aligned to a large cultural facility and whether it would attract enough footfall to function. Capco felt that it was overly prescriptive for the SPD to provide in the form of a single space at the centre of the site and that the SPD should allow flexibility of approach.

### **UD4 Urban Form**

With regard to the block structure, support was expressed for taking the local LBHF/RBKC character of housing blocks placed around garden squares into the Opportunity Area. However, there was concern that some blocks with private space contained at the rear within blocks may create gated communities. The value of glimpsed views to the interior gardens of those blocks was queried if access is private. Some concerns were also expressed about the scale of blocks lining and enclosing streets and suggestions were made that buildings should be set back to reduce their impact on the streets and eaves heights should vary to avoid uniformity.

### **UD5 Building Heights**

A substantial number of comments related to the scale and massing of new buildings along the edges of the site, the effects on existing edge buildings and the local and wider impacts of tall buildings within the Opportunity Area.

Concerns were expressed by residents about the height and proximity of new buildings close to the existing Victorian residential buildings on site edges. The main concerns were the effects on privacy, outlook, daylight and sunlight. Some comments were also received regarding the design and materials of new buildings and their compatibility with the existing Victorian buildings, some of which are in conservation areas.

A number of comments specifically referred to prevailing heights in the surrounding local streets with uniform heights of 4-5 storeys and relatively few buildings above 7-8 storeys. Some respondents questioned the need or strongly objected to any new tall buildings on the site which would exceed the prevailing Victorian/Edwardian storey heights. The Empress State building was singled out as a building that should not be taken as a precedent for further tall buildings. There was however some support for clustering any taller buildings close to the Empress State building but not elsewhere on the site. There were also concerns about the impact of new tall buildings on the skyline and their impact on existing conservation areas around the Opportunity Area.

Within the site, some respondents were concerned about the potential for over enclosure of streets and open spaces by buildings of an oppressive scale. Some comments focused on the ratios of height to width expressed in the SPD as a means of controlling enclosure.

Capco are concerned that the SPD is too prescriptive in terms of widths and ratios, that dimensions and ratios should be removed from the SPD and that the enclosure above the stated ratios could be acceptable if presented as part of an appropriate design solution.

On the Seagrave Road Car Park several respondents were concerned about the impact of new buildings on the Grade I listed Brompton Cemetery.

#### **UD6 A Vibrant Mix of Uses**

The impact of new retailing on all existing centres such as Fulham Town Centre and Earl's Court Road was raised by several respondents who did not want to see the creation of a rival town centre. Capco on the other hand, commented that the location of retail uses along the High street should not be restricted (at the planning stage), if it can be demonstrated that there will be no detrimental impacts to the existing town centres.

There was some support expressed for the retention of EC1 rather than for it's replacement with a new cultural facility. Some comments focused on whether there would be enough cultural uses to fill the zone and the viability of a new cultural destination or cluster of major active uses.

The viability of offices along the A4 was also questioned.

#### **Comments unrelated to Key principles**

Some respondents questioned the assumption that the Opportunity Area needs to have a centre, and that maybe the area is better regarded as a series of conjoined parts that flow from the neighbouring context.

Some respondents believe insufficient attention is given to heritage assets on and off site and requested that more emphasis should be given to heritage in the SPD, suggesting a new key principle that relates to enhancing and protecting the historic environment.

## **4.5 Development Capacity Scenarios**

### **Overview**

A total of 118 comments were made in relation to the Development Capacity Scenarios, summarised under the following topics:

- General comments
- Development Capacity Scenario 1
- Development Capacity Scenario 2
- Development capacity Scenario 3

### **General Comments**

Several comments were made with regard to the development capacity scenarios not taking a strategic approach to the major infrastructure issues associated with each scenario, and that infrastructure should form the basis of formulation the development capacity scenarios. Many comments were critical of the cluster of tall buildings that tend to be a feature of all three scenarios, although to a lesser extent with respect to Scenario 1. Some comments also raised the possibility of combining scenarios and basing scenarios on land ownership boundaries.

Many respondents were critical of the overall scale and density associated with all three scenarios and in particular the impacts of the tall buildings on surrounding areas. There were also general comments made that the development capacity scenarios were flawed, including the land use assumptions made in the development capacity figures underpinning each scenario. Many comments were also critical of the number of houses proposed along with the amount of retail and commercial space proposed. A number of comments also pointed to the high cost associated with each scenario and whether development is feasible given the site constraints and infrastructure costs. Further development capacity scenarios were requested by some respondents involving the exclusion and inclusion of specific sites within the Opportunity Area.

There was also some confusion over the nature of the illustrative masterplans and whether these were realistic and based on the defined development capacity figures as set out in the table. Some comments also expressed the view that the illustrative masterplans prepared with respect to each development capacity scenario are misleading and appear to fix the overall layout and block structure. Some respondents also questioned the purpose and objectives of the masterplan exercise and the development of differing scenarios.

### **Development Capacity Scenario 1**



Few comments were made expressing a preference for Scenario 1, although some respondents expressed a clear preference for the estates to be excluded from redevelopment. Other respondents noted the benefits of comprehensive redevelopment including estate renewal and the benefits that flow from this.

#### **Development Capacity Scenario 2**

Although there was no strong preference for any particular scenario, several comments expressed a preference for Scenario 2 over Scenarios 1 or 3. Some respondents noted the benefits of comprehensive redevelopment, although preferred Scenario 2 to Scenario 3 on the basis that it was of lower density and building heights are lower on average.

#### **Development Capacity Scenario 3**

Most of the specific comments made with respect to Scenario 3 were negative in nature, with many respondents critical of the density, scale and height of development. Many general comments were also critical of the proposed height and density of Scenario 3 although do not specifically mention the scenario.

## **4.6 Housing Strategy**

### **Overview**

A total of 104 comments were received on the Housing Strategy from 25 respondents, summarised under the following topics:

- Estate Regeneration
- Tenure Mix
- Housing Mix
- Housing Quality and Design
- Amenity Space; and
- Accessible Housing

A summary of the key issues and themes raised by respondents in relation to these topics is set out below:

### **Estate Regeneration**

Many comments were received on estate regeneration and closely related issues, and overall it was one of the most topical and sensitive issues to come out of the consultation exercise.

There was very strong opposition to the demolition of the Gibbs Green and West Kensington estates, and the associated upheaval and inconvenience to residents and communities associated with the decant process. Many comments were received questioning the case for estate regeneration and the justification for the development proposals. Although some respondents acknowledged the benefits that could come through estate regeneration including improved quality of life and socio-economic benefits to residents.

Many questions were raised and concerns expressed regarding the nature of new accommodation and whether there would be enough accommodation for

existing residents, and whether or not some residents would have to leave the area. There was also concern expressed that if there are viability issues with redevelopment whether estate regeneration would still come forward. Questions were also raised over the proposed decant strategy. It was also noted that there has been recent investment in the Gibbs Green and West Kensington Housing estates to raise the standard of housing.

### **Tenure Mix and Housing Mix**

Many comments were made regarding the tenure mix of new housing and a diverse range of views were expressed regarding preferences in new housing. Many commented on the need for more and better affordable housing and an increased proportion of affordable housing to that currently in the area. There were also many comments expressing a desire for more affordable family housing and larger residential units, including intermediate units. Many respondents commented on the need for a diverse mix of housing types and unit sizes to cater for different groups, and the need for new communities to be mixed and balanced. The need for housing to cater for elderly and other vulnerable groups along with key workers was also raised.

Conversely, there were also strong views on the need for more high quality housing and private housing in general and less affordable housing.

### **Housing Quality and Design**

The quality and design of proposed housing was a topic raised frequently by respondents. Many expressed a strong desire for high quality, well designed homes although there were a diverse range of views on what this entails. The need for increased floorspace, access to usable outdoor space and improved accessibility were strong themes.

### **Amenity Space**

Many respondents voiced strong opinions on the need for quality communal and private amenity space associated with new housing, along with the need for existing amenity space and outdoor space to be preserved or reprovided. Concerns were expressed at the amount and location of amenity space relative to proposed housing given the proposed height of residential buildings and the density of proposed development.

### **Accessible Housing**

Housing accessibility issues were raised including the need for safe and easy access for vulnerable groups and the need for housing to be built to lifetime homes standards and wheelchair housing standards where appropriate. The need for consideration of disabled residents and other mobility impaired groups was also raised as an issue.

## **4.7 Transport and Accessibility Strategy**

### **Overview**

A total of 289 comments were received on the Transport and Accessibility Strategy from 34 respondents, summarised under the following topics.

- Strategic Transport Study and Development Scenarios
- Pedestrian Environment, Accessibility and Cycling
- Public Transport
- Road Network, Car Parking and Freight

A summary of the key issues and themes raised by respondents in relation to these topics is set out below:

### **Strategic Transport Study and Development Scenarios**

Many comments were made on the strategic nature of the Earl's Court location and the need for a strategic approach to be taken towards the provision of transport infrastructure. In addition, many comments also commented on the lack of a strategic transport study underpinning the draft SPD and raised serious concerns as to the viability of the higher density redevelopment options without such a study and key findings in place. In particular, many respondents commented on the lack of understanding of the impacts of the scenarios on London Underground services, rail services and highways infrastructure. The ability of the surrounding transport infrastructure to support major additional trips was raised by many respondents. Several respondents also commented that conclusions regarding transport interventions and impacts should not be drawn in the SPD until the findings of the strategic transport study are known.

### **Pedestrian Environment, Accessibility and Cycling**

Many respondents raised the issue of poor pedestrian accessibility within and immediately surrounding the Opportunity Area, the rundown and poorly maintained nature of footways and pedestrian safety issues on surrounding roads, especially associated with pedestrian crossings. Key principles promoting improvement and provision of pedestrian facilities were supported by many respondents.

A number of comments were made on the need to prioritise pedestrian movement within and surrounding the Opportunity Area and the need to ensure pedestrian movement is safe and unimpeded. Integration of proposed open spaces with safe and accessible pedestrian routes, along with the need to ensure pedestrian routes are prioritised from bus stops and underground stations was also raised. Many comments were also received with regard to key pedestrian access points and the need for these to be upgraded, in particular with regard to Earl's Court Station at the Warwick Road entrance and West Brompton Station. Under-width, over-crowded, cluttered and dirty footways surrounding the Opportunity Area were also raised by several respondents.

Many comments were received with respect to cycling, and similar to the views expressed regarding the pedestrian environment, respondents noted the need for provision of safe and direct cycle routes both in and around the Opportunity Area

with the ability to link into existing cycle routes. The need for adequate cycle parking associated with any new development and in particular at underground and train stations was also repeatedly raised.

The need to extend the Mayor's cycle hire scheme into the Opportunity Area was also raised. Many respondents were generally supportive of the key principles set out with respect of walking and cycling and many welcomed the overall approach to walking and cycling set out in the SPD.

### **Public Transport**

A large number of respondents raised the issue of public transport capacity and the strain the redevelopment of the Opportunity Area will place on existing London Underground and rail services in particular. Comments echoed those with respect to the Strategic Transport Study in that until the impacts of redevelopment are known it is unrealistic to consider high density redevelopment scenarios. Many expressed doubt that London Underground services in particular would be able to cope with the increased pressure and trip generation associated with redevelopment of the Opportunity Area. There was some support for the key principles in this respect although the need for specific improvements was raised.

Many respondents commented on the overcrowded and run down state of existing underground infrastructure and stations, and the need for redevelopment of Earl's Court, West Brompton and West Kensington Stations irrespective of any major redevelopment of the Opportunity Area. Improved access including step free access, along with more general circulation room at stations was raised by some respondents. The need for accessibility for mobility impaired users was also raised.

Improving capacity and reducing delay on the London Bus Network within proximity of the Opportunity Area was also raised.

### **Road Network, Car Parking and Freight**

Many comments were received on the potential impact of redevelopment on the surrounding highway network, and in particular the Earl's Court one-way system. There were strong concerns expressed about the traffic that will be generated and the additional congestion, air pollution, safety issues and amenity impacts that would result. Scenario 3 was singled out as having the greatest negative impact on the highway network in this respect. Many commented that the highway network is currently at capacity (both local highways and the strategic highway network) and existing issues need to be resolved.

Many specific comments were received on the operation of the strategic highway network, namely Warwick Road and West Cromwell Rd (A4). Many respondents queried the ability of major junctions to handle the additional traffic generated by redevelopment and were sceptical of the improvements set out in the SPD without the findings of the strategic transport study. Many respondents also commented on the need for a major overhaul of the road network including junctions, although many also questioned why findings from the transport study had not been presented.

Parking related issues were raised by several respondents, in particular the issue of parking provision for new residential dwellings. Many respondents commented on the need for strict parking controls on residential development as a means of limiting traffic generation, and encouraged car-free development. Conversely, some respondents highlighted the need to ensure there is adequate off-street parking for residents to cater for the likely demand. There was support for the key principles in this section relating to encouraging trips by walking, cycling and other sustainable means and measures to limit trips by private vehicles. Parking in and around the Opportunity Area for existing users was also highlighted as an issue.

## **4.8 Economic Development Strategy**

### **Overview**

A total of 74 comments were received on the Economic Development Strategy from 23 respondents, summarised under the following topics:

- General comments
- Office provision
- Retail provision
- Employment and training

A summary of the key issues and themes raised by respondents in relation to these topics is set out below:

### **General Comments**

There were a diverse range of views expressed on economic development in the Opportunity Area. However, many comments expressed concern and regret at the loss of the Earl's Court Exhibition Centres and the impact this will have on local businesses dependant on trade from the exhibition centres. Concern was also expressed at the direct loss of jobs from the closure of the Exhibition Centres and TfL Lillie Road depot.

### **Office Provision**

There were several comments questioning the quantum of office space being considered in the Opportunity Area, raising concern that there is already an oversupply. However, several respondents acknowledged the benefits of mixed and integrated commercial development (including offices).

### **Retail Provision**

A significant number of comments on the Economic Development Strategy related to the need to protect existing retail centres, such as North End Road and Earl's Court Road. Many respondents stated that too much retail was being considered in the Opportunity Area and this would compromise existing retail centres. There was general support for requirements for a retail impact assessment to accompany each phase of development. Some comments raised the need for a diverse retail offer.



There were differing opinions on whether the retail offer should serve day to day needs or a wider catchment. There was also mixed opinions on whether independent or chain stores should be encouraged, with some specific opposition to further big name retailers.

Several comments were made with respect to the North End Road Market, and the desire for this to be protected. Several respondents also supported its relocation and improvement.

### **Employment and Training**

Several respondents raised concern about the loss of jobs from the closure of the Exhibition Centres, TfL Lillie Road Depot and businesses dependant on the exhibition centre trade, although some respondents acknowledged the potential job creation associated with redevelopment of the Opportunity Area. Several respondents identified the need for employment opportunities for local residents, especially those on surrounding housing estates.

## **4.9 Culture Strategy**

### **Overview**

A total of 79 comments were received on the Culture Strategy from 27 respondents, summarised under the following topics:

- Culture and Entertainment Facilities
- Public Art
- Hotels

A summary of the key issues and themes raised by respondents in relation to these topics is set out below:

### **Culture and Entertainment Facilities**

Many respondents highlighted the importance of the exhibition centres and acknowledged their significance in shaping Earl's Court as an internationally renowned venue for major events. Many expressed regret at the loss of the existing exhibition centres, including representatives from the exhibition industry who stated that there is still demand for this type and size of exhibition space, and some supported the protection of the existing exhibition centres for their heritage value.

Although there was opposition to the loss of the exhibition centres there was also some support for re-provision of facilities within the Opportunity Area. There were views on the form a replacement facility should take and nature of events that should be accommodated, although many respondents expressed the need for flexibility of use. Some also highlighted the need for more floorspace than proposed in Key Principle CS1 to compensate for the loss of the exhibition centres. Several comments also expressed support for a new cultural destination type use of national or international significance.

### **Public Art and Hotels**

Very few comments were received on public art, although some comments suggested an art feature as part of the cultural destination.

There were varying views on the need for hotels. There was some support for hotel space to compliment the cultural destination. Some respondents also commented on the need for some boutique and specialty type hotels to create some distinctiveness to the development. However, some opposed the general principle of new hotels in the Opportunity Area. .

## **4.10 Social Infrastructure Strategy**

### **Overview**

A total of 108 comments were received on the Culture Strategy from 26 respondents, summarised under the following topics.

- Education
- Health
- Open Space and Play Space
- Sport, Leisure and Community Facilities

A summary of the key issues and themes raised by respondents in relation to these topics is set out below:

### **Education**

There were few comments on education provision. However, two respondents identified the need for further schools and one respondent objected to the potential loss of the Queens Mill School. One respondent queried the child yield assumptions, which are used as the basis for calculating educational requirements. Some respondents expressed concern at the additional demand for school places, particularly secondary school places from new children living in the Opportunity Area. The need for facilities for adult education was also raised by some respondents. The need for crèche and other early years education was also raised.

### **Health**

A number of respondents expressed support for the provision of a new health facility (Key Principle SIS2), although there were differing views on the nature and location of the facility. The need for further GP surgeries and primary health care services was raised by several respondents, citing the current length of waiting times for doctor appointments.

### **Open Space and Play Space**

The need for a large amount of high quality, well integrated and accessible open space suitable for a range of different activities and uses was raised repeatedly in comments, with many picking up on the current lack of open space within and surrounding the Opportunity Area. Whilst some were supportive of the 2 hectare park (Key Principle SIS3); many respondents expressed a strong desire to see a greater provision of open space. There were also mixed views on the linear

nature of the proposed 2ha open space with many respondents preferring a consolidated green space in addition to the linear park.

High quality, private amenity space for new residential development was viewed as a priority by some respondents.

## **4.11 Environment Strategy**

### **Overview**

A total of 151 comments were received on the Environmental Strategy from 37 respondents, summarised under the following topics:

- Climate Change Mitigation and Adaptation
- Air Quality
- Waste
- Land Contamination and Construction Waste Strategy
- Flood Risk and Water Management
- Ecology and Biodiversity
- Noise and Vibration

A summary of the key issues and themes raised by respondents in relation to these topics is set out below.

### **Climate Change Mitigation and Adaptation**

Many respondents commented on the need for redevelopment to be 'carbon zero' and for construction materials to be sustainably sourced. In this respect some respondents endorsed the requirement for residential and non-residential buildings to be built in accordance with the Code for Sustainable Homes and draft Replacement London Plan targets, and in particular the need for all homes to be 'carbon zero' by 2019.

Comments were also made with respect to the high CO<sub>2</sub> emissions associated with the construction and demolition process, the embodied energy associated with building materials, and the ongoing CO<sub>2</sub> generating potential of the entire development. The potential for increased CO<sub>2</sub> and other and other emissions from traffic generated by the scheme once built was also raised as a concern.

There was some support for the decentralised energy or Combined Heat and Power (CHP).

There were some comments requesting that the Climate Change Strategy do more to reduce CO<sub>2</sub> emissions and mitigate the impact on climate change, and some minor discrepancies in two of the key principles were highlighted.

### **Air Quality**

Air quality, both in and surrounding the Opportunity Area, was a very topical issue. Many respondents commented on the degraded air quality both within and surrounding the Opportunity Area, largely from the high volume of traffic on the surrounding highway network. Many commented on the need to improve air

quality and expressed concern at the potential negative impacts of the redevelopment on air quality, especially from additional traffic.

Many respondents were also concerned about the impact of construction on air quality, especially vehicle movements and dust resulting from demolition and construction. Respondents were also concerned about the impact of construction on health and wellbeing of residents given the long construction period.

### **Waste**

Concern was raised about the potentially high waste generation associated with the redevelopment of the Opportunity Area, highlighting the need for waste minimisation. A desire for underground refuse servicing was expressed in several comments. Potential issues associated with the various methods of collection were also raised. The need for refuse servicing and collection to be undertaken in accordance with industry best practice was raised. The need for recycling and green waste collection was also stated in some comments.

### **Land Contamination and Construction Waste Strategy**

The potential for impacts associated with land contamination and the treatment of contaminated soil on site was not specifically raised.

Many respondents expressed concern at the volume of demolition and construction materials and the high number of vehicle movements the construction process will generate over a long period of time. Several comments stated the need for rail to be used to transport demolition and construction materials. Concern was also expressed about the potential for physical impact on buildings, homes and trees adjoining the Opportunity Area as a result of construction and demolition activities.

### **Flood Risk and Water Management**

A number of comments were received on the potential rainfall runoff resulting from redevelopment of the Opportunity Area and for the need for runoff to be limited as much as possible. Some comments also raised the need for green spaces and sustainable drainage measures to be implemented to mitigate the impact on the surrounding sewer and drainage network.

Both the Environment Agency and Thames Water made comments on this section and were in support of the approach proposed and embodied in the key principles, although suggested some technical amendments. They also reiterated the potential for both tidal flooding from the Thames and localised sewer flooding and the need for this to be avoided or mitigated.

The need to integrate water conservation and grey water recycling measures in buildings, along with the need to attenuate rainfall on site, was raised by a number of respondents.

### **Ecology and Biodiversity**

Many comments were received on the need for the redevelopment to include a large amount of green space and to incorporate gardens and trees in the overall

layout. There was considerable support for the retention of the Borough listed ecological area adjacent to West Brompton Station and the West London Line. Several respondents also commented on the need for the redevelopment of the Opportunity Area to be based on ecological principles and incorporate 'green' measures wherever possible, particularly planting. The need for green roofs was also mentioned, along with the need to protect species that inhabit the Opportunity Area and surrounding areas.

### **Noise and Vibration**

Respondents, especially from surrounding areas, expressed strong concerns at the potential impact of demolition and construction noise over a long period of time and made clear the need for detailed mitigation.